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Development, P.O Box 8147 Kampala, Uganda

8th December, 2021

The Country Manager World Bank Country Office KAMPALA

SUBMISSION OF PROGRESS REPORT ON IMPLEMENTATION OF ENVIRONMENT AND SOCIAL SAFEGUARDS UNDER THE UGANDA INTERGOVERNMENTAL FISCAL TRANSFERS (Ugift) PROGRAM-FY 2020/21

Implementation of Environment and Social Safeguards under the UgIFT Program is guided by the Environment and Social Systems Assessment (ESSA) report of the World Bank of May 2020. Within this report are nine (9) actions that should be reported on.

Accordingly, the progress report on the implementation of Environment and Social Safeguards for FY 2020/21 was compiled.

The purpose of this letter therefore, is to submit the attached progress report for your consideration.

Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

Permanent Secretary, Ministry of Education and Sports Copy to:

Permanent Secretary, Ministry of Health

Permanent Secretary, Ministry of Water and Environment Permanent Secretary, Ministry of Agriculture, Animal

Industry and Fisheries

Permanent Secretary, Ministry of Gender Labour and

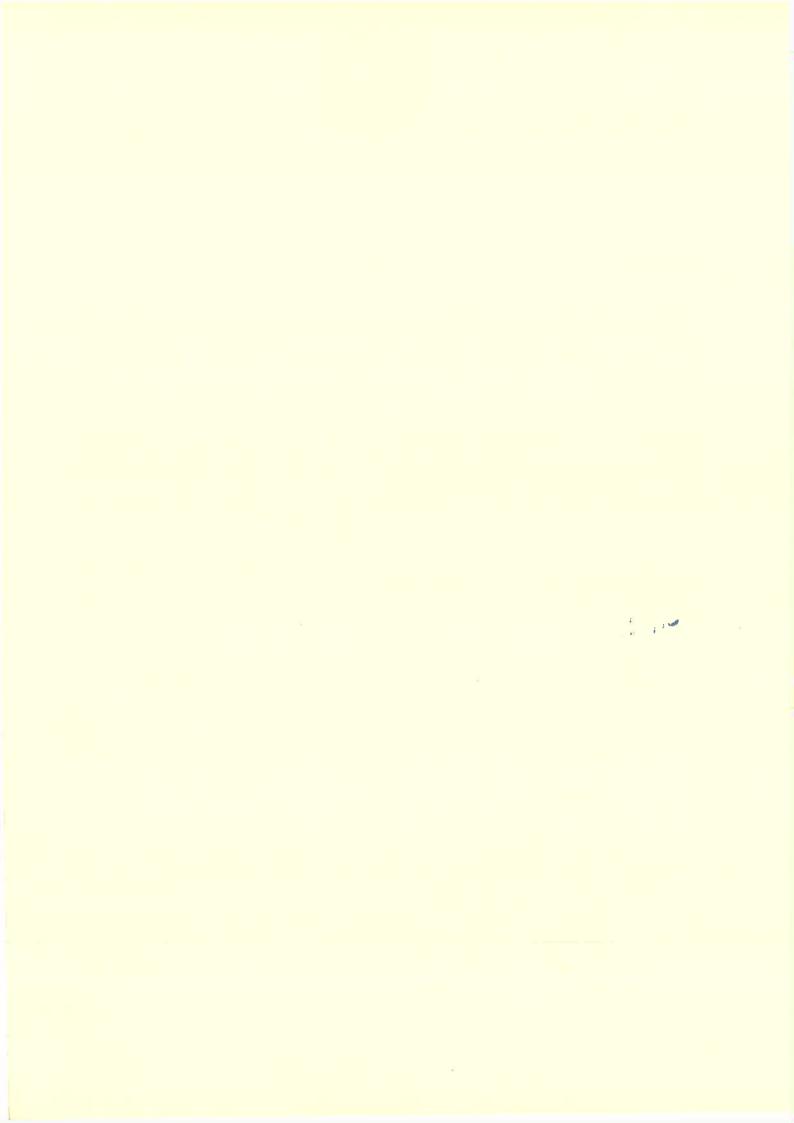
Social Development

Permanent Secretary, Ministry of Local Government

Permanent Secretary, Ministry of Lands, Housing and Urban Development

Executive Director, National Environment Management Authority

Executive Director, Public Procurement and Disposal of Public Assets Authority



Foreword

Government of Uganda (GoU) in collaboration with the World Bank is implementing the Uganda Intergovernmental Fiscal Transfer (UgIFT) Program for Results (PforR), which supports GoU's Intergovernmental Fiscal Transfers Reforms Program (IFTRP) whose cardinal objective is enhancing the adequacy and equity of fiscal transfers and improving fiscal management of resources for service delivery by Local Governments.

The GoU recognises the need to attain development in a manner which reflects sustainable environment and social management by mitigating the negative environment and social impacts of our investments. The Environmental and Social System Assessment (ESSA) Report was issued by the World Bank in May 2020 and it forms the basis for the implementation of Environment and Social (E&S) safeguard requirements for the UgIFT Program.

I wish to report that, since the World Bank Mission conducted in November 2020, the program has registered a number of improvements, notable among these are; the issuance of Environment and Social, Safety and Health Safeguard Guidelines by the Ministries of Water and Environment, and that of Gender, Labour and Social development respectively; the revision of the Standard Bidding Documents for Local Governments to include environment and social safeguards requirements by PPDA; and conducting the Environment and Social Functional Review and Skills Needs Assessment and the monitoring of adherence to Environment and Social Safeguards at the three joint monitoring exercises of the investments in Health, Water, Education and Agriculture.

However, despite the above-mentioned milestones, we acknowledge that some gaps still persist and thus, call upon the relevant MDAs and Local Governments to ensure that, environment and social safeguard requirements are adhered to not only under the UgIFT Program, but across all other Programs and projects implemented in Local Governments.

It is our duty to ensure that Environment and Social, Health and Safety Safeguard requirements are adhered to in all our investments and contracts and therefore, we will continue to seek your commitment towards implementation of E&S requirements in all our Programs and investments.

I wish to thank the World Bank for the commitment towards improving fiscal decentralisation performance and for the efforts towards streamlining environment and social inclusion in our Development Agenda. Furthermore, I appreciate the commitment by the various MDAs and Local Governments towards the implementation of the environment and social safeguard requirements in the UgIFT and other Government Programs.

Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY



The Republic of Uganda

Uganda Intergovernmental Fiscal Transfer (UGIFT) Program

PROGRESS REPORT ON IMPLEMENTATION OF ENVIRONMENT & SOCIAL SAFEGUARDS UNDER UGIFT

FY2020/21

MOFPED, Kampala

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Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

List of Abbreviations

AF Additional Financing B.o.Qs Bills of Quantities

CBSD Community Based Services Department

CDO Community Development Officer

CSO Civil Society Organisation

DCDO District Community Development Officer

DDEG Development Discretionary Equalisation Grant

DEO District Environment Officer

DHO District Health Officer
DLG District Local Government
DLI Disbursement Linked Indicator

DWRM Directorate of Water Resources Management

E&S Environment and Social

ESHS Environment, Social, Health and Safety

ESIA Environmental and Social Impact Assessment
ESMF Environmental and Social Management Framework

ESMP Environmental and Social Management

Plan

ESSA Environmental and Social Management System Assessment

FD TC Fiscal Decentralisation Technical Committee

GBV Gender Based Violence

GHs General Hospitals
GoU Government of Uganda

GRC Grievance Redress Committee GRM Grievance Redress Mechanism

HC Health Centre

HIV/AIDS Human Immunodeficiency Virus/Acquired Immunodeficiency

Syndrome

IFTRP Intergovernmental Fiscal Transfers Reforms Program

ILO International Labour Organisation KCCA Kampala Capital City Authority

LC Local Council

LGs Local Governments

LGFC Local Government Finance Commission
LGPA Local Government Performance Assessment

LLG Lower Local Government

MAAIF Ministry of Agriculture, Animal Industry and Fisheries

MC Municipal Council

MDA Ministries, Departments and Agencies

MoES Ministry of Education and Sports

MoFPED Ministry of Finance, Planning and Economic Development

MoGLSD Ministry of Gender, Labour and Social Development

MoH Ministry of Health

MoLG Ministry of Local Government

MoLHUD Ministry of Lands, Housing and Urban Development

MoPs Ministry of Public Service

MTP Medium Term Plan

MoWE Ministry of Water and Environment

NDA National Drug Authority
NEA National Environment Act

NEMA National Environment Management Authority

NFA National Forest Authority

NGO Non-Government Organization

NWSC National Water and Sewerage Corporation

OHS Occupational Health and Safety
OPM Office of the Prime Minister

OTIMS Online Transfer Information Management System

PAP Program Action Plan

PBS Performance Budgeting System
PDE Procurement and Disposal Entity
PDO Program Development Objective

PforR Program for Results

PIP Program Improvement Plan
PIU Program Implementation Unit
POM Program Operation Manual

