STAKEHOLDER ENGAGEMENT FRAMEWORK

FOR

UGANDA DIGITAL ACCELERATION PROGRAM

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LIST OF ACRONYMS

CAO	Chief Administrative Officer
CSOs	Civil Society Organisations
DCDO	District Community Development Officer
DEO	District Environment Officer
EISM	Enhanced Implementation Support and Monitoring
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Monitoring Plan
GBV	Gender Based Violence
GRC	Grievance Redress Committees
GRM	Grievance Redress Mechanism
ICT	Information Communication Technology
IT	Information Technology
IFC	International Finance Cooperation's
LC	Local Council
LGs	Local Governments
MDAs	Ministries Departments and Agencies
MoFPED	Ministry of Finance, Planning and Economic Development
MoGLSD	Ministry of Gender, Labour and Social Development
NAPE	National Association of Professional Environmentalists
NBI	National Backbone Infrastructure
NEMA	National Environment Management Authority
NITA-U	National Information Technology Authority, Uganda
NWSC	National Water and Sewerage Corporation
NGOs	Non-Government Organisations
PACs	Program Affected Communities
PAPs	Program Affected people
PCRs	Physical and Cultural Resources
PSFU	Private sector Foundation Uganda
PWPs	Persons with Disabilities
RDC	Resident District Commissioner
SEA	Sexual Exploitation and Abuse
UAIA	Uganda Association for Impact Assessment

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UCC	Uganda Communications Commission
UNRA	Uganda National Roads Authority
UHRC	Uganda Human Rights Commission
UNBS	Uganda National Bureau of Standards
UTL	Uganda Telecom Limited
VMGs	Vulnerable and Marginalized Groups
WB	World Bank

NITA UGANDA

- Driving the IT Revolution -

1.0 PROGRAM DESCRIPTION

1.1 Introduction

Despite significant recent economic progress, the East and Southern Africa (E&SA) region continues to face a number of development challenges including extreme poverty and hunger (48.5% of the population living with Public Disclosure Copy less than $1.25 per day (PPP) in Sub-Saharan Africa in 2010), HIV/AIDS prevalence (4.5% of the population ages 15-49 infected with HIV in Sub-Saharan Africa in 2013). ICT is one of the key drivers of socio-economic development in so far as it prevalently enhances service delivery, health services, education, governance, information dissemination and trade.

The proposed Uganda Digital Acceleration Program builds on the foundations being laid down by Regional Communications Infrastructure Project (RCIP)-5 and is designed to accelerate digital transformation of Uganda to achieve the aspirations of the Digital Transformation for Africa initiative. The project will expand access to affordable high-speed internet through a combination of investments and reforms. It will strengthen public sector data infrastructure and digital platforms for improved service delivery, enabling coordinated roll-out of digital services at scale across key ministries and agencies. It aims to ensure a digitally capable and inclusive Uganda, by enhancing ICT research and innovation, improving digital skills and promoting digital inclusion. The project will finance a coordinated effort to build up the core foundations of the digital economy.

This Stakeholder Engagement Framework (SEF) has been prepared as a standalone guide to facilitate identification, implementation, monitoring and reporting of all stakeholder environmental and social risk engagements under the UDAP. It is a living document that will be updated throughout the life of the project.

In March 2024, following the enactment of the Anti-Homosexuality Act, 2023, by the Government of Uganda, the SEF and other safeguards instruments were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World bank-financed projects and programs in Uganda. These measures are described in various sections of this document as well as section 4 and annexes 18 and 19 of the UDAP ESMF. This SEF was modified to

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ensure such vulnerable or marginalized individuals or groups are consulted appropriately throughout the implementation of the project.

1.2 Project Development Objectives

The Project Development Objectives are to expand access to high-speed internet, improve efficiency of digital government services, and strengthen the digital inclusion of refugees and hosting communities.

1.3 Location of the Project Area

The project will be implemented nationwide focusing on network expansion and strengthening of the national digital backbone. The main implementing agency, NITA-U will expand the geographical coverage of the NBI/EGI Network across the Country. Under the Digital Connectivity outreach Component 1, the project will continue to focus on improving government connectivity, expanding the National Backbone Infrastructure and connecting government facilities (MDAs, municipal councils, schools, health centers, hospitals) across the country.

1.4 Program Components

Component 1 will contribute to promoting universal access to high-speed, affordable internet in Uganda under a 'Maximizing Finance for Development' (MFD) approach. It will focus on improving government connectivity by pre purchasing international bandwidth, expanding the National Backbone Infrastructure to the regions and connecting government facilities (MDAs, municipal councils, schools, health centres, hospitals) across the country, with a focus on underserved areas. The investments made in the publicly owned backbone infrastructure will be designed with the intention to further promote private sector participation and incentivize investments in digital communications infrastructure and services in underserved areas where the private sector might otherwise not go due to low commercial viability. This component will focus on the following subcomponents: (1.1) Expanding the digital infrastructure outreach; (1.2) Strengthening of digital infrastructure "complements" and (1.3) Strengthening of the enabling environment, digital capabilities, and inclusiveness of digital services.

Component 2: Enabling Digital Transformation of the Government

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This component will leverage the improved internet connectivity and digital government enablers developed under RCIP-5 with the aim to further accelerate the move towards 'digital first' government in Uganda. The activities in this component support the Government's plans for developing and scale-up of robust, cost-effective, secure and user friendly shared digital government infrastructure and platforms, in line with the Objective 2 of the NDP III, which aims to enhance the development of digital services in business and service delivery across Government. The goal of this component is to transform the way people, governments, businesses, and civil society interact with each other, by supporting digital transactions and e-services that are on-demand, paperless, cashless and available through the internet without requiring physical presence. Doing so will provide a level of Government resilience to digitally respond to COVID-19 and mitigate similar future shocks through strengthened digital government services. The subcomponents are: (2.1) Accelerating Digital Transformation of Service Delivery (2.2) Mainstreaming Digital Services in Priority Sectors and (2.3) Strengthening Cybersecurity Resilience.

Component 3: Promoting Digital Inclusion of refugees and host communities

This component will improve the supply of core digital infrastructure in remote refugee hosting districts for the benefit of both refugees and the local population. In addition, demand side barriers will be addressed, including the cost of mobile devices, the need for basic digital skills, and the limited availability of digital services. In 2016, UNHCR set a goal of universal internet for refugees recognizing the role connectivity plays for protection, communications, education, health, self-reliance, and empowerment.45 Similarly, humanitarian organizations are shifting towards digital service delivery to improve efficiency and impact. In Uganda, for example, 55% of WFP beneficiaries now receive cash-transfers digitally (WFP). This trend has been accelerated by the COVID-19 pandemic, where digital solutions are recognized as a means to limit the spread of the pandemic in densely populated refugee settlements, and offer stable services given travel restrictions. Beyond short-term pandemic resilience, digital inclusion can accelerate post-COVID 19 recovery by reducing barriers that stand between refugees and opportunity. Through improved access and digital skills the component aims to stimulate jobs and financial opportunities, which will lay the groundwork for broader long-term social and economic benefits. The subcomponents are: (3.1) Digital inclusion of refugees and host communities through enhanced connectivity and (3.2) Digital inclusion of refugees and host communities through access enablers.

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Component 4 of the project will finance project management and coordination, including procurement, financial management, monitoring & evaluation and environmental and social safeguards management. There is a Contingent Emergency Response Component (CERC) with zero budget added as component 5 of the project.

1.5 Rationale of the Stakeholder Engagement Framework

The proposed program (UDAP) is meant to connect additional MDAs, District Headquarters, and target user groups (Hospitals, Schools, Universities and Research Institutions to the NBI. As a requirement of the IFC/World Bank ESS 10 and the Uganda Environmental Impact Assessment Regulations (1998), NITA-U is mandated to continuously run stakeholder consultations and engagements as a minimum standard for all development projects with potential environmental and social impact risks.

As a policy requirement therefore, NITA-U has developed this Stakeholder Engagement Plan highlighting the NITA-U strategy for continuous consultations particularly, during the scoping, baseline ESMP, disclosure and the on-going phase after disclosure.

1.6 Potential Environmental and Social Impact of the Program

The program presents a substantial level social and environmental risks and impacts both positive and negative. Possible potential positive risks include generation of employment, business opportunities, digital skilling, capacity building and knowledge transfer to improve service delivery and uptake.

In regards to potential negative impacts, key risks anticipated include possible discrimination and exclusion of vulnerable or marginalized individuals or groups in accessing project benefits and services (ESS1), risks related to labor and working conditions (ESS2) including discrimination and Occupational Health and Safety (OHS) issues, community health and safety (ESS4) risks including Gender-based violence (GBV)/ Sexual Exploitation and Abuse (SEA) /Sexual Harassment (SH) and transmission of communicable diseases such as HIV/AIDs, temporary loss of biodiversity (ESS6), rights of Historically Underserved Local Communities (ESS7), loss of cultural heritage (ESS8), and exclusion from stakeholder consultation (ESS10). To mitigate these risks, the project is to ensure that it is mandatory for the contractor and sub-contractors to have a set of environmental and social risk management specialists assigned to the project. A Grievance Redress Mechanism [GRM] shall be developed including a provision

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for operationalization of Grievance Redress Committees [GRC] to settle any disputes from the PAPs and employees. Matters relating to Sexual Exploitation and Abuse [SEA] will be channeled to the criminal justice system through police after a Sociologist has documented and provided psycho-social support to the victim.

Further, for protection against health or safety risks on the job no employee shall be allowed entry to the site without PPE, drank or with any alcoholic drink as indicated in the project code of conduct signed by each worker. And to guard against accidents, tools box talks shall be conducted every morning with all workers on duty and job safety analysis and method statements will be generated in these talks for every specific task to be performed.

To mitigate against community health and safety risks, PACs and project workers will be sensitized on the HIV/AIDS policy, workplace GBV/SEA/SH policy, the COVID-19 management strategy with clear SOPs shall be enforced at all times. The obligations of the contractor and sub-contractors on the HIV/AIDS risk mitigation are addressed in the HIV/AIDS policy that will be given to all contractors and their sub-contractors. These include but are not limited to sensitization of the community on HIV/AIDS, making condoms accessible to the workers, making arrangements for voluntary counselling and management and lastly, preventing any form of stigma and discrimination against any worker with HIV/AIDS. The SEF will include specific sensitization measures against the risks of GBV.

To protect aesthetic beauty of project sites, no trees shall be cut, only minimal brush/branch trimming will be permitted. Trenches will also be backfilled within twenty-four hours of excavation and installation. Please refer to Annex 4 containing a Generic Summary of Potential UDAP Environmental and Social Impacts.

Where the project enters sensitive biodiversity areas like game reserves, an aerial approach with poles not exceeding nine meters high shall be utilized and excavation will be avoided to prevent animals from falling in the trenches or affecting their movements. To manage potential damage to the Physical and Cultural Resources [PCRs], a chance finds procedure has been developed that will be applied.

An ESMF has been developed prior to project commencement which will contribute to the formulation of an ESMP to provide specific guidance on risk management and mitigation measures. The ESMP will contain the following;

- Summary of the potential impacts of the proposal;

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- Description of the recommended mitigation measures;
- Statement of their compliance with relevant standards;
- Allocation of resources and responsibilities for plan implementation;
- Schedule of the actions to be taken;
- Program for surveillance, monitoring and auditing; and
- Contingency plan when impacts are greater than expected.

1.6.1 Vulnerable or Marginalized Individuals or Groups Likely to be Impacted by the Project

Vulnerable or marginalized populations that might be affected by the project include the income poor, youth, persons with disabilities, women- and child-headed households, orphans, the elderly, the homeless, persons living with human immunodeficiency virus (HIV), and those with other chronic health conditions, including severe mental illness, displaced persons (refugees and internal displaced persons), and others.

