

**STAKEHOLDER ENGAGEMENT PLAN
(DRAFT)**

FOR

**THE PROPOSED CONSTRUCTION OF THE UGANDA -TANZANIA
INTERCONNECTOR PROJECT 400/ 220 KV, 258 KM TRANSMISSION LINE AND
ASSOCIATED SUBSTATIONS**



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LIST OF ABBREVIATIONS

Abbreviation	Full Term
AHA	Anti-Homosexuality Act, 2023
CAO	Chief Administrative Officer
CDO	Community Development Officer
CGV	Chief Government Valuer
CHS	Community Health and Safety
CoC	Code of Conduct
CSO	Civil Society Organisation
DLB	District Land Board
DISO	District Internal Security Officer
DPC	District Police Commander
DTT	District Technical Team
EA	Environmental Assessment
EAC	East African Community
EAPP	Eastern Africa Power Pool
E&S	Environmental and Social
EISM	Enhanced Implementation Support and Monitoring
EMF	Electromagnetic Fields
ERA	Electricity Regulatory Authority
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESIRT	Environmental and Social Incident Response Toolkit
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMPs	Environmental and Social Management Plans
ESS	Environmental and Social Standard
FGD	Focus Group Discussion
GBV	Gender-Based Violence
GM	Grievance Mechanism / Grievance Management
GMC	Grievance Management Committee
GoU	Government of Uganda
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service (World Bank)
H&S	Health and Safety
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome
IEC	Information, Education and Communication
IVA	Independent Verification Agent
kV	Kilovolt
LC	Local Council
LC1	Local Council I
LC3	Local Council III
LC5	Local Council V
LMP	Labour Management Procedures
LRP	Livelihood Restoration Plan
MEMD	Ministry of Energy and Mineral Development
MGLSD	Ministry of Gender, Labour and Social Development
MIS	Management Information System
MoFPED	Ministry of Finance, Planning and Economic Development

Abbreviation	Full Term
MoH	Ministry of Health
NEMA	National Environment Management Authority
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
O&M	Operation & Maintenance
PAP	Project Affected Person
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RoW	Right of Way
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEP	Stakeholder Engagement Plan
UETCL	Uganda Electricity Transmission Company Limited
UTIP	Uganda-Tanzania Interconnector Project

GLOSSARY OF KEY TERMS

Term	Definition
Affected Individuals and Communities	Individuals and Communities, or groups of people, living in areas where the Project is implemented and who may experience direct or indirect environmental, social, economic, or cultural impacts as a result of the Project. Under the World Bank ESF, these are commonly referred to as <i>Project-Affected Parties</i> .
Consultation	A process of two-way communication between the Project and its stakeholders through which information is shared, views are expressed, and feedback is received and considered in Project decision-making. Consultation under World Bank Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure is expected to be meaningful, inclusive, and ongoing.
Engagement	An ongoing process by which the Project builds and maintains constructive, transparent, and responsive relationships with stakeholders throughout the Project lifecycle, including planning, construction, and operation.
Environmental and Social Impact Assessment (ESIA)	A comprehensive assessment comprising environmental and social studies undertaken to identify, evaluate, and manage potential positive and negative impacts of a proposed Project, and to design appropriate mitigation and enhancement measures.
Grievance	A concern, complaint, or claim raised by an individual or group regarding the Project's activities, impacts, or performance.
Grievance Redress Mechanism (GRM)	A formal, project-level process for receiving, assessing, resolving, and documenting grievances from Project-Affected Persons, stakeholders, workers, and other interested parties in a timely, transparent, and culturally appropriate manner.
Non-Governmental Organizations (NGOs)	Independent, non-profit or not-for-profit organizations that operate outside of government structures and may support community development, advocacy, service delivery, capacity building, or environmental and social protection.
Partnership	In the context of stakeholder engagement, a collaborative relationship between the Project and one or more stakeholders aimed at achieving shared objectives, often involving shared resources, responsibilities, risks, and benefits.
Project-Affected Persons (PAPs)	Individuals, households, or groups who are directly affected by the Project through loss of

Term	Definition
	land, assets, livelihoods, access to resources, or exposure to environmental or social impacts.
Stakeholders	Individuals or groups who are directly or indirectly affected by the Project, or who have an interest in, or the ability to influence, Project outcomes. Stakeholders include Project-Affected Persons, government authorities, local communities, civil society organizations, and other interested parties.
Stakeholder Engagement Plan (SEP)	A Project-specific plan that outlines how stakeholders will be identified, engaged, informed, consulted, and involved throughout the Project lifecycle, including mechanisms for disclosure, feedback, and grievance redress.
Vulnerable or Disadvantaged Groups	Individuals or groups who may be disproportionately affected by Project impacts or who may face barriers to participation in consultation and decision-making processes, such as women, children, elderly persons, persons with disabilities, and economically or socially marginalized groups.

1 CHAPTER ONE: INTRODUCTION / PROJECT DESCRIPTION

1.1 Background to the Project

The East African Community (EAC) Partner States, together with members of the Eastern Africa Power Pool (EAPP), are coordinating the implementation of regional power interconnection projects aimed at promoting power trade, enhancing system reliability, and maximizing the utilization of electric energy resources across the region. These initiatives are designed to facilitate cross-border electricity exchange through planned interconnections, coordinated system monitoring, and improved control of power flows between Member States, thereby supporting regional economic growth and energy security. Achieving these objectives requires a stable, robust, and reliable regional transmission network, including the design and construction of high-capacity transmission tie-lines interconnecting neighbouring countries.

Within this regional context, the Uganda–Tanzania Interconnector Project (UTIP), which is under consideration for financing by the World Bank, includes the proposed 400 (220) kV Wobulenzi–Masaka–Mutukula Transmission Line. This transmission line forms part of a broader set of regional interconnection projects intended to strengthen cross-border power exchange. The Project will interconnect the Uganda and Tanzania power grids at Mutukula and will also include provisions for future tee-offs to facilitate interconnection with the Tanzania–Rwanda power system. Through these linkages, the Project will contribute to improved regional grid integration, enabling potential future interconnections between Rwanda and Burundi and enhancing overall power system reliability in the Eastern Africa region.

1.2 Project Description

Uganda Electricity Transmission Company Limited (UETCL) plans to construct a 400/220 kilovolt (kV) transmission line from the proposed new Wobulenzi 400/220 kV Substation to a new substation at Kakunyu (Masaka) and onward to interconnect with the United Republic of Tanzania electricity grid at Mutukula. The total length of the proposed transmission line is approximately 258 kilometres (km).

The Wobulenzi–Masaka–Mutukula Transmission Line, which forms part of the Uganda–Tanzania Interconnector Project (UTIP), is a flagship regional interconnection project intended to strengthen power system integration among East African Community (EAC) Partner States and members of the Eastern Africa Power Pool (EAPP), including Uganda, Tanzania, Rwanda, and Burundi. The Project aims to support regional power trade by facilitating the sharing and optimal utilization of electric energy resources through planned interconnections, coordinated monitoring, and control of cross-border power flows, thereby contributing to economic growth and energy security in the region.

The conceptualisation of the Project is based on recommendations from the East African Power System Master Plan Study, undertaken by BKS Acres, together with other regional power sector studies. Key recommendations from these studies included the following:

- Development of a transmission ring around Lake Victoria in the medium term to supply loads in the Kagera Region and improve the reliability of the regional power network;
- Promotion of regional power pooling arrangements, which culminated in the establishment of the Eastern Africa Power Pool (EAPP);
- Evaluation of technically viable options for supplying electricity to north-western Tanzania, including mining areas, through a Tanzania–Uganda interconnection; and
- Completion of full feasibility studies for candidate transmission projects where such studies had not previously been undertaken.

In Uganda, UETCL, a government-owned company operating under a transmission licence, is mandated to develop, operate, and maintain the national high-voltage electricity transmission grid, as well as to buy and sell electricity in bulk. In line with this mandate, UETCL will develop the proposed transmission infrastructure and put in place the necessary arrangements to enable power interconnection and exchange with Tanzania through bilateral energy exchange agreements. The proposed Wobulenzi–Masaka–Mutukula 400/220 kV Transmission Line will therefore form part of the Lake Victoria transmission ring, support regional power trade and foster economic development among EAC and other Eastern African countries.

In 2010, with financing from the World Bank, SWECO prepared a feasibility study together with a detailed Environmental and Social Impact Assessment (ESIA) and an abbreviated Resettlement Action Plan (RAP) for the Project, which were completed in June 2017. However, due to the passage of time and changes in project design considerations, including potential adjustments to the transmission line route, these studies required updating.

Subsequently, UETCL engaged NEK Consults Limited to undertake a new Environmental and Social Impact Assessment (ESIA) and Resettlement Policy Framework (RPF) for the Masaka–Mutukula section of the transmission line. This study covered approximately 92 km between Kakunyu (Masaka)—the proposed location of a new take-off substation via a line-in/line-out connection on the Masaka–Mbarara 220 kV Transmission Line and Mutukula.

During project preparation, the World Bank, as the proposed financier, advised that an additional extension be considered to connect the Project to the Karuma–Kawanda Transmission Line through a line-in/line-out arrangement at Wobulenzi. In response, UETCL, through revised Terms of Reference, commissioned NEK Consults Limited to undertake additional studies to extend the Project scope from Wobulenzi to Kakunyu (Masaka). This extension adds approximately 166 km, bringing the total length of the proposed transmission line to about 258 km from Wobulenzi to Mutukula.

The Stakeholder Engagement Plan (SEP) forms part of the suite of environmental and social risk management instruments prepared for the Project, alongside the Environmental and Social Impact

Assessment (ESIA) and the Resettlement Policy Framework (RPF), to guide stakeholder engagement and information disclosure during project preparation and subsequent implementation.

1.3 Project Scope

The proposed Project will comprise the following components:

- Construction of a new approximately 258 km long transmission line, designed for 400 kV operation but initially operated at 220 kV, extending from the Wobulenzi 400/220 kV Substation to Mutukula;
- Clearing of the transmission line right-of-way (RoW);
- Construction of access roads, where required (the exact locations will be determined during construction; however, the ESIA will assess the likely impacts and define mitigation measures within the Environmental and Social Management Plan (ESMP), as well as relevant decommissioning measures);
- Construction of workers' camps and storage facilities, as necessary (the ESIA will undertake a preliminary assessment of potential impacts and provide generic mitigation measures within the ESMP and associated decommissioning plans); and
- Identification, assessment, and management of environmental and social risks and impacts associated with the Project.

Overview of Assessed Environmental and Social Impacts

The Environmental and Social Impact Assessment (ESIA) for the Project identified a range of potential environmental and social (E&S) impacts across the planning, construction, and operation phases. These impacts vary in nature, scale, and significance and affect different stakeholder groups to varying degrees, including Project-Affected Persons (PAPs), local communities, vulnerable groups, workers, and institutional stakeholders.

The summary presented in Tables 1.1 and 1.2 (Impact–Engagement Linkage) is drawn directly from the ESIA findings and highlights the key assessed impacts and their pre- and post-mitigation significance. This impact assessment provides the evidence base for determining the scope, intensity, timing, and methods of stakeholder engagement set out in this Stakeholder Engagement Plan (SEP). Engagement measures have therefore been designed to be proportionate to the level of risk and impact, with more frequent, targeted, and inclusive engagement applied to impacts assessed as having higher significance, and appropriate information-sharing and consultation measures applied where impacts are assessed as moderate or low.

By explicitly linking assessed E&S impacts to stakeholder engagement objectives and activities, the SEP ensures that engagement is meaningful, responsive, and aligned with the Project's risk profile, in

accordance with the requirements of the World Bank Environmental and Social Standard 10 (ESS10).

Table 1.1: Impact–Engagement Linkage – Construction Phase

Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party	Timing
Land use impacts (restricted access to land and livelihoods)	Ensure Project-Affected Persons (PAPs) understand Right-of-Way (RoW) restrictions, temporary access limitations, and livelihood restoration options	Disclosure of strip maps; household consultations; livelihood restoration planning sessions	Project Implementation Unit (PIU) Social Team, Resettlement Action Plan (RAP) Team, Local Council I (LC1) leaders	RAP preparation; monthly during construction
Land acquisition and involuntary resettlement (physical and economic displacement)	Ensure transparent valuation, compensation, relocation, and livelihood restoration for physically and economically displaced PAPs	Compensation notices; valuation disclosure meetings; relocation planning and resettlement consultations	RAP Team, PIU, Licensed Valuers	Prior to compensation payment and during relocation
Employment and local economic impacts	Promote fair access to local employment and manage resource-related conflicts	Disclosure of recruitment procedures; labour awareness meetings; dialogue on resource use	Contractor, PIU, District Labour Office	Pre-construction; quarterly
Damage to infrastructure and traffic disruptions	Inform communities of planned disruptions and relocation of infrastructure	Advance public notices; road signage; coordination meetings with district engineers	Contractor Health, Safety and Environment (HSE) Team, District Engineers	At least 14 days before disruption
Cultural and archaeological heritage (risk of disturbance or destruction of physical	Prevent damage to known or chance-found cultural heritage and ensure awareness of	Disclosure of Chance Finds Procedure; consultations with cultural and religious leaders;	PIU Environmental and Social Team, Contractor, Department of	Before construction; as needed

Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party	Timing
cultural resources)	Chance Finds Procedures	coordination with Museums and Monuments Department	Museums and Monuments	
Gender relations (risk of Sexual Exploitation and Abuse and Sexual Harassment, and marginalization of women)	Prevent Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) and promote safe participation of women in project activities	Women-only meetings; SEA/SH awareness sessions; worker Code of Conduct training; information on confidential reporting and referral pathways	PIU Gender-Based Violence (GBV) Specialist, Contractor Safeguards Team	Before mobilisation; quarterly
Community social cohesion (conflict and exclusion of vulnerable PAPs)	Reduce social conflict and ensure inclusion of vulnerable groups	Conflict mediation meetings; school safety awareness; targeted household visits for vulnerable PAPs	PIU Social Team, LC1 leaders	Monthly; as needed
Community health and safety risks (disease spread, traffic accidents, worker interactions)	Minimise community health and safety risks associated with construction activities	Community safety campaigns; SEA/SH hotline awareness; traffic safety meetings	Contractor HSE Team, District Health Offices	Pre-construction; quarterly
Landscape and visual impacts (vegetation clearing and visual change)	Manage community expectations regarding vegetation clearance and visual impacts	Design disclosure meetings; consultations with tourism and local business stakeholders	PIU Environmental Team	Before clearing; during construction
Worker health and safety	Ensure safe working conditions and worker awareness of grievance channels	Worker induction sessions; toolbox talks; disclosure of Workers' Grievance Mechanism	Contractor Occupational Health and Safety (OHS) Team, PIU Safety Officer	Continuous

Table 1.2: Impact–Engagement Linkage - Operation and Maintenance phase

B. Operation and Maintenance (O&M) Phase Impacts			
Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party
Land use impacts during maintenance (temporary access restrictions)	Inform PAPs and land users of temporary access limitations during maintenance activities	Maintenance notices; Short Message Service (SMS) alerts; radio announcements	Uganda Electricity Transmission Company Limited (UETCL) Operations and Maintenance (O&M) Team
Infrastructure disruptions (telecommunications or utility interruptions)	Provide timely notification of service disruptions	Coordination meetings with service providers; public notices	UETCL O&M Team
Gender relations (temporary economic impacts on women due to crop loss or restricted access)	Support women affected by temporary crop loss or restricted access to agricultural land during maintenance	Targeted livelihood advisory visits; women's forums on compensation and livelihood restoration measures	UETCL Social Team
Community social cohesion (legacy land and compensation disputes)	Maintain community relations and address outstanding or legacy grievances	Annual community meetings; dispute resolution clinics	UETCL Social Team
Community health and safety (electrocution and electromagnetic field awareness)	Promote public safety and awareness around operational transmission infrastructure	Safety awareness campaigns; school-based education programmes	UETCL O&M Safety Team
Landscape and visual impacts (ongoing vegetation management)	Maintain communication regarding vegetation control and scenic areas	Vegetation management consultations with affected communities	UETCL Environmental Team
Worker health and safety (O&M activities)	Ensure continued compliance with occupational health and safety requirements	Toolbox talks; refresher training; worker grievance awareness	UETCL O&M OHS Team
Traffic and road safety (maintenance vehicles)	Reduce risks associated with maintenance traffic	Disclosure of maintenance schedules; coordination with traffic police	UETCL O&M Team

1.4 Location of the line route

The proposed transmission line route extends from Wobulenzi Substation through Masaka to Mutukula

at the Uganda–Tanzania border. The routing has been determined through preliminary engineering design and environmental and social screening undertaken as part of project preparation, with the objective of minimizing environmental and social impacts while ensuring technical and economic feasibility.

To facilitate clear understanding of the Project’s geographical extent, Figure 1.1 and Figure 1.2 present the indicative routing of the transmission line in two sections: Wobulenzi–Masaka and Masaka–Mutukula, respectively. These maps illustrate the general alignment of the proposed line, key settlements, major infrastructure crossings, and administrative boundaries. The maps are indicative and may be refined during detailed design and site-specific Environmental and Social Impact Assessment (ESIA) and Resettlement Action Plan (RAP) studies.

Following the maps, Table 1.3 provides a summary of the administrative units traversed by the proposed transmission line, including districts, sub-counties, parishes, and villages. This information is intended to support stakeholder identification, planning of consultations, disclosure activities, and coordination with local authorities, as well as to guide the implementation of the Stakeholder Engagement Plan (SEP) and the Grievance Redress Mechanism (GRM).

The final alignment of the transmission line and the list of affected administrative units will be confirmed during detailed surveys and field verification, and any changes will be communicated to stakeholders through the engagement and disclosure mechanisms outlined in this SEP.

Note: “Inclusion of an administrative unit in the table does not imply that all villages or households within that unit will be affected by the Project.”

Figure 1.1 Wobulenzi-Masaka Transmission Line Route map:

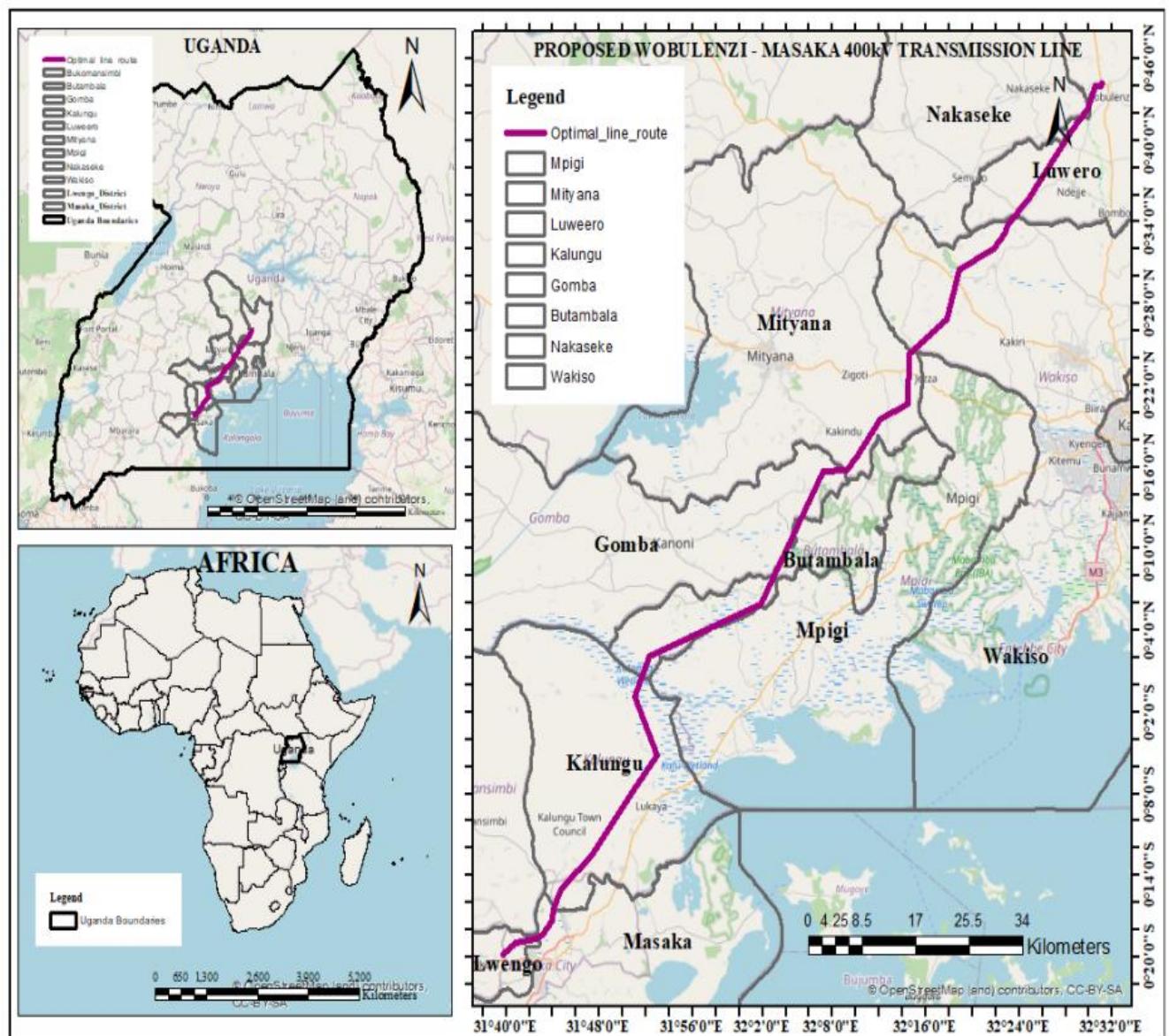


Figure 1.2: Masaka- Mutukula Transmission Line Route map:

