



REPUBLIC OF UGANDA

MINISTRY OF GENDER, LABOUR AND SOCIAL DEVELOPMENT (MGLSD)

**GENERATING GROWTH OPPORTUNITIES AND PRODUCTIVITY FOR WOMEN ENTERPRISES IN
(GROW) UGANDA - P176747**

RESETTLEMENT PROCESS FRAMEWORK (RPF)

MAY 2022

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LIST OF ABBREVIATIONS AND ACRONYMS

APL	Adaptable Programme Loan
ARAP	Abbreviated Resettlement Action Plan
BoU	Bank of Uganda
CAO	Chief Administrative Officer
CBO	Community Based Organisation
CDM	Clean Development Mechanism
CGV	Chief Government Valuer
CIC	Community Information Center
CSF	Credit Support Facility
DLB	District Land Board
DLC	District Local Council
DLT	District Land Tribunal
DP	Displaced Person
ESIA	Environmental and Social Impact Assessments
ESMF	Environment and Social Management Framework
GBV	Gender Based Violence
GDP	Gross Domestic Product
GEF	Global Environment Facility
GO	Grievance Officer
GoU	Government of Uganda
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immuno Virus/Acquired Immuno Deficiency Syndrome
ICT	Information and Communication Technology
IDA	International Development Agency
IMU	Independent Monitoring Unit
LG	Local Government
LGA	Local Government Act
LGI	Local Government Institution
LGRC	Local Grievance Redress Committee
LRP	Livelihood Restoration Plan
MAAIF	Ministry of Agriculture, Animal Industry and Fisheries
MoES	Ministry of Education and Sports
MoFPED	Ministry of Finance, Planning and Economic Development
MoH	Ministry of Health
MoLG	Ministry of Local Government
MoWE	Ministry of Water and Environment
MPS	Minimum Package of Services
MSME	Micro, Small and Medium Scale Enterprise
NDP	National Development Plan
NFA	National Forestry Authority
NGO	Non-Government Organisations
PAPs	Project Affected Persons
PCDP	Public Consultation and Disclosure Plan
PIM	Project Implementation Manual
PLC	Parish Land Committees
PSFU	Private Sector Foundation Uganda
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SCA	Survivor Centred Approach
SEA	Sexual Exploitation and Abuse
ST	Service Territory
STEI	Science, Technology, Engineering and Innovation -

UAREP	Uganda Accelerated Rural Electrification Project
UCC	Uganda Communications Commission
UECCC	Uganda Electricity Credit Capitalisation Company
ULC	Uganda Land Commission
USE	Universal Secondary Education
UWA	Uganda Wildlife Authority
VPC	Village Peace Committees
PVTMA	PV Targeted Market Approach

DEFINITIONS

Unless the context dictates otherwise, the following terms will have the following meanings in this Resettlement Policy Framework:

Census: A field survey carried out to identify and determine the number of Project Affected Persons (PAPs) or Displaced Persons (DPs) as a result of land acquisition and related impacts. The census provides the basic information necessary for determining eligibility for compensation, resettlement and other measures emanating from consultations with affected communities and local government institutions.

Compensation: Payment in kind or cash for the acquisition of land or other assets as well as other impacts resulting from project activities.

Cut-off Date: Is the date of commencement of the census of PAPs or DPs within the project area boundaries. This is the date on and beyond which any person occupying the area or establishing fixed assets will not be eligible for compensation.

Displaced Person(s): A person(s) who, for reasons due to involuntary acquisition or voluntary contribution of their land and other assets, will suffer direct economic and or social adverse risks and impacts, regardless of whether or not the said displaced persons are physically relocated. These people may have their: standard of living adversely affected, whether or not the displaced person will move to another location; lose right, title, interest in any houses, land (including premises, agricultural and grazing land) or any other fixed or movable assets acquired or possessed, lose access to productive assets or any means of livelihood.

Economic Displacement: Loss of income streams or means of livelihood resulting from land acquisition or obstructed access to resources (land, water, or forest), resulting from the construction or operation of a project or its associated facilities.

Gender Based Violence: Is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual, mental, social, or economic harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private spaces (IASC, 2015).

Involuntary Resettlement: Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, including those that lead to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

Involuntary Land Acquisition: The repossession of land by government or other government agencies, for the purposes of the project when the affected persons do not have the right to refuse. This includes land for which the owner enjoys uncontested customary rights.

Land: Refers to agricultural and/or non-agricultural land and any structures there on whether temporary or permanent and which may be required for the GROW project.

Land Acquisition: refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include: (a) acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible. "Land" includes anything growing on or permanently affixed to land, such as crops, buildings and other improvements, and appurtenant water bodies means the repossession of or alienation of land, buildings or other assets thereon for purposes of the project.

Minimum Package of Services: refers to the very least of services that every survivor of: GBV including sexual violence against children may access depending on their needs as determined by themselves in accordance with principles of the survivor centred approach or in close consultation and agreement with the Probation and Welfare Officer if the survivors are children (minors). The minimum package of services includes: psychosocial support, medical care, safety/security and legal redress/justice.

Physical Displacement: refers to relocation, loss of residential land or shelter resulting from the acquisition of land associated with a project.

Project Affected Household: All members of a household, whether related or not, operating as a single economic unit, who are affected by a project.

Project Affected Person: Any person who, as a result of the implementation of a project, loses the right to own, use or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Also includes any person who may lose or be denied an income source or means of livelihood. This person is affected whether or not they will move to another location.

Rehabilitation Assistance: Support provided to people who are physically displaced by a project. Assistance may include transportation, food, shelter, and social services that are provided to affected people during their relocation. Assistance may also include cash allowances that compensate affected people for the inconvenience associated with resettlement and defray the expenses of a transition to a new locale, such as moving expenses and lost work days.

Resettlement Action Plan: A document in which a project sponsor or other responsible entity specifies the procedures that it will follow and the actions that it will take to mitigate adverse effects, compensate losses and provide development benefits to persons and entities affected by an investment project.