PPDA Public Procurement and Disposal of Public Assets Authority

PPE Personal Protective Equipment
PSRP Public Service Reform Programme

PSC Program Steering Committee
PTA Parent Teachers Association

PTW Permit to Work

RTRR Reporting, Tracking, Referral and Response

SBD Standard Bidding Documents
SMC School Management Committee

STD/STI Sexually Transmitted Disease/Infection

TC Town Clerk

UgIFT Uganda Intergovernmental Fiscal Transfers

UTSEP Uganda Teacher and School Effectiveness Project

VAC Violence against Children

VACIS Violence against Children in School

WB World Bank

EXECUTIVE SUMMARY

- 1. The Uganda Intergovernmental Fiscal Transfers (UgIFT) Program for Results (PforR) supports GoU's Intergovernmental Fiscal Transfers Reforms Program (IGFTRP) whose objective is to enhance the adequacy and equity of fiscal transfers and improve fiscal management of resources for service delivery by Local Governments (LGs).
- 2. The original UgIFT PforR was approved on June 27, 2017, and became effective on May 29, 2019, with US\$200 million equivalent. The World Bank approved AF to the UgIFT Program with additional credit of US\$240 million equivalent and a grant of US\$60 million equivalent in September 2020. Meanwhile, the original UgIFT Program was also restructured to align with the additional financing (AF) and was approved by the World Bank management on October 26, 2020. The UgIFT-AF will continue to support construction of secondary schools and health centre IIIs while broadening the scope to include rural water infrastructure; micro irrigation systems and integrate services in refugee settlements into the LG system.
- 3. GoU, as part of the requirements for the Additional Financing with the Bank undertook an Environment and Social System (ESSA) in 2017 and later this was updated in 2020. The updated ESSA for the UgIFT Program established gaps in implementation of environment and social safeguards and thus made recommendations.
- 4. The updated ESSA of May 2020 guides the implementation of the Environment, Social, Health and Safety Safeguard requirements in the UGIFT Program. Specifically, the ESSA contains the Program Action Plan within which, nine (9) Actions for implementation are included.
- 5. Similarly, Environment and Social considerations have been integrated in the Disbursement Linked Indicators (DLIs) 1, 2, 3, 4, 5 and 6; and implementation of Environment, Social, Health and Safety Safeguard requirements across the participating sub-programs is an on-going process.
- Following the Bank Mission of November, 2020, overall, performance of the Program in regard to adherence to the Environment and Social safeguard requirements was upgraded to Moderately Unsatisfactory from Unsatisfactory owing to the actions undertaken by GoU so far.

- 7. Government, (a) recruited additional staff i.e. an Environmental Specialist and Social Development specialist at MoFPED to provide technical assistance to LGs and the participating Ministries; (b) included NEMA and the Ministry of Gender, Labour, and Social Development (MoGLSD) on the UgIFT Technical Committee and ensured that they are part of the joint monitoring team; (c) issued a circular from MoFPED to LGs on Contract Management roles and use of investment service costs inclusive of E&S safeguards requirements.
- 8. Government made progress towards the achievement of the first action of the PAP on strengthening tools for enhancing the integration of E&S issues into LGs' plans, budgets, procurement, and monitoring. Environment and Social Health and Safety Guidelines (inclusive of tools checklist and templates) had been developed by MoWE and MoGLSD and disseminated to 176 Local Governments and other MDAs in December 2020.
- 9. Notably, the PPDA revised the Standard Bidding Document (SBDs) for works to integrate E&S requirements and issued them to LG Accounting Officers in September 2020.
- 10. In line with the design of the UgIFT-AF Program and the third action of the PAP, Environment and Social requirements were adequately integrated into the LGPA manual, DLIs, and verification protocols. The MDAs also revised the sub-program technical guidelines and the grant and budgeting guidelines to integrate sub-program-specific environmental and social aspects; and these were issued and disseminated to all LGs between April-May 2021.
- 11. From the joint quarterly monitoring reports, whereas findings indicate improvement in E&S safeguards, e.g. increased screening of projects, implementation of E&S safeguard requirements at LGs and sub-project level remains a big challenge. Nevertheless, this is expected to improve with efforts in addressing the capacity gaps in the E&S requirements implementation performance through the technical assistance provided to LGs and the various Guidelines and tools that have been developed.

12. It is important to note that more work needs to be done as also highlighted by the world Bank Missions e.g. building capacity of the MDAs and the Local Government technical staff in implementing E&S requirements, strengthening the implementation of the Guidelines by MoGLSD that guide on the establishment of GRCs and the Stakeholder Engagement Plans; Undertaking of stakeholder engagements; and formalisation of land ownership for projects among others.

2.0 INTRODUCTION

2.1 Program Overview

- 1. The Uganda Intergovernmental Fiscal Transfers (UgIFT) Program
- 2. for Results (PforR) supports GoU's Intergovernmental Fiscal Transfers Reforms Program (IGFTRP) whose objective is to enhance the adequacy and equity of fiscal transfers and improve fiscal management of resources for service delivery by Local Governments (LGs).
- 3. The original UgIFT PforR was approved on June 27, 2017, and became effective on May 29, 2019, with US\$200 million equivalent. The World Bank approved AF to the UgIFT Program with additional credit of US\$240 million equivalent and a grant of US\$60 million equivalent in September 2020. Meanwhile, the original UgIFT Program was also restructured to align with the AF and was approved by the World Bank management on October 26, 2020. The UgIFT Additional Financing (AF) will continue to support construction of secondary schools and health centre IIIs while broadening the scope to include rural water infrastructure; micro irrigation systems and integrate services in refugee settlements into the LG system.
- 4. GoU as part of the requirements for the Additional Financing with the Bank undertook an Environment and Social System (ESSA) in 2017 and later this was updated in 2020. The update of the ESSA, aimed at assessing the current National system of government for managing Environment and Social (E&S) risks and impacts against the Bank's core principles for PforR programs, in the context of the new scope of the UgIFT-AF Program; and propose measures for strengthening identified gaps in the system.
- 5. The updated ESSA for the UgIFT Program established gaps and made recommendations. The updated ESSA of May 2020 was developed to guide the implementation of the Environment, Social, Health and Safety Safeguard requirements in the UGIFT Program. Specifically, the ESSA contains the Program Action Plan within which, nine (9) Actions for implementation are included.
- 6. The Environment and Social Systems Assessment Report of May 2020 is the guiding document for the implementation of the Environment, Social, Health and Safety Safeguards for the UGIFT Programme;

7. Environment and Social considerations have also been integrated in the Disbursement Linked Indicators (DLIs) 1, 2, 3, 4, 5 and 6 (Annex 3).

2.2 The PforR Program Action Plan

The analysis from the ESSA identified key areas for action to ensure that the Program interventions continue to be aligned with the Core Principles of Bank Policy for Program-for-Results Financing.

These actions also either form part of the Service Delivery Improvement Matrix (DLI3) or represent routine actions to be carried out annually (DLI4). Annex 2 indicates the actions in the Program Action Plan (PAP) with indicative timeline, responsibility for implementation and indicators for measuring the completion of such actions.

2.3 Objectives of the E&S Safeguards Report

This report gives general highlights on how the Environmental, Social, Safety and Health safeguard aspects of the Program have been implemented in the reporting period of FY2020/21. The report specifically points out: activities that have been undertaken by the program team to implement the environment and social safeguard requirements as stipulated in the Program Action Plan; monitoring/mitigation regimes; challenges and recommendations.

Key environmental and social, safety and health activities included: development of Environment and Social Health and Safety Guidelines for LGs, integrating E&S Guidelines into the sector grant Guidelines, dissemination of guidelines, joint monitoring activities; acquisition of land and documentation for projects; compliance monitoring against the issued guidelines and the ES provisions in the enhanced Standard Bidding Documents, development and implementation of ESMPs among others.

2.4 Scope of the E&S safeguards Report

This Report covers all activities or services related to the implementation of the actions in the ESSA Program Action Plan (PAP) under the UgIFT Program; and all other environmental and social impacts identified in the ESSA Report of 2020 that need mitigation, monitoring and approval conditions by NEMA and other MDAs.

3.0 E&S LEGAL, POLICY, INSTITUTIONAL & PROJECT ORGANISATIONAL FRAMEWORK

3.1 National Legal Framework

The legal frameworks and guidelines followed in the implementation and monitoring of E&S Safeguards under the Program are as outlined below:

- Constitution of the Republic of Uganda, 1995
- Historical Monument Act, 1967
- National Environment (Noise Standards & Control Regulations), 2003
- National Environment (Waste Management) Regulations, 1999
- National Forestry and Tree Planting Act, 2003
- Occupational Safety and Health Act, 2006
- Pest Control Products Act;
- Petroleum Supply Act, 2003
- The Environmental Impact Assessment Regulations, 1998
- The Land Act, Cap 227
- The Local Government Act (Cap 243)
- The National Environment (Audit) Regulations, 2006
- The National Environment Act No.5 of 2019.
- The Public Health Act, 1964
- The Water Act, Cap 152;
- The Workers Compensation Act, Cap 225

3.2 Plans and Policy Framework for E&S

- MoWT OHS Policy Statement
- National HIV/AIDS Policy, 2011
- The National Irrigation Policy (2017);
- The National Water Policy (1999);
- Sectorial Policy Statements and Guidelines for Mainstreaming Cross-Cutting Concerns
- The Environment & Social Safeguards Policy (2018);
- The National Environment (Control of smoking in Public Places, 2014)
- The National Environment Management Policy, 1994
- The National Gender Policy, 2007
- Water Resources Policy, 1995

3.3 Institutional Framework

- Central Government is responsible for developing and disseminating guidelines to implementing entities including Local Governments. UGIFT implementing MDAs include: MoFPED, MoWE, MoGLSD, OPM, MoLHUD, PPDA, MoLG, NEMA, LGFC, MAAIF, MoH, and MoES.
- At Local Government (LG), the environment and social functions fall under the Natural Resources Department (NRD) and the Community Based Services Department (CBSD) respectively.