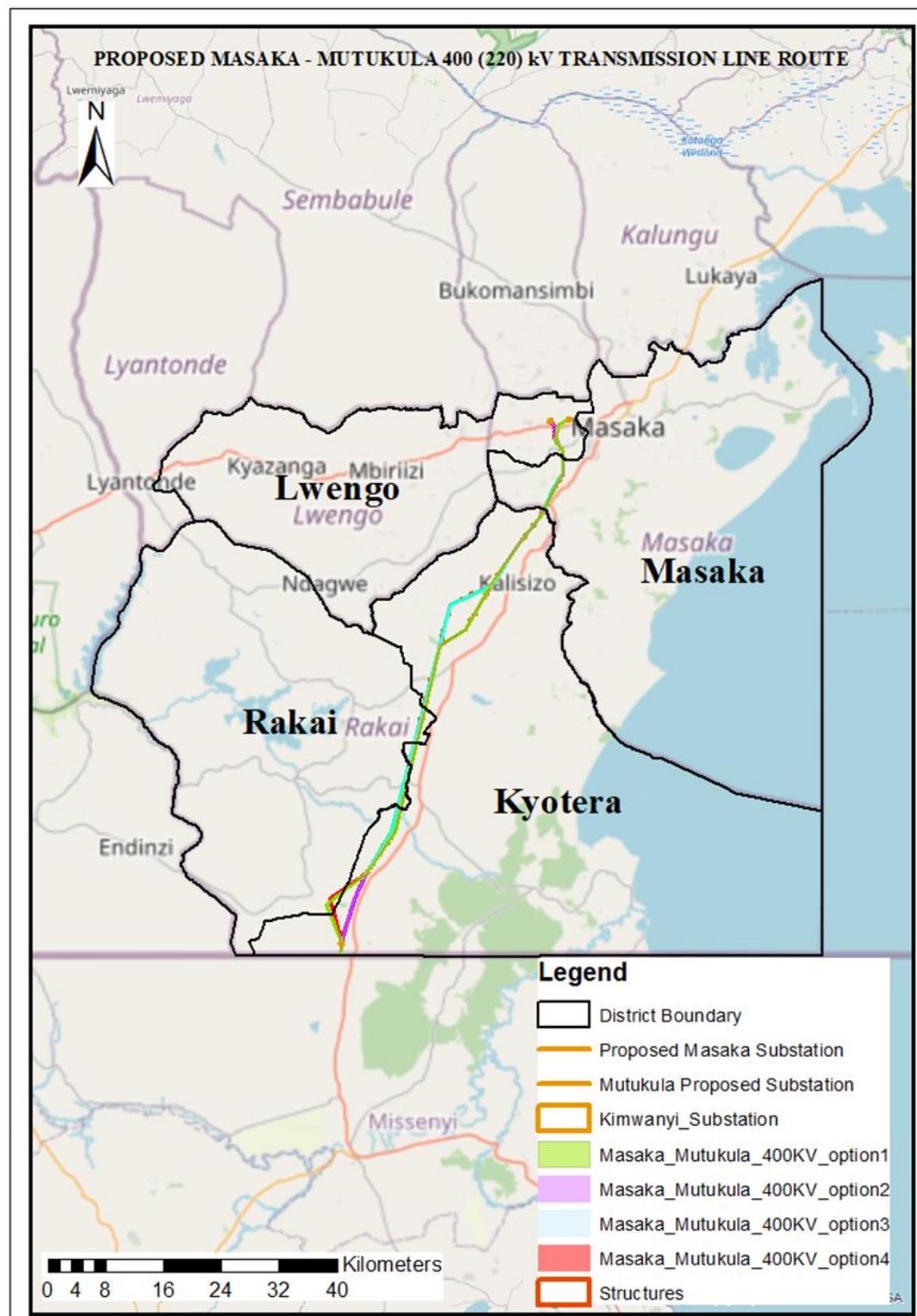


Table 1.3: Administrative Boundaries of the Proposed Wobulenzi-Masaka -Mutukula 400 (220) kV Transmission Line Corridor

DISTRICT	COUNTY	SUB-COUNTY	PARISH	VILLAGE
Luwero	Bulemezi	Wobulenzi Tc	Wobulenzi	Wobulenzi
		Katikamu	Kikoma	Bukalasa
		Makulubita	Waluleeta	Bakijulula
			Kagogo	Nakalembe Namyeso Bowa Semyungu - Kagogo Namagala - Buligwe Ntinda – Buligwe
		Makulubita	Kidukulu Kikoko Makulubita A"	
				Kalasa
			Katiti - Bibbo Kalasa	
Nakaseke	Bulemezi	Kasangombe	Bulyake	Kituntu
Wakiso	Busiro	Masulita Tc	Bbale – Mukwenda	Bbale – Mukwenda
			Kanzize	Kanzize - Kasumbuso Mulume
			Masulita Ward	Masulita
			Lugungudde	Nakatunda Lugungudde
			Katikamu Ward	Nabalanga
			Kyengeza	Kasudde Kyengeza
			Kakiri	Nampunge
		Namayumba	Gobero	
			Bukondo	Katuuso
		Bbembe	Kibujjo Nsantu Kagoma Bbembe - Kidugala Bulyana Kigugu	

DISTRICT	COUNTY	SUB-COUNTY	PARISH	VILLAGE
			Kyasa	Kabindula
Mityana	Busujju	Namungo	Kiteete	Davula Buwalula A
		Malangala	Kiwawu	Kawanga I Magezi – Ntonyeze
			Magonga	Nnono
			Kanyanya	Kabyuma B Kanyanya A Kanyanya B
		Kakindu	Nsambya	Kiwooya Bweza Nsambya Kawanjuki – Kanyogoga
			Ngugulo	Mayobyo Bethany
Gomba	Gomba	Mpenja	Mpogo	Busolo A Busolo B Mpogo
			Maseruka	Sugezi Maseruka A Maseruka
			Kanziira	Bwegombe Bwegombe FR Bujjege Kisubi
Butambala	Butambala	Gombe TC	Kayenje	Kibindizi Nyanama
		Mpenja	Kiriri	Nswanjere B
			Ggolola	Kyetume
		Bulo	Kyerima	Kyerima Mayungwe Watangalala Forest reserve

DISTRICT	COUNTY	SUB-COUNTY	PARISH	VILLAGE
			Nakatooke	Seeta Forest Reserve Kasekere - Bbya Seeta Central Nakatooke – Kito
			Butawuka	Nawango – Nkanaga
			Bulo	Mpanga Bwala Waduduma
			Ngando	Kasozi Bwetyaba
			Bukesa	Bukesa A
			Butende	Lwangiri B Butende Kanyogoga
Kalungu	Buddu	Lwabenge	Kiraaga	Kiraaga Kasabwera Nabikakala
		Bukulula	Kiti	Bukula Lugalama Kiti Kamwanga Kakwanzi Namilyango
			Lusasa	Buyikuuzi Butongo
			Lusango	Kisimba Nyirira
			Kyambala	Kisawo Miteete Muwoomya
		Mabuye	Mabuye	Kasebuti Kitokolo Mabuye Central Kikonda
			Lukaya TC	Central Ward Kalungi
		Kalungu	Bulawula	Kikonda

DISTRICT	COUNTY	SUB-COUNTY	PARISH	VILLAGE
			Kitamba	Nattita Kitamba
			Villa Maria	Bbala Kakunyu Kamukongo Bweyo Villa Maria
		Kalungu	Kibisi	Namagoma
			Kasanje	Kijomanyi Kirowooza Kigo
Masaka	Buddu	Mukungwe	Bugabira	Bugabira Ndegeya Kalundira
		Katwe – Butego	Butego Ward	Butego
		Kimaanya – Kyabakuza	Kimaanya	Kasubi Kigamba
		Kkingo	Kiteredde	Mwalo Kabukulwa Kyalubu Kkingo
		Bukoto	Ssenya	Ssenya Kitambuza
Lwengo	Buddu	Kkingo	Nkoni	Kakunyu Kyabbogo
	Bukoto	Kkingo	Kiteredde	Kking Kantungamye
Kyotera	Kyotera	Kirumba	Kabuwoko	Busowe Kindulwe Ddwaniro
			Lwamba	Lwamba
			Buyiisa	Kakondo Lwemikoma Kawule
			Kyengeza	Kito Nkokko Kajaguzo Kyakaleera
		Kalisizo TC	Kalagala Ward	Matale-Kinawa

DISTRICT	COUNTY	SUB-COUNTY	PARISH	VILLAGE
		Kalisizo	Matale	Bulengeza Kiwenda-Matale Kalwanga
			Kikungwe	Kalongo Luwawulo Lutoma Kikungwe
			Buziranduulu	Mbuye Buseesa Nninzi, Kiyimba Kabaale- Buziranduulu, Buziranduulu
			Nkenge	Nkenge Buyinji Kabaseke A
			Gayaza	Kyampagi, Luti
		Kakuuto	Kisuula	Kisuula Bwende Kisuula-Central Kisuula-Lutete
			Mityebiri	Luteete
			Kimukunda	Kasaalizi A Kasaalizi B Kimukunda C
			Kyebisagazi	Kyasimbi Kkoza Bikiri Kyakatum
			Mutukula Town Board	Kololo
	Kooki	Lwanda	Kiyovu	Sserinya A Kirema Kiganda Lukyamo Goosola
	Kakuuto	Kifamba	Kisaasa	Kisaasa Kiruuli Nyanga-Kentele
			Kifamba	Lwemisege Kijumba
		Kawunguli		Kagongero Lwemiuulu

DISTRICT	COUNTY	SUB-COUNTY	PARISH	VILLAGE
		Kibanda	Bbaale	Ggunda Namata Bbale Kitovu
			Kakinga	Kyakago Kasese
			Kyalugaba	Kiswere Kyamunyerere

1.5 Objectives and Scope of the Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) defines a structured, purposeful, and culturally appropriate approach to stakeholder consultation and disclosure of information, in accordance with the World Bank Environmental and Social Standard 10 (ESS10). The SEP recognizes the diversity of stakeholders and their varying interests, influence, and expectations, and sets out an approach for engaging stakeholders at different stages and levels of interaction with the Project.

The overall aim of the SEP is to foster an atmosphere of trust, transparency, and mutual understanding that actively involves Project-Affected Persons (PAPs) and other stakeholders in Project planning and implementation, thereby supporting informed decision-making and improved environmental and social performance.

1.5.1 Specific Objectives of the SEP

The specific objectives of the SEP are to:

- I. Establish a systematic approach to stakeholder engagement that enables the implementing agency to identify stakeholders, including Project-Affected Persons, and to build and maintain constructive relationships with them throughout the Project lifecycle.
- II. Assess the level of stakeholder interest, concerns, and support for the Project, and ensure that stakeholder views are considered in Project design, implementation, and environmental and social risk management.
- III. Promote effective, inclusive, and continuous engagement with Project-Affected Persons and other relevant stakeholders on issues that may affect them during all phases of the Project.
- IV. Ensure that timely, relevant, and understandable information on Project activities, environmental and social risks, and mitigation measures is disclosed to stakeholders in an accessible and appropriate format.
- V. Provide accessible, inclusive, and culturally appropriate mechanisms through which Project-Affected Persons and other stakeholders can raise concerns, provide feedback, and lodge grievances, and ensure that such issues are addressed in a timely and transparent manner.

1.5.2 Scope of the SEP

Overall, the SEP serves the following purposes:

- I. Identification and analysis of Project stakeholders, including vulnerable or marginalized individuals and groups;
- II. Planning and implementation of stakeholder engagement modalities, including communication, consultation, and disclosure mechanisms that enable stakeholders to influence Project decisions;
- III. Definition of institutional roles and responsibilities for effective SEP implementation;
- IV. Establishment of monitoring, reporting, and feedback measures to assess the effectiveness of stakeholder engagement activities; and
- V. Elaboration of the role, structure, and procedures of the Project Grievance Mechanism (GM), including provisions for handling sensitive grievances such as Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH).

1.6 Principles of Stakeholder Engagement

To meet international good practice and the requirements of ESS10, the Project will apply the following principles in all stakeholder engagement activities:

- **Openness and lifecycle approach:** Stakeholder engagement and public consultations will be conducted throughout the entire Project lifecycle in an open, transparent, and inclusive manner, free from manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Relevant Project information will be disclosed in a timely and appropriate manner to enable stakeholders to understand Project risks and opportunities. Stakeholders will be provided with opportunities to express their views, and their feedback will be documented, analyzed, and addressed.
- **Inclusiveness and sensitivity:** Stakeholder identification and engagement processes will be inclusive and accessible. Particular attention will be given to vulnerable or marginalized groups, including women, youth, elderly persons, persons with disabilities, and other socially or economically disadvantaged groups, to ensure their meaningful participation.
- **Flexibility:** Engagement methods will be adapted to context-specific conditions and constraints. Where traditional face-to-face engagement is not feasible, alternative methods such as telephone, radio, online platforms, or written communication will be used in accordance with national requirements (including Ministry of Health standard operating procedures) and relevant World Bank guidance on stakeholder engagement.

- **Meaningful and ethical engagement:** Engagement will be conducted in a manner that is respectful, culturally appropriate, and ethical, ensuring that all stakeholders have the opportunity to participate meaningfully and without fear of retaliation or exclusion.
- **Accessible and responsive grievance management:** Clear, transparent, and accessible mechanisms will be in place for receiving and resolving stakeholder complaints and grievances. This includes the application of a survivor-centred approach for handling GBV, SEA, and SH-related complaints, as well as confidential and safe pathways for reporting cases related to exclusion or discrimination of vulnerable or marginalized individuals or groups.

2 CHAPTER TWO: STAKEHOLDER IDENTIFICATION AND ANALYSIS

This chapter presents the approach used to identify, categorize, and analyse stakeholders relevant to the Project. It describes the types of stakeholders involved, their potential interests, levels of influence, and vulnerability, and provides the basis for designing appropriate and proportionate stakeholder engagement measures in accordance with the World Bank Environmental and Social Standard 10 (ESS10).

2.1 Introduction

The proposed 400 kV Transmission Line from Wobulenzi–Masaka–Mutukula will engage a wide range of stakeholders, including individuals and groups that may be directly or indirectly affected by the Project, as well as institutions and organizations with an interest in its implementation. While not all affected parties will necessarily be direct beneficiaries, it is essential that information is disclosed and consultations are conducted in an inclusive and transparent manner to ensure that all stakeholders understand the Project scope, implementation modalities, and criteria for accessing Project-related benefits.

Special attention is given to disadvantaged or vulnerable individuals and groups, including women, youth, elderly persons, persons with disabilities, refugees, widows, female-headed households, and sexual and gender minorities, who may face barriers to participation or may be disproportionately affected by Project impacts. The SEP seeks to ensure that these groups are meaningfully engaged and that Project processes do not result in exclusion, discrimination, or harm.

In accordance with World Bank Environmental and Social Standard 10 (ESS10), paragraph 5, stakeholders are defined as individuals or groups who:

- Are affected or likely to be affected by the Project (**Project-Affected Parties**, including Project-Affected Persons – PAPs); and
- May have an interest in the Project (**Other Interested Parties**).

Stakeholder identification was carried out through a participatory process involving consultations with central and local government institutions, district and community leaders, and community members during Project preparation. Through individual and group meetings, a preliminary list of stakeholders was identified and subsequently refined.

For clarity and alignment with ESS10, stakeholders are categorized primarily under the following groups:

a) Project-Affected Parties

Individuals and communities that may experience direct or indirect environmental, social, or economic impacts from the Project, whether positive or negative.

b) Other Interested Parties

Stakeholders who may not be directly affected by the Project but have an interest due to their institutional roles, proximity to the Project area, sectoral involvement, or mandate. These include government agencies, local authorities, community leaders, civil society organizations, and development partners.

c) Disadvantaged / Vulnerable and Marginalized Individuals or Groups

Individuals or groups who may be disproportionately affected by Project impacts or face barriers to participation in consultation and decision-making processes. In this Project, these include women, widows, persons with disabilities, elderly persons, youth, refugees, female-headed households, **sexual and gender minorities**, and other socially or economically marginalized groups.

2.2 Stakeholder Analysis

The Project applies the stakeholder classification set out in World Bank Environmental and Social Standard 10 (ESS10) as the sole framework for identifying stakeholder engagement needs and designing appropriate engagement measures. Accordingly, stakeholders are categorized as:

- **Project-Affected Parties (PAPs)** – individuals and communities directly or indirectly affected by Project activities and impacts; and
- **Other Interested Parties (OIPs)** – institutions, organizations, and groups with an interest in the Project due to their roles, mandates, location, or sectoral involvement.

Disadvantaged or vulnerable individuals and groups may be present within both Project-Affected Parties and Other Interested Parties. Vulnerability is therefore treated as a cross-cutting characteristic rather than a separate stakeholder category. Engagement measures are tailored to address barriers to participation faced by such groups, in line with ESS10.

For operational planning purposes only, Other Interested Parties may be sub-grouped to distinguish government and regulatory institutions, community-based leadership structures, and civil society or private sector actors. This internal distinction is used solely to support coordination arrangements and engagement logistics and does not represent a separate stakeholder classification system.

Table 2.1: Stakeholder Analysis

ESS10 Group	Stakeholder Group	Stakeholder Type/ Special consideration	Remarks / Rationale
Project-Affected Parties	Women and Girls	PAP – Vulnerable Group	Directly affected by land use changes, livelihood impacts, community health and safety risks, and exposure to GBV/SEA/SH risks associated with labour influx and construction activities.

ESS10 Group	Stakeholder Group	Stakeholder Type/ Special consideration	Remarks / Rationale
Project-Affected Parties	Vulnerable Households	PAP – Vulnerable Group	Includes female-headed, elderly-headed, child-headed households and households with persons with disabilities; may face disproportionate livelihood, access, and participation constraints.
Project-Affected Parties	Widows	PAP – Vulnerable Group	May be directly affected by land acquisition and livelihood impacts and face heightened risks of exclusion or intra-household disputes over compensation and assistance.
Project-Affected Parties	Youth in Affected Communities	PAP	Affected through land and livelihood impacts and community safety issues; also interested in employment opportunities and skills development.
Project-Affected Parties	Persons with Disabilities (PWDs)	PAP – Vulnerable Group	Directly affected PAPs who may face barriers to access, communication, and participation in consultations and grievance mechanisms.
Project-Affected Parties	General Community Members within the Project Area	PAP	Residents living within or adjacent to the Right-of-Way (RoW) affected by construction nuisances, traffic, safety risks, and temporary access restrictions.
Project-Affected Parties	Men / Heads of Households (PAPs)	PAP	Often land and asset holders involved in compensation decisions and livelihood restoration, and key participants in household-level decision-making.
Other Interested Parties	Cultural and Religious Leaders	OIP – Community leadership	Influence community norms, support dispute resolution, and facilitate engagement on cultural heritage and social cohesion issues.
Other Interested Parties	District Local Governments (RDCs, CAOs, LC5s, Mayors)	OIP – Government institution	Responsible for local governance, coordination, mobilisation, security oversight, and participation in grievance management.
Other Interested Parties	District Technical Teams (DTTs)	OIP – Government institution	Provide technical support on land administration, physical planning, agriculture, health, and social development matters.
Other Interested Parties	District Land Boards and Area	OIP – Government	Responsible for land valuation oversight, land dispute

ESS10 Group	Stakeholder Group	Stakeholder Type/ Special consideration	Remarks / Rationale
	Land Committees	institution	resolution, and customary land verification.
Other Interested Parties	Sub-county Technical Staff (SAS, CDOs, Health Assistants)	OIP – Government institution	Support community mobilisation, social services, public health, and grievance handling at local level.
Other Interested Parties	LCIII and LC1 Leaders	Community Representatives	Act as key links between communities and the Project for mobilisation, verification of PAPs, and grievance redress.
Other Interested Parties	Civil Society Organisations (CSOs) and Non-Governmental Organisations (NGOs)	OIP – Civil society	Represent community, environmental, and vulnerable group interests. CSOs/NGOs may support stakeholder mobilisation, independent monitoring, biodiversity and natural habitat conservation, environmental awareness, Gender-Based Violence (GBV) prevention and referral pathways, livelihood restoration, and social accountability during Project preparation and implementation
Other Interested Parties	Local Businesses and Contractors	OIP – Private sector	Potential service providers and employers; interface with communities on employment, traffic, and service delivery issues.
Other Interested Parties	Media (Radio, Television, Print and Social Media)	OIP – Information intermediary	Dissemination of Project information, public notices, and stakeholder feedback.
Other Interested Parties	Surveyors Registration Board	OIP – Regulatory body	Regulates professional conduct of surveyors and valuers involved in Project-related land acquisition activities.

Vulnerability considerations (e.g., gender, disability, age, social marginalization) apply across both Project-Affected Parties and Other Interested Parties where relevant, and targeted engagement measures are described in Section 2.3 and subsequent engagement strategy sections.

2.3 Disadvantaged, Vulnerable and Marginalized Individuals and Groups

Certain individuals and groups may be disproportionately affected by the Project or may face barriers to participation in consultation, compensation, livelihood restoration, and grievance redress processes. In the context of this Project, vulnerability may arise due to gender, age, disability, household composition, social exclusion, or exposure to specific environmental and social risks, including those

associated with land acquisition, livelihood disruption, labour influx, and community health and safety.

The Environmental and Social Impact Assessment (ESIA) has identified that resettlement-related impacts, community safety risks, and gender-based risks may affect some groups more severely than others. The Project will therefore apply targeted and inclusive engagement measures, and where necessary, additional assistance, to ensure that disadvantaged or vulnerable individuals and groups are able to participate meaningfully in Project processes and access Project benefits on an equitable basis.