Resettlement Assistance: Support provided to people who are physically displaced by a project. Assistance may include transportation, food, shelter, and social services that are provided to affected people during their relocation. Assistance may also include cash allowances that compensate affected people for the inconvenience associated with resettlement and defray the expenses of a transition to a new locale, such as moving expenses and lost work days.

Replacement cost: This is a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs. Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement material and labor for construction of structures or other fixed assets, plus transaction costs. In all instances where physical displacement results in loss of shelter,

replacement cost must at least be sufficient to enable purchase or construction of housing that meets acceptable minimum community standards of quality and safety. The valuation method for determining replacement cost should be documented and included in relevant resettlement planning documents. Transaction costs include administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons. To ensure compensation at replacement cost, planned compensation rates may require updating in project areas where inflation is high or the period of time between calculation of compensation rates and delivery of compensation is extensive

Resettlement Policy Framework: An instrument prepared to be used throughout the project implementation. The RPF will be disclosed to set out the resettlement and compensation policy, organizational arrangements and design criteria to be applied to meet the needs of the people who may be affected by the program.

Sexual Exploitation and Abuse: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. **Sexual abuse** is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Women, girls, boys and men can experience SEA.

Survivor Centred Approach: A strategy for supporting GBV/SEA survivors that aims to create a supportive environment in which the survivor’s rights are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions. The other key attribute of the SCA is keeping the identity of the survivors and all information about them confidential and only revealed, if necessary¹, with the informed consent of the survivors.

¹ The main reason for revealing the identity of survivors is access to services as needed and determined by the survivors themselves. Even in such circumstances, confidentiality must, to the extent possible, be maintained.

EXECUTIVE SUMMARY

Background

The Government of Uganda plans to acquire credit from the World Bank towards the implementation of the Enhancing Growth Opportunities and Productivity for Women Enterprises project hereinafter referred to as GROW project. The proposed project will support the country's efforts to scale up economic empowerment of women and to enable them play their expected role in national socio-economic development and transformation. The project will build on other recent and on-going efforts which include Uganda Women Entrepreneurship Program (UWEP) and Youth Livelihood Project (YLP), among others.

The project is fully aligned with the priority areas identified in the World Bank Group's Country Partnership Framework (CPF, 2016-2021), which emphasizes support to sustained high rate of growth, social economic transformation and inclusion as well as reduction of poverty and vulnerability.

The proposed GROW project contributes to the country's NDP-III and Vision 2040's goal of a transformed society from peasant to middle income status.

Project Components

The GROW Project components are **Component 1**: Support for Women Empowerment and Enterprise Development Services: with 4 sub-components; **Subcomponent 1A**: *Supporting creation and strengthening of women platforms, community mobilization, and mind-set change*; **Subcomponent 1B**: *Support for core business development for micro and small enterprises*; **Subcomponent 1C**: *Support for trade/sector specific skills* and **Subcomponent 1D**: *Women entrepreneurship work placement program*. **Component 2**: *Access to Finance for Women Entrepreneurs*: with **Subcomponent 2A**: *Grant support for micro enterprises through business competition*; **Sub-component 2B**: *Facilitating access to credit for enterprise growth* **Subcomponent 2C**: *Enhanced Loan Products and Processes for Women Entrepreneurs*. **Component 3**: *Enabling Infrastructure and Facilities for Women Enterprise Growth and Transition with* **Sub-component 3A**: *and Subcomponent 4B*: *Policy innovation and evidence generation*; **Sub-component 3B**: *Enabling Access to Gender Inclusive Workplace Infrastructure*; **Component 4** *Project Management Support, Policy Innovation, and Evidence Generation* with **Subcomponent 4A**: *Project management support for high-quality implementation* and **Subcomponent 4B**: *Policy innovation and evidence generation*

Project Beneficiaries

The GROW Project beneficiaries will include: Direct and Indirect beneficiaries. The Direct beneficiaries include 20,000 women entrepreneurs, transitioning from micro to small and small to medium. 10,000 of these will get affordable credit and training in the core course, 5,000 will obtain practical skills through apprenticeship training, and 5,000 will benefit from work spaces, common user production facilities and upskilling in the common user production shelter. The Indirect beneficiaries will include the families of the female entrepreneurs including men, girls, boys and children, through improved business incomes of the female enterprises. The suppliers and transporters of raw materials, inputs and stocks to the transitioning female enterprises will derive more revenues and profits. Government will also benefit from increase in revenue collection as a result of expanded economic activity. Other indirect beneficiaries are those who will gain employment, the host communities where the enterprises are located, financial institutions that will receive funds from the project, public institutions, including vocational institutes, schools and health centres, Refugees and their associated host communities, other vulnerable and marginalised groups (people with disabilities, ethnic minorities, female youth, elderly females, people

living with HIV, survivors and those at risk of GBV) and personnel from the project implementation institutions will indirectly benefit.

Purpose of this Resettlement Policy Framework

The purpose of this Resettlement Policy Framework (RPF) is to clarify resettlement principles, organizational arrangements, and design criteria to be applied to sub-projects or project components to be prepared during project implementation. Once the sub-project or individual project components are defined and the necessary information becomes available, such a framework will be expanded into a specific resettlement plan proportionate to potential risks and impacts. Project activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and approved by the Bank. Therefore, this RPF will guide the management of social issues associated with infrastructure investments financed under the GROW project and guide the preparation of Resettlement Action Plans (RAPs), to ensure that the resettlement aspects of the project are adequately understood and addressed. This RPF seeks to ensure that in the event that government through the Ministry of Gender, Labour and Social Development (MGLSD) and Private Sector Foundation Uganda (PSFU) seek to acquire land, restrict land use or bring about involuntary resettlement for project activities, any possible adverse impacts of proposed project activities are minimized and addressed through appropriate mitigation measures, in particular, against potential impoverishment risks in a manner outlined in this RPF.