3.4 E&S Mitigation Capacity & Management

3.4.1 Program Organizational Capacity

The management and monitoring of environmental, safety and social safeguards was jointly undertaken by three entities, namely; MoFPED, MDAs and World Bank. Continuous program oversight of the roles of the LGs and Contractors was enforced through sustained and coordinated monitoring of activities and compliance to all Environmental, Social, Safety and Health safeguards by all key stakeholders (Program and extra project communities).

An Environmental Specialist and a Social Development Specialist were recruited by MoFPED in July 2020 to support the implementation of the Environment and Social safeguards on the Program.

3.4.2 E&S Safeguards Implementation Management

The Program team executed the E&S safeguards in accordance with the governing laws including E&S guidelines from the World Bank. The various interventions were in compliance with the ESSA and WB Guidelines and enforced through quarterly Fiscal Decentralization Technical Committee (FD-TC) meetings and quarterly Spot/Joint monitoring, where identified gaps were addressed, and recommendations made.

4.0 PROGRESS IN THE IMPLEMENTATION OF THE ACTIONS IN THE ESSA PROGRAM ACTION PLAN OF MAY 2020

The implementation of environmental and social safeguards under the UGIFT Programme is guided by the Environment and Social Systems Assessment (ESSA) Report by the World Bank of May 2020. In the ESSA Program Action Plan, there are 9 Actions relating to E&S considerations and their status of implementation is presented below.

5.1 Action #1: Strengthening tools for enhancing integration of E&S issues into LGs plans, budgets, procurement and monitoring.

Completion Measurement

- i. Strengthen and issue tools for environmental and social screening and monitoring of implementation of requirements;
- ii. PPDA coordinate with MoLG to issue a follow-up circular to all accounting officers of LGs to use revised SBDs and institute penalties for LGs not complying.

a) Preparation and Dissemination of E&S Guidelines and Tools

Environmental Guidelines to Local Governments for strengthening





compliance with safeguards requirements in development projects were developed by the Ministry of Water and Environment. The Guidelines incorporated a Tool for Environmental Climate Change and Screening (captured in Annex 1; pgs. 27-30), and the Environmental Monitoring Checklist (as Annex 5; pgs. 46-49) of the Guidelines.

Similarly, the Social Safety and Health Safeguard Guidelines for Local Governments were developed by the Ministry of Gender, Labour and Social Development - A Social Screening Form is captured in - Annex 3 (pgs. 30-33) and Monitoring Checklists for new and on-going projects- Annex 8 (pgs. 38-44) of the Guidelines. Other tools included in the guidelines include the Environment Social Management Plan (ESMP) template.

The Guidelines were endorsed by the FD-TC and disseminated to LGs between **14th-30th December 2020** by a multi sectoral (MDAs) team. Further dissemination has been carried out during the two joint monitoring exercises and during several stakeholder engagements.

The Environment and Social Health and Safety Guidelines can be accessed online at http://budget.go.ug/all-documents.

b) E&S Monitoring and Reporting Tools

The Monitoring and reporting tools on E&S used for joint monitoring were updated and automated on OTIMS for the 2nd Joint Monitoring held from **27th July-7th August 2020** and at the 3rd Joint Monitoring held from **25th April-8th May 2021**.

For the 3rd Joint Monitoring, the tools were updated to include a checklist on Micro-Scale Irrigation and Water projects where E&S indicators were included.

c) Standard Bidding Documents revised to integrate E&S requirements

The Standard Bidding Document (SBD) for use by Local Government Procuring and Disposing Entities (PDEs) for the procurement of works under Open Bidding was revised by PPDA in collaboration with other stakeholders namely **NEMA**, **MoWE**, **MoLG**, **MoGLSD** and **MoFPED** to integrate E&S requirements.

The revision fulfils the requirement to include ESHS requirements in bidding documents for infrastructure projects (roads, water and sanitation systems, building works, bridges,

) or works category of procurement.

These were approved by the FDTC and issued by PPDA on the 15th September 2020 to all Accounting Officers, LG PDEs in Circular No.4 of 2020 dated **15th September 2020.** The revised SBDs can be accessed on the PPDA website at www.ppda.go.ug.

Penalties for non-compliance with the revised Standard Bidding Documents E&S requirements have also been integrated in the Local Government Management of Service Performance Assessment process as captured in the Local Government Management of Service Delivery Performance Assessment Manual of September 2020, Environment and Social Safeguards thematic area, 15c & g (pg. 28).

Challenges

- Guidelines are yet to be disseminated to the Lower Local Governments, the level at which most projects are located and implemented;
- Absence in some LGs of the requisite staff (EOs, CDOs, and Labour Officers) to champion the implementation of E&S safeguards;
- Non-implementation of E&S mitigation measures by the contractors;
- Local Governments are yet to fully implement the E&S inclusions in the revised SBDs.

Recommendation

- A National Training Resource Pool for E&S Officers from MoWE/NEMA/ MoGLSD should be constituted to train the TPCs at HLGs as trainers. The TPC would then disseminate the Guidelines to the LLGs and the LLGs would also disseminate the Guidelines to facilities (Schools and Health Centers).
- PPDA will follow up on compliance to E&S provisions in the enhanced standing bidding document.

5.2 Action #2: Guidelines for unified system of grievance redress and community engagement planning in Local governments issued.

Completion Measurement

Guidance for establishment and functioning of grievance redress in Local Governments including:

- A grievance handling system (Complaints Log)
- Functional Grievance Redress committees at each LG and at implementing agencies
- Communities aware of the Grievance Redress Mechanism (GRM).
- Establishing an Ethical Code of Conduct available at each site.
- Each implementing agency developing a stakeholder engagement Plan

The Social, Safety and Health Safeguards Implementation Guidelines for Local Governments developed by MoGLSD, in Annex 2, pg. 29 provide a Grievance/Complaints Log Template; direction on composition of the Grievance Redress Committees (GRCs) at various levels- i.e. HLG, LLG, Project and Community levels and the Roles of the GRC (pgs. 7-10 of the Guidelines).

In addition, it is a requirement of the LG Management of Service Delivery Performance Assessment Manual that the GRC is in place, operational and publicised- (See Performance Area on Environment and Social Safeguards No.14 a, b & c on pg. 27 of the Manual). Also, the Ethical Code of Conduct is part of the revised SBDs (See Part 1, Section 4 of SBDs of Works under Open Bidding).

The Guidelines further provide guidance on the Community/Stakeholder Engagement Plan for Local Governments by defining what it is, who develops the plan and the levels at which it will be implemented. The Guidelines also provide a template for the Community/Stakeholder Engagement Plan at LG level Annex 1(pgs. 27-28).

Challenges

Despite the Guidelines being developed and disseminated, the level of constitution of GRCs is low. For instance, in the just completed National

Assessment of LGs on Service Delivery, the lowest scored indicator was "established a consultative grievance redress Committee" with only 25%.

While in the 3rd Joint Monitoring undertaken from April-May 2021, establishment of GRCs stood at 16% for Education facilities and at 18% for Health facilities which are below average.

Each UGIFT implementing Agency is required to constitute a GRC to address Agency specific grievances related to the Program. To date, MDAs have not yet established these GRCs.

Recommendations

- MGLSD will support LGs to constitute GRCs at the various levels of LG and at project level.
- MGLSD and LGs should support the Community Based Services Department to train GRC's at facility, LLGs and HLG level.
- MoFPED and LGs should provide resources to functionalise the GRCs (i.e. funds for meetings, communication and raising awareness).
- MoFPED and MGLSD will provide guidance on the establishment of GRC's at MDA level
- 5.3 Action #3: Updated sectoral budget and implementation guidelines and technical guidelines, and annual performance assessment manual to cover sector specific environmental and social aspects and integrate of standard guidance and tools.

Completion Measurement

 Updated Sectoral guidelines of implementing agencies and annual performance assessment manual responsive to E&S requirements

Budget and Implementation Guidelines of MAAIF, MoWE, MoH, and MoES were updated by the respective MDAs to incorporate E&S requirements. In updating these guidelines, reference was made to the earlier issued

Environment and Social, Safety and Health Safeguard Guidelines by MoWE and MoGLSD.