Table 2.2: Disadvantaged, Vulnerable and Marginalized Individuals and Groups

Disadvantaged / Vulnerable Group	Remarks / Rationale
Women	Women may face barriers to participation in decision-making related to land, compensation, and livelihoods, and may be disproportionately affected by livelihood disruption. The ESIA identified heightened risks related to Gender-Based Violence (GBV), including Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), particularly in the context of labour influx. Targeted engagement is required to ensure safe participation and access to information, services, and benefits.
Girls	Girls may face reduced access to education and increased risks of sexual exploitation and abuse due to prevailing social norms and labour influx. The Project will ensure age-appropriate engagement, safeguarding measures, and coordination with child protection structures to prevent harm and exclusion.
Youth	Youth may be affected by livelihood impacts and may face limited employment opportunities. Engagement will focus on access to information on Project-related employment, skills development, and community safety, while discouraging involvement in risky or harmful activities.
Female-Headed Households / Widows	Female-headed households, including widows, may face economic vulnerability, limited access to resources, and risks of exclusion from compensation due to intra-household or extended family dynamics. These households may require targeted support, including assistance with documentation and access to grievance redress mechanisms.
Child-Headed Households	Child-headed households may face significant barriers in accessing compensation, livelihood support, and legal documentation, particularly in areas affected by HIV/AIDS-related mortality. Special engagement and coordination with social welfare institutions will be required to protect their rights and interests.
Children	Children may be exposed to risks such as child labour, sexual abuse, and road safety hazards during construction. Engagement will include community awareness, school-based safety programmes, and coordination with relevant child protection

Disadvantaged / Vulnerable Group	Remarks / Rationale
	authorities.
Persons with Disabilities (PWDs)	Persons with disabilities may face physical, communication, and social barriers to participation in consultations, compensation processes, and grievance mechanisms. Women and elderly persons with disabilities may face compounded vulnerability. Engagement methods will be adapted to ensure accessibility and inclusion.
Elderly Persons	Elderly persons, particularly those heading households, may experience challenges in attending meetings, understanding procedures, or accessing compensation. Targeted assistance and adapted communication approaches may be required.
Sexual and Gender Minorities and Other Marginalized Groups	Sexual and gender minorities and other marginalized individuals may face discrimination, stigma, or exclusion from Project processes. The Project will apply non-discriminatory, confidential, and safe engagement approaches to ensure equitable access to information, grievance mechanisms, and Project benefits.

2.4 Summary of Project Stakeholder Needs

This section provides a structured analysis of the diverse needs, capacities, and communication preferences of stakeholders who may be affected by, or have an interest in, the Project. Understanding these needs is essential for designing meaningful, inclusive, and responsive engagement processes that comply with the World Bank Environmental and Social Standard 10 (ESS10).

Stakeholder groups differ in their exposure to Project impacts, levels of vulnerability, information requirements, and preferred modes of engagement. Certain groups—such as women, girls, persons with disabilities, elderly persons, youth, and vulnerable households may face barriers to participation and therefore require targeted, accessible, and culturally appropriate engagement approaches. Other stakeholders such as district authorities, community leaders, and civil society organizations play key facilitation, coordination, oversight, or advocacy roles in Project implementation.

Table 5 summarizes, for each stakeholder group:

- (a) key characteristics relevant to engagement;
- (b) language and accessibility requirements;
- (c) preferred notification and communication channels;
- (d) expected frequency of engagement; and
- (e) specific measures required to ensure effective and inclusive participation.

This analysis supports implementers in tailoring engagement methods to stakeholder context and ensures that the SEP remains practical, inclusive, and responsive to the needs of Project-Affected

Parties, Other Interested Parties, and Disadvantaged or Vulnerable Groups, in line with ESS10.

Table 2.3: Project Stakeholder Needs

Stakeholder Level	Stakeholder Group (ESS10)	Key Characteristics	Language Requirements	Preferred Notification Means	Frequency of Engagement	Specific Needs / Engagement Measures
District / City	District Technical Committees	Coordination and technical oversight for RAP, SEP, construction	English & local languages	Email, phone, official letters	Weekly during implementation	Structured agendas; data sharing; meeting venues
District / City	LC1 & LC3 Councils	Primary interface with communities; grievance handling	Local languages & English	Phone, word of mouth, meetings	Weekly during implementation	Clear escalation pathways; simple guidance; facilitation support
District / City	Traditional & Religious Leaders	Influential community figures; social cohesion	Local languages	Phone; face-to-face meetings	Monthly	Culturally appropriate messaging; translation support
District / City	District Technical Teams	Land, health, community development expertise	English	Email; meetings	Monthly	Joint field visits; technical documentation
District / City	District Land Boards / Area Land Committees	Compensation rates; land verification	English	Official correspondence	As needed	Updated rate schedules; case-specific consultations
Community	Women (Vulnerable Group)	May face exclusion and GBV/SEA/ SH risks	Local languages	Community meetings; targeted visits	Monthly (RAP); quarterly (construction)	Women-only meetings; childcare; daytime sessions; GBV referral information
Community	Girls (Vulnerable Group)	Adolescents requiring safeguarding	Local languages	Community officers; school meetings	As appropriate	Safe spaces; female facilitators; age-appropriate messaging
Community	Vulnerable	Low	Local	Home	Monthly /	Home-based

Stakeholder Level	Stakeholder Group (ESS10)	Key Characteristics	Language Requirements	Preferred Notification Means	Frequency of Engagement	Specific Needs / Engagement Measures
Community	Households	income, elderly, ill persons, disabled, single-parent household	languages	visits; notice boards	as needed	engagement; accompaniment; accessibility support
Community	Youth	Potential workers; safety and livelihood concerns	Local languages	Notice boards; youth groups	Monthly	Youth-friendly materials; job information; safety messaging
Community	Persons with Disabilities (PWDs)	Mobility, visual, hearing impairment s	Local languages	Home visits; notice boards	As needed	Sign language; large print; accessible venues
Community	Other Vulnerable or Marginalised Groups	Groups not captured above, including sexual and gender minorities, refugees, ethnic minorities, and socially excluded individuals	Local languages & English	Tailored meetings; trusted intermediaries	As appropriate	Confidential, non-discriminatory engagement; neutral venues; trauma-informed facilitation
Community	General Community Members	Residents near the Project area	Local languages	Community meetings; notice boards; radio	Quarterly	Simple language; visual aids; open Q&A
Community	Local Labour (ESS2)	Community members seeking short-term employment	Local languages	Notice boards; community meetings	As opportunities arise	Transparent recruitment; clear eligibility criteria; worker Code of Conduct awareness

3 CHAPTER THREE: STAKEHOLDER ENGAGEMENT PROGRAM

This chapter presents the Stakeholder Engagement Program for the Project, outlining how stakeholders have been engaged to date and how engagement will be planned, implemented, and documented throughout the Project lifecycle. In accordance with the World Bank Environmental and Social Standard 10 (ESS10), the program is designed to ensure early, continuous, inclusive, and meaningful engagement with Project-Affected Parties, Other Interested Parties, and Disadvantaged or Vulnerable Groups.

The Stakeholder Engagement Program builds on consultations undertaken during Project preparation to inform the Environmental and Social Impact Assessment (ESIA), the Resettlement Policy Framework (RPF), and this Stakeholder Engagement Plan (SEP). Issues raised during these engagements such as land acquisition and livelihood impacts, community health and safety, employment opportunities, gender-based risks, grievance management, and information disclosure have been integrated into the engagement strategies, disclosure approaches, and mitigation measures presented in this SEP.

This chapter first summarizes stakeholder engagement activities conducted to date and the key issues raised, and then sets out the planned stakeholder engagement activities for subsequent phases of the Project, including RAP preparation and implementation, construction, and operation. The chapter also explains how stakeholder feedback will be documented, responded to, and incorporated into Project decision-making, ensuring transparency, accountability, and adaptive management over time.

3.1 Brief Summary of Previous Stakeholder Engagement Activities

Stakeholder engagement activities have been undertaken progressively to inform the preparation of the Environmental and Social Impact Assessment (ESIA), the Resettlement Policy Framework (RPF), and the Stakeholder Engagement Plan (SEP). These engagements provided early identification of stakeholder concerns, informed impact assessment and mitigation measures, and shaped the design of engagement approaches reflected in this SEP.

Consultations were conducted between August 2022 and January 2026 at national, district, sub-county, and community levels across the Project corridor, covering districts including Luwero, Nakaseke, Wakiso, Mityana, Mpigi, Gomba, Butambala, Kalungu, Masaka, Lwengo, Kyotera, and Rakai. Participants included district and sub-county leadership, technical officers, community leaders, and community members from potentially affected villages.

Issues raised during these engagements such as employment opportunities, compensation and resettlement processes, land-use restrictions, gender-based risks, HIV/AIDS prevention, grievance management, and access to information have been considered and integrated into the SEP through tailored engagement strategies, disclosure approaches, grievance mechanisms, and inclusion measures outlined in subsequent chapters.

Table 3.1: Summary of Stakeholder Engagements Conducted to Date (up to January 2026)

Stakeholder / Entity	Date(s)	Venue / Level	Purpose and Relevance to SEP
Masaka City leadership	31/08/2022	Masaka City Division Offices	Urban impacts, land use, and community concerns informing SEP engagement planning
Community and village-level consultations	31/08/2022 – 26/10/2022	Respective villages	Identification of PAP concerns, livelihoods, GBV risks, and communication preferences
Kyotera District Local Government	13/09/2022	District Headquarters	District coordination, land administration, grievance handling
Rakai District Local Government	04/10/2022	District Headquarters	Cross-border issues, land and health concerns
Luwero District Local Government	05/01/2023	District Headquarters	Confirmation of route start point and institutional coordination
District consultations (Masaka, Lwengo, Mpigi, Kalungu, Butambala, Gomba, Nakaseke, Wakiso, Mityana)	02–07/01/2024	District Headquarters	Validation of impacts, disclosure preferences, RAP/SEP inputs
Sub-county consultation (Kkingo)	02/01/2024	Sub-county Headquarters	Local-level engagement planning and PAP identification
Ongoing preparatory engagements	2025 – Jan 2026	District & community levels	Updating stakeholders on Project status; refining SEP approaches prior to appraisal

Note: Engagement activities are ongoing and will continue throughout RAP development, construction, and operation phases, as outlined in Section 3.4 of this SEP.

Table 3.2: Key Issues Raised During Stakeholder Engagements and How They Are Addressed

Issue Raised	Summary of Stakeholder Concerns	How Addressed in the SEP / Project Design
Access to jobs	Priority for local employment	Local labour preference included; transparent recruitment and disclosure measures related to employment
Awareness & mobilisation	Risk of conflict if communities not sensitised	Continuous engagement plan defined in SEP; multiple communication channels
Transparent communication	Need for accurate, consistent information	Disclosure strategy and feedback loops defined in SEP

Issue Raised	Summary of Stakeholder Concerns	How Addressed in the SEP / Project Design
Compensation adequacy	Concerns over valuation, graves, replacement costs	World Bank ESS5 on Land Acquisition, Restriction on Land Use and Involuntary Resettlement -aligned compensation principles; disclosure during RAP development and implementation
HIV/AIDS & health risks	Labour influx increasing health risks	Contractor ESMP to include HIV/AIDS prevention; district partnerships
Landowner vs Kibanja rights	Compensation sharing clarity	RAP to clarify entitlements; grievance mechanism included
Timing of resettlement	Fear of displacement before payment	SEP reiterates “compensation before displacement”
Local benefits / power access	Concern over bypassing communities	Addressed through RAP-linked community development initiatives
Grievance management	Disputes over valuation and family conflicts	Multi-tier Grievance Mechanism outlined in SEP
Land-use after compensation	Confusion over RoW use	Clear RoW disclosure and enforcement engagement planned
Valuation process	Who values and delays	Independent valuers and CGV approval disclosed
Project coverage	Route clarity	Maps and route disclosure included in SEP

3.2 Purpose and Timing of the Stakeholder Engagement Program

Stakeholder engagement has been a central element of Project preparation and has supported the identification of community priorities, service delivery expectations, and potential environmental and social risks. Engagements to date have been undertaken at national, district, sub-county, and village levels and have informed the preparation of the Environmental and Social Impact Assessment (ESIA), the Resettlement Policy Framework (RPF), and this Stakeholder Engagement Plan (SEP).

As Project design advances and specific transmission line footprints, ancillary facilities, and access routes are confirmed, stakeholder engagement will become more targeted and location-specific, particularly for Project-Affected Persons (PAPs). The SEP will therefore be refined and operationalized through the Resettlement Action Plan (RAP) and construction-phase engagement activities.

The Stakeholder Engagement Program under the Project is guided by the following key purposes:

a) Targeted engagement with Project-Affected Persons and communities

To provide timely, clear, and accessible information to individuals and communities that will be directly affected by land acquisition, restrictions on land use, physical or economic displacement, and livelihood

impacts. This engagement will be conducted in accordance with the principles set out in this SEP and elaborated in detail in the RAPs, including disclosure of entitlement frameworks, valuation methodologies, cut-off dates, compensation options, livelihood restoration measures, and resettlement assistance, as outlined in the RPF.

b) Understanding community service delivery and governance needs

To identify and understand community-level service delivery and governance needs that may be affected by the Project, including access to land, local infrastructure, social services, and administrative processes related to compensation and grievance handling. These issues were raised during Project preparation consultations and will be further explored through targeted engagement with PAPs, local leaders, and district authorities during RAP preparation, consistent with the RPF requirements for meaningful consultation and informed participation.

c) Receiving feedback, concerns, and grievances

To provide inclusive and accessible channels for stakeholders to express views, provide feedback, and raise concerns or grievances related to Project design, implementation arrangements, environmental and social risks and impacts, and mitigation measures. Stakeholder inputs received through consultations and the Grievance Mechanism will be documented, reviewed, and considered in Project decision-making, with feedback provided to stakeholders on how their concerns have been addressed.

d) Providing regular updates and feedback throughout the Project lifecycle

To ensure that stakeholders receive regular information on Project progress, implementation schedules, changes to Project activities, and emerging issues during RAP implementation, construction, and operation phases. Feedback loops will be maintained so that stakeholders are informed of decisions taken in response to their comments and concerns.

e) Ensuring transparency and accountability

To promote transparency and accountability in Project and sub-project design and implementation through clear disclosure of information, defined roles and responsibilities, and accessible grievance redress mechanisms.

Timing, Sequencing, and Notification of Engagement Activities

Stakeholder engagement will be undertaken throughout the Project lifecycle, with the type, frequency, and intensity of engagement proportionate to the level of impact and stakeholder interest, as summarized below:

- Project Preparation and RAP Development:**

Intensive, location-specific engagement with PAPs and affected communities, including household-level consultations, disclosure of RAP documents, and agreement on compensation and livelihood restoration measures.

- **Pre-Construction Phase:**

Engagement focused on disclosure of construction schedules, contractor mobilization, labour influx management, community health and safety measures, and grievance mechanisms.

- **Construction Phase:**

Regular engagement with communities, local leaders, and authorities to address construction-related impacts, including traffic, safety, noise, access restrictions, and employment opportunities. Engagement frequency will typically be monthly or as required based on site conditions.

- **Operation and Maintenance Phase:**

Periodic engagement to address maintenance-related impacts, land-use restrictions within the Right-of-Way, community safety, and grievance management.

Where decisions on public meeting venues, schedules, or specific engagement formats have not yet been finalized, stakeholders will be informed of forthcoming engagement opportunities through multiple notification channels, including community meetings, local radio announcements, notice boards, engagement with Local Council leaders, and direct communication with PAPs. Adequate notice will be provided to allow stakeholders to prepare and participate meaningfully.

3.3. Engagement Methods to be Used

This section describes the methods and tools that will be used to communicate and consult with stakeholders throughout the Project lifecycle. The selection of engagement methods is guided by the principles set out in this Stakeholder Engagement Plan (SEP), including inclusiveness, accessibility, transparency, and proportionality to the level of impact and stakeholder interest, in line with World Bank Environmental and Social Standard 10 (ESS10).

Engagement methods will be adapted to the Project phase (preparation, RAP development and implementation, construction, and operation), stakeholder characteristics, and local context, including literacy levels, language preferences, and accessibility needs of vulnerable or marginalized groups.

The following engagement methods and tools will be applied:

Stakeholder Engagement Methods and Tools

- **Online Platform / Project Website:** A dedicated project webpage will be established and maintained by the implementing agency to provide accessible and up-to-date information on the Project. The platform will host key Project documents, including Environmental and Social Framework (ESF) instruments, site-specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Resettlement Action Plan (RAP), and other relevant disclosures. The platform will also enable stakeholders to submit feedback and inquiries electronically.

- **Public Consultations (Physical and Virtual):** Public consultations will be conducted during Project

preparation, RAP development and implementation, construction, and operation phases. These consultations will support disclosure and discussion of ESF framework documents, site-specific ESIAs/ESMPs, RAP, construction-related environmental, social, health and safety issues, and mitigation measures. Consultations may be conducted through physical meetings or virtual platforms, as appropriate, and will include targeted engagement with Project-Affected Persons (PAPs).

- **Workshops:** Stakeholder workshops will be organized to facilitate focused discussion and validation of Project instruments and implementation arrangements. During Project preparation, workshops may be held to review and validate safeguards instruments such as the Environmental and Social Management Framework (ESMF), Labour Management Procedures (LMP), and GBV Prevention and Response Action Plan (GBV-PRAP). During implementation, workshops may address topics such as Project benefits, implementation schedules, occupational and community health and safety, grievance mechanisms, and other issues identified through ongoing engagement.
- **Beneficiary Surveys and Focus Group Discussions:** Surveys and Focus Group Discussions (FGDs) will be used primarily during Project implementation as part of monitoring and evaluation activities. These tools will help gather structured feedback from beneficiaries and affected communities on Project impacts, effectiveness of mitigation measures, and satisfaction with engagement processes. Surveys will be conducted within agreed timeframes and using appropriate methods for different stakeholder groups.
- **In-Depth Interviews with Key Informants and Experts:** Targeted interviews with technical experts, local leaders, sector specialists, and other knowledgeable stakeholders will be conducted throughout the Project to obtain expert insights and recommendations on Project-related risks, challenges, and opportunities.
- **Printed Information Materials (Leaflets and Information Notes):** Leaflets and information notes summarizing key Project information such as Project objectives, benefits, potential impacts, compensation processes, and grievance procedures will be prepared in accessible formats and distributed during meetings, consultations, and through public institutions such as schools and health centres.
- **Mass Media (Radio, Newspapers, and Other Media):** Radio announcements, newspaper notices, and other media channels will be used to disseminate Project information at key stages, including disclosure of documents, consultation opportunities, cut-off dates, and major Project milestones. Information will be provided in English and relevant local languages.
- **Official Correspondence (Letters and Notices):** Formal letters and written notices will be used to communicate with government institutions, local authorities, and Project-Affected Persons, including notifications related to meetings, disclosure of information, compensation processes, and implementation schedules.
- **Reports and Briefings:** Periodic reports and briefings will be prepared to inform stakeholders, including authorities and community representatives, about Project progress and environmental, social, health, and

safety performance.

- **Electronic Communication (Email and Telephone):** Email and telephone communication will be used to facilitate routine coordination and information exchange among institutions, stakeholders, and Project implementation teams.
- **Grievance Mechanism (GM):** A Project-level Grievance Mechanism will be established in accordance with ESS10 to enable stakeholders to raise concerns, complaints, or suggestions related to the Project. Grievances may be submitted through multiple channels, including in person, by telephone, in writing, or electronically. The GM is described in detail in Chapter 5 of this SEP.

3.4 Response to Stakeholder Comments

All comments, concerns, questions, and suggestions raised during stakeholder engagement activities will be systematically recorded and tracked by the Project Implementation Unit (PIU) Social Safeguards Team. A Stakeholder Comments Register will be maintained to ensure transparency, accountability, and timely follow-up.

The register will capture, at a minimum:

- (i) the issue raised;
- (ii) date and location of engagement;
- (iii) stakeholder group or category;
- (iv) clarification or response provided;
- (v) actions agreed or taken; and
- (vi) status of closure.

Where possible, responses and clarifications will be provided during the engagement meeting itself. Where issues require further review, feedback will be provided within ten (10) working days through appropriate channels, including follow-up community meetings, engagement through local leadership structures, written communication, telephone calls, or other stakeholder-preferred means.

To close the feedback loop, the Project will prepare a consolidated “**What We Heard – What We Did**” summary on a quarterly basis. This summary will highlight key issues raised by stakeholders and explain how they have been addressed in Project decisions, design, or implementation. The summaries will be shared publicly through district and sub-county notice boards, community meetings, and other appropriate disclosure channels.

3.5 Proposed Strategy for Information Disclosure

Disclosure of Project information will be undertaken in a structured, timely, and meaningful manner to ensure that all stakeholders—particularly Project-Affected Persons (PAPs) and disadvantaged or vulnerable groups—have access to information that is understandable, accessible, and relevant to their needs. Disclosure will be an ongoing process throughout the Project lifecycle, rather than a one-off activity, in accordance with

the World Bank Environmental and Social Standard 10 (ESS10).

3.5.1 Types of Information to be Disclosed

The Project will disclose, at a minimum, the following information:

- Project description, scope, and maps
- Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), and any addenda
- Stakeholder Engagement Plan (SEP)
- Resettlement Policy Framework (RPF) and site-specific Resettlement Action Plan (RAP)
- Environmental and Social Management Framework (ESMF), where applicable
- Entitlement matrix and compensation principles and timelines
- Cut-off date notices
- Grievance Redress Mechanism (GRM) procedures, including GBV/SEA/SH reporting and referral pathways
- Construction schedules and anticipated community impacts
- Traffic management and community safety plans
- Contractor Code of Conduct
- Employment and participation opportunities
- Quarterly “What We Heard – What We Did” summaries

3.5.2 Methods and Channels of Disclosure

Disclosure will use multiple communication channels, tailored to literacy levels, language preferences, gender considerations, disability, and vulnerability, including:

Physical / Community-Level Disclosure

- LC1 and parish notice boards
- District and sub-county offices
- Community meetings and barazas
- Local radio announcements in relevant local languages
- Mobile public address announcements, where appropriate
- Hard-copy summaries and disclosure booklets distributed during RAP consultations

Digital and Media-Based Disclosure

- UETCL website
- SMS notifications, where feasible
- District-approved social media platforms
- Radio talk shows and public information programmes

Targeted Disclosure for Vulnerable Groups

- Home visits for persons with disabilities, elderly persons, widows, and other vulnerable PAPs
- Women-only disclosure meetings
- Large-print, simplified, or pictorial materials
- Sign language interpretation or other accessibility support, as required

3.5.3 Timing and Frequency of Disclosure

Project information will be disclosed in a timely and systematic manner, aligned with key decision points throughout the Project lifecycle. The timing and frequency of disclosure are designed to ensure that stakeholders; particularly Project-Affected Persons and vulnerable groups have adequate opportunity to access information, understand potential impacts and mitigation measures, and provide informed feedback before decisions are taken.