Legal Framework

There are a number of national policies and legal frameworks that regulate land relations in Uganda that will be applicable to this project. These frameworks define land rights, ownership, procedures and requirements of transfer and acquisition of land between individuals and groups. They also provide procedures for the acquisition of land by the state or a public body for public projects. Among the most important legal instruments in this regard are: The Constitution of the Republic of Uganda (1995), The Land Act (1998), The Land Regulations, (2004) The Local Government Act (1992), and The Land Acquisition Act (1965), The National Land Policy, 2013 and the National Gender Policy, 1997

The World Bank's Environment and Social Standard on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, ESS5, is to be complied with where involuntary resettlement, impacts on livelihoods, acquisition of land or restrictions to access to natural resources, may take place as a result of the project.

In comparison to Ugandan law that defines rights to land ownership and ownership of property *per se*, the World Bank's ESS 5 goes further to highlight the important relationship between property rights, human settlement and the need to maintain people's source of livelihood. It complements existing law in Uganda related to property rights and land ownership by recognizing the socio-economic value this presents to persons affected. The higher of the two standards will be followed in this policy framework, since that procedure also satisfies the requirements of the lesser standard.

Potential Impacts

This section presents the likely potential resettlement risks and impacts that may arise before, during and after the implementation phase of the projects, which include:

- Loss of residential land
- Loss of structures used for housing
- Loss of other structures
- Loss of Agricultural Land / Pasture Land
- Loss of Crops (perennial and seasonal)
- Loss of Trees

- Production systems are dismantled,
- Impoverishment when PAPs productive assets or income sources are lost, people are relocated to environments where their productive skills may be less applicable and the competition for resources greater, community institutions and social networks are weakened, dispersion of kin groups and cultural identity, traditional authority, and the potential for mutual help are diminished or lost.

Mitigation Measures

Provisions are made under this RPF to minimize all impacts associated with land acquisition, restrictions on land use and involuntary resettlement in accordance with the World Bank ESS5. The potential social impacts to be addressed within the context of preparing Resettlement Action Plans have been identified in this RPF. The RPF also gives guidelines to undertake site-specific social assessment studies as part of the preparation of each RAP.

This RPF establishes the principles for compensation/ resettlement that apply to the GROW Project, including: (1) institutional arrangements, (2) resettlement/ compensation eligibility criteria, (3) implementation procedures, (4) financial responsibilities, and (5) monitoring and evaluation plan. This RPF will be applied taking into account the need to include the marginalised and vulnerable groups as will be identified.

Eligibility for Compensation

Determination of the eligibility of the PAPs to be compensated shall be done through a transparent and legal process, taking into consideration all the applicable existing laws of Uganda and the World Bank's ESS5 and local customs, aiming at restoring the lives and livelihoods of the affected persons or making them equal or better than before the project intervention. In case of discrepancy between these various standards, the one most advantageous to the PAPs shall be applied.

As soon as the nature and location of a sub project has been determined, a land survey demarcating the required project land will be undertaken after which the identification of all the project affected persons (census) will be undertaken. The affected persons may be classified as persons: (a) Who have formal legal rights to land or assets; (b) Who do not have formal legal rights to land or assets, but have a claim to land or assets that is recognized or recognizable under national law; or (c) Who have no recognizable legal right or claim to the land or assets they occupy or use, like tenants or sharecroppers who would have rights to compensation for assets on the land but would not own the land. These PAPs will need to be identified prior to the cut-off date.

(Sub) Project Screening and Preparation

Sub-projects might have a social impact on the community. Potential socio-economic impacts that will require mitigation measures, resettlement and compensation will have to be identified. The sub-projects will be screened by the project implementing agencies to know whether involuntary resettlement, or loss, denial or restriction of access to land and other economic resources will be caused by the implementation of the sub-project or whether the sub-project result in the permanent or temporary loss of crops, fruits and household infrastructures such as granaries, outside toilets, kitchens, and other structures. Whenever it has been determined that involuntary land acquisition (whether temporary or permanent) is needed for the project, a RAP shall be prepared.

Preparation of Resettlement Action Plans

Sub-project specific Resettlement Action Plans (RAP) will be developed and implemented by a RAP consultant in consultation with MGLSD and PSFU Environment and Social Safeguards staff. The completed

sub project RAP reports will be submitted to MGLSD and PSFU for review and onward submission to the World Bank for further review and approval prior to their implementation. Note that there will be no activities until the RAPs are fully implemented.

Roles and Responsibilities

The implementation activities will be under the overall guidance of the MGLSD and PSFU with support from line ministries (MLHUD and MoFPED) and lead agencies such as the office of the Chief Government Valuer which approves compensation rates. The respective District Local Governments through their District Land Boards that provide the compensation rates for crops and trees in alignment with replacement value will also participate in some resettlement activities like relocation and verifying PAPs during the compensation exercise for sub-projects together with the GROW Project and PSFU.

Capacity of MGLSD and PSFU to Monitor RAP Implementation

The MGLSD and PSFU will have their capacity in monitoring RAP implementation enhanced. The PSFU will build on the capacity for social risk management acquired during implementation of the Skills Development Facility (SDF). The PSFU has long experience in implementing World Bank funded projects. MGLSD has several technical departments and officers whose mandate will be leveraged to compliment the social safeguards team in the GROW project PIT

Monitoring Aspects

The monitoring and evaluation will be the main mechanism to alert the GROW project PIT in MGLSD and PSFU of any delays and problems and these activities will help measure the extent to which the main objectives of the RPF, and any resettlement plans (RAPs) prepared in line with this RPF, have been achieved. To ensure that the preparation of resettlement plans and subsequent implementation of resettlement is executed in line with this RPF, all resettlement activities will be monitored and evaluated internally in MGLSD by a Project Implementation Unit. Depending on the capacity within the implementing agency and desire, a decision will be taken if there is need to engage an external evaluation team. The PITs will undertake the routine internal monitoring and evaluation of the implementation of this RPF and subsequent RAPs so as to ensure that all the responsible units follow the schedule and comply with the principles of the applicable resettlement plan (RAP). A number of objectively verifiable indicators shall be used to monitor the impacts of the compensation and resettlement activities.