To support the updating of these sector grant guidelines, a working retreat was organised in the month of April 2021 and held at Kigo, Serena Hotel. During this retreat, MDAs were provided with guidance on inclusion of E&S requirements into their guidelines.

These Guidelines were disseminated to all Local Governments during the 3rd Joint Monitoring of Projects that was held from **25th April - 8th May 2021**. A report of the 3rd joint monitoring which includes a section on the dissemination of grant and implementation guidelines is available at http://budget.go.ug/all-documents.

Meanwhile, the Local Government of Service Delivery Performance Assessment Manual of September 2020 has integrated E&S requirements in the minimum conditions and performance measures for Education, Health, Water and Environment and Micro-Scale Irrigation.

Challenges

 The comprehensive integration of the E&S requirements in the grant Guidelines is new and thus subject to varying interpretations. This could lead to misinterpretations and non-implementation of E&S requirements.

Recommendations

- Regular monitoring of the implementation of E&S requirements by the Line Ministries.
- Training in E&S requirements per Ministry should be sustained.

5.4 Action #4: Dissemination of and training on Updated Sector and Cross-sectoral Guidelines and Tools, including safeguards aspects

Completion measure

- Dissemination of updated E&S tools and guidelines from MoWE/NEMA and GLSD takes place before effectiveness.
- Dissemination of sector guidelines, including E&S requirements, takes place before the end of December 2020.
- E&S Awareness / trainings activities for stakeholders at central government & LGs including political and technical officers.

a) Dissemination and Training on the E&S Guidelines

Following the issuance of the guidelines on ESHS by MoWE and MoGLSD, it was imperative for the MDAs to disseminate the guidelines to Local Governments in order to strengthen compliance with safeguards requirements in development projects.

The ESHS Guidelines were disseminated to the 176 Local Governments from **13th to 30th December**, **2020**. The dissemination exercise was done by a multi sectoral team drawn from the various UgIFT implementing MDAs. At the same time, support was given to LGs on alignment of the Local Government Budget Framework Papers (BFPs) to the National Development Plan (NDP) III. E&S requirements were emphasised in this activity.

A total number of 3500 copies of the Environment and Social, Health and safety safeguard guidelines were distributed to the LGs and 500 copies were distributed to the UGIFT implementing MDAs.

A dissemination report is available on the budget website at http://budget.go.ug/all-documents.

b) Dissemination and Training on the updated Sector and Cross Sectoral Guidelines and Tools

Dissemination of the updated Sector Guidelines from MoES, MoH, MoWE, MAAIF and MOLG was carried out in all Local Governments between **25th April - 8th May 2021.**

DDEG guidelines were not disseminated because the inclusion of the Parish Development Model was not yet finalised.

Challenges

Whereas Dissemination of E&S Guidelines and Sector Guidelines has been done, there is need to undertake further training, clarification and further dissemination of the Guidelines and the tools to Local Governments, Lower Local Governments and to the facilities (Schools, Health facilities and host farmers)

E&S Awareness / trainings activities for stakeholders at Central Government & LGs including political and Technical Officers have also not yet been conducted.

Recommendations

The TA due to be recruited by the World Bank in collaboration with MoFPED specialists should provide guidance on the training of trainers (ToTs) in E&S at various levels and develop tools/manuals in this regard.

5.5 Action #5: Quarterly Joint monitoring visits to Local Governments take place, covering safeguards as well as contract management and procurement

Completion Measure

 NEMA and MGLSD participate as part of the national resource pool in quarterly joint monitoring

Three (3) quarterly Joint Monitoring visits for UGIFT projects covering safeguards and contract management issues have been undertaken. These

targeted all 176 local governments and projects in Health, Education, Water and Agriculture.

The joint monitoring team is comprised of senior Officers from UgIFT participating MDAs including NEMA, MoGLSD, OPM, MoWT, MoES, MoWE, MoFPED, MoLG, MoH, LGFC, PPDA.

All the three Joint Monitoring reports are available on the budget website at http://budget.go.ug/all-documents.

a) The 1st Joint Monitoring

The first joint monitoring was held in March 2020 in the 176 local governments. Focus was on the Phase 1 Seed Secondary Schools (117) and upgrade of Health Centre II-IIs (186) for FYs 2018/19 and 2019/20.

Findings from this monitoring indicated poor implementation of E&S requirements e.g. environment screening was undertaken in only 45% projects and only 32% had developed project briefs under Phase I construction of 117 seed secondary schools.

b) The 2nd Joint Monitoring

The second joint monitoring was held between July/August 2020 and targeted 176 local governments with a focus on Phase 1 seed secondary schools (117) and Health centres (186) for FY2018/19.

Key findings from the exercise exhibited minimal progress in adherence to E&S safeguard requirements e.g. environment and social screening for Education was 27% and 12% in upgrade of Health facilities. Meanwhile, formulation of ESMPs was only 28% and 34% in Health and Education respectively.

c) The 3rd Joint Monitoring

The third joint monitoring was held between April/May 2021 and this was done in 176 local governments focusing on Phase 2 - new projects for FY 2020/21 including seed secondary schools (115) and Health centres (64) and selected water and agriculture (micro scale irrigation) projects.

Key findings from the third joint monitoring in the ES sector showed an improvement in ES performance e.g. environmental screening was at 76% and social screening at 49% however, formulation of Environment and Social Management Plans (ESMPs) was still low, e.g. only 28% of the sites had approved ESMPs.

Challenges

Although MoWE/NEMA and MGLSD are part of the national resource pool and three (3) Joint Monitoring activities have been undertaken, implementation of E&S requirements is still low; Knowledge and capacity to implement among LG/Contractors and staff still low and staffing gaps still exist, e.g. several LGs do not have Labour Officers.

Implementation of some requirements is expensive e.g. Project Briefs and ESIAs are supposed to be done by qualified/certified people, the cost of securing land titles is cited as prohibitive, and the cost of functionalising GRCs at all levels.

Recommendations

- Training on E&S requirements by MGLSD, MoWE/NEMA, MOFPED should be sustained
- MoGLSD, MoLG, MoPs and MoFPED should engage on the matter of recruiting and facilitating Labour Officers
- MoFPED, LGs should ensure that facilitation to the Community Based Services Department and the Natural Resource Department is increased and/ or prioritised
- 5.6 Action #6: Technical support teams support LGs to implement Performance Improvement Plans (PIPs) and Recommendations of joint monitoring visits

Completion Measure

• Technical support teams, which include environment and social safeguards expertise, provide targeted support to LGs to help the implementation of follow up recommendations

The Ministry of Local Government (MoLG) is mandated to develop Performance Improvement Plans (PIPs) for poor performing LGs at the National Assessment. Development of the PIPs included Technical officers from MoWE/NEMA and MGLSD, so that the E&S area that had been performed poorly could be addressed.

During the period of reporting, 57 LGs (24 worst performing and 33 that scored below 60% in thematic areas) benefitted from targeted technical support from the PIP in 2019/2020. PIPS for 27 worst performing LGs (scored between 5% and 28%) under Crosscutting Thematic Areas were developed for the period 2020/2021. The PIPs will be implemented between May-August 2021.

Challenges

Performance Improvement Plans are currently reaching only a few LGs, 32% in 2019/2020) and 15% in 2020/2021.

Recommendations

- MoWE/NEMA, MGLSD and MoLG should be supported to increase the number of Districts benefitting from the PIPS.
- MoWE/NEMA, MGLSD and MoLG should provide targeted technical support in the areas of E&S after joint monitoring visits, preferably on a quarterly basis.
- 5.7 Action #7: Undertake environmental functional review and social skill needs assessment and agree on proposals related to strengthening social risk management at the LG level including, GBV and VAC, HIV prevention, and strengthening structures, investments

Completion Measure

A functional review has taken place and provisions updated, including;

Staffing structures requirements and roles at local and national level.

- Specification of sector investments and functions and DDEG guidelines strengthened to include E&S requirements.
- E&S Safeguard requirements identifiable in revised LG budget structure and reporting formats for Social Development and Natural Resources departments via outputs and performance indicators for inclusion in the PBS aligned with results from the functional review.

In order to carry out a functional review and social skills needs assessment as required in the Program Action Plan, a number of activities were carried out in order to achieve part of this action and these included: support field visits to the LGs/MDAs (quarterly joint monitoring, support to LGs in aligning of their BFPs to the NDPIII, updating and dissemination of sector grant guidelines, dissemination and training on environmental and social health and safety guidelines among others). During these activities, gaps were identified and remedial actions identified. A draft report was shared with the Bank for further action.

Checklists for on-going projects have been revised and those for new projects developed and have integrated E&S requirements. These were used during the 2nd and 3rd Joint Monitoring.

Meanwhile, automated Quarterly and Annual reports and tracking of E&S performance have not yet been done because the process of revamping the PBS is not yet completed.

Challenges

Automated Quarterly and annual reports and tracking of E&S performance could not be done because the process of revamping the PBS is not yet completed.

Recommendations

Revamping of the PBS should be fast-tracked by MoFPED to allow for adequate inclusion of E&S indicators.