Disclosure will occur at key stages of the Project, as summarized below:

Table 3.3: Timing and Frequency of Disclosure

Project Stage	Disclosure Materials	Timing
ESIA / ESMP Preparation	Draft ESIA/ESMPs	Prior to submission to NEMA and during the regulatory review process
ESIA / ESMP Disclosure	Final ESIA/ESMPs	Upon receipt of World Bank no-objection and during NEMA licensing
RAP Development	Cut-off dates, RAP process, PAP lists	At initiation of RAP; updated as required
RAP Disclosure	Valuation results, compensation packages	Prior to compensation agreements
Pre-Construction	ESMPs, GBV/SEA/SH protocols, safety plans	Before contractor mobilisation
Construction	Progress updates, impact notices	Monthly
Operation & Maintenance	Maintenance schedules, safety information	Annually or as required

Note: The Project ESIA has received a **World Bank no-objection and clearance for disclosure** and is publicly available on both the UETCL and World Bank websites.

3.5.4 Process for Confirming Understanding of Disclosed Information

To ensure that disclosure results in meaningful understanding not merely dissemination, the Project will apply the following measures:

- Facilitated question-and-answer sessions during meetings
- Use of visual aids (maps, diagrams, pictorial materials)
- Simplified summaries in local languages

- Feedback forms and verbal feedback during meetings
- Confirmation discussions at household level during RAP consultations
- Verification by Local Council I (LC1) leaders and Community Development Officers (CDOs), who will confirm whether key messages have been understood by affected households

Attendance registers will be used to document participation, while the above measures will be used to assess comprehension and address any information gaps.

3.5.5 Disclosure Feedback Loop

Stakeholders will be informed of how their comments on disclosed information have been considered through:

- Follow-up meetings
- Responses provided through the GRM
- Quarterly “What We Heard – What We Did” summaries

This feedback loop ensures transparency, accountability, and adaptive Project management.

3.5.6 Roles and Responsibilities

- PIU Social Safeguards Team: Lead disclosure activities; prepare and coordinate disclosure materials
- **District Local Governments:** Host and disseminate disclosure materials through local administrative structures
- **Contractors:** Disclose site-specific information related to construction schedules, traffic, and safety
- **Community Development Officers:** Support targeted disclosure for vulnerable groups
- **GRM Committees:** Disseminate information on grievance procedures, updates, and resolutions

Table 3.4: Strategy for Information Disclosure

Project Stage	Information to Be Disclosed	Disclosure Methods	Timing / Location	Targeted Stakeholders
RAP Preparation / Pre-Construction	ESMP and RAP scope, process, and key activities	Community radio announcements; announcements through religious institutions; community meetings; district and sub-county notice boards	Prior to commencement of RAP activities; at district, sub-county, and village levels	Community members (including vulnerable and marginalized groups), district and local governments, CSOs/NGOs, business community, County Coordination Committees
RAP Preparation	Survey and valuation activities (methodology,	Community meetings; household-level consultations;	During RAP development; village and household level	Project-Affected Persons (PAPs), including vulnerable

Project Stage	Information to Be Disclosed	Disclosure Methods	Timing / Location	Targeted Stakeholders
	(schedule, roles)	one-on-one meetings		households; local leaders; district officials
RAP Preparation	Compensation principles, entitlement matrix, and disclosure of compensation options	Community radio announcements; community meetings; household-level disclosure sessions	During RAP development; before compensation agreements	Affected community members, including all vulnerable and marginalized groups
RAP Preparation & Implementation	Resettlement arrangements, relocation assistance, and timelines	Community meetings; targeted household visits; radio announcements	Prior to and during resettlement implementation; village level	Physically displaced PAPs, vulnerable households, local leaders
RAP Preparation & Implementation	Livelihood Restoration Plan (LRP) activities and support measures	Community meetings; targeted group discussions; radio announcements	During RAP preparation and implementation; community level	Economically displaced PAPs, including women, youth, and vulnerable households
RAP Preparation & Implementation	Vulnerability assessment process and available additional assistance	Community meetings; targeted household visits; engagement through Community Development Officers	During RAP preparation and implementation; household level	Identified vulnerable and marginalized PAPs
Pre-Construction	Construction schedule, community health and safety measures, GBV/SEA/SH prevention and GRM	Community meetings; radio announcements; notice boards	Before contractor mobilisation; community level	Community members, vulnerable groups, local leaders
Construction	Monthly construction updates, traffic management, access restrictions	Community meetings; radio announcements; notice boards	Monthly during construction; community and roadside locations	Affected communities, road users, businesses
Operation & Maintenance	Maintenance schedules, safety information, land-use restrictions within the RoW	Radio announcements; community meetings; notice boards	Prior to maintenance activities; annually as needed	Communities along the transmission corridor

3.6 Proposed Strategy for Consultation

Stakeholder consultation will be undertaken throughout all phases of the Project lifecycle, including RAP preparation, compensation and resettlement, construction, and operation. Consultations will follow a structured and phased approach, linked to key Project decision points that require stakeholder input, validation, or agreement, in line with the World Bank Environmental and Social Standard 10 (ESS10).

During Project preparation, consultations will focus on validating impacts, identifying Project-Affected Persons (PAPs), and gathering stakeholder inputs into Project design, environmental and social risk management, and resettlement planning. As the Project progresses, consultations will become increasingly targeted and site-specific, particularly during RAP disclosure, compensation agreement, and livelihood restoration planning.

Where specific meeting dates or locations cannot yet be confirmed, such as prior to final design approval or contractor mobilisation, the Project commits to providing advance public notice of consultation opportunities and ensuring that stakeholders have adequate time and information to participate meaningfully.

Advance Notification of Meetings

Stakeholders will be notified of planned consultation meetings at least fourteen (14) days in advance, using locally appropriate and accessible communication channels. These will include announcements through Local Council I (LC1) leaders, parish and sub-county notice boards, community radio, Short Message Service (SMS) where available, engagement through district authorities, and publication on the UETCL website. This approach ensures that Project-Affected Persons and other Interested Parties have sufficient opportunity to attend meetings, review disclosed information, and provide informed feedback.

Table 3.5: Schedule of Planned Stakeholder Engagement Activities

Project Phase	Engagement Activity	Purpose / Decision Point	Frequency / Timing
RAP Preparation	PAP identification, household visits, disclosure of strip maps	Confirm affected land and assets; validate PAP lists; identify vulnerable PAPs	Once per community; follow-up visits as required
RAP Preparation	Community meetings on compensation principles and cut-off dates	Inform stakeholders on eligibility, valuation methodology, entitlement framework; receive inputs	During RAP development
RAP Disclosure (Stage 1 – Group	District, sub-county, and village-level	Disclosure of RAP summary, survey and	Three rounds of meetings at district,

Project Phase	Engagement Activity	Purpose / Decision Point	Frequency / Timing
Disclosure)	disclosure meetings	valuation methodologies, entitlement matrix, eligibility criteria, and preliminary lists of assessed beneficiaries; discussion of stakeholder roles in RAP implementation	sub-county, and village levels following RAP approval
RAP Disclosure & Agreement (Stage 2 – Household Disclosure)	Household-level disclosure and negotiation meetings	Disclosure of individual compensation packages and livelihood restoration options; decision point for PAP consent or submission of valuation queries	Once per PAP; follow-up as required
Pre-Construction	Community consultations on ESIA, ESMPs, and construction preparedness	Disclosure and discussion of ESIA/ESMP measures, construction schedule, GBV/SEA/SH prevention, worker conduct, camp siting, traffic and safety management	At least once per affected village
Construction	Monthly community update meetings and grievance clinics	Address construction-related impacts; resolve grievances; adapt mitigation measures	Monthly
Construction	District coordination meetings	Review grievance trends, land issues, traffic management, and community safety	Monthly or as agreed
Construction	Targeted engagement with vulnerable groups	Confirm effectiveness of support measures; follow-up on additional assistance needs	Monthly or as required
Operation & Maintenance	Annual community safety awareness sessions	Promote safe use of the Right-of-Way (RoW); address electrocution and maintenance-related	Annually

Project Phase	Engagement Activity	Purpose / Decision Point	Frequency / Timing
		risks	
Operation & Maintenance	Stakeholder monitoring and review meetings	Review grievances, legacy issues, and ongoing community concerns	Annually

Documentation and Feedback

For all stakeholder consultation activities, minutes of meetings, attendance registers, photographs (where appropriate), and records of key issues raised will be maintained. Stakeholders will be informed of how their comments have been considered through follow-up meetings, responses provided via the Grievance Mechanism, and quarterly stakeholder feedback summaries, including the “What We Heard – What We Did” reports.

3.7 Proposed Strategy to Incorporate the Views of Vulnerable and Marginalized Groups

The Project recognizes that certain individuals and groups may face barriers to participation in stakeholder engagement processes due to social, economic, physical, or cultural factors. These include, but are not limited to, women and girls, persons with disabilities, elderly persons, youth, widows, vulnerable households, sexual and gender minorities, and other marginalized individuals or groups. Ensuring that the perspectives of these groups are meaningfully integrated is essential not only during involuntary resettlement processes, but throughout the Project lifecycle, including Project design, identification of environmental and social impacts, development of mitigation measures, and identification of Project benefits.

Targeted engagement measures will therefore be applied to enable vulnerable and marginalized groups to access information, express their views safely and meaningfully, and influence Project decisions. As outlined in Table 2.3 (Project Stakeholder Needs), engagement methods will be adapted to address specific communication, accessibility, and participation needs, including language preferences, literacy levels, mobility constraints, and gender-sensitive considerations.

During RAP preparation and implementation, the RAP Team will ensure that women and other vulnerable Project-Affected Persons (PAPs) are able to participate in consultations related to land acquisition, compensation, resettlement, and livelihood restoration. This will include separate and targeted meetings, such as women-only discussions, household-level consultations, and Focus Group Discussions, in addition to general community meetings.

Beyond resettlement, vulnerable and marginalized groups will be engaged on a broader range of Project issues, including community health and safety, labour influx management, Gender-Based Violence (GBV) prevention, traffic and access impacts, environmental management, and opportunities for employment and community development. Engagement methods may include one-on-one meetings, facilitated group discussions, home visits, and the use of trusted community intermediaries, as

appropriate.

To promote gender equality and inclusive decision-making, women's groups and representatives will be engaged on an ongoing basis throughout Project preparation, construction, and operation. Their views will be considered in the design of mitigation measures, selection of livelihood restoration options, and identification of community benefits.

The Project Grievance Mechanism (GM) has been designed to be accessible, safe, and responsive to vulnerable and marginalized groups. Information on the GM will be disclosed using the communication approaches identified in Table 3.4, and multiple intake channels will be provided to allow grievances to be submitted confidentially and without fear of retaliation. Feedback will be provided in a manner that is understandable and accessible to the complainant.

Through these measures, the Project aims to ensure that vulnerable and marginalized groups are not only informed, but are active participants in shaping Project decisions and outcomes in a manner consistent with the World Bank Environmental and Social Standard 10 (ESS10).

3.8 Review of Stakeholder Comments and Feedback

The Project will systematically collect, review, analyze, and use stakeholder comments, concerns, and suggestions to inform Project design, implementation, and adaptive management throughout the Project lifecycle. Inputs will be gathered through multiple engagement channels, including community meetings, Focus Group Discussions (FGDs), beneficiary surveys, consultations with local authorities, and records from the Grievance Mechanism (GM).

All stakeholder inputs will be consolidated and maintained in a Stakeholder Feedback and Comments Register, managed by the Project Implementation Unit (PIU) Social Safeguards Team. The register will record the source of the feedback, the issues raised, the Project's response, actions agreed or taken, responsible parties, and the status of follow-up. This process will enable the Project to track emerging concerns, identify trends, and adjust engagement and mitigation measures as necessary.

Stakeholder feedback will be actively used to:

- Refine Project design and implementation arrangements;
- Inform the development and updating of environmental and social mitigation measures, including RAP and ESMP measures;
- Improve communication approaches and engagement methods;
- Identify additional support needs for vulnerable or marginalized groups; and
- Strengthen grievance management and resolution processes.

Recognizing that stakeholder engagement is a two-way process, the Project will ensure that feedback is provided back to stakeholders in a timely and appropriate manner. Where possible, clarifications and responses will be provided during engagement meetings. Where issues require further review, stakeholders will be informed of outcomes and next steps through follow-up meetings, communication

via local leadership structures, written responses, telephone calls, or other preferred communication channels.

To support transparency and close the feedback loop, the Project will prepare periodic “What We Heard – What We Did” summaries that explain how stakeholder inputs have influenced Project decisions or actions. These summaries will be shared with stakeholders through community meetings, district and sub-county notice boards, and other disclosure channels described in this SEP.

During Project preparation and implementation, particular attention will be given to providing feedback on issues raised by stakeholders during earlier engagement phases, including ESIA, RPF, and RAP consultations, to demonstrate how concerns have been considered and addressed over time.

Through these measures, the Project will ensure that stakeholder inputs are not only documented, but are meaningfully integrated into Project decision-making and communicated back to stakeholders, in line with the requirements of the World Bank Environmental and Social Standard 10 (ESS10).

4 CHAPTER FOUR: RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

Effective stakeholder engagement requires adequate resourcing, clearly defined institutional responsibilities, and strong coordination mechanisms. This chapter describes the financial, human, and institutional resources that will be mobilised to implement the Stakeholder Engagement Plan (SEP), as well as the roles and responsibilities of UETCL, the Project Implementation Unit (PIU), contractors, and other partners involved in delivering engagement activities in accordance with the World Bank Environmental and Social Framework.

4.1 Resources

Adequate financial and human resources will be dedicated to the implementation of this Stakeholder Engagement Plan (SEP) to ensure that all engagement commitments are effectively delivered throughout the Project lifecycle. The SEP budget forms an integral part of overall Project costs and has been developed in line with the requirements of World Bank Environmental and Social Standard 10 (ESS10).

UETCL will allocate dedicated budgetary resources for stakeholder engagement activities, including consultation, disclosure, grievance management, monitoring and reporting, targeted engagement of vulnerable and marginalized groups, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) awareness, and capacity building. The budget covers engagement activities during Project preparation, RAP development and implementation, construction, and operation and maintenance phases.

The indicative SEP budget has been prepared to reflect:

- All engagement activities described in Chapter Three (Stakeholder Engagement Program), including Sections 3.2 (Purpose and Timing of Engagement), 3.3 (Engagement Methods), 3.4 (Response to Stakeholder Comments), 3.5 (Information Disclosure), 3.6 (Strategy for Consultation) 3.7 (Vulnerable and Marginalized Groups), and 3.8 (Review of Comments); and
- The institutional arrangements described in Chapter Four (Implementation Arrangements and Monitoring).

Budget estimates are based on reasonable unit costs and assumptions, and costs are grouped under consistent categories, including personnel, logistics, communication and disclosure, capacity building, grievance management, and monitoring. The budget will be reviewed and updated periodically to reflect Project progress and any emerging engagement needs.

4.1.2 Budgeting Approach and Timeframe Clarification

The budget presented in Table 4.1 represents an **annual indicative allocation** for Stakeholder Engagement Plan (SEP) implementation. Given the phased nature of the Project — including RAP

preparation and implementation, construction, and subsequent operation and maintenance — stakeholder engagement activities will span multiple years. The figures shown therefore represent **estimated yearly costs**, which will be updated and approved annually as part of Project work planning and budgeting processes.

Over the full Project lifecycle, SEP costs will be scaled in line with activity intensity at each stage, with higher engagement expenditure anticipated during RAP implementation and construction phases.

Table 4.1: Indicative Budget for Implementation of the Stakeholder Engagement Plan

No.	Cost Category	Activities Covered	Responsible Party	Unit Cost (USD)	Quantity / Frequency	Total (USD)	Total (UGX)
1	Consultation Meetings	Community meetings; LC1/LC3 meetings; district and sub-county consultations	PIU Social Safeguards Team; District Local Governments	250 per meeting	60 meetings	15,000	54,000,000
2	Disclosure and Communication	Printing of ESIA/RAP summaries; posters; radio announcements; SMS alerts; notice boards	PIU Social Safeguards Team	Lump sum	—	8,000	28,800,000
3	Targeted Engagement for Vulnerable Groups	Home visits (elderly, PWDs); women-only meetings; sign-language interpretation; tailored materials	PIU Social Team; Community Development Officers	150 per session	40 sessions	6,000	21,600,000
4	Grievance Redress Mechanism (GRM)	Establishment and operation of GM committees; grievance clinics; hotline; documentation and tracking	PIU Social Safeguards Team; District GRM Committees	Annual	1 year	10,000	36,000,000
5	GBV/SEA/SH Prevention and Awareness	Community sensitization; IEC materials; engagement with women and girls; referrals	PIU Social Team; GBV Service Providers	Lump sum	—	7,500	27,000,000
6	Training and	Training of	PIU;	1,500	4 sessions	6,000	21,600,000

No.	Cost Category	Activities Covered	Responsible Party	Unit Cost (USD)	Quantity / Frequency	Total (USD)	Total (UGX)
	Capacity Building	PIU, contractors, and district teams on SEP, ESS10, GRM, GBV/SEA/SH	External Trainers	per session			
7	Monitoring and Reporting	Quarterly field monitoring; third-party monitoring (as applicable); “What We Heard – What We Did” reporting	PIU Social Safeguards Team; Third Parties	Annual	1 year	5,000	18,000,000
8	Logistics and Transport	Vehicle hire; fuel; per diem for engagement visits and monitoring	PIU	Annual	1 year	12,000	43,200,000
9	Contingency (10%)	Inflation and unforeseen engagement needs	PIU	—	—	6,950	25,020,000
Total Estimated SEP Budget						76,450	275,220,000

Note: Actual SEP expenditures will vary by Project phase, with increased allocations during RAP implementation and construction, and reduced but continued engagement during the operation and maintenance phase.

4.2 Management Functions and Responsibilities

Effective implementation of this Stakeholder Engagement Plan (SEP) requires clear institutional arrangements, defined roles and responsibilities, and adequate human and financial resources. This section sets out the management structure, staffing arrangements, and accountability mechanisms that will be used to plan, coordinate, implement, and monitor stakeholder engagement activities throughout the Project lifecycle. The arrangements described are designed to ensure compliance with the World Bank Environmental and Social Framework (ESF), promote timely and meaningful engagement, and provide effective oversight of grievance management, information disclosure, and feedback mechanisms.

4.2.1 Institutional Arrangements for SEP Implementation

Implementation of the Stakeholder Engagement Plan (SEP) will be undertaken through a strengthened, multi-disciplinary institutional structure within UETCL’s Project Implementation Unit (PIU). Given

the scale of the Project, its multi-district geographic spread, and the intensity and sequencing of engagement activities across the Project lifecycle, reliance on a single Social Officer would not be sufficient to deliver the commitments set out in this SEP.

Accordingly, SEP implementation will be led by a dedicated Social Safeguards Team within the PIU, supported by District Local Governments and the Contractor's safeguards staff. This structure ensures that stakeholder engagement is adequately resourced, technically competent, and continuously implemented during, ESIA, ESMPs, and RAP preparation and implementation, and more broadly across the project's construction and operation phases.

The PIU Social Safeguards Team will be responsible for overall coordination, quality assurance, compliance with World Bank Environmental and Social Standard 10 (ESS10), and integration of stakeholder feedback into Project decision-making. District Local Governments will play a critical facilitation and oversight role at the community level, while the Contractor will support site-specific engagement related to construction activities, labour management, and community health and safety.

All engagement activities will be systematically documented, including attendance registers, minutes, photographs (where appropriate), consultation reports, grievance logs, and feedback summaries. These records will be consolidated and maintained by the PIU and used for monitoring, reporting, and audit purposes.

Table 4.2: Roles and Responsibilities for SEP Implementation

Role	Minimum Qualifications / Experience	Key Responsibilities	Reporting Line
Social Safeguards Specialist (Team Lead)	<ul style="list-style-type: none"> • Degree in Social Sciences, Anthropology, Development Studies, or related field • Demonstrated experience implementing World Bank ESS10 and ESS5, including RAPs 	<ul style="list-style-type: none"> • Overall oversight and coordination of SEP implementation • Ensure compliance with ESS10 and alignment with RAP, ESMPs, and GRM • Supervise field engagement teams • Review and approve consultation records and reports 	PIU Project Manager
Community Liaison Officers (2-3)	<ul style="list-style-type: none"> • Degree/diploma in Community Development or related field • Fluency in local languages • Experience working with local councils and district structures 	<ul style="list-style-type: none"> • Day-to-day community engagement and mobilisation • Support consultations, disclosure, and household visits • Facilitate engagement with 	Social Safeguards Specialist

Role	Minimum Qualifications / Experience	Key Responsibilities	Reporting Line
		<p>vulnerable and marginalized groups</p> <ul style="list-style-type: none"> Maintain attendance lists, minutes, and follow-up actions 	
GBV/SEA/SH Specialist	<ul style="list-style-type: none"> Degree in Gender Studies, Psychology, Social Work, or related field Experience in GBV risk management and survivor-centred approaches 	<ul style="list-style-type: none"> Implement GBV/SEA/SH prevention and response measures Establish and manage referral pathways Train workers, GM committees, and community focal points Support safe and confidential handling of GBV-related grievances 	Social Safeguards Specialist
GRM and Data Management Officer	<ul style="list-style-type: none"> Background in MIS, statistics, information management, or administration Strong digital record-keeping and reporting skills 	<ul style="list-style-type: none"> Maintain the grievance registry and tracking database Monitor grievance resolution timelines and closure status Produce periodic GRM and engagement reports Support “What We Heard – What We Did” reporting 	Social Safeguards Specialist
District Local Government Teams	<ul style="list-style-type: none"> Community Development Officers (CDOs) Senior Assistant Secretaries (Sub-county) LC1 and LC3 leaders District Land Boards and District Technical Teams 	<ul style="list-style-type: none"> Support community mobilisation and information disclosure Assist with PAP identification and verification Participate in grievance management committees Support inclusion of vulnerable and marginalized groups 	PIU (coordination role)
Contractor Safeguards Team	<ul style="list-style-type: none"> Social / Community Liaison Officer Occupational Health & Safety Officer 	<ul style="list-style-type: none"> Conduct pre-construction and site-specific sensitisation Implement Worker Code of Conduct 	Contractor Project Manager; functional reporting to PIU Safeguards

Role	Minimum Qualifications / Experience	Key Responsibilities	Reporting Line
	• GBV/SEA/SH Focal Person	<ul style="list-style-type: none"> • Report social incidents and grievances to PIU • Participate in joint community engagement activities 	

4.3 Documentation of Stakeholder Engagement Activities

All stakeholder engagement activities under the Project will be systematically documented using a standardized and auditable documentation system, consistent with the requirements of World Bank Environmental and Social Standard 10 (ESS10). Documentation will enable transparency, tracking of commitments, monitoring of follow-up actions, and verification of meaningful stakeholder engagement. The following records will be maintained throughout the Project lifecycle:

- I. **Stakeholder Engagement Logbook** (digital and hard-copy), capturing the date, location, type of engagement, stakeholders present, and key outcomes;
- II. **Attendance Registers**, disaggregated by sex and, where relevant, by vulnerable group category;
- III. **Meeting Minutes**, documenting issues raised, responses provided, agreed actions, responsible persons, and timelines;
- IV. **Comments and Issues Register**, tracking each issue from identification through response, assignment of responsibility, and closure;
- V. **Grievance Redress Mechanism (GRM) Database**, with unique reference numbers for each grievance and status tracking;
- VI. **Quarterly Stakeholder Engagement Reports**, summarizing activities undertaken, key concerns raised, responses provided, and lessons learned;
- VII. **Photographic Evidence**, where appropriate and culturally acceptable, to support verification of engagement activities.