Budget and Funding

At this stage, it is not possible to estimate the likely number of people who may be affected. The budget will be developed for each RAP from the specific social assessment studies and censuses to be undertaken, and mitigation/livelihood restoration measures to be provided, in accordance with this RPF. The budget will cover resettlement activities including compensation cost for affected assets. Government of Uganda will be the sole source of funding for all compensation related activities though MGLSD will be the Implementing Agency.

Disclosure of this Resettlement Policy Framework

This RPF will be disclosed in compliance with relevant Ugandan regulations and The World Bank Environment and Social Standard 5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. The documents will be disclosed on the World Bank external website, District Offices, various sub county offices and MGLSD and PSFU websites. It will also be available to any interested persons through the media in Uganda.

1 INTRODUCTION

1.1 Background

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

The Resettlement Policy Framework has been developed in tandem with an Environmental and Social Management Framework (ESMF), Stakeholder Engagement Framework (SEF), and the Vulnerable and Marginalized Group's Framework (VMGF) as a set of instruments required to address and manage the environmental and social risks and impacts associated with the GROW Project. The RPF has been prepared to meet the Government of Uganda's and the World Bank's Environmental and Social Framework requirements and will be disclosed as part of the project appraisal process. MGLSD, PSFU, MUBS and the various other service providers will be responsible for implementing the provisions and recommendations outlined in the RPF.

1.2 Project Description

1.2.1 Introduction

The GROW Project will be implemented by the Ministry of Gender, Labour and Social Development (MGLSD) through the PIT, headed by the Commissioner Labour, Industrial Relations and Productivity (LIRP). The implementation of GROW Project is estimated to take five (5) years, implemented nationwide and structured around four main components discussed below. The specific sub-project locations are yet to be ascertained.

1.2.1.1 Project Development Objective (PDO)

The Project Development Objective (PDO) is to generate opportunities for women to grow their micro and small enterprises in targeted districts, including in refugee and host communities. These will benefit from the GROW Project through the four components stated above as explained in the project beneficiary section below.

Specifically, the GROW Project has the following objectives:

1. To promote women enterprise development and productivity; and
2. To promote skills development for women's entrepreneurship and productivity

In achievement of the said objectives, the following outcomes are anticipated:

1. Improved access to business finance by female entrepreneurs
2. Improved employability of women and girls

1.2.2 The proposed PDO-level indicators are:

Increasing access to services for women entrepreneurs

- Number of female entrepreneurs who complete the core female entrepreneur course, disaggregated by district and refugee status.
- Number of micro and small enterprises accessing loan finance from formal financial institutions under the project, disaggregated by district and refugee status of firm owner (CRI).
- Enabling the growth of women-owned small and micro-enterprises in Uganda
- Number of jobs of enterprises benefiting from the project, disaggregated by gender, district, and refugee status (CRI).
- Number of enterprises benefiting from the project that transition from informal to formal, disaggregated by district and refugee status.
- Women entrepreneurs increase the economic and social impact of their enterprises
- Number of direct beneficiaries of enterprises supported by the project, disaggregated by district and refugee status.
- Percentage of women benefiting from the project who state their economic situation has improved due to the project, disaggregated by district and refugee status.
- Percentage of direct beneficiaries of enterprises supported by the project stating that their involvement in decision-making over household expenditures has increased, disaggregated by district and refugee status.

1.2.3 Project Beneficiaries

The GROW Project will target all the districts and cities of the country. The beneficiaries are expected to include female entrepreneurs as described below.

i) Direct beneficiaries: About 20,000 women entrepreneurs will benefit directly from the project, targeting women transitioning from micro to small and small to medium. Of these, about 10,000 of them will get affordable credit and training in the core course, 5,000 will obtain practical skills through apprenticeship training, and 5,000 will benefit from work spaces, common user production facilities and upskilling in the common user production shelter.

ii) Indirect beneficiaries: Families of the 20,000 female entrepreneurs including men, girls, boys and children will benefit from the improved business incomes of the female enterprises. The suppliers and transporters of raw materials, inputs and stocks to the transitioning female enterprises will derive more revenues and profits. Government will also benefit from increase in revenue collection as a result of expanded economic activity. In addition, there will be more jobs from the expanding female enterprises which will help to improve the school to work transition and reduce the unemployment problem in the country. Other indirect beneficiaries are the communities where the enterprises are located, financial institutions that will receive funds from the project, Public institutions, including vocational institutes, schools and health centres. Additionally, Refugees and the associated host communities, other Vulnerable and marginalised groups (People with disabilities, Ethnic Minorities, Female Youth, Elderly Females, People living with HIV, Survivors and those at risk of GBV) and Personnel from the project implementation institutions will indirectly benefit.

iii) Project Affected Persons: It is expected that the sub-projects will be developed on existing enterprise land, family land or land acquired by the project beneficiaries as required in various parts of the country. In effect, therefore, the project will have to provide resettlement and displacement assistance to the affected persons

1.2.4 Description of Project Components

The project consists of four components that together constitute a comprehensive package of customized support for empowering female entrepreneurs to grow and transition their enterprises from micro to small and from small to medium. Component 1 will provide enterprise development services for women through training (technical, life-skills, digital), business advisory services, and enhanced networks for women through platforms that facilitate market linkages and value chain development and seek to change negative social norms that prevent women from engaging business activities. Component 2 will facilitate access to finance for women entrepreneurs to transition from micro enterprises to small and medium enterprises. This component will address the key constraint of access to larger scale finance for women entrepreneurs to expand their business. Component 3 will support investments in enabling infrastructure and facilities including common-user facilities and childcare facilities to ensure that women have access to economic and social infrastructure. Component 4 will support project management, policy innovation, and evidence generation. These components will include host communities and have specialized activities that address the specific needs of women entrepreneurs that are refugees and that are from refugee hosting community locations.