5.8 Action #8: Enhanced Budgeting and Reporting Systems, including for E&S activities operational

Completion Measures

- Strengthened LG joint monitoring of contract management, construction management issues as well as compliance to E&S risks and impacts.
- Automated Quarterly and Annual reports generated on Environment and Climate change integration in annual work plans and budgets.
- Strengthened budgeting and reporting system for tracking and reporting on environmental (including Climate Change) and Social performance.

The action is due to be implemented in 2021/22

5.9 Action #9: Integrated Refugee Response planning and implementation (including E & S safeguard requirements for program interventions in 13 refugee hosting LGs).

Completion Measure

- OPM guidance to all MDAs and the respective refugee-hosting Local Governments, accompanied with integrated plans including refugees' communities.
- Integrated Guidelines for LG Planning for the Refugee response and transition prepared and disseminated, (including E & S safeguard requirements for program interventions) in 13 refugee hosting LGs.
- Costed and integrated refugee response and transition plans (including ESMP as well as child protection and GBV prevention plans).

The Office of the Prime Minister (OPM) provided the required framework for refugee response and transition in the form of the Comprehensive Refugee Response Framework which was launched on 24th March 2017.

Furthermore, a field visit to the 12 refugee hosting LGs was conducted by a joint team of officials from MoH, MoES, MoFPED, MoWE/NEMA and MGLSD from **21st-30th March 2021** to assess the Implementation of E&S Safeguard requirements in the Refugee Response and Transition Process. During the visit, the LGs were provided with a checklist to guide the integration of E&S requirements in refugee matters at LG level.

However, the findings from the field visit indicated that implementation of E&S requirements in the Education and Health facilities to be transitioned is not systematic Also, the specifically costed and integrated refugee response and transition plans which should integrate E&S requirements were not yet in place however some LGs had incorporated E&S issues in their draft Development Plans and Annual Work Plans.

Challenges

- Implementation of E&S requirements in the facilities to be transitioned is not systematic because the guidelines on E&S have not yet been disseminated up to facility level.; and
- Costed and integrated refugee response and transition plans which should integrate E&S requirements are not yet in place.

Recommendations

- The Guidelines for E&S should be disseminated to facility level by the Technical Planning Committee members (especially DCDO and District Environment Officer).
- MOLG, OPM, MoWE/NEMA and MGLSD should facilitate refugee hosting LGs to develop specific plans for refugee response and transition.
 MWE/NEMA and MGLSD should ensure that these integrate E&S Requirements

5.0 SUMMARY OF ISSUES & RECOMMENDATIONS/WAYFORWARD

During this reporting period, whereas there was progress in the implementation of the E&S safeguard requirements on the program, there still exist some issues that need attention. A number of recommendations are presented in the Table 5-1 below.

Table 5-1: Issues and Recommendations on implementation of E&S requirements under the Program

Action 1:		ANGELINE STATE OF THE PARTY OF	forward
Strengthen tools for enhancing integration of E&S issues into LGs plans, budgets, procurement and monitoring	Achieved	Guidelines are yet to be disseminated to the Lower Local Governments at which most projects are located	 A National Training Resource Pool for E&S of officers from MWE/NEMA/ MoGLSD will be constituted to train the TPC at HLGs as trainers The TPC would then disseminate the Guidelines to the LLGs The LLGs will also disseminate the Guidelines to facilities
Action 2: Guidelines for unified system of grievance redress and community engagement planning in Local governments issued.	Achieved	 Grievance Redress Committees (GRCs) are largely not in place, GRC establishment was the lowest scored indicator in the 2019/20 (25%) National Assessment GRCs stands at 16% for Education facilities and at 18% for Health facilities at the 3rd Joint monitoring 	 Training the LGs on the constitution and operationalization of the GRC will be provided by MGLSD, MoFPED MOFPED, MGLSD will provide guidelines on the constitution and operationalization of the GRC at the level of the UGIFT implementing agencies
Action 3: Updated sectoral	Achieved/ on-going	E&S requirements in the Guidelines is	Regular Monitoring of the implementation and training on

Action	Status	Issues	Recommendation/Way forward
budget and implementation guidelines and technical guidelines, and annual performance assessment manual to cover sector specific environmental and social aspects and integrate of standard guidance and tools.		new and is subject to varying interpretations	E&S requirements by the Line Ministries will be undertaken
Action 4: Dissemination of and training on Updated Sector and Crosssectoral Guidelines and Tools, including safeguards aspects	Achieved	Training on the Guidelines and the tools is yet to be undertaken, or not adequate	The TA due to be recruited by the World Bank should provide guidance on the training of trainers in E&S at various levels and develop tools/manuals in this regard.
Action 5: Quarterly Joint monitoring visits to local governments take place, covering safeguards as well as contract management and procurement	Achieved/ on-going	Although MoWE/NEMA and MGLSD are part of the national resource pool and 3 Joint Monitoring activities have been held implementation of E&S requirements is still low	 Training on E&S requirements will be sustained MoGLSD, MoLG, MoPS will engage on the matter of recruiting and facilitating Labour Officers MOLG, MOFPED, MGLSD will engage LGs to prioritise facilitation to the Community Based Services Department and the Natural Resource Department
Action 6: Technical support teams support LGs to implement Performance Improvement Plans and Recommendations of joint monitoring visits.	On-going	Performance Improvement Plans are currently reaching only a few LGs, 32% in 2019/2020) and 15% in 2020/2021	 MoWE/NEMA, MGLSD and MoLG will be supported to increase the number of Districts benefitting from the PIPS MoWE/NEMA, MGLSD and MoLG will provide targeted technical support in the areas of E&S after joint monitoring visits- Quarterly basis
Action 7: Undertake environmental functional review and	Achieved and report submitted to the		A Capacity Building Plan has been developed and implementation will begin in January 2022 with support

Action	Status	Issues	Recommendation/Way forward
social skill needs assessment and agree on proposals related to strengthening social risk management at the LG level including, GBV and VAC, HIV prevention, and strengthening structures, investments	World Bank		from the TA recruited by the World Bank
Action 8 Enhanced Budgeting and Reporting Systems, including for E&S activities operational	Due to be	implemented in Jur	ne 2022
Action 9: Refugee Response planning and implementation (including E & S safeguard requirements for program interventions in 13 refugee hosting LGs)	Not achieved	Implementation of E&S requirements in the facilities to be transitioned is not systematic Costed and integrated refugee response and transition plans which should integrate E&S requirements are not yet in place.	MGLSD and MoWE will support the sub-programmes to integrate E&S safeguards into the sub-program specific refugee response interventions

ANNEXES

- Annex 1: Key risks, mitigation measures, Action matrix and performance assessment ref: ESSA 2020
- Annex 2: Program Action Plan (PAP) relating to E&S Considerations
- Annex 3: DLIs and Verification protocols with Environment and Social considerations

Key risks, mitigation measures, Action matrix and performance assessment – ref: ESSA 2020 Annex 1:

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
Environment and social risks				
Risks associated with poor site selection / siting of the proposed infrastructure e.g. schools constructed on flood prone areas, steep slopes, etc. this could not only impact on the integrity of the physical infrastructure but also pose a health and safety threat to school-going children. Similarly, poor siting of schools may cause children to walk long distances and expose them to the risks of absenteeism, dropping out of school, sexual exploitation among others.	Moderate	a) E & S screening and assessment will be carried out (prior to civil works), to inform site selection, planning and design of all sub-projects under UgIFT AF. b) Early engagement of key stakeholders will be undertaken to inform site selection where necessary for new schools under UgIFT AF. c) Ensure site geo-technical studies are undertaken where required, and site plans are approved by the relevant Government dovernment d) Site specific ESMPs will be prepared that provide the following mitigation	Environmental and social requirements (PPDA standard bidding documents for works incorporating environmental and social risk requirements has been adopted by all LGs under UgIFT AF). MWE, NEMA and MoGLSD to develop E&S screening and monitoring tools LG Public Investment	DL14 and DL15 (LGs to undertake the E&S screening, ESMP preparation & implementation).
		measures, among otners:	Maliayellient III	

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
Additional risks relating to poor siting of infrastructure include;		- Ensure proper landscaping and vegetation restoration after	place which - includes	
lack of review of architectural plans and drawings by Occupational Safety and Health/MoGLSD, before approval,		soil erosion; ites with indigenous p ther appropriate spec	safeguards mainstreaming checklist to guide	DLI4, DLI4, DLI5
		- Waste generated during construction will be disposed to	ning, c yeting, ing	
lack of geotechnical investigation to determine level of ground water, which increases the risk of		registere ny;	contracting and implementation	
ground water contamination from VIP latrines constructed at schools,		ors will be required to conand safety training for	Enhanced and revised DDEG	
lack of site hoarding increases the risk of falls into excavations which could be fatal or cause major injuries etc.		ers, hold regular tool ngs and provide per ctive equipment (PPE) ce its use.	guidelines providing for eligible investments in environment, climate	
Localized environmental risks/impacts (vegetation clearance, excavated sites, wastes, etc.), community and worker's health and safety risks associated		Post safety signage on the construction sites (including hoarding of sites) to restrict un authorized access to the construction sites.	change mitigation and adaptation and social risk management (MoFPED, MWE and NEMA) in addition to	
with construction		a) Involvement of District Environment Officer, Labour Officer and Community Development officer, head teachers, representative of the School Management Committee	routine monitoring. Undertake functional review of E & S skill needs	
		(SMC) and representative of Parents Teacher Association (PTA), in- charge of health facilities, in routine monitoring of ESMP implementation and compliance to related E &S	assessment (update budgeting guidelines to require allocations to E&S requirements	