The project also affects vulnerable groups under ESS7 which applies to communities or groups of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities who, during the lifetime of members of the community or group, have lost collective attachment to distinct habitats or ancestral territories in the project area, because of forced severance, conflict, government resettlement programs, dispossession of their land, natural disasters, or incorporation of such territories into an urban area.

2.0 PRELIMINARY STAKEHOLDER ENGAGEMENT ACTIVITIES

To ensure inclusivity, NITA-U conducted preliminary stakeholder engagements aimed at achieving the following objectives:

a) Ensure that the views, interests, and concerns of Program stakeholders are taken into account in the assessment of the potential impacts of the program as well as in program decisions, particularly in the design of mitigation measures.
b) Understand the extent of study required to ensure all potential program aspects addressed with reasonably practicability.

Preliminary stakeholder consultations were conducted from June 2019 to December 2020 at various levels; national, regional, district, and with potentially affected communities in the program districts presented in Annex 5. Due to the outbreak of COVID-19 pandemic, intermittent consultations were conducted online with selected stakeholders particularly, the World Bank in March 2020.

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All consultations were done in compliance with the World Bank technical guidance on Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings dated March 20, 2020 and the Ministry of Health COVID-19 SOPs. *[Please refer to Annex 10]*

2.1 Stakeholder Identification and Analysis

The first step to any stakeholder engagement process is identification of the key stakeholders to be informed and consulted about the project, including individuals, groups, or communities that:

a) Are affected or likely to be affected by the program (project-affected parties); and
b) May have an interest in the program (other interested parties)
c) Can influence the project outcome.

In this step, an initial list of UDAP stakeholders was developed as part of the stakeholder mapping exercise. These include Government and Non-Governmental Agencies, individuals in program affected/ impacted communities, potential private interests, religious, cultural and traditional institutions.

To build on this stakeholder identification process, a stakeholder analysis exercise involving the sorting of stakeholder groups that are likely to affect or to be affected by a proposed action according to their impact on the action and the impact the action will have on them[1] was also conducted. In this process which is still preliminary and is expected to evolve as new stakeholders in the program emerge, interest groups were identified with their respective levels of interests in the program and the influence each may have on the program using a three-point Likert scale of Low (L), Moderate (M) and High (H) variability as demonstrated in Table I.

To enhance awareness of the project, the stakeholders highlighted in Table 1 in their respective classifications, with their interests, level of influence and potential role in the project, shall be continuously engaged, without manipulation, interference, and intimidation. This is crucial to support the development of strong, constructive and responsive relationships for effective management of the environmental and social risks that may accrue. As a living list, stakeholders are expected to expand during the scoping and baseline phases, program disclosure and the ongoing consultations during project implementation.

[1] Panaroma Environmental Inc (2018): Government of Saint Lucia Stakeholder Engagement Plan: Geothermal Resource Development Project, Panaroma Environmental Inc, Feb 2018

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Table 1: Stakeholders Identified for Continuous Engagements, their Interests, Influence and Potential Role

Classification	Stakeholders	Interest	Interest	Influence	Potential role in the project
PACs	PAPS	Income opportunities from the project, community health and safety, occupational health and safety, visual aesthetics, welfare enhancement by the project, compensation in the unlikely cases of displacement from land and property. Depending on the engagement process, these may oppose or support the project.	High	Moderate	Provision of semi and unskilled labor during operational phase, will be consulted in risk assessments
Vulnerable or marginalized individuals or groups	Women, children, the poor, youth, the elderly, PWDs, IDPs, and others	Income opportunities from the project, community health and safety, occupational health and safety, visual aesthetics, welfare enhancement by the project, compensation in the unlikely cases of displacement from land	Moderate	Low	Providing semi and unskilled labor during implementation. These will be consulted in risk assessments

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Classification	Stakeholders	Interest	Interest	Influence	Potential role in the project
		and property			
Vulnerable and Marginalized Groups [VMGs] Under ESS7	Batwa, Benet, Tepeth and Ik communities	Conservation of their cultural heritages Batwa, providing semi and unskilled labour during earthworks, income opportunities from the project, community health and safety, occupational health and safety, visual aesthetics, welfare enhancement by the project, change in way of life occasioned by the project, compensation in the unlikely cases of displacement from land and property.	Moderate	Low	Conservation of their cultural heritages Batwa, providing semi and unskilled labour during earthworks. These will be consulted in risk assessments
Local Government Executives	CDOs, DEOs, LCVs, CAOs, RDCs, District IT officers, sector institutional heads, hospitals, etc…	Improvement in quality and access to low cost internet, compliance by the developer with the national and international environmental and social safeguards. These are more inclined to support	High	High	Provision of program related information in their context for risk management. They may also partner with NITA-U in monitoring compliance with safeguards

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Classification	Stakeholders	Interest	Interest	Influence	Potential role in the project
		the program since it is government owned. These are also able to provide professional advice in various areas of their jurisdiction to ensure successful program implementation.			
MDAs at central Government	MoGLSD, Ministry of Tourism, Ministry of water and environment, NEMA, UTL, UCC, MoICT, MoFPED, NWSC, NITA-U, UHRC, Parliament, PSFU, UNRA, Ministry of Agriculture, Animal Industry and Fisheries, Ministry of Health, Ministry of Education and Sports, Local Government, Office of the Prime Minister (OPM)-lead	Improvement in quality and access to low cost internet, compliance by the developer with the national and international environmental and social safeguards, safety of their underground utilities. These are more inclined to support the program since it is government owned.	High	High	Provision of program related information in their respective sectors for risk management. They may also partner with NITA-U in monitoring compliance with safeguards

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Classification	Stakeholders	Interest	Interest	Influence	Potential role in the project
	for refugees, Ministry of Trade & Industry, Ministry of Energy and Mineral Development and Ministry of Works/Transport etc.				
Intergovernmental agencies and / or Development Partners	World Bank	World Bank is the Program funder. To achieve its mission of eradicating poverty, it wants to see the program succeed while demonstrating total commitment to environmental and social safeguards as provided for in the national, international and its own legal, institutional and policy frameworks. The Bank is neutral but needs regular engagements	High	High	Monitoring program fidelity with safeguards as enshrined in the national and international policy, legal and institutional frameworks
CSOs and conservation agencies	Chapter 4, Joy for the Children, NAPE, UAIA, Action Aid,	Improvement in the quality and access to low cost internet, protection of	High	High	Outreach and communication with the community about the

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Classification	Stakeholders	Interest	Interest	Influence	Potential role in the project
	Human rights watch, Entities presented by the Collaboration on International ICT Policy for East and Southern Africa (CIPESA), and other CSOs advocating for digital/ICT governance etc.	the rights of the vulnerable groups, compliance by the developer with the national and international environmental and social safeguards. These are likely to oppose the program if engagement is shallow and safeguards are neglected.			project. Providing program related information in their contexts for risk management. They may also partner with NITA-U in monitoring compliance with safeguards
Private sector	MTN, Airtel, SEACOM (East African Coast), TEAMS (East African coast), EASSy (East African Coast), WACS, WIOCC, I-way Africa, Gilat, Simbanet/ Wananchi Group, Liquid Telecom, Google/C-Squared Uganda, Roke, American Tower Company, • Eaton Towers, Airtel, MTN, Vodafone, Orange,	Market for their services and safety of their underground utilities. As direct rivals, these are likely to look out for any information that may undermine the program or out-compete the project. With already existing infrastructure for some of these stakeholders, they may express worry on equipment damage and would appreciate continuous liaison with them.	High	High	Provide perspectives from the data sector on issues and opportunities for OFC development and risk management. Leasing of their infrastructure in areas of operation for program operations

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Classification	Stakeholders	Interest	Interest	Influence	Potential role in the project
	Uganda Telecom (UTL), Ericsson, ZTE, Huawei, Nokia Siemens Africel, etc…				
Religious, Traditional and cultural institutions	The various religious leaders, Buganda Kingdom, Busoga Kingdom, Bunyoro Kingdom, Tooro Kingdom, Chiefdoms of Kooki, Teso, Adhola, Rwot, etc…	Welfare of their people, conservation of their cultural values, norms and PCRs. These are neutral but need engagements to address their concerns. In the unlikely event where valuables are involuntarily interfered with, some form of compensation and discussions should be agreed upon. Many of these institutions are also landlords and thus need continuous liaison to check on potential conflict during program implementation.	Moderate	Moderate	Provide perspectives from the traditional and cultural sector for OFC development and risk management
The media	Nation media group of Companies, The Vision group of	Profit by publishing news, running investigations series, civic awareness	High	High	Dissemination of program related information

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Classification	Stakeholders	Interest	Interest	Influence	Potential role in the project
	Companies, NBS, TV West, radio stations, the Independent, the Observer, Red Pepper, the East African, NITA-U social media handles (Web Page, Facebook, Twitter, YouTube , etc)	creation and education, human rights and etc. Need to be engaged with to furnish them with accurate information on the project.			
Land users and Property Owners	Iganga road side markets, Igara, Lwengo, Rakai etc…	Security of their land, market and property ownership. Compensation in case of involuntary take	High	High	Program will only utilize land within the Road Reserve and Government owned land for installation of transmission sites. Providing information from their perspective for OFC development and risk management

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2.2 Purpose of UDAP Stakeholder Engagement

The key objectives of engaging with the stakeholders are:

a) To furnish key stakeholders with program information, alternative approaches to its implementation, potential impacts and strategies to mitigate those negative impacts while optimising the positive

b) To educate stakeholders on the grievance management mechanism and Gender Based Violence framework the program plans to utilize

c) To identify key stakeholders that are affected, and/or able to influence the Program and its activities

d) Provide stakeholders an opportunity to make input into the program risk management process by highlighting their expectations, fears, concerns and implementation approaches in regards to project expectations and service delivery

e) Provide the framework for development of constructive, long-term relationships, based on dialogue and communication that are aimed at attaining broad support for the program in affected communities.

f) Provide the framework for ongoing stakeholder identification, analysis, mapping and prioritisation; consultation and engagement; risk and issue identification; information sharing; and documentation of engagement and required follow-up actions.

g) Build on previous engagement efforts during the Environmental and Social Impact Assessment (ESIA) phase using regular contact and information exchange

h) Clarify the roles, responsibilities and resources necessary to implement a risk managed program

2.3 Guiding Principles for Effective Stakeholder Engagement

UDAP stakeholder engagement process follows a set of principles that define the core values underpinning interaction with stakeholders. Based on the IFC Best Practice[2], these principles

[2]IFC, 2007, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.

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include:

a) **Commitment:** To demonstrate commitment, the need to understand, engage and identify the community(ies) must be recognized and acted upon early in the process;
b) **Integrity:** This is demonstrated when engagement is conducted in a manner that fosters mutual respect and trust;
c) **Respect:** This is created when the rights, cultural beliefs, values and interests of stakeholders and neighboring communities are recognized;
d) **Transparency:** This is demonstrated when community concerns are responded to in a timely, open and effective manner;
e) **Inclusiveness:** This is achieved when broad participation is encouraged and supported by appropriate participation approaches which serve to include all key stakeholders including those that are typically underrepresented such as vulnerable or marginalized individuals or groups ; and
f) **Trust:** This is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

3.0 APPROACH TO STAKEHOLDER ENGAGEMENT CONSULTATIONS

This SEF proposes that depending on the phase and stakeholder influence level, NITA-U will approach the engagement process using a number of appropriate techniques that help in relationship building, information gathering and dissemination as highlighted in Table 2. The process will be facilitated by sharing a program brief and design with the participants to steer discussion. This is a response to the demand by MDAs and district representatives for the program brief and design during baseline survey prior to free and informed dialogues.