All four project components will begin in the first year of implementation. The post-approval period will consist of two distinct phases: the effectiveness phase and the implementation phase. During the effectiveness phase (Year 0), the World Bank will mobilize trust fund resources and collaborate with development partners to deliver technical assistance and capacity building support to MGLSD, PSFU and the implementing partners to strengthen their readiness and capacity to rapidly implement the project during the first year after effectiveness (Year 1).

GROW will use a two-prong strategy to achieve national coverage of its integrated approach. Some subcomponents will begin with national coverage in Year 1. This includes the entrepreneurship core course, the work placement initiative, the business competitions, and the access to credit mechanism. These interventions will accept applicants from all regions and districts. For these interventions, the first year of implementation will cover 30 districts selected (including six RHDs) from all the 14 sub-regions of the country and Greater Kampala Metropolitan Area (KCCA). Two districts will be purposively selected from each sub-region (lowest and highest poverty incidence) and two districts from the Greater Kampala Metropolitan (KCCA and Wakiso). These criteria will ensure there is sufficient demand from a pool of female entrepreneurs from the least poor districts, while at the same time supporting female entrepreneurs from the poorest districts to benefit.

1.3 Project Development Objective (PDO)

1.4 Project Implementation Arrangements

The key management structures for this project will be a project steering committee, a technical steering committee and two PITs. Both the MGLSD and PSFU will be implementing agencies for different components or sub-components of GROW hence will require Project Implementation Teams (PITs) to ensure smooth implementation and disbursement. However, project activities that may result in resettlement will be implemented under MGLSD. The PITs will comprise of a Project Director, Deputy Project Director and key technical staff to ensure effective implementation. The PITs will be overseen by the Technical Committee and a Steering Committee.

Similar to the recently concluded UWEP Project and in line with the planned Parish Development Model, GROW Project will make use of the local government structures (for example: Using Community Development Officers and Women Council Structures) to ensure wide-scale penetration across geographic areas, and tap into existing infrastructures and networks of women entrepreneurs, and stakeholders.

1.5 Purpose and Objectives of this Resettlement Policy Framework

1.5.1 Purpose of this RPF

The purpose of the RPF is to clarify resettlement principles, organizational arrangements, and design criteria to be applied to sub-projects or project components to be prepared during project implementation.

Precise location(s) of (sub) project activities and the need for compensation is not known at this stage. However, the activities of the project may lead to land acquisition, restrictions on land use and involuntary resettlement; and as a result there is need to put in place a framework for resettlement planning and implementation.

Once the sub-project or individual project components are defined and the necessary information becomes available, such a framework will be expanded into a specific plan proportionate to potential risks and impacts. Project activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and approved by the Bank and fully implemented. Therefore, this Resettlement Policy Framework (RPF) will guide the management of issues associated with land acquisition, restrictions on land use and involuntary resettlement in relation to infrastructure investments financed under the GROW project and guide the preparation of Resettlement Action Plans.

This RPF seeks to ensure that in the event that Government through the MGLSD and PSFU seek to acquire land for project activities, any possible adverse impacts of proposed project activities are minimized and addressed through appropriate mitigation measures.

The potential risks associated with any decision to acquire land for the project or sub-projects by government through MGLSD and PSFU can be minimized by:

- Avoiding displacement of people as much as possible;
- Having a well-designed resettlement processes in place; in the event that displacement is required;
- Compensating in a timely manner for losses and ensuring resettlement assistance
- Identifying public or community infrastructure, property or services that may be affected
- Ensuring mitigation of land acquisition associated risks such as GBV and family break up, are planned for upfront. The prevention and response to such risks should be mainstreamed in the land acquisition and involuntary resettlement process.

1.5.2 Objectives of the RPF

The specific objectives of this RPF are to:

- Provide framework guidance in identifying and managing situations when the project may lead to physical or economic displacement/resettlement or interfere with their cultural resources. Any compensation measures will be implemented in accordance with this RPF.
- Guide the management of all social issues associated with land acquisition, restrictions on land use and involuntary resettlement in relation to infrastructure investments financed under GROW Project and ensure that the resettlement aspects of the project are adequately understood and addressed. During the development of this RPF, special reference was made, but not limited to the current national socio-economic dynamics, World Bank Environment and Social Standards and, the Uganda legal, policy and institutional framework as applicable to the implementing ministry and line ministries specifically under the GROW Project.
- Provide a thorough understanding of how the developed RPF will be applied by the MGLSD and other implementing agencies and what type of tools, technical inputs, institutional capacity and other kinds of support will be required for its effective use and implementation.
- Define the eligibility criteria for identification of project affected persons (PAPs) and entitlements.

- Describe the consultation procedures and participatory approaches involving PAPs and other key stakeholders in resettlement planning.
- Provide procedures for filing grievances and resolving disputes.

1.5.3 Scope of the RPF

This Resettlement Policy Framework covers the following elements, consistent with the relevant Ugandan national laws and provisions of the World Bank Environment and Social Standards described in ESS5. The following activities were undertaken during preparation of this RPF:

1. Review the relevant legislation, regulations and local rules governing the use of land and other assets
2. Consult with MGLSD officials and other key stakeholders that are engaged in land acquisition, restrictions on land use and involuntary resettlement processes to identify current challenges and community vulnerabilities and suggest workable recommendations to be adopted into the project.
3. Assess the capacity of the implementing agencies (MGLSD and PSFU) and any other stakeholders to implement this RPF. In addition, identify the capacity strengthening needs for the implementation of the RPF by the project; and propose and cost capacity building program including training for key institutions and other stakeholders
4. Review and update RPF management tools, such as screening procedures, checklists, assessment of typical anticipated impacts, draft Resettlement Action Plans for typical impact mitigation for inclusion in the RPF in line with the planned GROW Project activities.
5. Review and update the grievance redress mechanism and RAP guidelines

2 LEGAL, POLICY, AND INSTITUTIONAL FRAMEWORK

The legal framework of this RPF will describe all laws and policies relevant to the resettlement activities associated with this project. This framework identifies, examines and abides by all laws of Uganda that are applicable to land acquisition and involuntary resettlement including:

- The scope of the power of eminent domain and the nature of compensation associated with it, both the procedures for assessing compensation values and the schedule for making compensation payments,
- The legal and administrative procedures applicable, including the appeals process and the normal time for such procedures, land titling and registration procedures, and
- Laws and regulations relating to the agencies responsible for implementing resettlement and those related to land compensation, consolidation, land use, environment, water use, and social welfare.