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
		requirements.	must be at least	
			capital each).	
		and Social Compliance certificate prior to payment of contractor invoices and following site inspection	ate tor ion	
		to ascertain E & S compliance.		
Safety risks/impacts relating to	Moderate	a) Contractor should develop implement a health and sa	and Environmental and Safety social requirements	DL14
inadequacy in safety systems		contractors should have in p	place bidding documents for works incorporating	
presents a risky working environment that may result in		competent ESHS personnel to ensure	environmental	
fatal and non-fatal accidents to		b) secure site hoarding to eliminate	ate social risk has has	
Workers and confinings		interaction between site works and	been adopted by	
		safety provision of well-maintained	cal <i>LGs under UgIFT AF</i>). ned	
		tools and equipment, appropriate	ate	
		signage and traini	for	
		workers provision of enicient emergency response system	JUD.	
Occupational and community	Moderate.	a) Contractor will be required to comply		DL14
health risks/ impacts" relating to		with contractual requirements	social requi	
the protection and prevention of		g provision of safe a	ian (FFDA Stalldalu hidding documents for	
diseases or III health results from		drinking water, gender sensitive		
protection and prevention issues			environmental	
not instituted, then		surveillance pr	re- <i>social</i> risk	
and community could develop		employment medical examination,	been adopted by	
_		examinatio		
may sometin		post-employment illeuical	Ca	
compensable or cause a public				

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
health concern,		c) prevent and control exposure to hazardous substance, exposure to noise, vibration, heat, radiation, gases, particulate matter above the Permissible levels, issue a permit to work (PTW) in highly risky tasks		
Natural Resources Degradation Natural habitats could be altered as a result creation of borrow pits for aggregate materials. If not properly managed, borrow pits for construction materials pose perhaps the greatest potential negative impacts on natural habitats and land degradation if abandoned without proper reclamation/restoration.	Moderate	Contractors will be required to ensure proper and progressive restoration of the Borrow area site after gravel extraction through remediation of borrow pits, landscaping, and grass planting where appropriate. The restoration process should not be limited to only time of closure, but should be carried out at various stages and at allocations where the contractor will have extracted marram.	Environmental and social requirements (PPDA standard bidding documents for works incorporating environmental and social risk requirements has been adopted by all LGs under UgIFT AF).	DL14 &DL15
Effects due to unsustainable use of biomass fuel: the construction of additional schools under AF is expected to result in significant increased enrolment children. an indirect environmental impact, may lead to an increase in the consumption of biomass fuel wood for cooking at the schools. This could subsequently lead to an increase in deforestation.	Substantial	Support LGs through planting of wood lots on at least2 acres, utilize cleaner burning biomass-fuelled cook stoves that have the potential to lower exposure to air pollution as well as reduce fuelwood demand and/or construction of a biogas digester (where possible). This however, should be included in the planning and design of the school infrastructure under AF.		
Climate change related risks: The combination of high vulnerability to climate change (14 th mostvulnerable country) and low readiness to improve resilience	Moderate	a) Under micro irrigation: the matching grant will support farmers' capacity, by funding them to acquire proclimate irrigation equipment so as to enable them cope with climate risks	Climate change to be integrated into the ESHS screening forms, and in planning and design	DLI4 &5

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
(48th least ready country)		and reduce their vulnerability to floods and droughts;	of the UgIFT- AF Infrastructure	
		b) Water and Environment. In terms of mitigation measures, the AF will provide finances to encourage technological change with efficient pumping from boreholes and development of small networks that will increase efficiency in water production;		
		c) Health sector - the design of health infrastructure will incorporate energy efficiency measures such as use of renewable energy, energy efficient technologies and building designs and materials. In terms of adaptation measures, the design of the buildings will construct climate resilient health infrastructure in areas prone to landslides and flood waters and provisions for rain water harvesting, among other measures.		
		d) Strengthen the capacity of LGs to undertake gender responsive climateresilient infrastructure investments, implement climate change adaptation and mitigation measures.		
Risks related to inadequate management of health care waste include:	Substantial	a) MoH will be supported to develop health care waste management guidelines to ensure disposal of healthcare waste in an	Actions in Health Strengthening processes and tools for the	DLI4 (MoH oversight roles in developing Health Care Waste Management

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
- some HCs segregate medical waste from the general waste, however, the medical waste is eventually disposed at regular landfills along with municipal waste, other HCs practice open burning of waste or use inefficient incinerators that results in emission of dioxins, furans, and particulate matter posing a risk to human health due to air pollution. -Poor management of healthcare waste exposes workers & community to risks such as infections, injuries etc. -potential for surface/ groundwater contamination from effluents from healthcare facilities flowing into drains and run-off from soil during rains following dumping of infectious and chemical wastes. The potential for groundwater contamination from buried infectious wastes, sharps and body parts is also significant.	*:	environmentally safe manner, b) The design and functionality and of the HCs should consider among others, the inclusion of adequate disinfection/sterilization facilities, ventilation systems to ensure isolation and protection from airborne infections, provision of hazardous material and waste storage and handling areas, medical waste pit, placenta pits etc. c) HC-IIIs & IVs need to be supported to establish, operate and maintain a health care waste management system that is adequate for the scale, and type of activities, identified hazards and that promotes waste segregation, proper on- site handling, collection, transportation and storage based on good international industry practice. d) Explore support for the establishment of a centralized facility (perhaps at national/regional level) were infectious medical waste (from HC II, III and IV) is incinerated.	District/Municipal Health Team to manage staff, infrastructure and service delivery (c) the oversight and management of construction the environmental, social and fiduciary considerations and; (d) the management and maintenance of infrastructure and equipment including health care waste management systems).	Guidelines) DLI5 (assessment on evidence of dissemination of Health Care waste management guidelines to HCs) DLI6(under continuous quality improvement-HCs assessed on functionality of infection prevention, and control including health care waste management)
Impacts from investing in rural water supply and sanitation:	Moderate	a) E & S screening/ESIA will be conducted, costed ESMPs prepared and integrated into BoQs, bidding and contract documents, for all sub-	Actions in Water - MWE in collaboration with MoGLSD	DL14 (MWE oversight role)

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
-Pollution of point sources may arise from latrines, animals, as well as handling of drinking water source to the point of consumption.		projects, prior to commencement of civil works. b) sub-project investments in rural water supply and sanitation will be designed, constructed and operated to mitigate	strengthened LG technical guidance which includes environment and	DLIS
-Additionally, poor hygiene habits may lead to contamination of potable water (due to safe water chain from source to mouth Not being maintained) and the hygienic condition of latrines is generally noor or non-existent		negative environmental effects by ensuring proper drainage of wastewater, preventing water stagnation and avoiding the risk of groundwater contamination and development of breeding grounds for mosquitoes, etc. c) develop and implement water source protection	Structures that allows for the inclusion of water into the natural resources department	DL14 (MWE oversight role)
contributing to high incidence of water-borne and sanitation related diseases		and environment and natural resource management plans on the land management activities that contribute to soil erosion and loss of water storage in the catchment.	and local government positions agreed with MoPS.	DLI5
		c) Support the establishment and functionality of gender responsive (with 33-50% women membership) Water User Management Committees at all levels and ensure they are trained/sensitized on safeguard requirements (e.g. protection of water sources from point source pollution etc.) d) Support to LG to budget for and acquire simple portable water quality monitoring kits in their development plans. The kits will be utilized for testing samples from selected water points as part of routine water quality	Environment and Natural Resource Management MWE to prepare and implement water source protection plans and environment and natural resource management plans	DL16(S/C service Delivery Performance on functionality of Water user management committees

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
		and quantity monitoring of source point water supplies.		
		e) Gender responsive and inclusive Community Sensitization should be undertaken to raise local communities' awareness on environmental health hazards associated with water infection and poor drainage and the need to maintain good hygiene at point water sources. The sensitization should be carried out at a time when women are able to attend since they usually fetch water from water points		
Impacts from investing in	Moderate	6	Actions in micro	
Irrigation include potential for:		(i.e. Individually-owned irrigation systems) rather than small/large-scale	Irrigation	
- increased erosion, pollution of		schemes, hence, the scale of	-MAAIF	
surface and groundwater due to		d environmental and s	responsive Technical	
use agrochemicals, deterioration of water quality.		impacts will be minimized with application of appropriate mitigation	staff for irriga	
- waterloading (due to over			developed (in close	DL14
irrigation) and salinization of		b) E & S screening and assessment will	5G	
soils.		be carried for all potential sites,	and disseminated	
-Diversion of water through		ESMPs prepared, costed and integrated integrated into Bills of Outstation	(including safeguard	
irrigation further reduces the		into Dilis I contract do		DLI5 and 6
water supply for downstream		1	-Sub-county	
users, hence potential to		c) Where possible, use sprinkler	Irrigation	
exacerbate water conflicts.			Assessment	
-Poor water quality below an		waterlogging, erosion and inefficient	tool/manual jointly	