Table 2: UDAP Approach to Stakeholder Consultations

Stakeholder	Approach	Phase
VMGs under ESS 7	As guided by ESS 7, consultations with traditional and district leaders and CSOs (focus group meetings, community/district meetings, one on one engagements with key informants)	Scoping, ESIA, disclosure, preparation of ES instruments and on-going post-disclosure engagements
PACs, PAPS,	FGDs, public meetings (entry and exit meetings), brochures, surveys, establishment of GRS in each PAC, program briefs that answer FAQs, radio	Scoping, ESIA, disclosure, preparation of ES instruments and

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Stakeholder	Approach	Phase
	talks, site visits	on-going post-disclosure engagements
Vulnerable or marginalized individuals or groups.	Carry out targeted consultations with vulnerable individuals and groups with the support of relevant CSOs/NGOs, if appropriate. (focus group meetings, community/district meetings, one on one engagements with key informants)	Scoping, ESIA, disclosure, preparation of ES instruments and on-going post-disclosure engagements
Local Government Executives	KIIs, roundtable discussions, meetings, workshops, site visits, brochures, establishment of GRS in each PAC, program briefs that answer FAQs, and correspondence by email, phone, mail, sms, etc…	Scoping phase, ESIA, disclosure, preparation of ES instruments and on-going post-disclosure engagements
MDAs at Central Government	KIIs, roundtable discussions, meetings, workshops, site visits, brochures, establishment of GRS in each PAC, program briefs that answer FAQs and correspondence by email, phone, mail, sms, etc…	Scoping phase, ESIA, disclosure, preparation of ES instruments and on-going post-disclosure engagements
Intergovernmental agencies and / or Development Partners	KIIs, roundtable discussions, meetings, workshops, site visits, brochures, program briefs that answer FAQs, establishment of GRS in each PAC and correspondence by email, phone, mail, sms, etc…	Scoping phase, ESIA, disclosure, preparation of ES instruments and on-going post-disclosure engagements
CSOs and conservation agencies	KIIs, roundtable discussions, meetings, workshops, site visits, brochures and program briefs that answer FAQs, establishment of GRS in each PAC correspondence by email, phone, mail, sms, etc…	Scoping phase, ESIA, disclosure, preparation of ES instruments and on-going post-disclosure engagements
Private sector	KIIs, roundtable discussions, meetings, workshops, site visits, brochures and program briefs that answer FAQs, establishment of GRS in each PAC, and correspondence by email, phone, mail, sms, etc…	Scoping phase, ESIA, disclosure, preparation of ES instruments and on-going post-disclosure engagements
Land Owners	KIIs, roundtable discussions, meetings, workshops, site visits, brochures and program briefs that answer FAQs, establishment of GRS in each PAC and correspondence by email, phone, mail, sms, etc…	ESIA disclosure, preparation of ES instruments and on-going post-disclosure engagements

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In line with the various ESSs, NITA shall ensure that FGDs, interviews and also instrument appropriate consultations are carried out with CSOs, cultural/district leaders, key informants and VMG representatives.

3.1 Engagement Phases and Approaches

Stakeholder engagement as an on-going process is organized and conducted in four relevant phases including:

I. Scoping Engagement Phase
II. Baseline Engagement Phase
III. Disclosure & Consultation Phase; and,
IV. Ongoing engagement in the post ESMF disclosure process phase

I. Scoping Engagements Phase

Committed to stakeholder engagements as a participatory planning and inclusion tool, this stage of engagement has duly been completed by NITA-U. The purpose was to:

a) Ensure that the views, interests, and concerns of Program stakeholders are taken into account in the assessment of the potential impacts of the program as well as in program decisions, particularly in the design of mitigation measures.
b) Improve communication between the program implementation team and impacted or interested groups.
c) Understand the extent of study needed to have all potential program aspects addressed with reasonably practicability.

To achieve these objectives, the developer visited national, regional and local authorities and potentially affected communities in all the program districts. The stakeholders consulted during the scoping mission included among others; NITA-U staff, District Environment Officers, Community Development Officers, Town Planners, Health Development Officers, scholars and some of the local community members in sampled areas.

To assist in documentation, a comments register containing all available contact details of stakeholders was compiled. A record of all comments and observations entered in this register will also be maintained and included in each program stakeholder engagement report. For

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efficiency, the developer integrated the UDAP Program ESMF scoping engagements with the -Missing Links Project Stakeholder engagement in S. Western Uganda, West Nile and North Eastern or the ongoing Last Mile project launch stakeholder engagements in Eastern Uganda from June 2019. Highlights from these engagements are presented in Table 34 below.

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Table 3: The Key Concerns Raised in the Integrated UDAP Program Stakeholder Engagement Phase[3]

Name/ Contact	Comments/ Concerns	Response
Director Technical Services NITA-U	✓ NITA-U as a Government agency with a mission and core values will absolutely be privileged to be compliant as has always been with all legal requirements of all her projects including this last mile. ✓ We look forward to the ESIA report that will assist the institution to design a program that meets the current national and international ratings including the donor requirements ✓ Ensure stakeholders as possible are consulted to enrich the ESIA report	✓ Indeed compliance improves public and donor confidence within the institution Our team will conduct extensive stakeholder consultations and engagements with all host districts to enrich the ESIA ✓ The ESIA will be publicly disclosed upon approval by NEMA and World Bank
Manager Infrastructure Delivery – NITA-U	✓ Will the program provide employment opportunities to locals of the host districts. ✓ Since it will involve connections through urban centers, it attracts more stakeholders' attentions thus urban council authorities must be involved	✓ Provision of employment opportunities is among the project's positive social and economic benefits that must be harnessed by stakeholders ✓ Consultations will be as inclusive as possible to eliminate/minimize complaints among the community members
DEO Jinja	✓ The program is highly welcome only that it has even taken long ever since the NBI cable was laid to connect to Districts. ✓ However, NITA-U needs to involve as many stakeholders as possible to avoid disturbances during implementation ✓ Since most of the utility services are within the road reserve including water, other private communication	✓ Indeed stakeholders will be engaged as much as possible to ensure their concerns are captured and incorporated within the ESIA. We just need your help in identifying them for us ✓ Signage for our cable will be a must because we are also cautious to avoid damages and cost therein pus the

[3] See detailed stakeholder engagement reports in Annex 4.

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Name/ Contact	Comments/ Concerns	Response
	service providers, there is need for proper markings/signage for each user to avoid service interruptions due to damages	inconveniences that come with such damages
Senior Environment Officer Wakiso District	✓ Welcomes development as it will contribute to job creation for some of our community members. ✓ NITA-U gets clearance from UNRA and Urban Councils for use of Road reserves with mitigation plans in regard to inconveniences like Traffic flow. ✓ Am interested to know the engineering designs for swampy areas. ✓ Hope to participate in the review the ESIA report when it is ready.	✓ Contractors will be encouraged to employ locals since most of the work requires unskilled labour. ✓ As has always done NITA-U is committed to complying with laws and regulations for the different authorities and where need be dialogue takes precedence ✓ The designs will be fully explained in the ESIA report
DNRO Nebbi	✓ Welcomes development and hope for improved service delivery in terms of time and reporting frequency and offloading the district from the burden of costs involved in carrying reports to Kampala ✓ Contractors should corporate with local authorities in ensuring minimum distractions to peoples' movements and welfare as they do their work ✓ Contractors should also ensure that they program on a portion of their daily work that they must complete fully within that particular day to avoid leaving open trenches	✓ Indeed service delivery improvement and effectiveness is the goal of such infrastructure investment thus we hope to meet your expectations ✓ This will be emphasized in the report including a GRM (Grievance Redress Mechanism/Plan) to be incorporated ✓ The work schedules will not allow leaving of open trenches and where it happens due to unavoidable reasons, the site will be cordoned off with clear signage
DNRO – Nakasongola	✓ We welcome development in the area since it will improve service delivery. ✓ As long as the study will be conducted, we only pray that the	✓ Definitely since your District is among and it is government's wish to connect all Districts

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Name/ Contact	Comments/ Concerns	Response
	implementers will incorporate the concerns ✓ Hope the program will not affect the planted trees within the road reserves.	✓ All the concerns will be addressed through incorporating them in the ESIA which will include the ESMMP to be followed during implementation
DCDO – Nakasongola	✓ Hope the locals will be given jobs during implementation. ✓ Issues of child labour abuse need to be mitigated.	✓ The ESIA process will try as much as possible to make recommendations based on such views for consideration
MUK –GIS Specialist	✓ It's a good investment venture for Government for its efficiency and effectiveness to institutions such as Makerere especially for student's research since internet costs will be greatly lowered ✓ I hope NITA-U in the design will use GIS applications to solve some of the problems ✓ It's one thing to consult and include our concerns within the document but it is also another to ensure implementation of stakeholder concerns.	✓ Thanks for your positive comment and indeed the program will ensure that the goal of the program is met ✓ More consultations will be made on how best such technologies can support the program for effective delivery ✓ ESIA process will develop an ESMMP that will ensure strict monitoring of the implementation
Private Practice Engineer	✓ Respect/care for other properties within the road reserve to avoid conflicts and detractions to the works schedule ✓ Authorities should monitor works for proper restoration (backfilling and compaction) of roads where trenching crosses roads ✓ Implementation should follow the approved designs and where changes are inevitable, stakeholders should be notified	✓ NITA-U as a developer will ensure contractors maintain harmony with the local authorities and road users ✓ ESMMP will ensure compliance to approved designs and where changes are to be made, contractors will seek for new approvals too

Invitation letters were sent to the targeted participants prior to conducting one on one engagements MDAs and Local Government between June 2019-December 2020.

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II. Baseline Stakeholder Engagement Phase

This is the second phase of stakeholder engagements that NITA-U has conducted. The focus of engagement was to primarily gather information and opinions from stakeholders. Stakeholder engagement techniques applied here included FGDs, interviews, meetings and workshops with the key stakeholder representatives and organizations.

The specific objectives of engagement in the baseline phase included:

a) To identify likely positive and negative environmental impacts due to the proposed development at these locations;
b) To identify and evaluate all significant negative environmental and social impacts and risks (including potential land take), and recommend appropriate mitigation measures for the attention of the developer, for incorporation into the construction and operational phases;
c) To generate baseline data that will be used to monitor and evaluate effectiveness of the mitigation measures implemented during the program cycle;
d) To identify and quantify different potentially program affected people (PAPs) in potentially program affected communities (PACs) who may require some form of dialogue or engagements
e) To undertake stakeholder analysis including identifying beneficiaries, socio-economic profiles of various groups, analyzing key institutions and interest groups; and provide guidelines for stakeholder consultation and participation in program impacted areas
f) To assess the different program sites, technological and material alternatives and make recommendations on those that optimize utility
g) To adhere to and comply with the NEMA ESIA standards
h) To identify and provide safety to the different physical and cultural resources potentially affected by the program
i) To compile an Environmental and Social Impact Statement incorporating an Environmental and Social Management and Monitoring Plan for all aspects of the proposed development for submission to NEMA for consideration for approval.
j) To comply with the World Bank Environmental and Social Framework [ESF].
k) Lastly, to inform the program design and implementation with issues identified during ESMFs as a mechanism towards Environmental and Social sustainability of the project

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The following key stakeholders were consulted in the project districts:

• Chief Administrative Officers (CAO) • Chairman LCV • Town Clerk • Residence District Commissioner (RDC) • Physical Planners • District Community Development Officers (DCDO) • Community Development officers (CDO) • Roadside businesses	• District Environment/Natural/Forest officers (DENFO) • Labour Officers • Information Technology officers • Regional Police Commander (RPC) • District Police Commander (DPC) • DISO/GISO • District Engineers • Educational institutions

The field visits considered the following to initiate the baseline:

- Physical-cultural and historical sites;
- Wildlife habitats, feeding, and crossing areas;
- Land tenure system;
- Electricity grid coverage;
- Environmental and Social Safeguards

The Socio-economic aspects captured during the baseline survey included:

- General population data and settlement patterns/ Living patterns;
- Community level of wealth/ level of income/ economic activities;
- Education (Schools and Vocational institutions);
- Presence of resource personnel;
- Gender issues and community setting.