The Constitution of the Republic of Uganda (1995) and the Land Act (1998), Cap 227 require that compensation is paid if a development project would damage structures or other property or take private land. The same requirement is provided by World Bank Environment and Social Standards and guidelines under World Bank's ESS5 which requires that displaced persons are compensated at full replacement cost and assisted during the relocation.

2.1 *Ugandan Laws*

There are a number of national and local legal frameworks that regulate the land relations in Uganda. These frameworks define land rights, ownership, procedures and requirements of transfer and acquisition of land between individuals and groups. They also provide procedures for the acquisition of land by the state or a public body for public projects. Among the most important legal instruments in this regard are the following:

- a) The Constitution of Uganda (1995)
- b) The Land Act (1998)
- c) The Land Acquisition Act (1965)
- d) Land Regulation Act (2004)
- e) Land Act (Amendment) (2010)
- f) Local Government Act (1997)

While all matters relating to land acquisition, compensation and resettlement are managed within the provisions of the above legislation, the most decisive document in this regard is the Land Act of 1998, as amended.

2.1.1 **The Uganda Constitution (1995)**

Article 237(1) of the Constitution vests all land of Uganda in the citizens of Uganda. However, under Article 237(1) (a), the government or local government can acquire land in the public interest. Such acquisition is subject to the provisions of Article 26 of the Constitution, which gives every person in Uganda a right to own property.

The Constitution also recommends the tenure regimes in accordance with which rights and interests in which land may be held namely; Customary, Freehold, Mailo and Leasehold. It introduces Bonafide occupancy" as a form of tenure that gives the occupant some rights to the land occupied". According to the Constitution, all land belongs to the people of Uganda and is held in trust by the Government.

Government is authorized to acquire land for a public purpose and compensate affected persons in accordance with the law. It provides procedures to follow during the acquisition of land for public interest and provides for the “***prompt payment of fair and adequate compensation***” prior to taking possession of the land.

2.1.2 The Land Act, Cap 227 (1998)

The 1998 Land Act addresses land holding, management, control and dispute processing. The Act creates a series of land administration institutions, namely, the Uganda Land Commission (ULC), the District Land Boards (DLBs), the Area Land Committees (ALCs) and the District Land Tribunals (DLTs). Section 78 of the Act gives valuation principles for compensation, i.e. compensation rates to be yearly approved by DLBs. The basis for compensation is depreciated replacement costs for rural properties and market values for urban properties.

Article 75 of the Land Act 1998 and Article 243 of the 1995 Constitution creates District Land Tribunals with jurisdiction to determine disputes relating to the grant, lease, repossession, transfer or acquisition of land by individuals, the ULC or other authority with responsibility relating to land; and the determination of any disputes relating to the amount of compensation to be paid for land acquired. Article 77 (e) of the Land Act 1998 gives power to the DLTs to determine any other dispute relating to land under this act. Article 88 (1) of the Act stipulates that an appeal shall lie from the decision of a DLT to the High Court. Key features of the recognized forms of land tenure in Uganda are:

Customary Tenure - Is governed by rules generally accepted as binding and authoritative by the class of persons to which it applies. That is, customary tenure is not governed by written law. Landowners do not have deeds recognizing their ownership rights and land is managed according to rules and practices generally accepted as legitimate and binding by a particular community. Customary laws vary according to region of the country but most systems are based on the same general principles. Ownership rights are recognized by the community through inheritance, purchase, or by settling on a plot of land which was previously vacant. Under Ugandan customary legal systems, particularly in northern and eastern Uganda, land is usually communally owned by the clan but it can also be owned individually. Rights and responsibilities that derive from communal ownership are shared among various members of the clan according to traditional practices. Usually, the head of the clan or family, the “custodian”, has the responsibility to look after each member’s land rights and to allocate land fairly to all. Under this system, disputes are heard and settled by clan elders.

Leasehold Tenure - Is created either by contract or by operation of the law and is a form under which the landlord or lessor grants the tenant or lessee exclusive possession of the land, usually for a defined period and in return for a rent. The tenant has security of tenure and a proprietary interest in the land.

Freehold Tenure - Derives its legality from the constitution and its incidents from the written law. It involves the holding of land in perpetuity or a term fixed by a condition and also enables the holder to exercise, subject to the law, full powers of ownership.

Mailo Tenure - Has roots in the allotment of land pursuant to the 1900 Uganda Agreement and derives its legality from the constitution and its incidents from written law. It involves the holding of land in perpetuity and permits the separation of ownership of land from the ownership of developments on land made by a lawful or bona fide occupant. The system enables the holder to exercise all powers of ownership, subject to the rights of those persons occupying the land at the time of the creation of the mailo title and their successors.

2.1.3 Land Acquisition Act (1965)

This Act makes provision for the procedures and method of compulsory acquisition of land for public purposes whether for temporary or permanent use. The Minister responsible for land may authorize any

person to enter upon the land and survey the land, dig or bore the subsoil or any other thing necessary for ascertaining whether the land is suitable for a public purpose. The Government of Uganda is supposed to pay compensation to any person who suffers damage as a result of any action. Any dispute as to the compensation payable is to be referred to the Attorney General or court for decision.