	Performance Assessment (DLIs 4,5,6)		DL14
Integration in design	Action Matrix (DLI3)	developed (by relevant stakeholders and agencies) which includes among others requirements for E & S screening/ESMP preparation and implementation	Environmental and social requirements (PPDA standard bidding documents for works incorporating environmental and social risk requirements has been adopted by all LGs under UgIFT AF).
Recommended Mitigation Measures		water use; d) Waterlogging will be minimized, by using micro-irrigation which applies water more precisely and limit quantities to meet crop needs. MAAIF to develop technical guidelines to include among others, the safe use, storage and disposal of agrochemicals. e) MAAIF through LG extension workers, will train the LGs and the selected farmers on occupational health risks, the safe storage, use and disposal of agrochemicals and associated waste. f) As much as possible, MoUs signed between the farmers and LGs will include the clauses to adhere with	requirements for proper storage, use, transportation and disposal of agrochemicals. a) Procedure on how to handle chance finds of physical cultural resources should be included in all civil works contracts. b) If the Contractor discovers any physical cultural resources, such as archaeological sites, historical sites, remains and objects, including graveyards and/or individual graves
Rating			Moderate
Risk and Impacts		irrigation project may render the water unfit for other users and impacts of the use of groundwater for irrigation may also arise from over-extraction (withdrawing water in excess of the recharge rate). This can result in the lowering of the water table, land subsidence and decreased water quality.	Construction activities related to rehabilitation, expansion or establishment of new infrastructure could adversely affect physical cultural resources.

Rating	Recommended Mitigation Measures	Integration in design Action Matrix	Performance
		(DLI3)	Assessment (DLIs 4,5,6)
	during excavation or construction, the Contractor shall:	E&S screening/ESIAs	
	- Stop the construction activities in the area of the chance find;	to include physical cultural aspects (as	
	- Delineate the discovered site or area;		
	Secure the site to prevent any damage or loss of removable objects until the responsible local authorities or the Department of Museums and Monuments of the Ministry of Tourism, Wildlife and Antiquities take over;		
	Notify the supervisory Project Engineer who in turn will notify the responsible local authorities and the Department of Museums and Monuments of the Ministry of Tourism, Wildlife and Antiquities immediately.		
Substantial	a) E&s Screening and assessment undertaken to identify potential land conflicts.	Actions in crosscutting (social and environment)	DLI 5 0772890543
	b) LG to avail land with proof of ownership, access and availability (e.g. land title, land agreement, formal consent, MoU etc.) and without encumbrance - particularly economic	LG avails land with proof of ownership, access availability (e.g. land title, land agreement, formal	

Risk and Impacts	Rating	Reco	Recommended Mitigation Measures	Integration in design	
				Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
		· · · · · · · · · · · · · · · · · · ·	displacement. Risk and impact assessment of land acquisition and resettlement to consider gender responsiveness	consent, MoU including community witnessing evidence, etc.) following an E&S screening to confirm absence of economic displacement.	
Child Abuse and Gender Based Violence: Construction activities and establishment of construction camps are likely to lead to sexual harassment and sexual abuse in certain cases on children by construction employees.	Substantial		E & S screening and assessment undertaken, costed ESMPs developed (including child protection plans and GBV prevention and response plans, and HIV/AIDS prevention plans where required) Support LG to develop necessary social action plans such as child protection plans, GBV prevention and response plans and ethical code of conduct for contractor site workers. It was proposed to adapt UTSEP project Ethical Code of Conduct developed for UgIFT-AF Awareness raising will be carried out for the contract workers and communities.	Crosscutting (environmental and social) MoGLSD, Uganda AIDS Commission and NEMA in consultation with the oversight bodies and implementing agencies to prepare ESHS screening and monitoring checklists (which will also include guidance on child protection, GBV prevention and response, and HIV/AIDS	DLI4 (oversight), DLIs 5&6 (planning and implementation)
Labour management including influx contracted workers: Labour related concerns e.g. violation of workers' rights,	Substantial	a)	LGs to ensure that contractors prepare labour management plans and ethical code of conduct for contractor	Crosscutting environmental & social)	

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
underpayment; health and safety issues, sexual harassment, unfair dismissal; non-payment for excessive overtime, etc. Additionally, non-payment or compensation of community owners for construction materials will result in conflicts		site workers among others. b) Institute workers' grievance redress at respective project sites. c) LGs to institute grievance redress mechanisms in communities surrounding the sites. d) Ls to ensure contractors sign and adhere to terms and conditions for stipulated in the agreement with community owner (s)in liaison with LC1.	MoGLSD in consultation with the oversight bodies and implementing agencies to prepare social ESHS screening and monitoring checklists (which will also include guidance on child protection and GBV prevention and response, and HIV/AIDS	DLIS 5 &6 (planning and implementatio n)
Inadequate engagement of relevant stakeholders throughout the project cycle. GoU defines requirements for engaging stakeholders and communities laid down in the National Environment Act, 2019	Substantial	a) LGs to have in place stakeholder engagement plan to ensure meaningful and inclusive stakeholder engagement. b) LGs need to delegate staff at District level (utilize DCDOs) to lead and be responsible for continuous inclusive and gender responsive stakeholders' engagement on identified project risk, impacts and mitigation measures throughout the project cycle	Cross cutting Stakeholder engagement and establishment of functional Grievance redress mechanism.	DLIS and DLI6
DCDOs aren't being utilized to be focal points for this community engagement, there is no clear channel for involvement of the DCDO in the project management cycle. MGLSD has a responsibility		c) LGs need to delegate staff at District Level to be responsible for coordinating the establishment of Grievance Redress Committee at respective LG levels and at construction sites and in communities		

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
to provide guidelines on engagement of communities		surrounding the sites (with optional co-option of relevant departmental heads/staff as found relevant);		
		d) Promote Participatory monitoring of activities and community feedback using facility management committees. UgIFT could share experiences from CSOs such as World Vision Uganda		
		e) LGs should establish a centralized complaints log with clear information and reference for onward action (a clear complaints referral path);		
		f) Publicize the grievances address mechanisms so that aggrieved parties know where to report and get redress.		
		g) GRCs need to be facilitated with simple stationary materials and trained on guidelines to manage their mandates.		
		h) MoGLSD to provide guidelines on engagement of communities and stakeholders		
Refugees: Drawents heady expe	Substantial		Key actions- refugee hosting LGs	DLI4 &DLI5
environmental and social challenges that are exacerbated by the presence of refugee. These		districts and between rerugee runding development partners and LGs/CBSD.	Gender responsive Guidelines for	

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix (DLI3)	Performance Assessment (DLIs 4,5,6)
include impacts relating to increased pressure on land resources (for farming and settlement), loss of natural vegetation cover, increased demand for firewood and thatching/roofing material. This has potential to increase tension between refugees and host communities, hence, disrupting social cohesion between refugees and host and host communities.		OPM to offer guidance to all MDAs and the respective refugee-hosting Local Governments, accompanied with integrated plans including refugees communities	Integrated LG Planning for the Refugee Response and Transition prepared and disseminated, including E&S safeguard requirements for program interventions in 13 refugee hosting LGs.	
			Refugee hosting LGs have prepared costed and integrated refugee response and transition plans (including ESMP as well as child protection and GBV prevention and response plans, and HIV/AIDS prevention plans).	
Weak Oversight and Coordination amongst implementing institutions	High	a) Establish a coordination unit housed in MoFPED (with an Environmental and a Social Development Specialists recruited) that will be responsible for	MWE, MoGLSD, and NEMA to update and harmonize tools for environmental and	DL14

Risk and Impacts	Rating	Recommended Mitigation Measures	Integration in design	
			Action Matrix P (DLI3) A 4	Performance Assessment (DLIs 4,5,6)
		ensuring safeguards due diligence is carried out throughout the project cycle.	social screening and monitoring of implementation of requirements	
		b) Develop integrated reporting forms/checklists for joint monitoring at the local governments and central government	PED to redironmental cialist a la Develicialist to sialist to sial	
		c) Conducting joint quarterly monitoring of construction: involvement of central line ministries and agencies (NEMA, MoGLSD) together with relevant district local povernment staff	monitoring, technical strengthening and E&S coordination in the coordination Unit.	
			Note: Actions affectedbyCOVID-19 restrictions and to be	
			concluded immediately after lifting of restrictions.	