For illustration, key issues raised during these stakeholder consultations are presented in Table 4.

Table 4: Key Issues Raised during the preliminary Stakeholder Consultations

Name/ Contact	Comments/ Concerns	Response
Traffic Officer, Mukono Police Station	✓ Ensure that areas are backfilled. The teams should liaise with Police and also get support especially around traffic management.	✓ All excavation works shall be carried out in consultation with the district leadership including Uganda Police. ✓ Contactor shall ensure that all areas are appropriately backfilled.
Mukono District Physical Planner	✓ Share layouts with this office and other technical teams for their inputs before work commences	✓ NITA-U shall ensure that these are shared with the District leadership prior to program commencement and

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Name/ Contact	Comments/ Concerns	Response
		shall work hand in hand with all technical teams in the districts to benefit from the last mile project
Ag DPC-Buikwe	✓ This is a good project. It will however move smoothly if an official communication is sent to Police	✓ All stakeholders shall be provided with official communication and also invited to pre-entry meetings so as to capture and embrace all program related aspects
Lugazi Police LC1	✓ This is a good development and we welcome it in our area ✓ Provide a sketch plan before excavation	✓ NITA-U strives to provide quality services to enhance efficiency in all its clients' operations. ✓ All plans shall be shared and desired access points planned together with local authorities prior to excavations.
Senior Labour Officer-Jinja	✓ The social economic interventions on the program e.g opening & improper restoration disrupts business for women and youth ✓ Refilling is always inappropriate-people seem to be in a hurry and ditches come up ✓ Some contractors use Vulgar language which is inappropriate for our society	✓ All works shall be carried out in liaison with local leadership and as first as possible to reduce on business interruptions ✓ Awareness sessions on refilling and restoration shall be carried out. Refilling shall also form part of the KPIs to consider ✓ Respect to cultural norms and values shall form part of the induction process for all program teams
P.M Kigulu Chiefdom	✓ NITA-U should only bring technology that will not impact on people ✓ NITA-U should look into the benefits that Busoga kingdom will gain from the project ✓ The program should avoid cutting trees since these have various uses	✓ NITA-U strives to only utilize the most recent technology with utmost EHS considerations to provide for the health and safety. ✓ Program is expected to have cumulative benefits that shall also boost the kingdom given the increase in efficiency. Government shall continue liaising with all cultural

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Name/ Contact	Comments/ Concerns	Response
		institutions in aspects of sustainable development ✓ Intentional avoidance for trees and shrubs shall be carried out.
Iganga Chief Magistrates Court	✓ Ensure that the new internet is better than what is available now in terms of quality	✓ The new service will be faster and cheaper making it better and more competitive marketwise.
DEO Bugiri	✓ Restoration of sites should be carried out ✓ Ensure that workers' occupational Health and Safety (OHS) is priority during program implementation	✓ Backfilling and site restoration shall be carried out as in liaison with NITA-technical teams and District technical teams. Post restoration inspections should also be carried out ✓ All works shall adhere to safe systems of work with minimums set by NITA-U. Risk Assessments, Supervision by competent personnel, awareness sessions toolbox talks, issuing of appropriate PPE among others shall be done during program implementation.
NWSC Busia	✓ Ensure that pipes are not cut during excavations. NWSC can provide a guide during the excavation exercise for the whole of Busia to check on this as it has been a challenge in with fibre cable related businesses in the area	✓ NITA-U welcomes the guidance and program teams shall ensure that engagements are held with NWSC prior to the commencement of project implementation works
Regional ICT Officer, Bukedi Regional Police	✓ Stick to road reserves	✓ Welcomed this remark and notify the meeting that implementation works will be conducted in road reserves and government owned properties. ✓ There shall also be a grievance resolution mechanism to cater for various issues, this inclusive

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Name/ Contact	Comments/ Concerns	Response
Boda-boda, Mount Elgon Stage (FGD PAPs)	✓ Please cover area on the same day or improvise a shade if you cannot complete work fast since the trench may make it hard for us to rest under our stage tree	✓ Excavations and backfilling will be carried out as soon as reasonably possible
Head, Inspectorate of Government Mbale	✓ Program welcome and we hope it improves our IT systems and cut down costs ✓ We shall bear the cost of dust and distance but it should be done swiftly	✓ NITA-U pledges to provide world class services at competitive prices
Mt Elgon Hotel	✓ No objection since it is a government program passing through the road reserve ✓ Please back fill areas and minimize damage on impacts	✓ All impacted areas shall be backfilled to encourage business continuity.
Gulu UHRC	✓ These are Old premises and the office shall be moving to new point net year near Gulu LGHQs former cemetery	✓ All offices moving to new premises have been noted and an agreed approach to connecting these as they await relocation shall be provided to ensure smooth operations and transfer- hopefully utilizing poles as opposed to excavations
NWSC Gulu	✓ Obtain permission from Head office IT before excavation	✓ All works shall only commence after communication to the relevant stakeholders
District Police Commander, Gulu	✓ This is a very good program & healthy idea that will ease our work and we look forward to operating with NITA. Contact us where you need police assistance	✓ Appreciated the offer of assistance and looks forward to working closely with the Police
Gulu Prime Minister's Office- FGD Traditional Leaders	✓ Is it possible to share with PPDA since we share most costs since we are in the same compounds? If you bring separate lines, can we switch off one line ✓ Please if we can use our router or do we need a big IT office It is a good initiative to get a reliable network since the current one is not stable	✓ NITA-U shall ensure that all queries related to the connections are addressed ✓ NITA-U has plans to have other districts connected in the near future.

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Name/ Contact	Comments/ Concerns	Response
	✓ Can this be paid for quarterly since we get our money in quarters ✓ What if the amount paid is not used? Is it just cut off or forwarded? ✓ Why doesn't the program first focus on entities that have no connection at all e.g. Amur, Lamar, Adjumani	
BOU Kabale	✓ Ensure that communication should prior to excavation to the Director Administration Services BOU Kampala.	✓ All works shall only commence after communication to the relevant stakeholders
Principal, Uganda technical College Lira	✓ Work together with estates team to avoid situations like those on roads where they are constructed & broken thereafter (proper planning).	✓ All works in this institute shall be carried out in liaison with the estates team.
Systems Administrator Mpigi High Court	✓ Weak link & other buildings like the CAO's office, water office and health are not connected, please look into it.	✓ NITA-U strives to continuously improve on their systems, the last mile program shall provide better services and also provide for extension into other blocks.
LC III Chairman Buwama Sub county HQ	✓ Please consult UNRA before excavation.	✓ Approvals from UNRA have already been acquired and NITA-U shall continue to liaise with UNRA during program implementation.
Masaka DEO	✓ Future projects should consider using bigger conduits or pipes so that any new developments utilized this and it also eases decommissioning.	✓ NITA-U strives to continuously improve on their systems and shall further study this approach for future projects.
DWO Masaka	✓ No fears however, this is Buganda Kindgom's land, so we should ensure that the LG & Buganda kingdom should first give permission for excavation. ✓ Coordinate with UNRA and other agencies to align plans so as to avoid continuous road and surface excavations	✓ NITA-U shall ensure that all relevant stakeholders are on board to ensure smooth operations

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Name/ Contact	Comments/ Concerns	Response
BM, NWSC Kalisizo	✓ Please look into situations where offices are already connected to other providers like MTN, UTL	✓ NITA-U shall have solutions to all field scenarios to ensure smooth transition as and when the need arises.
Physical Planner Ntungamo Municipal Council	✓ Avoid surging after drilling across the road. ✓ Ensure that the municipal engineers are consulted ✓ Add landlords and owners of structures to the list of people invited for disclosure meeting	✓ NITA-U shall ensure that all relevant stakeholders are on board to ensure smooth operations
District Environment Officer, Dokolo	✓ Ensure that dust and mud issues after excavation are addressed	✓ Program teams shall provide for dust suppression especially during dry spells ad timely back filling to limit mud related hazards like slips. ✓ Barricades or caution tape shall be utilized to check on access to excavated points
Senior Labour Officer-Jinja	✓ Look for people with disabilities, women and children. These should be considered, and areas backfilled in time/have proper crossing point for people to pass.	✓ Phased excavation shall be carried out while a provision for alternative routes has been forwarded in the ESIS to cater for this.

The Post Program Design Stakeholder Engagement Consultations

Further, the Contractor will be required to develop a detailed design for UDAP subject to approval by NITA-U. Using this design, nine sub-regional engagement consultations that bring together stakeholders from all classifications in Table 3 will be conducted in each of the nine sub-regions[4]. The objectives of these program design stakeholder engagements are similar to those of the pre-design period, but these are expected to furnish the stakeholders with a program brief and design for free and more informed input and risk assessment. To assist in documentation, a comments register containing all available contact details of stakeholders will be compiled. A record of all comments and observations entered in this register will also be maintained and included in the report.

[4] The more the sub-regions, the lesser the cost of fuel refunds

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Table 5: Planned UDAP Regional Stakeholder Engagement Consultations

Region	Target Stakeholders/MDAs/PACs	Period
South East	LG Executives, MDAs, Intergovernmental agencies, CSOs, representatives of the Private sector, land owners, PACs, PAPs, Think Tanks, the CSOs, Academia & VMGs	When the design is ready
Mid-East	AS ABOVE	AS ABOVE
North East	AS ABOVE	AS ABOVE
Mid-North	AS ABOVE	AS ABOVE
West Nile	AS ABOVE	AS ABOVE
Mid-West	AS ABOVE	AS ABOVE
South West	AS ABOVE	AS ABOVE
Central	AS ABOVE	AS ABOVE
Kampala-Wakiso	AS ABOVE	AS ABOVE

Field Reconnaissance Study

In addition, a reconnaissance study will be conducted with the PAPs in PACs in areas where the design projects the line to pass through private land and markets. A reconnaissance report for this study will be prepared and attached to the baseline ESMF as an addendum. The duration of this study unfortunately cannot be pre-determined now before the design projects areas where private markets, property and land interests may be potentially impacted or affected.

January 2024: Additional Consultations on Non-Discrimination

In January 2024, additional consultations were undertaken on the project to specifically discuss the vulnerability of some individuals or groups to discrimination.

During the consultations, key issues raised relating to UDAP included:

- The need for capacity building to teach vulnerable and marginalized refugees how to use the tele-centers for education;
- The need to adequately address the cyberbullying and extortion of vulnerable or marginalized individuals or groups who may be afraid to report incidents to the police;
- The possibility that project's GRMs are not safe and confidential;
- The need to ensure that all shared data is protected and safe;
- The need to protect users from sexual and cyber harassment; and
- The need to address discrimination across Ministries.

The approach to managing these issues and other issues raised during the consultations are found at Section 4.18 and Annex 19 of the UDAP ESMF. A summary of these additional

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consultations is posted on the World Bank website under Uganda Consultations on Non-discrimination and Inclusion. For additional information, see:

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

III. Program Disclosure Engagement Phase

During this period, the ESMP reports will be uploaded on the NITA-U, MoICT &NG and WB websites for free public access. Stakeholders can also comment on the reports during the disclosure period. The focus of engagements in this phase are on disclosing and consulting on the preliminary findings of the process. Specifically, engagements in this phase will:

a) Provide feedback to the stakeholders on the impact assessment and associated management/mitigation measures (disclosure)
b) Gather stakeholder feedback on the report and its risk management measures.
c) Provide more opportunities for compliance management and monitoring (continuous improvement).