The Land Acquisition Act stops at payment of compensation. It is not a legal requirement to purchase alternative land for the affected people by the project. Once they are promptly and adequately compensated, then the obligations stop there. The Government through the Ministry of Lands, Housing and Urban development will pay the compensation to the affected persons. There is no requirement or provision in the law that people need to be assisted with relocation or that alternative land is made available or bought. Each affected person entitled to be compensated; on receipt of his/her compensation is expected to move and has no further claim.

2.1.4 The Land Act, 1998

The Land Act principally addresses four issues namely; holding, control, management and land disputes. As regards tenure, the Act repeats, in Section 3, provisions of Article 237 of the Constitution which vests land ownership in the citizens of Uganda, to be held under customary, freehold, mailo or leasehold tenure systems. However, the Land Act provides for acquisition of land or rights to use land for public works.

Regarding control of land use, the Act reaffirms statutory power of compulsory acquisition conferred on the government and local authorities under articles 26 (2) and 237(2) (a) of the Constitution (Section 43). Since the Act does not repeal the Land Acquisition Act No. 14 of 1965, it is assumed that this legislation, meets requirements of Article 26(2) of the Constitution that requires a law to be in place for the payment of compensation and access to the courts. The Act also requires that landowners manage and utilize land in accordance with regulatory land use planning (Sections 44 and 46). Section 77(2) of the revised edition (2000) of the Land Act 1998 provides for a disturbance allowance on top of the computed compensation amount as shown below:

- a) 30% of compensation amount if quit notice is given within 6 months.
- b) 15% of compensation amount if quit notice is given after 6 months.

The rights of spouse and children are protected under the Constitution of Uganda and the Land Act (Cap 227). The consent of spouse and children must be acquired prior to any transaction by the head of household on land on which the family ordinarily resides.

Section 40 of the Land Act, 1998 requires that no person shall:

1. Sell, exchange, transfer, pledge, mortgage or lease any land; or enter into any contract for the sale, exchange, transfer, pledge, mortgage or lease of any land;
2. Give away any land *inter vivos*, or enter into any transaction in respect of land:
 - a. In the case of land on which the person ordinarily resides with his or her spouse, and from which they derive their sustenance, except with the prior written consent of the spouse;
 - b. In the case of land on which the person ordinarily resides with his or her dependent children of majority age, except with the prior written consent of the dependent children of majority age;
 - c. In the case of land on which the person ordinarily resides with his or her dependent children below the majority age, except with the prior written consent of the Committee;
 - d. In the case of land on which ordinarily reside orphans below majority age with interest in inheritance of the land, except with prior written consent of the Committee.

2.1.5 Land Acquisitions, Title, Transfer and Term of Ownership

Land acquisition in Uganda may be achieved through:

- i. Occupancy by individual persons and by local communities, in accordance with customary norms and practices, which do not contradict the constitution;
- ii. Uninterrupted occupancy by individual nationals who have been using the land in good faith for at least twelve years before 1995; and
- iii. Authorization on the basis of an application submitted by an individual or corporate person in the manner established by the land law.

The Land Law stipulates that a land title will be issued by the Lands Department. However, the absence of a title will not prejudice the right of land use and benefit acquired through occupancy. The application for a land title will include a statement by the local administrative authorities, preceded by consultation with the respective communities, for the purpose of confirming that the area is free and has no occupants. Title to local community land will be issued in a name decided upon by the community and individual men and women who are members of the local community may request individual titles after partitioning community land.

The right of land use and benefit can be proven by presentation of the respective title; testimonial proof presented by members, men and women of local communities and by expert evidence and other means permitted by law.

Among other modes of land transfer, the Land Law permits the transfer of land by inheritance, without distinction by gender. The right of land use/ownership is not subject to any time limit for the following cases: (i) Where the right was acquired by local communities through occupancy; (ii) Where it is intended for personal residential purposes and; (iii) Where individual nationals intend it for family.

2.1.6 The Land Regulations, 2004

Section 24(1) of the Land Regulations, 2004 states that the District Land Board shall, when compiling and maintaining a list of rates of compensation, take into consideration the following:

- a) Compensation shall not be payable in respect of any crop which is illegally grown;
- b) As much time as possible shall be allowed for harvest of seasonal crops;
- c) The current market value of the crop and trees in their locality will form the basis of determining compensation;
- d) For buildings of non-permanent nature, replacement cost less depreciation will form the basis of compensation.

2.1.7 The Land (Amendment) Act, 2010

Section 76(1) (a) of the Land (Amendment) Act 2010 states that the jurisdiction of the District Land Tribunal shall be to determine dispute relating to the grant, lease, repossession, transfer or acquisition of land by individuals, the commission or other authority with responsibility relating to land.

The institutions with responsibilities identified in this RPF are the MGLSD and the PSFU. These entities will liaise with MLHUD and local authorities and comply with their obligations under the RPF.

2.1.8 The Local Government Act (1997)

The Local Government Act (LGA) was enacted to give effect to the policy of decentralisation and devolution of functions, powers and services; and to provide for decentralisation at all levels of local government to ensure good governance and democratic participation in, and control of decision making by the people. The Local Government Act provides for the system of Local Governments, which is based on the district. Under the district there are lower Local Governments and administrative units. This system

provides for elected Councils. The chairman nominates the executive committee of each council. The functions of this committee include:

1. Initiating and formulating policy for approval of council;
2. Overseeing the implementation of the Government and Council's policies, and monitor and coordinate activities of Non-Government Organizations in the district; and
3. Receiving and solving disputes forwarded to it from lower local governments.

According to the second schedule to the LGA, the Central Government is responsible for water resources and the environment (Part I, Second Schedule of the Local Government Act). The Lower Local Government Councils (sub-county or division) are responsible for the protection and maintenance of local water resources (Part 4). It is the function of the various executive committees, including the parish or village executive committees, to generally monitor projects and other activities undertaken by government, local governments, and non-governmental organisations in their area (Section 50(8)).