Program Action Plan (PAP) relating to E&S Considerations Annex 2:

Action Description	Due Date	Responsible	Completion Measurement
Action 1: Strengthentools for	June 2020/Before Effectiveness	MWE,NEMA, MoGLSD, PPDA	1. Strengthen and issue tools for environmental and social screening and monitoring of implementation of requirements include:
procurement and monitoring			Preparation of guidelines (by MWE &MoGLSD) for the management of Environment and Social Safeguards by LGs; E&S guidelines including the respective tools and disseminated by the National Resource Pool and Joint Monitoring Teams;
			Sectoral E&S screening checklists integrate climate and disaster risk screening, Violence and Abuse of Children (VAC), GBV prevention and response plans, HIV prevention plans, and temporary labour influx screening.
			ESMPs templates
			ESHS provisions including (i) Use of PPDA standard bidding documents for works, (ii) Bidding evaluation considers E&S criteria and (iii) interim payment certificates shall be approved by the Engineer only where a) the Clerk of Works has cleared b) the Environment Officer has approved
			 Monitoring and reporting checklist
			 Mainstreaming checklist for planning, design, budgeting, bidding, contracting, implementation and monitoring
	- =		2.PPDA coordinate with MoLG to issue a follow-up circular to all accounting officers of LGs to actualize the guidance provided (on use of the

Action Description	Due Date	Responsible	Completion Measurement
			enhanced Standard Bidding documents - SBDs) for the next procurements and institute penalties for LGs not complying.
Action 2: Guidelines for unified system of grievance redress and	July 2020/Before	MoFPED, MoLG	Guidance for establishment and functioning of grievance redress in LGs including:
community engagement planning in Local governments issued.	EIIECIIVENESS		- A grievance handling system
			Grievance Redress committees to handle grievances and disputes at each LG and at implementing agencies (MoES, MoH, MAAIF and MWE and co-opting MoFPED, PPDA, MoPS and MoGLSD as may be required) in line with Public Service Negotiating, Consultative, and Dispute Settlement Machinery.
			- Functional Grievance Redress Committees in place and communities aware of the GRM mechanisms.
			- Establishing a complaints log with clear information and reference for onward action (a clear complaints referral path); in addition, all contractors will be required to a workers' complaints mechanism at the Site;
			 Establishing an Ethical Code of Conduct that should be available at each site.
			- Each implementing agency developing a stakeholder engagement plan in collaboration with respective LGs
Action3:Updatedsectoralbudgetand implementation quidelines and	July 2020/Before	MOFPED, OPM, MAAIF, MWE,	 Updated Sectoral guidelines include:
li ses	Effectiveness	MoES MoES	Medical waste management guidelines for HCII, HC III, HCIV and GHs

Action Description	Due Date	Responsible	Completion Measurement
standard guidance and tools			Rural water technical guidelines to provide for access to land (without encumbrance), source and catchment protection.
			Micro- irrigation guidelines to provide for proper siting, land access (without encumbrance), proper use of agrochemicals and safe disposal of its waste.
	1		Education guidelines to provide for access to land (without encumbrance), proper siting of schools, 'green' schools and energy conservation All sector guidelines provide guidance for investment servicing costs to include E&S.
			Annual Performance Assessment Manual Updated to include strengthened performance measures and minimum conditions for E&S reflecting implementation of strengthened systems.
Action4:Dissemination of and training on Updated Sector and Cross-sectoral Guidelines and Tools, including safeguards aspects.	Annually, starting Dec 2020; with dissemination	PIU at MoFPED; NEMA; MoGLSD,	First Dissemination of updated E&S tools and guidelines from MWE/NEMA and GLSD takes place before effectiveness.
	tools taking place prior to effectiveness	9	Dissemination of sector guidelines, including E&S requirements, takes place before the end of December 2020.
			 Evidence of dissemination of guidelines directly to LG departments and facilities / schools / Lower LGs
			- Evidence of organized E&S Awareness / trainings activities for stakeholders at central government institutions and LGs including political and technical officers

Action Description	Due Date	Responsible	Completion Measurement
Action5:QuarterlyJointmonitoring visits to local governments take place, covering safeguards as well as contract management and procurement.	Quarterly	NEMA, MGLSD	- NEMA and MGLSD participate as part of the national resource pool in quarterly joint monitoring and contribute to reports on compliance with requirements and follow up action taken
Action6: Technical support teams support LGs to implementation Performance Improvement Plans and Recommendations of joint monitoring visits.	Ongoing, from Q12020/21	MoLG, NEMA, MGLSD	Technical support teams, which include environment and social safeguards expertise, provide targeted support to LGs to help them implementation of follow up recommendations
Action7: Undertake environmental functional review and social skill needs assessment and agree proposals related to strengthening social risk management at the LG level including, GBV and VAC, HIV prevention, and strengthening structures, investments	By December 2020	Public service; OPM; MoLG, MWE; MoGLSD	A functional review has taken place and provisions updated, including - Staffing structures and requirements and roles and local and national level - Specification of sector investments and functions in sector and DDEG guidelines strengthened to include environment, climate change mitigation (green infrastructures, waste management equipment and infrastructures) and adaptation and social risk management. - Environment and Social Safeguards requirements identifiable in revised LG budget structure and reporting formats for Social Development and Natural Resources departments via outputs and performance indicators for inclusion in the PBS aligned with results from the functional review.
Action8:EnhancedBudgetingand Reporting Systems, including for E&S activities operational	June 2022	MoFPED; OPM; MoLG,	Strengthened LG joint monitoring of contract management, construction management issues as well as compliance to E&S risks and

Action Description	Due Date	Responsible	Completion Measurement
		MWE NEMA;	impacts – Guidelines in place.
		MoGLSD	Automated Quarterly and Annual reports generated on Environment and Climate change integration in annual work plans and budgets.
			Strengthened budgeting and reporting system functionality for PBS functionality for tracking and reporting on environmental (including Climate Change) and Social performance.
Action9: Integrated Refugee Response planning and implementation(including E&S safeguard requirements for program interventions in 13refugee hosting (Se). Coordinated by OPM	By September 2020	MOFPED, MOLG, OPM, MOH	OPM guidance to all MDAs and the respective refugee-hosting Local Governments, accompanied with integrated plans including refugees' communities
		MOES. MWE MAAIF NEMA, MOGLSD	Integrated Guidelines for LG Planning for the Refugee response and transition prepared and disseminated, including E & S safeguard requirements for program interventions in 13 refugee hosting LGs.
		-	costed and integrated refugee response and transition plans (including ESMP as well as child protection and GBV prevention plans)

DLIs and Verification protocols with Environment and Social considerations Annex 3:

Result Area 1: Improving the adequacy and equity of Financing of Local Services DLI 1 - Adequacy and Equity of Wage and Government Service Delivery Improves in line with the Medium-Term Plan for Financing Local Government Service Delivery. DLI 2 - The Adequacy and Targeting of Equipment Financing for Service Delivery Infrastructure and Equity of Secult Area 2: Improving performance in the oversight, management and delivery of LG services in proved service delivery within and scross sectors are strengthened.	Verification protocols with Environment and Social considerations
e and Local Local Local vice vice role of vice in the local local local local vice local l	dequacy and equity of Financing of LG services
Local Local Ig of Vice Tocal Tocal Tocal Tocal Tocal	f Wage and DLR1.1. Wage allocations, Recruitment and Releases
ug of vice ce in the for ind	
vice ce in the for	DLR1.2. Non-wage Recurrent allocations and Releases
vice vice ce in the for	Non-wage increase in DLI Value:
Result Area 2: Improving performance in the oversight, management and delivery of LG sectors, processes and capacityfor improved service delivery within and across sectors are strengthened.	ig of vice
	rmance in the oversight, management and delivery of LG services
	Dacityfor At least 10 cross sectoral key actions from the Service Delivery Improvement characters and Matrix that are implemented by central government will be directly related to strengthening safeguards systems and capacity, with a value of at least \$7.5m.
DLI4 -Central Government core functions in oversight, guidance, performance assessment and improvement, monitoring	Central Ministries, Depa functions in the oversight

DLIS	Verification protocols with Environment and Social considerations
and technical support to LG service delivery take place	(including grant, budgeting and facility/LLG level guidelines).MWE & MoGLSD to prepare guidelines for the management of Environment and Social Safeguards should be prepared and updated annually; and for purposes of harmony, the guidelines issued should include the respective tools and will be disseminated by the National Resource Pool and joint monitoring teams Sectors have integrated Environmental and Social aspects as detailed in Program Action Plan insection5D.
	Routine oversight, performance information, monitoring of service delivery and construction and safeguards requirements in crosscutting; Education; Health; Water and Environment; Irrigation.
Result Area 3:ImprovingLGManagement of Service delivery	Service delivery
DLI 5 - The Management of Service Delivery is strengthened in LGs overall and in the weakest performers.	The performance assessment scores in the annual performance assessment of the LG management of services and delivery of infrastructure, which includes Environmental and Social aspects at LG level e.g. evidence of E&S screening, development of costed ESMPs etc.
Results Area 4: Improving the Delivery of Services at the Local Level	ervices at the Local Level
DLI6 - Service Delivery performance improves overall, and in the weakest performing facilities and sub counties.	Service delivery performance in facilities (school/health facility) and Lower LG areas (water, Irrigation). The assessment of the facilities and the lower local governments provides for key Environmental and Social issues e.g. availability and access to land free of encumbrances; medical waste management; use and management of agrochemicals and safe disposal associated waste; water source and catchment management; 'green' schools (talking environment, waste management, energy conservation).