IV. On-going Post-Disclosure Engagements

Following the completion of the reports and commencement of program implementation, NITA-U will perform on-going stakeholder engagements throughout the program life cycle. This is to support and maintain good relations with the community and to obtain feedback to inform the decision-making process.

The Stakeholder Engagement Plan (SEP) will be developed as a living document that will be refined and modified throughout the life of the project. All revisions shall be clearly marked, registered and signed off by relevant parties or departments. During this interactive process, the focus and scope of the SEP may shift in response to changing engagement needs and priorities for the project. Accordingly, the SEP will be updated after the ESMP process. Since it is practically difficult to meet every stakeholder public domain will also be used to disseminate information about UDAP including: Newspaper inserts, posters, brochures, leaflets, radio and television spots, official correspondences, meetings; website and social media platforms.

The stakeholder engagement process in this stage will also be supported using a Grievance Redress Mechanism.

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4.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Resources

The Program Social Scientist, the Environmental Specialist, Managers, Communications Specialist, Coordinator, Engineers and Business Analyst are devoted to managing and implementing the Stakeholder Engagement Plan and Framework. NITA U shall be responsible for management of these resources and stakeholder engagement activities. The above-mentioned team will review this plan quarterly to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated, and budget will be revised accordingly. The updated SEF will provide specific measures for sensitisation and management of GBV/SEA/SH risks as well as the risks of exclusion and discrimination of vulnerable or marginalized individuals or groups. It will also provide a requisite budget for the activities.

The breakdown of the estimated budget is detailed below:

Stakeholder Engagement Activities	Qty	Unit Cost, USD	№ of years	Total cost (USD)
Travel expenses of staff (cost per year) to project district to conduct compliance assessments		5,000	5	25,000
Communication materials (leaflets, posters, PR kits, talk shows including design)				25,000
Project press conferences (twice per year)	2	1,000	5	10,000
Trainings (Social issues, non-discrimination, outreach, GRM, etc.) for PIU, Regional employment departments and ESCs	14	1,500	1	21,000
Suggestions / GRM boxes at project districts	185	20	1	3,700
Total				**84,700**

Any comments or questions about the program or the consultation process; management can be addressed to:

The UDAP Program Coordinator,
The National Information Technology Authority, Uganda (NITA-U)

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Palm Courts; Plot 7A Rotary Avenue (Former Lugogo Bypass).
P.O. Box 33151, Kampala- Uganda
Phone number: Tel: +256-417-801041/2
Fax: +256-417-801050
E-mail address: info@nita.go.ug

4.2 Management Functions and Responsibilities

Stakeholder engagement activities have been incorporated into the project's management system with the leadership of the Director Technical Services, Program Coordinator and Coordinator EHSS under Supervision of the Executive Director. With their guidance, the program Social Scientist, the Environmental Specialist and the Communications Specialist will implement specialized Field Engagements with Stakeholder across the country. As a highly qualified team, the Social Scientist is a PhD holder in Social Anthropology with over 13 years of experience in Stakeholder Engagement. The Environmental Specialist is a NEMA certified Environmental Risk Specialist with an Msc. currently pursuing a PhD. All stakeholder engagements will be documented, tracked, and managed using a commitment register, activity reports to be presented to NITA-U ExCo for oversight and guidance purposes.

5.0 UDAP GRIEVANCE MECHANISM

A grievance is a concern or complaint raised by an individual or group affected by the project. Concerns and complaints can result from either real or perceived impacts and will be logged and handled in a similar manner. The objective of the GRM is to provide stakeholders processes for submission and raising grievances and grievance resolution and provide an avenue to influence project design and ownership. The GRM will be accessible, fair and transparent and will receive and log all complaints via all forms of communication including verbal, written, telephone calls, anonymous channels such as a toll-free hotline, and text messages. The GRM, as under ESS7, will be culturally appropriate. In addition, the World Bank will support the strengthening of the GRM to ensure that it includes an effective, safe, ethical and confidential mechanism to receive, manage, refer and monitor grievances related to exclusion and discrimination. Further details of this support can be in Annex 19 of the ESMF. Under the umbrella of ESS10, the Community Grievance Redress Mechanism will ensure all grievances are handled in a fair and transparent manner, in line with NITA-U internal policies, and the Ugandan legal framework.

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NITA's Social Scientist shall work with community leaders in the project sites and communities to establish and operationalize community Grievance Redress Committees where community grievances are received and addressed. The presence of a GRM shall not reduce the right to seek legal redress. Nevertheless, all attempts shall be made to settle all grievances amicably before resort to courts of law.

5.1 The Workers Grievance Redress Mechanism

NITA-U will as a requirement under ESS2, constitute a GRM for direct and contracted workers to raise workplace concerns. The nature of the GRM will be proportionate to the nature and scale of the project and measures will be put in place to make the grievance mechanism accessible to the workers. Grievances of community workers will be handled as prescribed under the LMP. All worker-related grievances of a contractual nature including among others, non-fulfillment of contracts, levels of compensation, exclusion from subproject benefits, or seizure of assets without compensation shall be addressed to the workers' grievance committee will be addressed to the civil complaints GRM and resolved. The procedure shall include:

Step One: All civil grievances shall be submitted in writing to the Secretary, site specific GRC that sits weekly to handle grievances and provides feedback in 7 days. The workers' grievance committee shall consist of the site Engineer, Workers Representative, NITA-U Grievance Officer (representative), Contractor EHS/Sociologist and the LC 1 Chairman (Traditional/Religious/Opinion leader). If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to the project implementation team GRC.

Step Two: Project Implementation Team (PIT) GRC that sits every week and will provide feedback in 14 days. This committee shall consist of the Project Manager, Contractor Project Manager, NITA-U Grievance Officer (representative), Contractor Engineer, Workers Representative, NITA-U Social Scientist and EHS and Contractor EHS/Sociologist. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to court for adjudication.

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Step Three: NITA GRC. This will include a Grievance Officer, Legal officer and the Executive Committee members of NITA-U with capacity to handle any civil issue including those that are intricate and complex. This GRC will meet once a month and respond to any issue within 21 days. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to court for adjudication.

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

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

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

5.2 Community Grievance Redress Mechanism

The community grievances the project may expect include, among others, crop destruction, tree pruning, theft, open excavations, dust, GBV/SEA/SH, damage to cultural heritage, and discrimination against and exclusion of vulnerable or marginalized individuals or groups from project benefits. Resettlement grievances such as crop destruction and tree pruning shall be referred to the Ministry of Lands and Chief Government Valuer in cases, that may not be settled at the field level.

In this mechanism, entities in the community seeking redress and wishing to record grievances will do so by notifying their Local Leader (LC 1 Chairperson) in writing using the project grievance registration form completed in a language best understood. All criminal grievances will be documented and logged in for record purposes. The victim will also receive psychosocial support and as legally mandated, the grievance will be referred to police for further management.

For vulnerable or marginalized individuals or groups, the Project will enhance access to both the Community GRM and workers' GRM. Customized support will be provided to vulnerable or marginalized PAPs based on the nature of their vulnerability and the impact of the project.

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Where required, provisions for confidentiality will be built into the GRM processes, and where necessary, a toll-free hotline will be made available.

Grievances will be received by the Local leader who will enter them in the grievance log, convene and chair a Local Grievance Committee at LC 1 level. This committee shall include the Chairman LC I, the site Engineer, the site Sociologist and a religious or opinion leader.
In historically underserved communities, the GRS shall be led by a recognized leader in the traditional conflict resolution system. A culturally appropriate GRM shall be constituted during implementation. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be brought to the District Community Development Officer (acting on behalf of the Chief Administrative Officer) who will convene a district grievance committee to meet and settle the matter within 14 days of receiving the complaint.

If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be brought to the NITA Grievance Officer who will then organize a NITA Grievance Committee meeting to address the grievance within 21 days of receiving the complaint. NITA's Grievance Committee will comprise
a Grievance Officer, Legal officer and the Executive Committee members of NITA-U with capacity to handle any civil issue including those that are intricate and complex. If the complainant is satisfied with the outcome of the mediation, the entity will fill in the grievance resolution form and the complaint will be closed. If the entity does not agree with the outcome of this committee meeting, the matter shall be referred to court for adjudication. Channeling complaints through the Local Council Grievance Committee is aimed at addressing the problem of distance and any travel costs the VMGs may incur.

The Local Leaders (trained by NITA's Social Scientist) shall maintain records of grievances and complaints received verbally or in writing, including minutes of discussions, recommendations and resolutions made. The affected person should file his/her grievance in writing, to the Local Leader. The grievance note should be signed and dated by the aggrieved person. Where the affected person is unable to write, s/he should obtain assistance to write the note and emboss the letter with his/her thumbprint. If the aggrieved person does not receive a

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response or is not satisfied with the outcome within the agreed time (s)he can lodge the grievance to the next level of grievance handling.

A mechanism describing the procedure, roles and responsibilities in grievance management process is given below.

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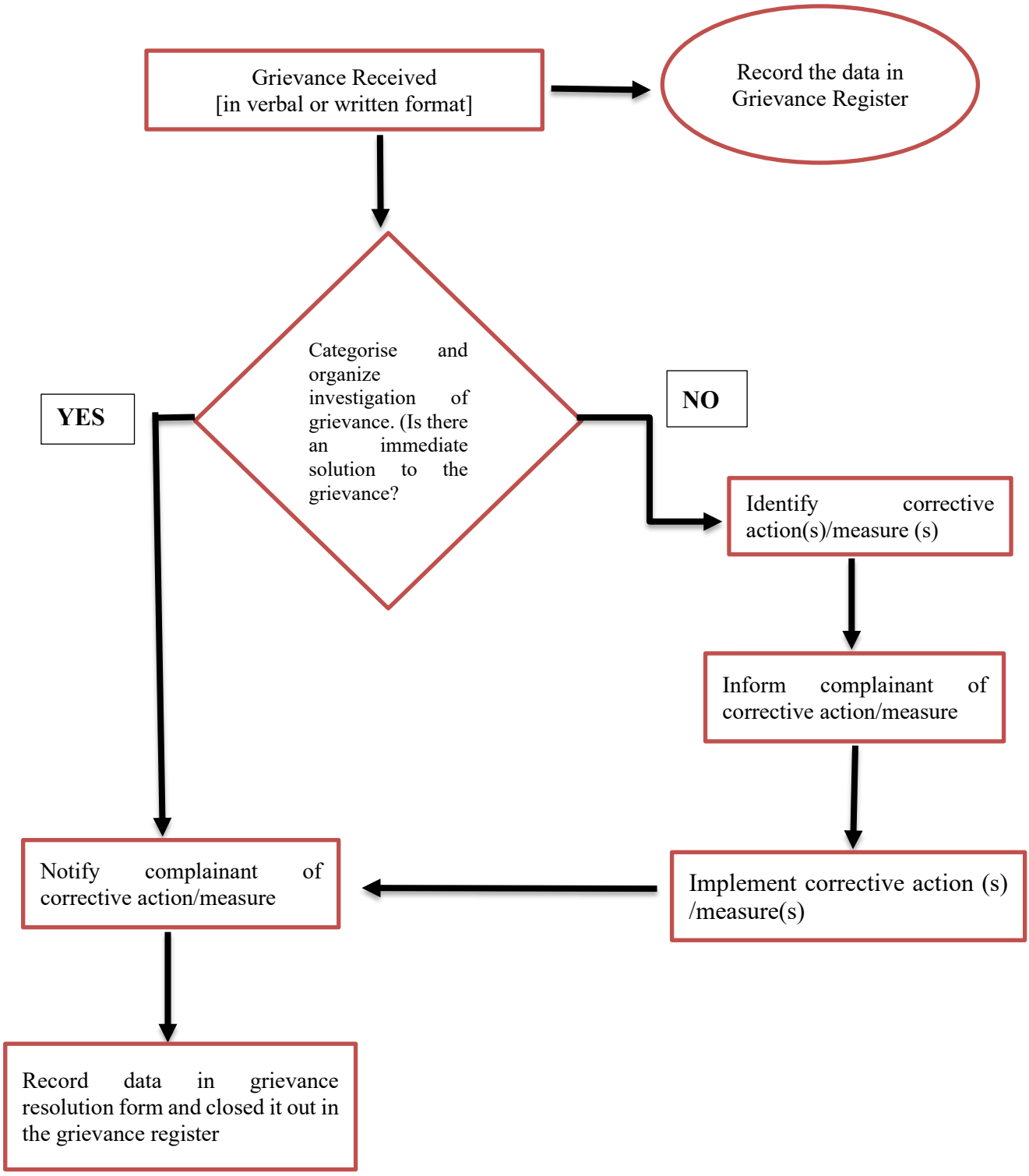
Matrix 1: Visual Illustration of the UDAP Grievance Redress Mechanism



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NITA-U's Roles and Responsibilities

All NITA-U staff and contractors are responsible for reporting any comment response, and grievance to the Social, Environmental Specialists and Program Management Team [PIT] who will serve as focal point persons on stakeholder engagements. These Specialists are responsible for receiving, documenting, coordinating investigations and responding to all grievances within agreed timeframes. This is in addition to holding the responsibility for on-going monitoring and review of effectiveness and efficacy of the Grievance Mechanism. NITA-U's communications or public relations teams shall be furnished with lists of these grievances and closeout solutions for their information and further action. For avoidance of doubt, the program team shall work together with all other structures within NITA-U to ensure smooth program execution.