All documentation will be securely stored by the PIU Social Safeguards Team in both electronic and physical formats. Records will be made available to the World Bank and other financing partners upon request and will support project supervision, monitoring, and independent audits.

4.4 Staffing Adequacy Statement

Given the scale and geographic spread of the Project, the anticipated number of Project-Affected Persons (PAPs), and the frequency and diversity of stakeholder engagement activities required across RAP preparation and implementation, construction, and operation, a dedicated and adequately staffed team is essential for effective SEP implementation.

At least four full-time staff within the PIU Social Safeguards Team are required to ensure compliance

with ESS10, including coordination of consultations, disclosure, grievance management, engagement of vulnerable and marginalized groups, monitoring, and reporting. Reliance on a single Social Officer would be insufficient to meet these requirements and would pose a risk to effective stakeholder engagement and timely response to stakeholder concerns.

The staffing structure described in Section **4.2.1** has therefore been designed to ensure adequate capacity, continuity, and accountability in implementing the SEP throughout the Project lifecycle.

5 CHAPTER FIVE: GRIEVANCE MECHANISM

This chapter sets out the Grievance Mechanism (GM) established for the Project, including its principles, institutional arrangements, procedures, and reporting requirements. The GM is a core element of the Project’s stakeholder engagement framework and provides a structured, transparent, and culturally appropriate process through which stakeholders may raise concerns, seek clarification, and have project-related issues addressed throughout the Project lifecycle.

5.1 Introduction

In accordance with the World Bank Environmental and Social Framework (ESF), Bank-supported projects are required to establish and maintain accessible, inclusive, and effective grievance mechanisms to address concerns and complaints arising in connection with project activities. In particular, Environmental and Social Standard 10 (ESS10) requires Borrowers to provide Project-Affected Parties with appropriate means to raise issues and grievances and to ensure that such grievances are responded to and managed in a timely and transparent manner.

The Grievance Mechanism (GM) for the Wobulenzi–Masaka–Mutukula Transmission Line Project is designed to receive, assess, and resolve concerns related to the Project’s environmental, social, health and safety performance. This includes, but is not limited to, grievances related to land acquisition and resettlement, compensation and livelihood restoration, contractor activities, labour influx, community health and safety, traffic impacts, and environmental disturbances.

The GM also incorporates specific procedures for handling Gender-Based Violence (GBV), Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH) cases, in line with ESS10 requirements, and applies a survivor-centred, confidential, and ethical approach.

In addition, consistent with ESS2 (Labour and Working Conditions), a separate workers’ grievance mechanism will be established for direct, contracted, and sub-contracted workers. Workers will be informed of this mechanism at the time of recruitment and assured that they may raise concerns without fear of retaliation. The workers’ GM, including procedures for workplace-related GBV/SEA/SH cases, will be detailed in the Contractor’s Environmental and Social Management Plan (ESMP).

5.1.2 Existing UETCL Grievance Management System

UETCL has an existing Grievance Management system that is applied across its projects and is embedded within Local Council (LC), Sub-county, and District administrative structures. This system has been used to manage community-level grievances related to land, construction impacts, and service delivery and has proven functional in previous UETCL projects.

For this Project, the existing system will be retained as the foundation of the GM to ensure familiarity, accessibility, and alignment with local governance structures.

5.1.3 Project-Specific Enhancements to the Grievance Mechanism

To ensure full compliance with ESS10, and to address the complexity and sensitivity of issues

anticipated under the Project, the existing UETCL GM has been strengthened through the following project-specific enhancements.

a) Expanded Grievance Uptake Channels (Enhanced)

In addition to existing channels, the Project will provide multiple, accessible grievance intake options, including:

- Dedicated GRM telephone numbers and WhatsApp line;
- A dedicated project email address;
- Direct intake through Community Liaison Officers and local leaders;
- Written submissions via suggestion boxes at project and district offices.

These channels ensure accessibility for different stakeholder groups, including vulnerable and marginalized individuals.

b) Defined Grievance Management Committees (New)

To improve clarity, accountability, and escalation, the Project will establish formal Grievance Management Committees (GMCs) at two levels:

- **District GMCs** – to handle grievances escalated from community and sub-county levels; and
- **PIU GMC** – to serve as the final administrative resolution level prior to judicial remedies.

This tiered structure strengthens oversight and ensures timely resolution.

c) GBV/SEA/SI-Specific Survivor-Centred Pathway (New)

A dedicated and confidential grievance pathway has been established for **GBV/SEA/SI cases**, representing a significant enhancement to the existing system. Key features include:

- Separate intake channels managed exclusively by trained GBV focal points;
- Immediate referral to accredited GBV service providers;
- Strict confidentiality and informed consent requirements;
- No disclosure of survivor information to non-GBV personnel;
- No requirement for survivors to pursue formal complaints or legal action to access support.

This pathway aligns with international good practice and World Bank guidance on GBV risk management.

d) Standardized Grievance Handling Timelines (New)

To improve predictability and accountability, the following standardized timelines will apply:

- **Acknowledgement of receipt:** within 3 working days;
- **Initial assessment:** within 7 working days;
- **Resolution:** within 30 working days;
- **Escalation:** after 30 days if unresolved.

Sensitive GBV/SEA/SI cases will follow survivor-centred timelines defined by service providers.

e) Transparency and Feedback Measures (New)

To strengthen trust and accountability, the Project will implement:

- Quarterly GM performance reports;

- Public disclosure of non-sensitive grievance statistics;
- Integration of GM outcomes into “**What We Heard – What We Did**” summaries shared with stakeholders.

5.2 Principles, Goals, and Objectives of the Grievance Mechanism

The Project Grievance Mechanism (GM) is guided by the principles of accessibility, transparency, fairness, and responsiveness, in line with the World Bank ESS10 (Stakeholder Engagement and Information Disclosure). The GM is intended to provide a trusted, effective, and inclusive platform for addressing concerns related to the Project’s environmental and social performance.

5.2.1 Guiding Principles

The following principles shall apply to the Project Grievance Mechanism:

- I. **Accessibility and Cultural Appropriateness:** The GM shall be readily accessible to all Project-Affected Persons (PAPs) and other stakeholders, free of charge, and implemented in a culturally appropriate manner, taking into account language, literacy levels, gender, disability, and local norms.
- II. **Timeliness and Effectiveness:** Grievances shall be acknowledged, assessed, and resolved promptly and efficiently in accordance with defined timelines, ensuring that concerns are addressed before they escalate.
- III. **Transparency and Accountability:** The grievance process shall be clearly communicated to stakeholders through community engagement and disclosure activities. Records of grievances received, actions taken, and outcomes shall be systematically documented and reported, with due regard for confidentiality.
- IV. **Fairness and Objectivity:** Grievances shall be handled impartially, objectively, and without bias, ensuring equal treatment of all complainants.
- V. **Legitimacy and Independence:** The GM shall operate through clearly defined and credible institutional arrangements, with sufficient independence to ensure that decisions are free from undue influence or interference.
- VI. **Simplicity and Ease of Use:** Procedures for lodging grievances shall be simple, clearly explained, and easy to follow. Multiple intake channels shall be available, and grievance offices or focal points shall be physically and socially accessible.
- VII. **Participation and Inclusion:** The GM shall actively encourage participation, particularly by vulnerable and marginalized individuals or groups, and shall take into account their specific needs and vulnerabilities when resolving grievances.
- VIII. **Confidentiality and Anonymity:** The GM shall allow for grievances to be submitted anonymously. Confidentiality of complainants shall be respected at all stages of the process.

- IX. **Non-Retaliation:** Complainants shall not be subject to retaliation, sanctions, or adverse consequences for raising grievances in good faith.
- X. **Survivor-Centred Approach (SCA) for GBV/SEA/SH Cases:** The GM shall uphold a survivor-centred approach for handling Gender-Based Violence (GBV), Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH) cases. Survivors shall be supported to access the **Minimum Package of Services (MPS)** in a safe, ethical, confidential, and respectful manner, in accordance with survivor preferences and informed consent.
- XI. **Complementarity with Judicial and Administrative Remedies:** The GM shall not prevent or limit access to judicial or administrative remedies. Stakeholders shall retain the right to pursue other legal avenues at any stage of the grievance process.
- XII. **Partnership and Referral:** The GM shall operate in coordination with relevant institutions and service providers, including district authorities, legal institutions, labour offices, and accredited GBV service providers, to ensure appropriate handling of different categories of grievances, particularly complex or sensitive cases.

5.2.2 Inclusion of Vulnerable and Marginalized Groups

The Project Grievance Mechanism will include specific provisions to enable vulnerable or marginalized individuals or groups to safely, ethically, and confidentially report grievances related to exclusion, discrimination, or unequal access to Project benefits. Tailored communication and intake approaches will be applied, consistent with the engagement needs identified in the SEP.

Where required, referral pathways and additional support measures will be developed with the assistance of World Bank–provided Enhanced Implementation and Monitoring Support, to ensure that grievances from vulnerable and marginalized groups are addressed effectively and in line with the principles of non-discrimination and inclusion.

5.3 Grievance Management Committees (GMCs)

To ensure that project-related grievances are addressed in a timely, accessible, and transparent manner, the Project will establish Grievance Management Committees (GMCs) with clearly defined mandates, membership, and procedures. The GMCs form a core component of the Project’s Grievance Redress Mechanism and provide structured platforms for resolving grievances at appropriate administrative levels.

5.3.1 Establishment and Scope of Grievance Management Committees

Grievance Management Committees (GMCs) will be established as part of overall Project implementation arrangements and will operate throughout the Project lifecycle, including RAP preparation and implementation, construction, and operation and maintenance. The GMCs are not limited to resettlement-related grievances, but will address the full range of project-related concerns,

including environmental, social, labour, compensation, livelihood restoration, contractor-related impacts, and community health and safety issues.

The GMCs will be trained by UETCL in grievance handling procedures, documentation, confidentiality, and survivor-centred approaches for sensitive cases. The system builds on existing local administrative structures and grievance resolution practices within UETCL projects, while incorporating project-specific enhancements to meet World Bank ESS10 requirements.

Grievance Management Committees will be established at two formal project levels; Sub-county and District/City; linked to the UETCL Project Implementation Unit (PIU).

5.3.2 First Level: Sub-county Grievance Management Committees

The **Sub-county GMCs** will serve as the first point of formal grievance resolution for community-level concerns. These committees will be chaired by the **Sub-county Assistant Secretary (SAS)** and will register and review grievances submitted by Project-Affected Persons (PAPs) through LC1s or directly at the sub-county offices.

Each Sub-county GMC shall comprise representatives drawn from the following:

- Sub-county Assistant Secretary (Chairperson)
- Local Council III Chairperson
- Sub-county Community Development Officer
- Area Land Committee Member
- Senior citizen (elder) knowledgeable in land matters
- Person with Disability (PWD) representative
- Women's representative
- Youth representative
- LC1 Chairpersons from affected villages (as relevant to cases under review)

The number of LC1 representatives participating in a sitting will depend on the villages from which grievances have been submitted.

Given that the Project traverses **11 districts and one city**, covering **36 sub-counties and approximately 190 villages**, Sub-county GMCs will be established in each affected sub-county.

Grievances that cannot be resolved at the Sub-county level within the prescribed timelines will be referred to the District/City GMC.

5.3.3 Second Level: District / City Grievance Management Committees

District/City GMCs will handle grievances escalated from Sub-county GMCs and will provide an additional level of administrative review. These committees will be composed of:

- Chief Administrative Officer (Chairperson)
- Resident District Commissioner

- LC V Chairperson / City Mayor
- District Engineer
- District Environment Officer
- District Community Development Officer
- Chairperson, District Land Board
- District Police Commander
- District Internal Security Officer
- Sub-county Chiefs from affected sub-counties (ex-officio)

District/City GMCs will review unresolved cases, provide guidance on complex matters, and coordinate with UETCL where technical or policy decisions are required.

5.3.4 UETCL / PIU Grievance Review Level

Where grievances remain unresolved after District/City GMC review, or where the nature of the grievance requires Project-level intervention, complainants may refer their cases to UETCL through the Project Implementation Unit (PIU). This level provides a final administrative review within the Project's Grievance Mechanism and ensures consistency in decision-making across districts.

5.3.5 Access to Judicial and Administrative Remedies

Nothing in the Project Grievance Mechanism prevents or restricts complainants from pursuing judicial or other administrative remedies at any stage. Project-Affected Persons retain the right to seek resolution through the courts of law or other lawful avenues, either in parallel with or independent of the Project GRM. Judicial processes are **not considered a tier within the Project's GRM**, but are acknowledged as an external legal option available to complainants. This clarification is provided to ensure transparency and to recognize that some grievances such as those involving pre-existing land disputes, inheritance matters, or legal title issues may fall outside the administrative scope of the Project.

UETCL has historically acknowledged the availability of judicial remedies alongside its project grievance mechanisms to ensure transparency and avoid the perception that Project-Affected Persons are restricted to internal project processes. In practice, some PAPs may already be involved in court proceedings related to land ownership, inheritance, or domestic disputes that affect compensation and resettlement processes. Others may, by personal choice, elect to pursue litigation directly. Acknowledging judicial remedies ensures clarity, protects complainant rights, and aligns with ESS10 requirements.

Figure 5.1: The GRM Diagram

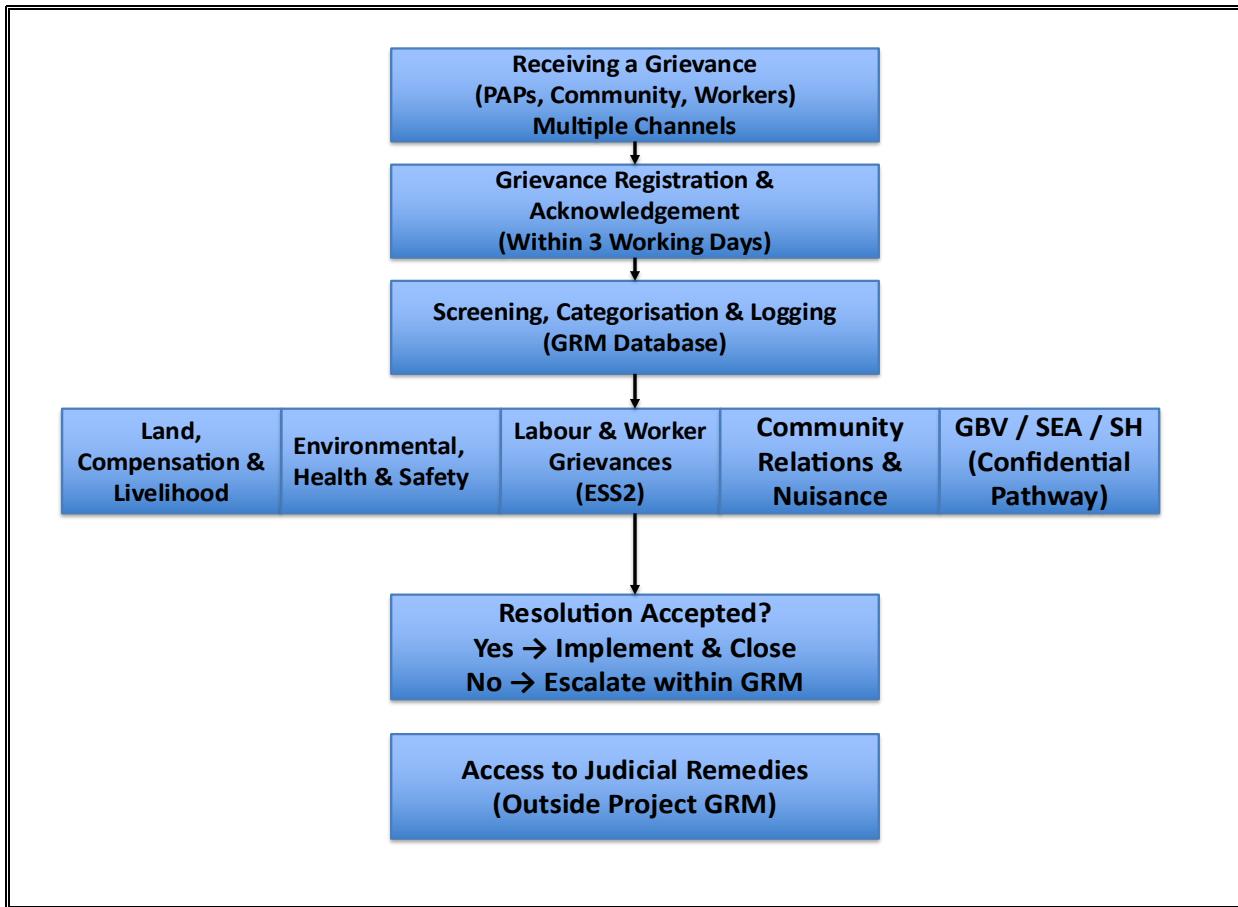
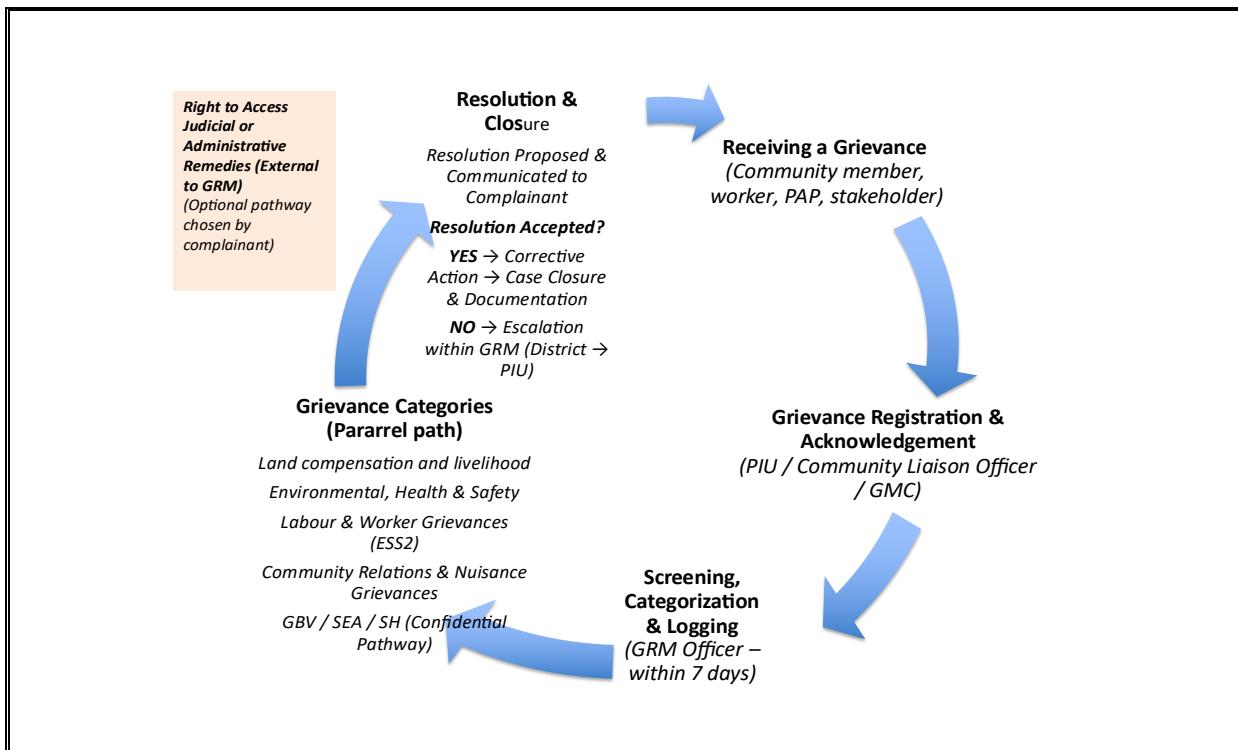


Figure 5.2: The GRM Flow Chart



Explanation of figures 5.1 and 5.2

Figures 5.1 and 5.2 illustrate the Project Grievance Redress Mechanism (GRM), which applies to all phases of the Project lifecycle and to all types of project-related grievances. The GRM begins with multiple accessible intake channels, through which Project-Affected Persons, community members, workers (direct and contracted), and other stakeholders may submit grievances. All grievances are formally registered and acknowledged within **three (3) working days**, after which they are **screened, categorised, and logged** into the Project GRM database to determine the appropriate handling pathway. Grievances are then addressed through **parallel resolution pathways** depending on their nature. **Land, compensation, and livelihood-related grievances** are handled through the Sub-county and District Grievance Management Committees (GMCs), with escalation to the Project Implementation Unit (PIU) where required. **Environmental, health, and safety grievances** are managed by the Contractor's E&S team under PIU oversight, while **labour and worker grievances** are addressed through a dedicated Worker GRM in line with ESS2, ensuring confidentiality and non-retaliation. **Community relations and nuisance-related grievances** are handled through community-level mediation by the PIU Social Team and local GMCs. **GBV/SEA/SH complaints follow a separate, confidential survivor-centred pathway**, managed exclusively by trained GBV focal points, with immediate referral to appropriate service providers and no committee hearings or disclosure without survivor consent.