In addition, the implementation agency will coordinate, assist and facilitate the role of the World Bank financed Enhanced Implementation Support and Monitoring (EISM) entity who will be hired to support project teams in addressing discrimination against vulnerable or marginalized individuals or groups. Further details can be found in Section 6.1 and in Annex 19 of the UDAP ESMF.

Procedure for Comment Response

The steps taken by NITA-U for receiving and handling any comments pertaining to the Program are subsequently outlined.

STEP 1: Submitting a comment to NITA-U

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

a) During regular meetings held between communities and the program team;
b) Through the Local Consultative Forums established in the affected villages;
c) During informal meetings;
d) Through communication directly with management – for example a letter addressed to site management, or other operational offices;
e) Directly by e-mail to **info@nita.go.ug,** telephone **+256-417-801041/2, servicedesk@gou.go.ug;**
f) **Using a toll-free hotline, where confidentiality is required;**
g) Placing a comment in the community suggestion boxes in each PAC;
h) Filling in a grievance record form and submitting it to selected offices; and
i) Through the Social and Environmental Specialists.

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

STEP 2: Logging the comment

Once a comment has been received it must first be logged in the comments and concerns register (clearly described in the ESMP Tracker under the Source) and the Social and Environmental Specialists will be informed. As this register is a living file, a draft may be found in (Appendix 2).

STEP 3: Providing the initial response

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

5.3 Procedure for Grievances Resolution

STEP 1: Investigating the grievance

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

STEP 2: Concluding/resolving the grievance

The grievance should then be resolved. NITA-U will outline the steps taken to ensure that the grievance does not re-occur. Consultation with aggrieved parties and views sought about company recommendations shall also be carried out. If complainant is satisfied, the PIT, Social

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and Environmental Specialists will seek their signoff from the Component Lead and Program Coordinator.

STEP 3: Taking further steps if the grievance remains open

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

5.4 Record Keeping

All comment responses and, grievances are to be logged using the Comment Response, and Grievance logging forms and registers. Closure of the same shall be signed off in the Grievance closure or resolution form (Annex 7). These registers include details of the comments/grievance, the commenter/aggrieved, and ultimately the steps taken to resolve the grievance. Any accompanying documentation e.g. written statements, photographic evidence, or investigation reports are to be filed along with the grievance log both in hard and soft copies.

A master database will be maintained by the NITA-U Service Desk to record and track management of all comments and grievances, and audited by the PIT, Social and Environmental Specialists. This will serve to help monitor and improve performance of the Comment Response and, Grievance Mechanism.

5.5 Comment Response and Grievance Mechanism Log

A sample format for logging summary details of each comment and grievance response is provided in Annex 8. As noted above, hard and soft copies should be kept on file.

Note:

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

5.6 Monitoring and Review

It is vitally important to monitor the effectiveness of the comment response and, grievance mechanism. Appropriate measures/KPIs for this include monthly reporting on the number of grievances received, resolved and outstanding. This will be undertaken by the Service Desk Team/Social and Environment Specialists and reported to the Component Lead and Program Coordinator. As part of the annual review/report, analyzing the trends and time taken for grievance resolution will help to evaluate the efficacy of the comment response and, grievance

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mechanism. Records of receipt grievances and status of resolution will be shared with the World Bank through the monthly Environmental and Social safeguards progress reports.

As part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the Comment Response and, Grievance Redress Mechanism is designed to improve effectiveness and stakeholder buy-in.

6.0 MONITORING, EVALUATION AND REPORTING

6.1 Monitoring and Evaluation

NITA-U will maintain a database and activity directory detailing all stakeholder engagements, information disclosure and grievances collected throughout the project. The database will be available for public review on request.

Monitoring of stakeholder engagement activities will be undertaken by the client or appointed representative on a quarterly basis. Stakeholder engagement will be evaluated by the PIT, Social and Environmental Specialists in line with set Key Performance Indicators. Additionally, a World Bank-financed Enhanced Implementation Support and Monitoring will be established to assess the level of non-discrimination achieved under the project. In particular, the EISM entity will assess the level of sensitization/training on social inclusion and non-discrimination given to communities, contractors, workers and other relevant stakeholders as well as the accessibility and confidentiality of the GRM. In addition, it will facilitate outreach and sensitization by preparing community and beneficiary information materials on community rights and non-discrimination on World Bank-financed operations in line with the Constitution of Uganda (informed by official circulars issued by the government on non-discrimination and inclusion-see Annex 18 of the UDAP ESMF) and World Bank policies. In addition, it will help the World Bank to prepare and implement a plan to disseminate information about the support available to communities.

The following indicators will be used for evaluation:

a) Level of understanding of the program stakeholders;
b) Annual grievances received and how they have been addressed;

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c) Annual grievances related to exclusion and discrimination received and how they have been addressed;
d) Number of sensitization/trainings on non-discrimination provided; and
e) Level of involvement of affected people in committees and joint activities and in the program itself.

In order to measure these indicators, the following data will be used:

a) Issues and management responses linked to minutes of meetings;
b) Monthly reports;
c) Feedback from primary stakeholder groups (through interviews with sample of affected people);
d) Feedback from entities involved in carrying out consultations with vulnerable or marginalized individuals or groups;
e) Commitment and concerns register; and
f) Grievance register.

6.2 Reporting

6.2.1 Monthly Reports

The Social and Environmental Specialists will prepare brief monthly reports on stakeholder engagement activities for the Program Secretariat which include:

a) Activities conducted during each month;
b) Public outreach activities (meetings with stakeholders and newsletters);
c) Entries to the grievance register and progress of resolution;
d) Entries to the commitment and concerns register;
e) Number of visitations to the information centre;
f) Progress on partnership and other social projects;
g) New stakeholder groups (where relevant); and
h) Plans for the next month and longer term plans.

Monthly reports will be used to develop annual reports reviewed by Program Coordinator and the Director Technical Services. These reports will be submitted to World Bank.

6.2.2 Quarterly Reports

Using the ground-truthing approach, informal meetings and the monthly reports as inputs, the

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Social and Environmental Specialists will then prepare quarterly SEP reports summarizing all public consultation issues, grievances and resolutions. They will also provide a summary of relevant public consultation findings from informal meetings held at community level. To inform decision making, these evaluation reports will be presented to the NITA-U ExCo for approval and onward submission to the World Bank.

6.2.3 Disclosure Process

The NITA-U will annually report back to the communities on matters relating to:

a) Main findings from the annual monitoring;
b) Progress on implementation of the mitigation including the community development plan and social investment initiatives;

The NITA-U will use best practice reporting methods including online publication of reports on NITA-U and MoICT & NG websites and printing and dissemination of hard copies to the relevant stakeholders.

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16. World Bank HOW-TO NOTES Feedback Matters: Designing Effective Grievance Redress. Mechanisms for Bank-Financed Projects. Part 1: The Theory of Grievance Redress.

Annex 1– GRIEVANCE RECORD OF FEEDBACK FORM

GRIEVANCE REGISTRATION FORM

Serial No: 1001
Ref No: ……
Date: …/……../……..

Name of Complainant: ……Gender: Male ☐ Female ☐

Telephone Number: ……..Age:……

ID Type and No: ……..

Description of Complaint;

……
……
……
……
……

Name & Contact details of witness (If available): ……

Location of Receipt of Grievance	**Location of occurrence of Grievance**
District:	District:
County:	County:
Sub county/Town council:	Sub county/Town council:
Village/Cell:	Village/Cell:
LC Chairperson's Name:	Line Number:
Grievance No in village:	Name of execution contractor:
Other (Specify)	Other (Specify)

Description of Activity/Project/ line that Grievance is related to

……

Signature or thumbprint: ……

FOR OFFICIAL USE ONLY: Received by: ……

Observation of receiving Officer: Issue ☐ Grievance ☐ Non Grievance ☐

Method of receipt: Letter ☐ Email ☐ Face to face ☐ Telephone call ☐

WhatsApp ☐ Etc…(Please specify) ……

Support documents provided by Complainant *(if any)*

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Annex 2: SAMPLE ESMP TRACKER FORMAT

Environment and Social Management and Monitoring Plan Tracker											
NITA-U											
NO.	**DATE RAISED**	**SOURCE**	**DESCRIPTION**	**ACTION**	**ACTION CLOSURE INDICATOR**	**PRIORITY**	**ACTIONEE**	**DUE DATE**	**MONITORING FREQUENCY**	**ACTION STATUS**	**ACTION STATUS AMENDED BY**

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Annex 3: GRIEVANCE RESOLUTION FORM

GRIEVANCE RESOLUTION FORM

Closure Date: …/……/……..
Ref No (Should be in line with registration form number): ……
Receipt Date: …/……/……

Name of Complainant: ……Gender: Male ☐ Female ☐

Telephone Number: ……..Age: ……

ID Type and No: ……..

Grievance registration Form Details:

Serial No: ……..System Ref No. ……..….Date of receipt ……..

Response to Complaint (detailed-Utilize overleaf/ additional paper if required)

……
……
……
……
……

Name & Contact details of witness (If available)……..

I ……..acknowledge that I agree to the solution proposed in respect to the above grievance and that the solution has been implemented to my satisfaction.

Complainant's Name & Signature: ……...

Witness' Name & Signature: ……

Company representative Name & Signature: ……

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ANNEX 4: GENERIC SUMMARY OF POTENTIAL UDAP ENVIRONMENTAL AND SOCIAL IMPACTS

Potential Impact	Status	Proposed Enhancement (+ve)/ Mitigation Measure (-ve)
• Provision of employment opportunities	+ve	• NITA-U shall ensure that the contractor is briefed about the need to give preference to competent local labour
• Provision of market for construction materials during the construction phase	+ve	• Contractor shall purchase materials from local businesses in the country
• Reduction in human movement • Use of ICT will reduce the need for movement of people from one location to another for (Meetings, Bid collection and submission, Collection of examination results, Document pickup and delivery etc.). Reduced movement minimizes traffic-borne air and noise emissions and also reduces exposure to risks of accidents by government and other beneficiaries' staff.	+ve	• NITA-U shall ensure availability of e-services
• Dematerialization: replacement of physical production and distribution of music, video, books, and software, etc. by the delivery of digital information over the network. Dematerialization reduces resource consumption and waste generation.	+ve	• MDAs shall be encouraged to utilize paperless communication and information storage
• Enhancement of environmental awareness and environmental education in schools, workplaces and individual beneficiaries from community outreaches, workplace inductions and Site signage.	+ve	• In line with the code of conduct, NITA-U commits to conducting stakeholder engagements, establishing a Grievance Redress System, toolbox talks, work place inductions and ensuring GBV signage is placed both at the project sites and district offices, schools, hospitals etc and that a SEA and VAC prevention and management plans are developed and enforced
• Building capacity in management of IT programs and projects	+ve	• NITA-U commits to providing the best available services as it transforms lives through e-services delivery
• Improved delivery of public services by improving efficiency through government cloud infrastructure	+ve	• NITA-U commits to providing services online as it transforms lives through e-services delivery
• Fast-tracking and backstopping the post conflict recovery programs by providing affordable connectivity to the region along with other benefits of the project.	+ve	• NITA-U commits to providing the best available services as it transforms lives through e-services delivery

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Potential Impact	Status	Proposed Enhancement (+ve)/ Mitigation Measure (-ve)
• Source of revenue to government from payment for internet services	+ve	• NITA-U commits to providing the best available services as it transforms lives through e-services delivery
• Improved E-waste management since the wider project components are looking at engaging other government stakeholders on E-waste aspects	+ve	• NITA-U is a member of the National e-Waste Steering Committee and is participating in the establishment of e-Waste disposal sites, conducting a e-Waste baseline survey and the review of the e-Waste Management Regulations, 2012.
• Promotion of healthy competition in the internet connectivity business in Uganda	+ve	• NITA-U commits to providing affordable services in the region
• Increase in susceptibility to soil erosion during rainy days as construction activities will be undertaken,	-ve	• Restrict vegetation clearance and ensure only on-spot vegetation clearance as far as is reasonably practicable
• Loss of vegetation cover at and around excavation points and access routes	-ve	• Have in-house restoration plans for contractors to plant especially indigenous grasses after backfilling excavations
• Dust pollution in case of project implementation during dry season	-ve	• Use water sprinkler where dust levels are likely to cause community discomfort,
• Temporal business disruptions due to trenches in urban centres, Construction noise and vibrations,	-ve	• Works should be planned to ensure trenches are covered within a day, • Contractors should utilize only equipment that is in good mechanical condition. • Noise and vibrations in Wildlife sites should be minimized as guided by UWA. • Any damage to adjoining structures arising out of compaction works should be immediately rectified or owners compensated by the contractors. • Conduct task specific Job risk assessments so as to plan for provision of risk-specific mitigation measures. • Ensure that teams are guided on the scope of operations for trench excavation to avoid costs and penalties from potential PAPs
• Water pollution and siltation	-ve	• Embrace sound run-off management techniques especially during the construction phase • Proper waste management and good housekeeping, no garbage/refuse, oily wastes, fuels/waste oils should be discharged into drains or onto site grounds, • Pre-Job site safety instructions should look out for the type of vegetation, terrain and proximity of the workstation to the downstream water courses. Give appropriate inductions to teams before works begin.

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Potential Impact	Status	Proposed Enhancement (+ve)/ Mitigation Measure (-ve)
		• Sediment traps should be installed at work sites adjoining watercourses.
• Impacts on protected/ sensitive areas. The laying of the fiber optic cables through wetland, forest. Ecosystems and protected areas will likely affect them. In addition, disposal of waste (oil, grease, plastics etc.) will pollute and possibly destroy some of the natural resources.	-ve	• All works through protected areas should be assessed and approvals sought prior to installations • With guidance from UWA (for Wildlife), NFA (for forests) and Wetlands Management Department (for Wetlands), where full impact assessment for project activities should be done whenever required. • It is noted that construction will be limited to existing road reserve, hence moderate impact significance. Clearance for a Right of Way shall be sought prior to project execution. • Implementation teams shall be made aware of the waste Management plan for EHS compliance reasons.
• Excessive vegetation clearing, excavation coupled with poor drainage can result in soil erosion, Flooding and landslides in flat lands and on steep slopes respectively. This may be likely in south-western Uganda regions.	-ve	• Restore trenched sites as soon as possible to avoid disturbed areas triggering erosion • Install silt traps on erosion prone sites when trenching for fiber optic cables.
• It is expected that project vehicular traffic will emit exhaust emissions, chiefly oxides of sulphur (SOx), nitrogen (NOx) and those of carbon (CO2 and carbon monoxide- CO). Others are particulates, unburned fuel (VOC) and ground-level ozone. Emissions quantities generated will depend on volume of traffic, travel distances, type and age of vehicles/ equipment, fuel type and quantities, and type of road. Impact on air quality will be short-term only manifesting during the construction phase.	-ve	• NITA should require contractors to submit equipment service schedules/ records as a means to ensure that all machinery used is properly maintained, efficient and emits low levels of emissions. • Instruct drivers and other operatives to STOP ENGINES when Not in USE. • However, the effects of such are temporary and can be low if managed well.
• Improper construction waste management (construction phase) and E-waste management especially during the care and maintenance stages of the project (mainly operational phase)	-ve	• Develop and adhere to a proper waste management plan emplacing hierarchical waste management practices like prevention, reduction and recovery at source, reuse, recycling, and responsible disposal among others. • Utilize NEMA licensed waste handlers in waste management
• Potential Child Abuse and promiscuity leading to spread of diseases	-ve	• Develop and follow, incorporation of clauses in procurement process, community Awareness for both the workers and the

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Potential Impact	Status	Proposed Enhancement (+ve)/ Mitigation Measure (-ve)
		community on the dangers of promiscuity and child abuse, installing signposts on zero tolerance of child abuse/GBV and promotion of child protection, enforce labor laws and incorporate compliance in the contracts, Maintenance and cleaning of vehicles, trucks and equipment should take place offsite, Where road use is restricted signage and alternatives should be provided to the public and Install equipment of high quality and proper standard as guided by Uganda National Bureau of Standards (UNBS).
• Incidents of Gender based Violence	-ve	• Carry out GBV risk targeted stakeholder engagements. • Incorporate and strengthen GBV risk management referral pathways under the project GRM. • Include in bidding documents requirements on GBV risk management.
• Discrimination against and exclusion of vulnerable or marginalized individuals or groups from project activities and benefits	-ve	• Carry out targeted stakeholder engagements to ensure there is broad understanding of the obligations of project participants to ensure non-discrimination under the project. • Develop and rollout training and sensitization material (including IEC material on non-discrimination. • Enhance the implementation of GRMs (hotlines, e-GRMs) to facilitate the report of sensitive complaints. • Ensure HR procedures, CoCs, contracts and whistle-blower protocols include non-discrimination clauses. • Monitor implementation of mitigation measures and reporting of incidents of discrimination.
• Impact on cultural heritage /archaeological interest.	-ve	• Carrying out awareness session on archaeological find to field teams and temporarily halting work when material of archaeological importance is found until further studies and retrievals are carried out.
• Occupational health and safety risks and Construction traffic related accident.	-ve	• Provision of personal protective equipment to the workers, Training of workers and community members on safety precautions.
• Traffic interference.	-ve	• Have flag personnel on site to deal with traffic and also liaise with Uganda Traffic Police Teams to ensure smooth traffic flows. • Minimize activity during rush hours.

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Potential Impact	Status	Proposed Enhancement (+ve)/ Mitigation Measure (-ve)
• Electrocution during excavation and pole erections.	-ve	• Inspection of electric units and adherence to a specific lockout and tag out system and isolation. • Coordination with respective electricity providers on any below ground services • Use competent personnel.
• Noise emissions from borrowing or excavation equipment.	-ve	• Proper maintenance of earthmoving equipment and powered tools and use of appropriate PPE

Legend: +ve: Positive, –ve: Negative

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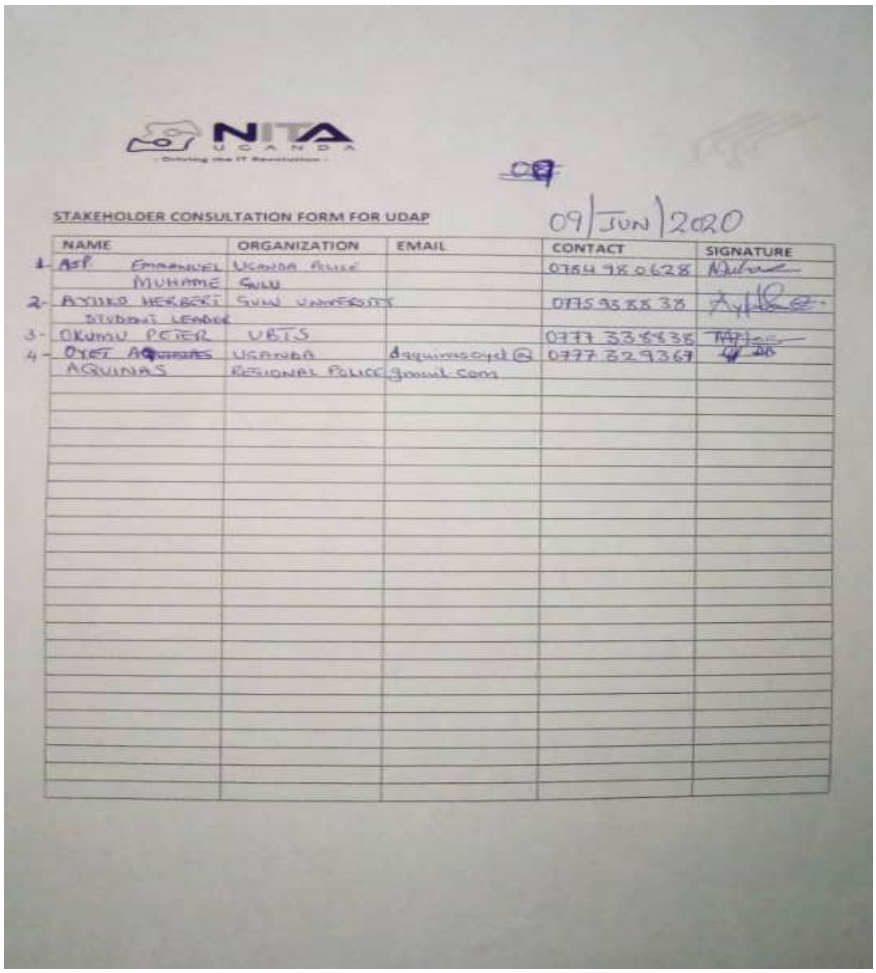
ANNEX 5: LIST OF PARTICIPANTS BY POSITION IN EACH DISTRICT WITH THEIR CONTACTS



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STAKEHOLDER CONSULTATION FORM FOR UDAP 09/JUN/2020

	NAME	ORGANIZATION	EMAIL	CONTACT	SIGNATURE
1.	ASP EMMANUEL MUHAME	UGANDA POLICE GULU		0764 98 0628	
2-	AYILO HERBERT DISTRICT LEADER	GULU UNIVERSITY		0775 95 55 38	
3-	OKUMU PETER	UBTS		0777 335535	
4-	OYET AQUINAS	UGANDA REGIONAL POLICE	Aquinasoyet@gmail.com	0777 329369	