Once a resolution is proposed, it is communicated to the complainant for acceptance. **Accepted resolutions are implemented and formally closed**, while unresolved cases may be escalated within the Project GRM structure. At all times, complainants retain the **right to access judicial or other administrative remedies**, which operate **outside the Project GRM** and are pursued at the complainant's discretion. This system ensures transparency, accessibility, accountability, and alignment with World Bank ESS10, ESS2, and ESS5 requirements.

5.4 Roles and Responsibilities of the Grievance Management Committees (GMCs)

The Grievance Management Committees (GMCs) are responsible for receiving, reviewing, and resolving grievances related to the Project in a **timely, fair, transparent, and culturally appropriate manner**, consistent with ESS10 and ESS2 requirements.

Key Roles and Responsibilities

The GMCs shall:

- Receive and register grievances from Project-Affected Persons (PAPs), workers, and other stakeholders through approved intake channels;
- Verify facts presented during grievance hearings using local knowledge, records, and site inspections where required;
- Ensure that grievances are acknowledged **within three (3) working days** of receipt;

- Review and assess grievances **within seven (7) working days**, including categorization and assignment of responsibility;
- Provide an accessible, free, and dignified forum for grievance resolution at the **lowest appropriate level**;
- Propose and communicate resolutions **within thirty (30) working days** of grievance registration;
- Ensure grievance handling is discreet, impartial, and sensitive to gender, disability, and vulnerability considerations;
- Facilitate participation of complainants in discussions affecting decisions that may adversely affect them;
- Maintain complete and accurate records of grievances, decisions, and actions taken;
- Prepare and submit minutes, decisions, and follow-up actions to the PIU for monitoring and reporting; and
- Escalate unresolved grievances to the next level of the Project GRM in accordance with established timelines and procedures.

Where grievances remain unresolved after escalation within the Project GRM, complainants retain the right to pursue **administrative or judicial remedies at their discretion**, without prejudice.

5.5 Publicizing the Grievance Mechanism

The Project Grievance Mechanism (GM) will be widely and continuously publicized throughout the Project area to ensure that all stakeholders are aware of their right to raise grievances and understand how to do so.

Publicization of the GM will be integrated into all stakeholder engagement, consultation, and disclosure activities across the Project lifecycle, including Project preparation, RAP development and implementation, construction, and operation and maintenance. Information on the GM will be disseminated through multiple channels, including:

- Community sensitization meetings and public barazas;
- Village, sub-county, and district notice boards;
- LC1 and LC3 offices in affected communities;
- Urban centres, public meeting places, and places of worship;
- Local radio announcements in local languages;
- Project information materials (posters, leaflets, summaries); and
- Inclusion of GM information in compensation agreements, consent forms, and worker induction materials.

The GM will be communicated in formats and languages that are accessible to women, youth, persons with disabilities, elderly persons, and other vulnerable or marginalized individuals or groups.

5.6 Types of Grievances That May Be Raised

The Project Grievance Mechanism is designed to address a **broad range of project-related grievances**, including but not limited to the following categories:

A. Land, Compensation, and Livelihood-Related Grievances

- Incorrect or outdated ownership information in cadastral or valuation records;
- Disagreements over plot boundaries or Right-of-Way (RoW) limits;
- Competing claims over ownership or use rights to land or assets;
- Disagreements over valuation of land, structures, crops, or trees, and compensation amounts;
- Assets established after the cut-off date;
- Absentee landowners who could not be contacted despite documented efforts;
- Confusion between lawful occupants and informal occupants;
- Family disputes arising from deaths, divorces, or inheritance issues affecting compensation.

B. Environmental, Health, and Safety Grievances

- Pollution, dust, noise, vibration, or waste management concerns;
- Traffic disruptions, road safety risks, or property damage caused by construction activities;
- Community health and safety risks related to construction or operation activities;
- Damage to crops, structures, or other assets caused by Project works.

C. Labour and Worker-Related Grievances (ESS2)

- Recruitment practices, wages, working hours, or employment conditions;
- Workplace health and safety concerns;
- Allegations of worker misconduct or harassment.

D. Community Relations and Governance Issues

- Insufficient information disclosure or lack of consultation on Project activities;
- Non-compliance with Project commitments, policies, standards, or safeguard instruments;
- Access restrictions or disruptions affecting community livelihoods or services;
- Social conflict or tensions related to Project activities.

E. GBV / SEA / SH and Discrimination-Related Grievances

- Allegations of Sexual Exploitation and Abuse or Sexual Harassment;
- Exclusion of, or discrimination against, vulnerable or marginalized individuals or groups in accessing Project benefits, opportunities, or services.

F. Queries, Suggestions, and Positive Feedback

- Requests for clarification or information;
- Suggestions for improving Project implementation;
- Positive feedback related to Project activities or engagement processes.

5.7 Overview of Grievance Management Procedures (Intake to Close-Out)

All project-related grievances, queries, and feedback may be submitted through multiple accessible

channels and are registered in the Project Grievance Management System. Each case is acknowledged within three (3) working days, assessed and categorised, assigned to the appropriate handling pathway, resolved within defined timelines, and formally closed following communication with the complainant. Where resolution is not accepted, cases may be escalated within the Project GRM, without limiting the complainant's right to pursue judicial or administrative remedies at any time.

A. Land, Compensation, and Livelihood-Related Grievances

These grievances include disputes related to land acquisition, valuation, compensation amounts, eligibility, resettlement assistance, and livelihood restoration measures. Complaints are first received and registered at the community or Sub-county level and reviewed by the Sub-county Grievance Management Committee (GMC). If unresolved, cases are escalated to the District GMC, and subsequently to the PIU GMC for final administrative resolution. Resolution outcomes are communicated to the complainant, and corrective actions (such as re-valuation or clarification of entitlements) are implemented prior to close-out.

B. Environmental, Health, and Safety Grievances

Environmental, health, and safety grievances include concerns related to dust, noise, vibration, traffic disruptions, property damage, community safety risks, and environmental pollution. These grievances are initially handled by the Contractor's Environment, Health and Safety (EHS) Team, under oversight of the PIU Environmental and Social Team. Corrective actions are agreed, implemented, and verified. If issues persist, the grievance is escalated to the PIU for enforcement measures and closure.

C. Labour and Worker-Related Grievances (ESS2)

Labour grievances, including issues related to recruitment, working conditions, wages, occupational health and safety, or worker conduct, are managed through a separate Worker Grievance Mechanism operated by the Contractor, in line with ESS2. Workers may submit grievances confidentially and without fear of retaliation. The Contractor addresses the grievance within defined timelines, with oversight and monitoring by the PIU. Unresolved cases may be escalated to UETCL management or relevant labour authorities.

D. Community Relations and Governance Issues

Community relations grievances include access restrictions, worker behaviour, social tensions, information gaps, and concerns related to local governance or project coordination. These grievances are managed through the Sub-county GMCs and the PIU Social Safeguards Team, often involving mediation and dialogue with local leaders. Resolutions are proposed, communicated, and implemented, with escalation to higher levels of the Project GRM where necessary.

E. GBV / SEA / SH and Discrimination-Related Grievances

GBV/SEA/SH and discrimination-related grievances follow a separate, confidential survivor-centred pathway. Such cases are handled exclusively by trained GBV Focal Points, without committee hearings or disclosure of information without survivor consent. Survivors are immediately referred to accredited service providers for medical, psychosocial, legal, and protection support. Case details are recorded in a restricted-access system and closed only with the survivor's consent.

F. Queries, Suggestions, and Positive Feedback

Queries, suggestions, and positive feedback related to Project activities are registered in the GRM system and responded to promptly by the relevant PIU or Contractor unit. While these inputs may not require corrective action, they are documented, acknowledged, and used to improve project design, communication, and implementation. Key themes and responses are reflected in periodic stakeholder feedback summaries.

Case Closure and Feedback

All grievance resolutions are formally documented and communicated to the complainant. Accepted resolutions are implemented and recorded as closed in the GRM database. Aggregated grievance information and lessons learned are shared with stakeholders through community meetings and “What We Heard – What We Did” summaries, ensuring transparency and continuous improvement.

5.8 Grievance Database Management and Tracking

All grievances received under the Project; whether submitted in person, verbally, in writing, electronically, anonymously, or through designated representatives, will be systematically recorded, tracked, and managed using a centralized Grievance Management Database maintained by the Project Implementation Unit (PIU).

5.8.1 Grievance Registration and Tracking

Each grievance will be assigned a unique reference number at the time of registration to enable effective tracking and follow-up. An acknowledgement of receipt will be issued to the complainant **within three (3) working days**, using the complainant's preferred communication method, unless the grievance is submitted anonymously.

The Grievance Database will, at a minimum, record the following information:

- Unique grievance reference number
- Date and method of submission
- Location (village/sub-county/district)
- Stakeholder category (PAP, community member, worker, etc.)

- Grievance type (e.g. land/compensation, environmental, labour, GBV/SEA/SI, community relations)
- Brief description of the issue raised
- Responsible unit or committee
- Agreed timeline for assessment and resolution
- Actions taken and decisions made
- Status (open, under review, resolved, closed, escalated)
- Date of resolution or closure

GBV/SEA/SI-related cases will be logged **without personal identifiers**, using a restricted-access module handled only by trained GBV focal points, in line with survivor-centred principles and confidentiality requirements.

5.8.2 Monitoring, Reporting, and Disclosure

The Grievance Database will be used to:

- Monitor compliance with agreed GRM timelines (acknowledgement, assessment, resolution);
- Track trends, recurring issues, and systemic risks;
- Support management decision-making and corrective actions; and
- Generate periodic reports for internal and external review.

5.8.3 Reporting to Stakeholders and the World Bank

- Quarterly GRM summary reports will be submitted to the World Bank as part of Project monitoring, including aggregated data on:
 - Number and types of grievances received;
 - Average time to resolution;
 - Percentage of grievances resolved/closed;
 - Number of grievances escalated; and
 - Key corrective actions taken.
- As part of the broader stakeholder engagement process, UETCL will also report back to communities and other stakeholders through:
 - Community meetings;
 - District and sub-county notice boards; and
 - Quarterly “**What We Heard – What We Did**” summaries.

These reports will present **non-sensitive, aggregated information only**, ensuring transparency while protecting complainant confidentiality.

5.8.4 Record Retention and Data Security

All grievance records will be securely stored (digitally and, where applicable, in hard copy) for the duration of the Project and in accordance with UETCL data protection procedures. Access to the

database will be restricted to authorized personnel to ensure data integrity, confidentiality, and ethical grievance handling.

5.9 Incident Reporting

Project-related incidents, including serious environmental, social, health and safety incidents, are managed through the Project's Incident Reporting and Response System in line with the World Bank ESIRT. Where such incidents also give rise to complaints from affected persons, these will be logged and tracked through the GRM in a coordinated manner.

5.9.1 Scope and Definition

Incident reporting applies to all environmental, social, health and safety (E&S / H&S), labour, security, and GBV/SEA/SH incidents that occur during Project preparation, construction, and operation. Incident reporting is distinct from grievance handling, as it addresses events or accidents that occur during Project activities, whether or not a complaint is formally lodged by an affected person.

Severe incidents are defined as incidents that result in, or have the potential to result in, significant adverse impacts on workers, communities, or the environment. These include, but are not limited to: fatalities, serious injuries, major traffic accidents, significant environmental pollution events, forced or child labour, and GBV/SEA/SH incidents.

5.9.2 Incident Notification and Reporting Timelines

- Immediate notification: Severe incidents shall be reported by the Contractor to UETCL/PIU as soon as they become known, and no later than 48 hours after occurrence.
- World Bank notification: UETCL will notify the World Bank of severe incidents in line with the Environmental and Social Incident Response Toolkit (ESIRT) requirements, using anonymised information where applicable.
- Non-severe incidents will be recorded, assessed, and managed through routine incident reporting and corrective action procedures.

5.9.3 Incident Recording and Tracking

All incidents will be captured in the Project's central incident register / Environmental and Social Incident Reporting Tool (ESIRT) database, maintained by the PIU. Records will include:

- Date and location of the incident,
- Type and category of incident,
- Description of the event,
- Immediate response actions taken,
- Responsible party,

- Corrective and preventive measures,
- Status and closure date.

Where an incident also generates a complaint or concern from stakeholders, the issue will be cross-referenced in the GRM database, ensuring coordinated follow-up without duplication.

5.9.4 Feedback and Communication

UETCL will provide timely feedback to affected persons regarding reported incidents, using appropriate channels such as direct communication, local leadership structures, or community meetings. For sensitive incidents, including GBV/SEA/Sexual Harassment (SH), feedback will be provided bilaterally and confidentially, in accordance with survivor preferences.

Aggregated, non-sensitive incident information will be shared with stakeholders through periodic engagement activities and “**What We Heard – What We Did**” summaries.

5.10 GBV / SEA / SH-Specific Incident Handling

Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) pose significant risks in infrastructure projects and require specialised, sensitive handling. In recognition of the potential harm to survivors and the need for strict confidentiality, the Project has established a dedicated survivor-centred incident handling framework that operates separately from standard grievance and incident management procedures, while remaining fully aligned with the World Bank Environmental and Social Framework and good international practice.

5.10.1 Confidential Reporting and Data Management

GBV/SEA/Sexual Harassment (SH) incidents will be handled through a separate, confidential survivor-centred pathway. Incident data recorded will be strictly limited to:

- The nature of the allegation (as described by the survivor),
- Whether the alleged perpetrator is associated with the Project,
- Survivor’s age and sex (with informed consent),
- Referral actions taken.

No personally identifiable information will be recorded or shared. If the survivor does not wish to pursue a formal complaint, referral to available services will still be offered, and the case will be recorded as closed with the survivor’s preference documented.

5.10.3 Referrals

Referrals are the process through which survivors are connected to appropriate services, including health, psychosocial, protection, legal/justice, and economic reintegration support. The grievance or incident recipient will immediately provide contact information for available services in the area and,

where necessary, support transport or access costs.

Survivors will be informed of their right to control how information is shared and may place limitations on what is disclosed. Informed consent must be documented prior to any referral or reporting.

5.10.4 Case Management and Follow-Up

Where the survivor consents, the case will be referred to the UETCL GBV Specialist, who will:

- Ensure the survivor has accessed appropriate services,
- Monitor safety and well-being,
- Coordinate follow-up actions.

If the alleged perpetrator is a Project worker, the case will be referred to the relevant employer for action under the Code of Conduct and applicable labour laws. Disciplinary action is the responsibility of the employer, while UETCL provides oversight. The survivor will be informed of actions taken, subject to consent.

The GRM does **not investigate or judge GBV/SEA/SH allegations**. Where the survivor opts to pursue legal action, UETCL will facilitate access to support services, while formal investigations remain the responsibility of the justice system.

5.10.5 Case Closure and Confidentiality

A GBV/SEA/SH case is considered closed when:

- The survivor has been referred to services (with consent);
- Appropriate actions have been initiated against the perpetrator where applicable; or
- The survivor indicates they do not wish to pursue the case further.

All reporting will strictly protect survivor confidentiality. No information that could lead to identification of survivors or retaliation risks will be disclosed at any stage.

6 CHAPTER SIX: MONITORING AND REPORTING

Monitoring and reporting are essential to ensuring that stakeholder engagement activities are implemented as planned, remain responsive to stakeholder concerns, and contribute effectively to the management of environmental and social risks and impacts. This chapter outlines the arrangements for monitoring the implementation of the Stakeholder Engagement Plan (SEP), reporting on engagement outcomes and grievances, and providing systematic feedback to stakeholders and the World Bank throughout the Project lifecycle.

6.1 Involvement of Stakeholders in Monitoring Activities

Adequate institutional arrangements, systems, and resources will be established to monitor the implementation and effectiveness of this Stakeholder Engagement Plan (SEP) throughout the Project lifecycle. Overall responsibility for monitoring SEP implementation rests with the Project Implementation Unit (PIU), under the leadership of the PIU Project Manager, who is accountable for compliance with environmental and social commitments, including stakeholder engagement and disclosure.

Day-to-day monitoring of SEP implementation will be coordinated by the PIU Social Safeguards Team, led by the Social Safeguards Specialist. This team will oversee the planning, documentation, and quality of stakeholder engagement activities, as well as follow-up on commitments made to stakeholders.

The Grievance Redress Mechanism (GRM) will serve as a complementary feedback channel, enabling stakeholders at community and institutional levels to raise concerns, provide feedback on project impacts and mitigation measures, and assess the responsiveness of the Project. While distinct from incident reporting systems, GRM data will inform SEP monitoring and adaptive management.

To enhance transparency and objectivity, the Project will engage an Independent Verification Agent (IVA) / Third-Party Monitoring entity through a competitive process. The IVA will provide independent reviews of Project implementation, including verification of SEP effectiveness, compliance with procedures set out in the Project Operations Manual (POM), and adherence to World Bank Environmental and Social Standards.

The PIU will consolidate findings from internal monitoring and third-party reviews into a **Quarterly Environmental and Social Progress Report**, which will include a dedicated section on stakeholder engagement. These reports will be submitted to the World Bank and shared, in appropriate formats, with relevant stakeholders.

6.2 Monitoring, Reporting Back, and Stakeholder Feedback

The Project will implement a participatory monitoring and reporting framework to ensure that stakeholder views, social risks, and safeguard commitments are continuously tracked, addressed, and communicated back in a transparent manner.

a) Stakeholder-Inclusive Monitoring

- At least twice per year (and more frequently during RAP implementation or construction if required), the PIU will organise stakeholder monitoring visits involving representatives of:
 - Project-Affected Persons (PAPs);
 - Women's groups, youth, and vulnerable households;
 - Community leaders and local government representatives.
- These visits will review:
 - Ongoing environmental and social impacts;
 - Effectiveness of mitigation measures;
 - Functionality of the GRM;
 - Contractor compliance with environmental, health and safety, labour, and social requirements;
 - Community concerns and social cohesion issues.
- Findings will be documented in Stakeholder Monitoring Notes, which will feed into quarterly Project reports.

b) Third-Party Monitoring (TPM)

- An independent third-party (e.g. a qualified local NGO or consulting firm) will be contracted to conduct annual audits of:
 - SEP implementation and effectiveness;
 - GRM functionality;
 - GBV/SEA/SH risk mitigation and referral systems;
 - Resettlement and livelihood restoration outcomes (where applicable);
 - Overall social safeguard compliance.
- The scope and methodology of TPM will follow the **World Bank Good Practice Note on Third-Party Monitoring**.
- The TPM entity will prepare an **Independent Monitoring Report**, which will be disclosed to stakeholders in line with the Project's disclosure procedures.

c) Reporting Back and Feedback Loop

- On a quarterly basis, the PIU will prepare a Stakeholder Feedback Bulletin (“**What We Heard – What We Did**”), summarising:
 - Key issues raised by stakeholders;
 - Grievances and trends (in aggregated, non-sensitive form);
 - Actions taken and commitments fulfilled;
 - Outstanding issues and next steps.
- The bulletin will be disseminated through:
 - Community meetings and barazas;
 - LC and sub-county notice boards;
 - Local radio announcements (in local languages);

- The Project website.
- For sensitive matters (e.g. GBV/SEA/SH), only anonymised and aggregated information will be shared to protect confidentiality.

d) Monitoring Indicators and Records

The monitoring and evaluation (M&E) framework will track, at a minimum, the following indicators:

- Number of stakeholder engagement activities conducted (disaggregated by sex, age, and vulnerable group);
- Number and types of grievances received, resolved, and pending;
- Timeliness of grievance resolution;
- Number of GBV/SEA/SH reports, referrals, and follow-ups (anonymised);
- Number of stakeholder monitoring visits conducted;
- Findings and corrective actions from third-party monitoring;
- Number of disclosure activities and feedback bulletins issued.

All monitoring data will be recorded in the Project Social Safeguards Database, with secure backups maintained by the PIU.

e) Roles and Responsibilities

- **PIU Social Safeguards Team:** Lead internal monitoring, organise stakeholder monitoring visits, prepare quarterly reports and feedback bulletins.
- **Third-Party Monitoring Entity:** Conduct independent field verification, audits, and prepare public monitoring reports.
- **District Local Governments and Community Representatives:** Participate in monitoring visits, facilitate community feedback, and support local-level reporting.

ANNEXES

Annex 1: Anti-Homosexuality Act (AHA) 2023

Following the World Bank Group's concerns with Uganda's enactment of the Anti-Homosexuality Act (AHA) 2023, the Government of Uganda issued five Circulars (see Annexes 6,7 and 8) regarding this law to ensure inclusion and non-discrimination of vulnerable or marginalized individuals or groups. Of particular importance is the Circular on Uganda's Social Safeguard Policies issued on September 21, 2023, by the Ministry of Finance, Planning and Economic Development, to all Accounting Officers, Ministries, Departments and Agencies and Local Governments which states that:

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

Considering this, further consultations were undertaken on nondiscrimination for the project environmental and social risk management documents including the Environmental and Social Impact Assessment (ESIA) prepared, to identify the additional risks and describes mitigation measures to address these risks. They include the implementation, monitoring, and reporting arrangements, and roles and responsibilities to assess the efficacy of the additional mitigation measures being implemented in some of the ongoing World Bank-supported projects. They also include the risks identified in the public consultations on these documents involving the Government of Uganda and civil society organizations. Noteworthy is that the World Bank will provide support to the Government of Uganda, particularly its Project Implementation Units, to help them to implement the additional mitigation measures for this project. Guidelines for implementing these mitigation measures to address AHA related risks are provided under Annex 8.

January 6, 2024: Additional Consultations on Non-Discrimination

In January 2024, additional consultations were undertaken on the project to specifically discuss the vulnerability of some individuals or groups to discrimination. During the consultations, key issues raised relating to the Project included:

- The possibility for discrimination against vulnerable or marginalized individuals or groups from access to project benefits.
- The need for a strategy to ensure that recruitment for contracts is competitive and based on merit.
- The possibility of hostility towards and stigmatization of individuals or groups based on their vulnerability.

The approach to managing these issues and other issues raised during the consultations are found at Annexes 6, 7 and 8 of this SEP. A summary of these additional consultations is posted on the World Bank website under Uganda Consultations on <http://www.worldbank.org/en/country/uganda/brief/consultations>.

Annex 2: PROJECT GRIEVANCE MECHANISM (GM) FORM - *TEMPALE*

Project: Wobulenzi–Masaka–Mutukula Transmission T- Line Project

Reference No.: _____ *(to be completed by GM Officer)*

A. Complainant Information

Full Name: _____

- I wish to submit this grievance **anonymously**
- I request that my identity **not be disclosed without my consent**

Gender: Female Male Other Prefer not to say

Age (optional): _____

Contact Details (optional):

- Telephone: _____
- Email: _____
- Mailing Address: _____

B. Nature of Grievance

Type of grievance (tick one or more):

- Land, compensation, or livelihood
- Environmental impacts (dust, noise, pollution, vegetation)
- Community health and safety / traffic
- Labour or worker-related issue
- Community relations / worker behaviour
- Exclusion or discrimination
- GBV / SEA / SH (*confidential – handled through a separate pathway*)
- Query, suggestion, or positive feedback
- Other (specify): _____

Incident occurrence:

- One-time incident — Date: ____ / ____ / ____
- Occurred more than once — How many times? _____
- Ongoing issue

C. Description of Incident or Concern

Please describe the grievance or concern in your own words (attach additional pages if needed):

Location where the issue occurred (District / Sub-county / Village):

D. Desired Outcome

What action or outcome would you like to see to resolve this issue?

E. Consent and Declaration

I confirm that the information provided above is accurate to the best of my knowledge.
 I understand that submitting this grievance is free of charge and will not result in retaliation.

Signature (if applicable): _____

Date: ____ / ____ / ____

F. For Official Use Only (GM Officer / Committee)

Date Received: ____ / ____ / ____

Received By: _____

Method of Submission:

In person Phone Email Suggestion box LC structure

Category Assigned: _____

Acknowledgement Provided (within 3 working days): Yes No

Responsible Unit: _____

Resolution Status:

Under review Resolved Escalated Closed

Date Closed: ____ / ____ / ____

Important Note

GBV / SEA / SH complaints will be handled through a confidential, survivor-centred pathway by trained personnel only. Survivors may choose to report anonymously and may access support services without submitting a formal complaint.

ANNEX 3: PROJECT GRIEVANCE REGISTER - *TEMPLATE*

The Project Grievance Register will be maintained by the Project Implementation Unit (PIU) using a secure digital database (preferably Excel or a dedicated MIS), with hard-copy registers used at community or sub-county level where necessary.

All grievances will be logged, tracked, and closed in accordance with the Project Grievance Mechanism (GM), ESS10, ESS2 (for workers), and the survivor-centred approach for GBV/SEA/SH cases.

Note: For GBV/SEA/SH-related grievances, only non-identifying information will be recorded. Personally identifiable information will not be entered into the general grievance register.

Table A2-1: Grievance Register

Information Category	Details to be Recorded
Grievance Log Number	Unique reference number automatically generated
Date Grievance Received	DD/MM/YYYY
Date Acknowledged	DD/MM/YYYY (within 3 working days)
Method of Intake	LC1 / Community Liaison Officer / Phone / WhatsApp / Email / Website / Suggestion Box / Other
Grievance Category	Land & Compensation / Livelihood Restoration / Environmental / Health & Safety / Labour & Working Conditions (ESS2) / Community Relations / GBV–SEA–SH / Discrimination & Exclusion / Information Request / Other
Complainant Name	Name of complainant (state “Anonymous” where applicable)
Sex	Male / Female / Other / Prefer not to say
Age Group	<18 / 18–35 / 36–60 / >60 (where voluntarily provided)
Contact Details	Phone number / Address (if provided and consented)
Location of Issue	District / Sub-county / Parish / Village
Affected Project Activity	RAP / Construction / Traffic / Labour / O&M / Other
Party Against Whom Grievance is Raised	Contractor / Sub-contractor / PIU / Consultant / Community Member / Other
Brief Description of Grievance	Summary of issue raised (in complainant’s own words where possible)
Sensitive Case Flag	Yes / No (GBV/SEA/SH automatically marked “Yes”)
Immediate Action Required	Yes / No (e.g. safety risk, GBV referral, fatal incident)
Referral Made (if applicable)	GBV service provider / Health facility / Labour office / Police / Other
Verification / Investigation Conducted	Yes / No – brief description
Responsible Unit	Sub-county GMC / District GMC / PIU / Contractor / GBV Focal Point

Information Category	Details to be Recorded
Proposed Corrective Action	Action agreed to address grievance
Timeline for Response	Date by which response/action is due
Date Initial Feedback Provided	DD/MM/YYYY (within agreed GM timelines)
Current Status	Open / Under Investigation / Action Ongoing / Resolved / Escalated
Date Resolved / Closed	DD/MM/YYYY
Complainant Acceptance of Resolution	Accepted / Not Accepted / Not Applicable
Escalation Level (if any)	District GMC / PIU / External remedy chosen by complainant
Spot Check Conducted	Yes / No
Remarks / Lessons Learned	Notes for reporting and system improvement
Information Category	Details to be Recorded
Grievance Log Number	Unique reference number automatically generated

ANNEX 4: GBV / SEA / SH CASE REGISTRATION FORM - *TEMPLATE*
(CONFIDENTIAL – RESTRICTED ACCESS ONLY)

Important note:

- 1) This form shall **only be completed by trained GBV focal points**.
- 2) Information recorded must be **limited to what is strictly necessary**, guided by the **Survivor-Centred Approach (SCA)**.
- 3) No identifying information shall be shared without the **explicit, informed consent** of the survivor.

A. Administrative Information

Item	Information
1	Grievance / Case ID
2	Survivor Code (unique identifier – no names)
3	Date case registered
4	Date incident occurred (if known)
5	Case reported by survivor directly <input type="checkbox"/> Yes <input type="checkbox"/> No
6	Case reported by third party (without survivor present) <input type="checkbox"/> Yes <input type="checkbox"/> No
7	Initial point of contact (GBV focal point / hotline / CLO / other)
8	Immediate safety risk identified <input type="checkbox"/> Yes <input type="checkbox"/> No
9	Immediate referral required <input type="checkbox"/> Yes <input type="checkbox"/> No

B. Survivor Information

(Record only with informed consent; do not collect unnecessary personal details)

Item	Information
10	Sex <input type="checkbox"/> Female <input type="checkbox"/> Male <input type="checkbox"/> Other
11	Age (or age range)
12	Location / Area (district/sub-county only)
13	Person with disability <input type="checkbox"/> Yes <input type="checkbox"/> No
14	Child survivor (<18 years) <input type="checkbox"/> Yes <input type="checkbox"/> No
15	Is the survivor a project-affected person or community member? <input type="checkbox"/> Yes <input type="checkbox"/> No
16	Informed consent obtained to record this case? <input type="checkbox"/> Yes <input type="checkbox"/> No
17	Consent to share anonymised information for reporting? <input type="checkbox"/> Yes <input type="checkbox"/> No

C. Child Survivor Sub-Section (Complete only if applicable)

Item	Information
18	Does the child live alone? <input type="checkbox"/> Yes <input type="checkbox"/> No
19	Primary caregiver relationship (parent/guardian/relative/other)
20	Immediate child protection referral made <input type="checkbox"/> Yes <input type="checkbox"/> No

D. Incident Description (Survivor's Own Words)

(Do not probe; record only what the survivor chooses to share)

Item	Information
21	Brief description of incident

22	Incident location (general, non-specific)
23	Was any money, goods, services, or benefits exchanged? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
24	Type of incident <input type="checkbox"/> SEA <input type="checkbox"/> SH <input type="checkbox"/> Other GBV

E. Alleged Perpetrator Information

(Only if voluntarily provided by survivor)

Item	Information
25	Number of alleged perpetrators
26	Relationship to survivor (worker/community/unknown)
27	Is the alleged perpetrator associated with the Project? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
28	Employer (if project-related) (Contractor / Sub-contractor / Other)

F. Referral and Immediate Support Actions

Item	Information
29	Survivor referred to services <input type="checkbox"/> Yes <input type="checkbox"/> No
30	Type of services requested (tick all that apply): <input type="checkbox"/> Health <input type="checkbox"/> Psychosocial <input type="checkbox"/> Legal <input type="checkbox"/> Police <input type="checkbox"/> Shelter <input type="checkbox"/> Livelihood support
31	Referral organisation / service provider
32	Safety measures taken (transport, safe space, accompaniment)
33	Survivor's immediate emotional state (general observation only)

G. Case Management & Closure

Item	Information
34	Case handler (GBV focal point code)
35	Follow-up actions agreed (with survivor consent)
36	Case status <input type="checkbox"/> Open <input type="checkbox"/> Referred <input type="checkbox"/> Closed
37	Date of closure (if applicable)
38	Reason for closure (services provided / survivor opted not to proceed / referral completed)

H. Confidentiality Statement

- 1) *All information contained in this form is strictly confidential and shall be stored securely with restricted access.*
- 2) *No information shall be disclosed without the survivor's informed consent, except where required by law and agreed by the survivor.*
- 3) *Names of survivors, alleged perpetrators, or witnesses must never be included in reports shared with the Project, the World Bank, or other parties.*

Annex 5: Summary of Key issues from previous engagements with Stakeholders

Summary of Key issues: Wobulenzi-Masaka section

Stakeholder	Key issue/Contribution /questions	Response
WAKISO DISTRICT		
CAO Wakiso District	<p>Wakiso is a very sensitive district, some people go to communities without the district leadership; when they get problems then they come to us.</p>	No project activity will be done without knowledge of local leadership. And that is why we are here to introduce the project.
	<p>How can a big line pass through communities and yet they do not have power?</p>	The power to the community can be provided as part of the Community Development initiatives. This will be picked by the RAP.
	<p>Delayed compensation, you come and value land and take 4 years and still pay the same amount?</p>	
Engineer	<p>The workers may come and impregnate young girls, what will you do?</p>	<p>There will be a program by the contractor to sensitise both workers and the communities. The workers will also have a code of conduct, to guide their behaviours.</p>
	<p>Land ownership: there are different <i>Kibanja</i>, titles, inheritance, speculators.</p>	<p>They normally share 70% for <i>bibanja</i> and 30% for the landlords. The valuer will explain more when time comes.</p>
	<p>What kind of graves will you compensate? Where I was a leader had graves where he had buried dogs.</p>	<p>We definitely compensate graves for human beings. Speculators are always there, but the valuer works with local leaders to manage this.</p>
Environmental officer Wakiso District	<p>How much land is affected in Wakiso, we need to know; Wakiso has a lot of wetlands, past projects have created access roads as they construct; and they do not restore after completion of the project. These provided easy route for people to encroach.</p>	<p>The actual land affected will be determined by the surveyor during RAP development, which is the next step, but not part of this contract. However, the issue of encroachment on wetlands is noted and the ESIA will pick it and give recommendations.</p>
	<p>Solid waste management</p>	<p>This is noted and will be taken</p>

Stakeholder	Key issue/Contribution /questions	Response
	Campsites need to be approved, normally contractors do not come for approval.	care of and by the ESIA. This will be noted in the ESIA
	Forest reserves; we need to know whether there are forest reserves that are affected.	Forest reserves are being captured by the Environmental team and they will be noted in the ESIA.
CDO	Awareness raising of the people. The compensation, are is the family involved? All family members should be involved.	This is key to the project and we shall sensitise. That is why we are here. Subsequent activities will be done in conjunction with local leaders.
	Where are you going to put the money? Insecurity, we do not want domestic violence.	The PAP is required to open a bank account and this money is kept on the account.
	The children, how do they come in?	Where a family is losing land, the children need to know and also give consent together with their mother.
	If relocation, can we look for alternative land? Build houses for the people instead of giving cash?	In-kind compensation is an option UETCL normally offers and houses have been built especially for the vulnerable.
CAO	Issues of money are complicated, men can marry many other women and when women get money they think, they are in-charge.	As part of RAP implementation, the project carries out financial literacy training to assist PAPs utilise their compensation properly.
	But if you are giving alternative compensation, people need to be informed, they have lost trust in government.	All options will be disclosed to people in a transparent manner, and they will chose what is best for them.
	Where land compensation is concerned, you need to involve the District Land officer.	All relevant stakeholders will be involved in land acquisition the District Land officer included.
	The district needs to be involved in monitoring projects. There was contractor who did not want to involve us, when he got problems, he came running to us. There should be quarterly monitoring for political and technical team.	The involvement of the district in monitoring will be recommended in the ESIA.
Meeting	Post construction management of Wayleaves; e.g.; Lubigi, no	This is noted and will be picked by the ESIA.

Stakeholder	Key issue/Contribution /questions	Response
	enforcement mechanism. There is need for a strong enforcement team to deter encroachment on the wetlands.	
	When time comes, please share with us the drawings for the line. Share all information with the physical planner so that new buyers can be advised accordingly.	The strip map will be shared during RAP development and implementation.
	Involvement al all leaders at the different levels; the district, sub-counties/Municipal and Town Councils, and; local councils.	The project commits to share and disclose information with all stakeholders as per World Bank Environment and Social Standards.
	We are ready to support the project since it is a government project.	This is very good and that is why we are here to seek your support to the project.
	Community meetings, project hold meetings without involving the CDO. We have a Community Liaison Committee	The project will work with all stakeholders.
	If someone refuses compensation and refuses to move, what happens?	The valuer takes great care coming up with compensation packages that are fair both to the people and the government. But if one is not satisfied, he/she can appeal. Sometimes re-evaluation can be done.
	As a District, we should participate in site meetings	This is noted and will be recommended in the ESIA and RAP.
	Nakatuba, one of the potentially affected Village has a history of refusing some projects. They were promised a connection, but nothing has been done. If there is any they can be helped through this project.	We take note of that, and we shall work with the local leaders to sensitise the communities. And as noted earlier, local connections to the grid can be done as part of the community Development Initiatives and will be captured during RAP development.
	We need to see the map so that we see the urban trends and plan for the people and institutions.	The strip map will be shared during RAP development and implementation, by the surveyor.
MPIGI DISTRICT		
	EXPERIENCE. Earlier involvement of the community is paramount and manage	The project will involve the communities early. That is why we are here to sensitise District

Stakeholder	Key issue/Contribution /questions	Response
	expectations and highlight responsibilities.	leaders and later communities.
	We would not like to see the project just by-passing people. Our people need to benefit.	We normally do community development activities, in health, education, rural electrification. The consultant will write recommendations and if budget allows, we shall look into it.
	Is the line in place, we need to see the strip maps, it will help to manage speculation. Work with us. The project of Kawanda-Masaka, some titles have not been brought back, some people have even died. Have a mechanism for titles.	The project will work with district leaders. The issue of Kawanda-Maska is taken note of and will be shared with the responsible offices.
Natural Resources	Timely reporting between the team and the District. The community runs to the district when they are aggrieved.	We shall bring back the reports, help to review to improve. And when the project starts, there will be regular feedback to district stakeholders.
RDC	The Land tenure system, the <i>bibanja</i> and land owners, when it comes to compensation, who gets which percentage. They come to us, that one should be systematically planned.	He ratios will be determined by the valuer in conjunction with the chief government valuer.
CDO	Most land in Mpigi is Milo, the ratios are not fair. The landowners are oppressed. 30%/70%	
Surveyor	Information sharing, and involvement in planning. The District team be involved in planning.	The project commits to share and disclose information with all stakeholders as per World Bank Environment and Social Standards
CAO Nakaseke District	We are happy you are confirming that Karuma delivered, the extension is due to Karuma, that is good news. Mpigi is part of Greater Kampala. The value of land and other investments should be given due compensation so that they can be able to relocate without much negativity.	
LC II Chairman	Is this just a transmission line or are people going to connect?	This is a high voltage line, it is just transmitting power to Masaka and then eventually Mutukula. Other projects can be done to

Stakeholder	Key issue/Contribution /questions	Response
		provide power to the people, e.g., Rural Electrification.
RDC	Electricity is very important as far as development is concerned. We are happy and we are going to participate, because participation is important. People should understand the project. Compensation should be done very well. The Environmental assessment should be done well, so that we do not destroy the environment.	All this is well noted and it is going to appear in our documents.
NAKASEKE DISTRICT		
CAO	We have 54 RCs without power, why only one village benefitting.	Response- the village is not benefitting, it is actually being impacted.
	The district has not been involved in compensation. Some people have refused compensation in the past.	We shall do thorough sensitisation and valuation will take into consideration current prices so as to offer adequate compensation, at full replacement value.
Natural Resource	Cultural issues in Nakaseke are key, will you compensate?	The project has a lot of respect for cultural property; in fact, World Bank takes issues of culture seriously. We can avoid or compensate.
	The village being affected is a difficult village, needs to be handled with care.	The consultant will work closely with local leaders to sensitise and share information.
	Who are the beneficiaries? What are we benefitting? Let us engage all the leaders at different levels. The leaders should mobilise and talk to people before you come.	
Chairman III	I have already requested for power through REA, but nothing has come up. But we can promise something so that we also get what we want.	Within this package our projects are package with community development initiatives. Health, education or even power/electricity, or even water. If the budgets allow. It can also be a public road. The consultant will have a chapter for community development initiatives. Low voltage power, hospital beds, etc. Let us have information on the

Stakeholder	Key issue/Contribution /questions	Response
		50 villages that do not have power. We shall capture this as a need at this level.
CDO	How do you intend to engage the district team and involve them in the process.	We involve different stakeholders at different levels, right from the national. We consider the district as an important stakeholder. We have a framework we don't do anything without consulting you. Land, natural resources. We work with respective district offices. World Bank does the audit to ensure things are done the right way.
Natural resources officer	Nakaseke has Natural Forest Reserve. Please take note of that.	The environmental team is going to the ground and will pick all affected natural resources and will advise.
CAO	Let us go with the positive part. Many people have benefitted from these projects and I urge all leaders to support the program.	Indeed, the project brings a lot of good things, we just need to enhance them together with the leaders.

Summary of Key issues: Masaka-Mutukula

Table A- 1: Meeting Minutes

Meeting held in Kasaali Town Council, Gayaza Ward, on 5 th /09/2022 at St Henry's Luti Primary School.	
Question	Answer
The project will disrupt people's plans for development of their plots. Will they receive compensation to replace their properties?	The valuation team will assess all the affected developments and total value compensated. This will include a disturbance allowance.
Will Project Affected Persons be given time for resettlement?	Yes, time will be given for resettlement.
There are some worship places, schools that may be affected and these are usually insured. These will need committees to follow up replacement of the affected developments. Will the amount given include insurance?	The total value given puts all factors including insurance into consideration.
Will graveyards be relocated?	Graves will only be relocated in case pylons points lie exactly on graves. Valuation will be done for the graves along the transmission line route and owners advised to change burial grounds as people are not advised to stay next to the high voltage power lines.

Meeting held in Kasaali Town Council, Gayaza Ward, on 5 th /09/2022 at St Henry's Luti Primary School.	
Question	Answer
Will the Project Affected Persons have counselling sessions that will reassure them about effects of resettlement and disruption of their sources of livelihood from the current properties?	During RAP development and Implementation; teams will be formed to do counselling. These will include project team and village committees.
Who receives payment for the murram from the borrow pits? Is it the landowner or <i>kibanja</i> holder?	Agreements will be made with the landowner, <i>kibanja</i> holder and contractor on how payment will be done.
Will they construct houses in the 50 meters (25 m on either sides) because compensation received will be half of the total value of land?	No, only farming of some crops like beans will be done in the 50 meters (25 meters on either sides) of the pylons and power lines - these take 10 meters. The exact height of the crops will be communicated during RAP development.
Areas have different values of land e.g. land value in Masaka and Kyotera is different. Will the affected persons receive compensation to replace their plots in any other area they wish since the project will have disrupted them?	Exact value of affected plot will be given including disturbance allowance; therefore, PAP should look for areas with same land value instead of high value areas unless they have amount to top up.
How do they directly benefit from the project since the project is transmitting to Mutukula (Tanzania) without considering supplying to the local people?	Jobs will be available, business opportunities to people in the area e.g. rent to those with rental properties, restaurants (food to the contractor's employees) and stepping down (electrification) will be done for those within 5 kilometers of the project area.
What happens in case one has plots affected in two different villages along the route? Will they receive compensation for both?	Yes, they will be paid. Each plot will be valued and compensation given.
What happens if affected plot has land wrangles? Who will receive payment?	Valuation will be done and time will be given to settle land wrangles before payment is processed for the right owner.
People's crops are destroyed for the 25 meters on either side of the existing 120KV power line yet they were told to use that area for farming. The PAPs need to be told what exactly should be done within those 50 meters (25m respectively) to avoid disruption in future by other teams that usually do clearing. Grateful that government will do some electrification because electric poles cost about 2,800,000 UGX and connecting is about 800,000 UGX, which is too expensive for the people.	Some crops like maize, beans can be grown in the 50 meters (25 on either sides). No houses, trees, tall vegetation e.g. trees, bananas in that section.
How is the land owner and <i>Kibanja</i> holder (tenant by occupancy) paid?	<i>Kibanja</i> holder is paid 70% of the land value while the registered landowner (title) receives 30% of the total land value. Value of developments goes to the <i>Kibanja</i> holder.
Shall we get power on our homes?	Substations will help the three-phase to tap for local transmission.
Shall I value my affected assets or the project shall do that? What if I don't agree with the value given?	The project shall have its certified Valuers that will do the valuation.