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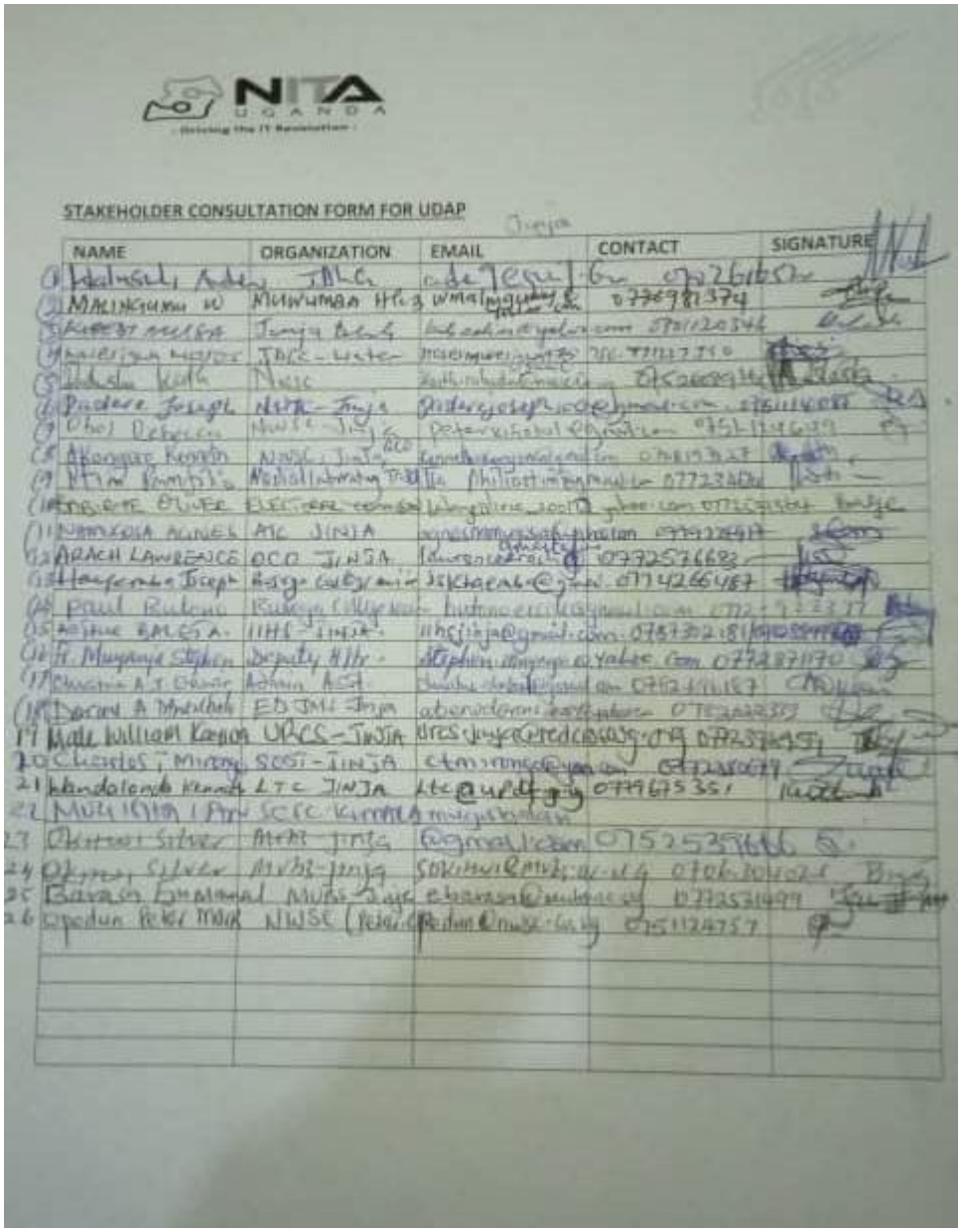

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	NAME	ORGANIZATION	EMAIL	CONTACT	SIGNATURE
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24	Okiwi Silver	MVBS - Jinja	sokiwi@mvbs.ac.ug	0706[illegible]	
25	Barasa Emmanuel	MVBS - Jinja	ebarasa@mvbs.ac.ug	0772531499	
26	Opedun Peter Mark	NWSC (Peter)	opedun@nwsc.co.ug	0751124757	

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18/JUN/2020

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OLONG BELMOS	COURTS OF JUDICATURE - LIRA	[illegible]	0771890536	[signature]
ASP MATOVU ANDREW	LIRA MAIN PRISONS		0783000278	[signature]
MARGARET OKWII - DEPUTY PRINCIPAL	LIRA SCHOOL OF COMPREHENSIVE NURSING		0782 612 581	[signature]
OCHEN TONNY WALTER	UTC - LIRA UGANDA TECHNICAL COLLEGE		0773 746310	[signature]

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NAME	ORGANIZATION	EMAIL	CONTACT	SIGNATURE
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LT. COL. MAIOVU RASHID	UPDF 4CIT REGT	[illegible]	0752756106 0703048725 0776500767	[signature]
OPIRA PAUL	GULU SCH OF NURSING AND MIDWIFERY	paulpaul01@gmail.com	0777 646096	[signature]
OPIRA PAUL	GULU INSTITUTE OF HEALTH SCIENCES	paulpaul01@gmail.com	0777 64 6096	[signature]
AKECH JOSEPHINE	GULU HIGH SCHOOL	akechjosephine@gmail.com	0786 584429	[signature]

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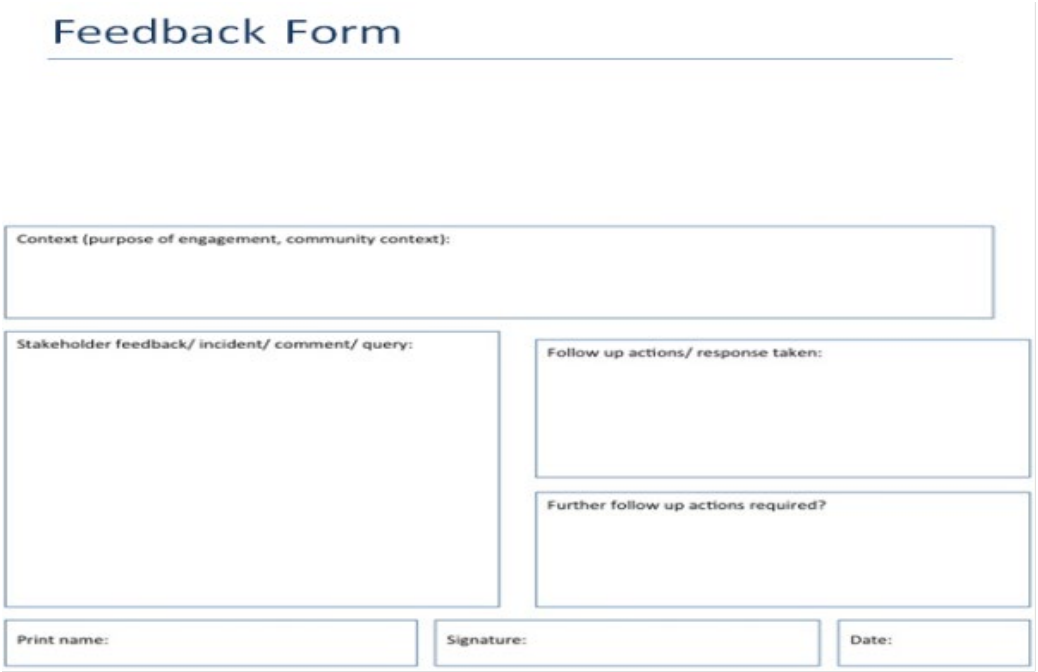
ANNEX 6: SEP FEEDBACK FORM



Feedback Form

Context (purpose of engagement, community context):

Stakeholder feedback/ incident/ comment/ query:

Follow up actions/ response taken:

Further follow up actions required?

Print name:

Signature:

Date:

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ANNEX 7: GRIEVANCE RESOLUTION FORM

PROJECT PUBLIC GRIEVANCE FORM	
REFERENCE NUMBER:	
NAME OF	
CONTACT INFORMATION: *(Please mark how you would like to be contacted: mail, telephone, email, in person)*	By Post: *Please provide mailing address* By Telephone: By Email:
TYPE OF GRIEVANCE:	Individual: Group: Cultural:
DESCRIPTION OF INCIDENCE OR GRIEVANCE:	*What happened? Where did it happen? Who did it happen to? What is the result of the problem?*
HAS THIS GRIEVANCE BEEN RAISED PREVIOUSLY BY YOU OR ANYONE	No Yes Details:
DATE OF INCIDENCE GRIEVANCE:	One time incidence/grievance (date …) Happened more than once (how many times …) On-going (currently experiencing problem)
WHAT WOULD YOU LIKE TO SEE HAPPEN TO RESOLVE THE PROBLEM?	
Signature: Date: Please return this form to: Grievance Manager *[Add details of contact]*	
ASSESSMENT CATEGORY	
GRIEVANCE ACCEPTED Yes / No	
RESPONSE/ FOLLOW UP (SUMMARY OF RESPONSE AND CORRECTIVE	
RESPONSE TO APPLICATION Date: Person: Observations:	
CORRECTIVE ACTION AND SIGN-OFF Applicant satisfied with corrective action: Yes / No (Details) Is further action required: No / Yes (Details) If Yes, date sign-off received from Application:	

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ANNEX 8: GRM LOG

Location (District)……
Sub County……
Village:……

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

Notes

1. **Reference Number: a** unique number assigned to the complaint for easy tracking and follow up
2. **Mode of receipt: how the c**omplaint was received. This could be by Telephone, "SMS", Email, Written, In Person, verbal
3. **Contact of complainant: to** include phone number, P.O. Box number, e-mail
4. **Description of complaint: a** brief description of the complaint received, could include; fraud, land disputes, compensation, environment and social management issues service delivery, facilities, management etc
5. **Action taken:** includes remedies, resolution, agreed upon actions to the satisfaction of the complainant

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ANNEX 9: GRM REPORTING TEMPLATE

REPORTING TEMPLATE

District…….
Sub-county……
Parish…….

Indicators

SN	Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
1.	No of grievances related to project activities logged per months												
2.	Number of grievances that received timely response (within 7 days)												
3.	Number of grievances received and addressed at parish level												
4.	Number of recurrent complaints received (over a period of 15 days)												
5.	No. of meetings held												
6.	Number of unresolved grievances												
7.	Number of grievances referred from parish to sub-county level for addressing												
8.	Number of grievances referred to other legal institutions e.g. LCs, Police, Courts of Law												

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Provide details on recurrent complaints raised (attach evidence where necessary)

……

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…….

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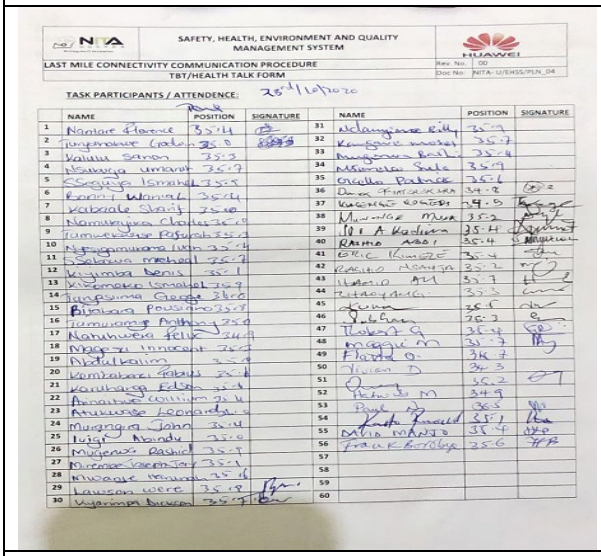
ANNEX 10: PICTORIAL EVIDENCE OF ADHERENCE TO MOH COVID-19 SOPS

Pre task TBT meeting in Masaka

Meeting Sheema DLG officials.



SAFETY, HEALTH, ENVIRONMENT AND QUALITY MANAGEMENT SYSTEM

LAST MILE CONNECTIVITY COMMUNICATION PROCEDURE

TBT/HEALTH TALK FORM

TASK PARTICIPANTS / ATTENDENCE: 28/10/2020

TBT – Capturing Temperature records

Top management visit briefing in Mbarara

NITA-U and KITTI inspection

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