Meeting held in Kasaali Town Council, Gayaza Ward, on 5 th /09/2022 at St Henry's Luti Primary School.	
Question	Answer
Why do projects take much time to compensate affected people?	Resettlement is done after payment even if there are delays at times.
Who is responsible for the three-phase power transmission?	UMEME is responsible.
What if I refuse to give way for the project?	The project team shall engage you to find a solution.
Is the proposed line same as the existing?	No, the existing line is 120kv but the proposed is 400KV.
Is this project going to benefit Tanzania?	The project is going to benefit both countries in the arrangement called East African Power Pool.
Shall the project commence before compensation?	No, all affected persons shall be compensated before project implementation.
Won't you compensate people without National IDs?	People without National IDs shall be given time to get them, however start preparing yourselves.
When is the project starting?	The project will commence as soon as these preliminary activities are done.
Shall we have assistance (costs) for land transfers? Which compensation rates are to be used?	The project will cater transfers. District for land compensation rates shall be used.
Shall we be compensated before implementation?	Yes, compensation shall be affected before implementation
We request that land transfers be catered for by the project from the PAPs' money.	The project will cater for land transfers.
Shall we get free power?	No, free power shall be given to PAPs.
Where does the power line begin and where does it end?	The power line shall start from Kimwanyi (Masaka City) to Mutukula in Rakai.
Shall our villages benefit from the transmitted power?	Some areas shall have substations where local power shall tap for onward transmission.
How will the <i>Kibanja</i> owners be paid?	This will be clarified during detailed RAP
Charles; When is the project starting?	These are preliminary activities paving way for the project.
What is the difference between this line and the existing line?	Existing line is 120KV and this project is 220KV.
Is everything within the 60 meters to be cleared?	10 meters will be cleared completely but 50 metres (25metres on either sides) can later be used for farming of some crops after project implementation. The height of crops will be clarified during RAP implementation.
Will those without Titles be paid?	This information will be provided during detailed RAP development
How will payment of landlords not known by <i>kibanja</i> holders be considered? Will the <i>kibanja</i> holder receive compensation without consent from the landlord unknown?	Consent is needed between the landlord and surveyor. Surveyor will guide on identifying some unknown landlords. Guidance will be given for landlords that won't be traced in next meetings.
What happens if one doesn't agree with the value of his property?	Grievance committees will be formed. One can also write a complaint addressing it to UETCL.
When does compensation of impact stop e.g. in case of accidents from falling wires?	The current compensation will be for lost assets. As for accidents, that may come later, but to avoid that; that is why they are resettling people

Meeting held in Kasaali Town Council, Gayaza Ward, on 5 th /09/2022 at St Henry's Luti Primary School.	
Question	Answer
What happens if every small portion of one's land is not affected by the project after the assessment within the 60 metres has been done and one can't make use of the remaining portion?	In case a small portion say 20% of the property remains, compensation is given for the whole property. Term is called injurious affection.
LC1 Chairpersons at times don't receive facilitation after working with some government teams especially when promised mobile money payment?	Complaint forwarded. Cash payments will be done instead of mobile money to LC1 Chairpersons.
How will they protect from HIV/AIDS as community after the influx of contractor's employees? Suggest that Contractor involves independent partners or district officials to help in HIV/AIDS sensitization.	Contractor usually has HIV/AIDS sensitization plan. Suggestion to involve independent partner noted.
How will they know the available jobs?	Contractor works with chairpersons to recommend the local people.
How long does compensation take because value of property keeps changing and sometimes payment takes long?	Period is 6 months. Inflation is considered to get final value of property.
What happens in case family has marriage conflicts?	Agreement between the couple on who should receive payment will be required.

ANNEX 6: Actions Taken by GOU to Ensure Inclusion and Non-Discrimination

Annex 6 highlights recent actions taken by the GOU to ensure inclusion and non-discrimination of vulnerable and marginalized individuals or groups. It also includes transcripts of relevant Guidelines and Circulars issued by the GOU.

The Anti-Homosexuality Act was passed on May 26, 2023. The Government has continued to ensure inclusion and non-discrimination in all its projects and consistent with this, the Government has taken the following measures:

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

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

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

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

- *Each project implementing entity shall develop comprehensive guidelines to address non-discrimination.”*

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

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In any correspondence on
This subject please quote No. ALD 141/259/01 TC



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

21st September 2023

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



UGANDA'S SOCIAL SAFEGUARD POLICIES

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

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

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

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

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

Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

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

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance Planning and Economic Development

Mission

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

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

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This subject please quote No.



ALD 141/259/01 TC

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

21st September 2023

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



UGANDA'S SOCIAL SAFEGUARD POLICIES

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

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

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

Mission

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

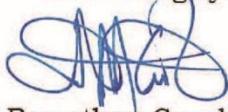
Specific Measures for High Risk Sectors

Health

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

Education

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



Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

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

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports
Hon. Minister of Health
Hon. Minister of Gender, Labour and Social Development
Hon. Minister of Energy and Mineral Development
The Principal Private Secretary to H.E. the President
The Solicitor General, Ministry of Justice and Constitutional Affairs
The Permanent Secretary, Ministry of Health
The Permanent Secretary, Ministry of Education and Sports
The Permanent Secretary, Ministry of Gender, Labour and Social Development
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This subject please quote No.
BPD 86/179/01



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

10th July, 2023

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

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

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

A. INTRODUCTION

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



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

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

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

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



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

Policy Directives

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

Non-Discrimination

- 10.** Accounting Officers should ensure that all projects (whether Government of Uganda or externally funded) are implemented within the provisions of Article 21 (1) and (2) of the Constitution and Section 13 (11) (e) (i-ii) of the Public Finance Management Act, 2015 (Amended). This emphasizes equality of all persons in access to all opportunities and benefits presented by the above projects, without prejudice and discrimination on the ground of sex, race,

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

Advertising by Ministries, Agencies and Local Governments

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

Contracting in Ugandan Shillings versus Foreign Currencies

12. I have received numerous requests from a number of Ministries, Departments and Agencies (MDAs) to undertake contracts in foreign currency, especially in United States Dollars and Euros. In line with the fiscal and monetary policies agreed with Bank of Uganda, I wish to reiterate this Ministry's position that no procurements should be undertaken in foreign currency as previously communicated in FY 2016/17, FY 2017/18 and FY 2018/19. Contracting in the local currency, is meant to preserve the sanctity and value of the Shilling since the budget is appropriated in the local currency which is easily convertible.

13. Therefore, this is to guide all Accounting Officers as follows:

- That all contracts for works, goods and services shall be awarded in Ugandan Shillings to hedge against cost overruns due to global forex rates fluctuations that impact on the stability of the Shilling; and
- All contracts, including those that follow international competitive bidding procedures, shall be quoted in Ugandan Shillings. The only exemption will be where it is clearly expressed in the financing agreements with Development Partners to use other currencies in the bidding process, if necessary. This should be strictly the exception and not the norm. I request the Honorable Attorney General's chambers to take note and enforce this guideline while approving agreements.



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Permanent Secretary's Office: 256 -417- 712221
Toll Free 0800100066
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Website: www.health.go.ug
IN ANY CORRESPONDENCE ON



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

THIS SUBJECT PLEASE QUOTE NO.

ADM:180/01

THE REPUBLIC OF UGANDA

5th June 2023

Circular

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

PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

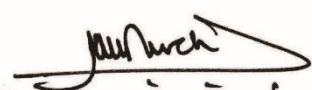
The constitution of the republic of Uganda recognises that health is a fundamental right and guarantees access to health care services for all. The Ministry of Health is mandated to provide Preventive, Promotive, Curative and Rehabilitative Health Services to all people in Uganda in their diversity **without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

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

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

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

A handwritten signature in black ink, appearing to read "M. N. N. N.", is placed over a diagonal line.



Dr. Henry G. Mwebesa
DIRECTOR GENERAL HEALTH SERVICES

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

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



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

18th August 2023

All Heads of Education Institutions

PROVISION OF EDUCATION SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

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

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

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

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

Ketty Lamaro
PERMANENT SECRETARY

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

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admin@dpp.go.ug
www.dpp.go.ug

Our Ref: ADM 12/01
Your Ref:

Date: 25th August, 2023

CIRCULAR NO.18/2023

All Prosecutors,
Office of the Director of Public Prosecutions.

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

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

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

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

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

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

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

Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS

ANNEX 7: Enhanced Implementation Support and Monitoring on Non-Discrimination

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

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

The objectives of the Enhanced Implementation Support and Monitoring include:

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

Table 0-2 illustrates the enhanced implementation support and monitoring steps. Figure 0-1 contains the Enhanced Implementation Support and Monitoring process. Figure 0-2 contains the Complaint Management for vulnerable or marginalized individuals or groups. Table 0-3 presents the roles and responsibilities for the implementation of mitigation measures

1. SCOPE OF WORK AND ACTIVITIES

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

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

To do so the EISM will:

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

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

Table 0-2: Enhanced Implementation Support and Monitoring Steps	
<i>Act as a key first step in the referral process from project-level GRMs</i>	<i>Designed specifically to handle complaints restricted to WB/IFC projects</i>
Step 1	Receives and document complaints of discrimination in accessing WB/IFC projects' benefits, services, and opportunities.
Step 2	Develops specific security protocols to ensure that communications are safe, ethical, and confidential.
Step 3	Establishes a data management system on an international server guaranteed by the provider as safe and secure encryption and privacy.
Step 4	Implements a data privacy and protection policy to include confidentiality clauses to be signed by all personnel entrusted with managing referrals or referral-related information.
Step 5	Handles complaints in a confidential, anonymous, and non-judgmental manner which is sensitive to local context and in local languages.
Step 6	Provides detailed monthly reports of complaints received to the WB/IFC
Step 7	Provides ad hoc incident reports of all allegations to WB/IFC within 48 hours of receipt.
Step 8	Reports grievances to the WB/IFC, proposes appropriate remediation, and follows up on agreed actions to resolve the case.

Step 9	Maps available services for vulnerable or marginalized individuals or groups including counselling, legal services, protection, and other services.
Step 10	Refers individuals to the appropriate local services or organizations as needed.
Step 11	Regularly evaluates the effectiveness of mitigation measures to determine whether and how well the mitigation measures are functioning.
Step 12	Recommends and supports the implementation of adjustments to mitigation measures based on regular evaluations and their impact.

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

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

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

1.3 Capacity strengthening and technical support

Activities related to capacity strengthening and technical support include:

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

1.4 Monitoring and Evaluation

Activities related to monitoring and evaluation include:

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

2. Roles and responsibilities

The GOU and its PIUs remain responsible for the implementation of all project activities including mitigation measures supported by the EISM. The enhanced implementation and monitoring support mandate is specifically focused on:

- 1) supporting the WB/IFC to ensure the agreed measures on non-discrimination in the portfolio are implemented fully, ethically, safely, and to an appropriate standard of quality; and
- 2) to support the WB/IFC to enhance our awareness of cases of discrimination across the WB/IFC portfolio.

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



Figure 0-1: Description of Enhanced Implementation Support and Monitoring Process

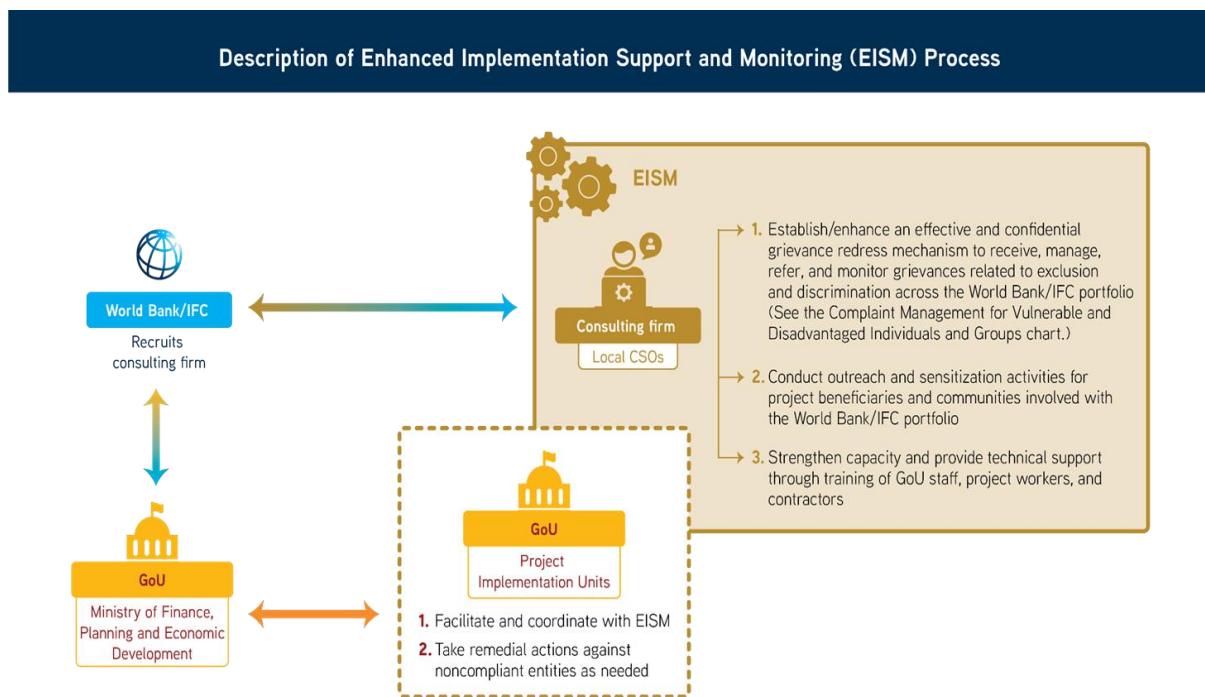
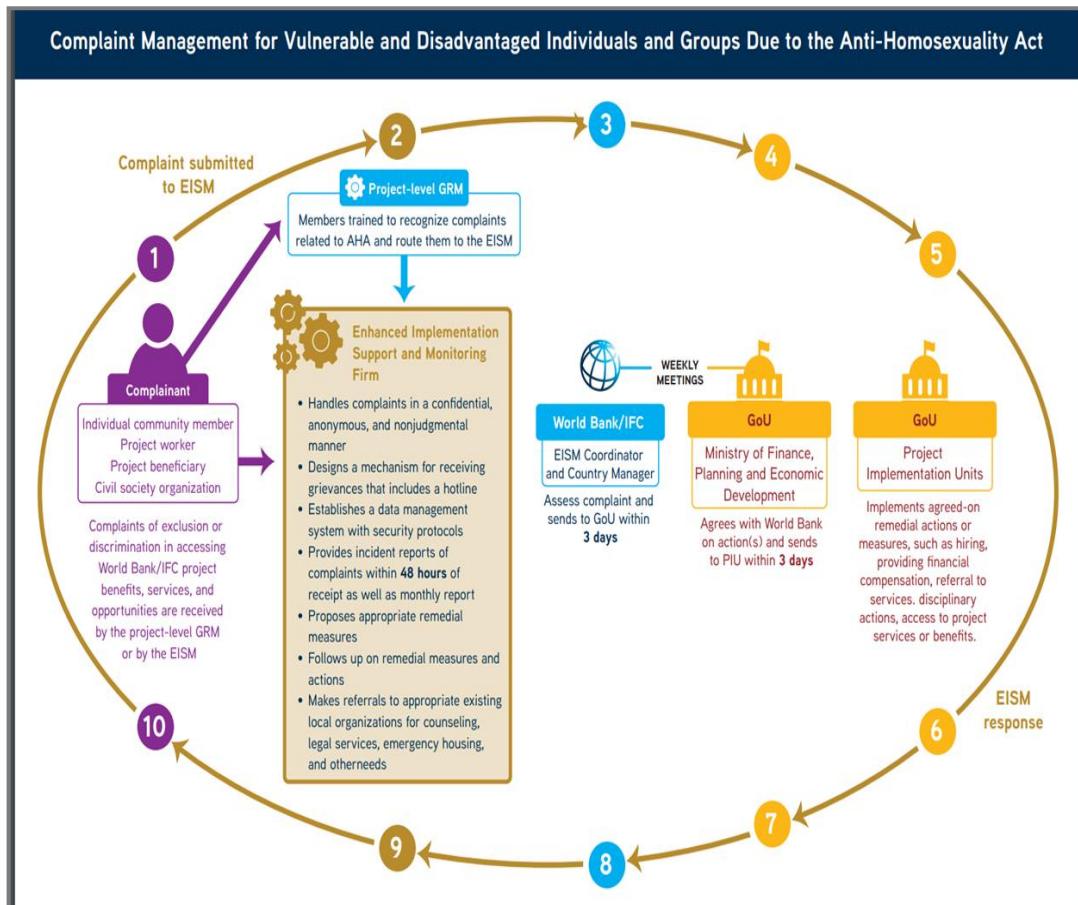


Figure 0-2: Complaint Management for Vulnerable or Marginalized Individuals or Groups due to AHA



ANNEX 8: Guidelines For Implementing Mitigation Measures to Address AHA-Related Risk

In July 2024, following the enactment of the Anti-Homosexuality Act (AHA) of 2023, the Environmental and Social documentation and its annexes including ESMF, LMPs, SEPs, POMs etc. for all ongoing projects in the Ugandan portfolio were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank-financed projects and programs in Uganda. This RPF for UTIP includes such mitigation measures in various sections as appropriate.

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

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

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

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

Steps for Implementing Mitigation Measures

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

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

1. Assess the Status of the Project

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

- **Ongoing projects.** Ongoing projects require retrofitting to include mitigation measures. Such projects should be considered high priority for monitoring because of the existing risk of discrimination.
- **Early-stage projects.** Projects at an early stage of implementation require retrofitting to include mitigation measures, but the need for monitoring is not as urgent as for ongoing projects. The priority level for early-stage projects will depend on the status of activities on the ground and whether or not a PIU and service providers are in place.
- **Closing and closed projects.** Projects that have closed since the enactment of the AHA or that will be closing in the next six months require a due diligence review to assess if

there are any outstanding complaints or issues related to the discrimination of vulnerable or marginalized individuals or groups and if any remedial measures are needed.

The results of the due diligence should be incorporated into the standard environmental and social closure review unless it has been completed already. No further action is needed.

- **Pipeline projects.** A project that has not yet begun implementation provides the opportunity to integrate AHA risk mitigation measures and monitoring into its design.

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

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

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

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

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

Hotline on Discrimination and Exclusion

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

- Receive complaints in a confidential, anonymous, and nonjudgmental manner that is sensitive to local context and available in local languages.
- Compile detailed monthly reports of complaints.
- Advise complainants on remedial actions.
- Map available services for vulnerable or marginalized individuals or groups, including counseling, legal services, and protection.
- Refer individuals to appropriate local services or organizations.
- Implement a data privacy and protection policy that includes confidentiality clauses which must be signed by all personnel handling referrals

- Establish a data management system that guarantees safety through secure encryption and privacy protocols.
- Develop specific security protocols to ensure communications are safe, ethical, and confidential.
- Ensure all grievance mechanisms have appropriate whistle-blower protection protocols in place that enable safe reporting.

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

3. Conduct Outreach and Sensitization Activities

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

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

4. Strengthen Capacity and Deliver Technical Support

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

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

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

5. Conduct Monitoring and Evaluation

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

- Support the monthly and quarterly monitoring and evaluation of the implementation of agreed measures and actions to mitigate the risk of exclusion and discrimination and to reduce incidents of discrimination or exclusion due to the AHA.
- Provide comments on regular evaluations of the effectiveness of mitigation measures.

- Offer feedback on recommendations and support the implementation of adjustments to mitigation measures based on their effectiveness.

6. Take Remedial Action

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

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

Roles and responsibilities for the Implementation of Mitigation Measures

The different steps presented are guidance on the how to do and the sequencing for the implementation of the mitigation measures bearing in mind that the sequencing can vary from one project to another, and activities done in parallel in some instances. Each step identifies the roles and responsibilities of the GOU, PIU, WBG, CSOs and SREO. The roles and responsibilities are summarized in this section in Table 0-2.

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

- Helping project teams improve existing project-level grievance redress mechanisms, and developing and operating an independent mechanism to identify, manage, and monitor cases of discrimination.
- Developing a robust data management system and process that secures personal data and information safely, ethically, and confidentially.
- Working with the World Bank to strengthen the capacity of PIUs, workers, contractors, subcontractors, and service providers.
- Ensuring that contracts, codes of conduct, hiring procedures, whistle-blower protections, and all other needed protocols are in place to remediate cases of discrimination.

- Supporting the World Bank in monitoring the efficacy of the agreed mitigation measures.
- Reporting complaints of discrimination to the World Bank, proposing appropriate remedial actions, and following up on agreed actions to resolve cases.

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

- Developing training, sensitization, information, educational, and communication materials on the principle of nondiscrimination of individuals or groups who are vulnerable or marginalized.
- Conducting consultations on nondiscrimination with targeted external stakeholders, including NGOs, CSOs, local governments, and other stakeholders, as appropriate.
- Integrating clauses on nondiscrimination and codes of conduct on nondiscrimination into all project contracts, which must be signed by all contractors, subcontractors, and service provider staff.
- Reviewing all relevant policy and protocol documents, including those for human resources and whistle-blower protections.
- Facilitating the monitoring of all measures to ensure their implementation, that all reported incidents are shared with the World Bank, and that they are addressed promptly.

Table 0-3: Roles and Responsibilities for the Implementation of Mitigation Measures

Government of Uganda

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

Project Implementation Units/Project Implementation Support Teams

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

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

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

Civil Society Organizations

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

SREO Consulting, Ltd.

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