2.2 Policy Framework

2.2.1 The Uganda National Land Policy 2013

This new land policy addresses the contemporary land issues and conflicts facing the Country. The vision of the policy is: "Sustainable and optimal use of land and land-based resources for transformation of Ugandan society and the economy" while the goal of the policy is: "to ensure efficient, equitable and sustainable utilization and management of Uganda's land and land-based resources for poverty reduction, wealth creation and overall socio-economic development".

Access to Land for Investment: Section 4.16 of the Policy (86) states that government shall put in place measures to mitigate the negative impacts of investment on land so as to deliver equitable and sustainable development. Part 90 of the same section positions government to protect land rights, including rights of citizens in the face of investments with measures for clear procedures and standards for local consultation; mechanisms for appeal and arbitration; and facilitate access to land by vulnerable groups in the face of investments.

Measures for Protection of Land Rights: Section 4.18 (93) of the Policy recognizes the inability of the majority of Ugandan to afford the cost of formally securing land rights and therefore government will put in place a framework that would ensure that land rights held by all Ugandans are fully and effectively enjoyed.

Rights for Minorities: As regards land rights of ethnic minorities, the Policy states that:

- (a) Government shall, in its use and management of natural resources, recognize and protect the right to ancestral lands of ethnic minority groups;
- (b) Government shall pay prompt, adequate and fair compensation to ethnic minority groups that are displaced from their ancestral land by government action.

To redress the rights of ethnic minorities in natural habitats, Government will take measures to:

- (i) establish regulations by Statutory Instrument to:
 - a. recognize land tenure rights of minorities in ancestral lands;
 - b. document and protect such de facto occupation rights against illegal evictions or displacements;
 - c. consider land swapping or compensation or resettlement in the event of expropriation of ancestral land of minorities for preservation or conservation purposes;
 - d. detail terms and conditions for displacement of minorities from their ancestral lands in the interest of conservation or natural resources extraction;

- (ii) pay compensation to those ethnic minorities that have in the past been driven off their ancestral lands for preservation or conservation purposes;
- (iii) deliberate and specify benefit-sharing measures to ensure that minority groups benefit from resources on their ancestral lands rendered to extractive or other industry;
- (iv) recognize the vital role of natural resources and habitats in the livelihood of minority groups in the gazetted or de-gazetted of conservation and protected areas

2.2.2 The National Gender Policy, 1997

The government adopted a National Gender Policy of 1997, a tool to guide and direct the planning, resource allocation and implementation of development programs with a gender perspective. The adoption of the gender policy has facilitated Uganda's gender mainstreaming programs in all sectors of the economy (implying, the planned works project should equally integrate gender into the implementation of works. This policy guides and brings on board all different genders into the national development agenda without any form of discrimination or segregation by virtue of one's gender. In this RPF it gives all persons, irrespective of their gender to equitable compensation without due regard to their gender.

2.2.3 The National HIV/AIDS Policy, 2004

The policy provides the principles and a framework for a multi-sectoral response to HIV/AIDS in Uganda's world of work. The policy applies to all current and prospective employees and workers, including applicants for work, within the public and private sectors. It also applies to all aspects of work, both formal and informal.

This policy guides and informs the requirement for the. Contractors to mainstream HIV and AIDS management in the workplace. Projects like GROW are likely to bring together a number of people of different categories into one workplace during implementation where there will be need to regulate their interaction so the spread of HIV is managed through protection and care interventions

2.2.4 The National Social Protection Policy, 2015 and the Uganda National Community Development Policy

The Government of Uganda, in recognizing the importance of social development in transforming the quality of life of Ugandans, formulated the National Social Protection Policy, 2015 and the Uganda National Community Development Policy. These Policies are aimed at enhancing participation and community ownership of government initiatives and acknowledge the fact that social protection is a pre-requisite for social development.

The GROW Project components and sub-projects shall directly feed into these policy goals. Where resettlement activities are likely to impact negatively on especially the vulnerable groups, these two policies come in handy to such groups.

2.3 World Bank Environment and Social Standards

World Bank Environmental and Social Standard 5 (ESS5) requires projects to appropriately plan for and respond to these impacts, and thus improve decision making about resettlement, options, alternatives, participation of PAPs and compensation. The World Bank's ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement is to be complied with where involuntary resettlement, impacts on livelihoods, acquisition of land or restrictions to access to natural resources, may take place as a result of the project. It includes requirements to:

1. Avoid and where avoidance is not possible to minimize involuntary resettlement by exploring project design alternatives
2. Avoid forced eviction
3. Mitigate unavoidable adverse impacts from land acquisition or restrictions on land use through timely compensation for loss of assets at replacement cost and assisting displaced persons in their efforts to improve, or at least restore, livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher
4. Improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure
5. Ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and informed participation
6. Conceive and execute resettlement activities as sustainable development programs,
7. Provide sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant

This standard covers direct impacts that result from Bank-assisted investment projects, and are caused by the land acquisition, restrictions on land use or involuntary resettlement resulting in:

- (i) Physical relocation or loss of shelter;
- (ii) Loss of assets or access to assets; or
- (iii) Loss of access to income sources or means of livelihood, whether or not the affected persons must move to another location

The standard implies that GROW project activities that may result in the involuntary acquisition of land resulting in adverse impact on livelihoods a RAP must be prepared by the implementing agencies and cleared by the World Bank prior to implementing the resettlement activities. The ESS5 also requires that the provision of compensation and other assistance to PAPs, to restore livelihoods when these are affected, shall be done prior to the displacement of people. In particular, the standard requires that damage to crops and trees or possession of land for project activities may take place only after compensation has been paid. Resettlement sites, new homes and related infrastructure, public services and moving allowances must be provided to the affected persons in accordance with the provisions of the RAP.

2.3.1 Comparison between Land Law in Uganda and World Bank ESS 5

Table 1 below outlines the gaps between Uganda law and World Bank requirements for resettlement and compensation. It is clear in the comparison that the ESS 5 offers more reasonable and/or fair benefits and recognition to PAPs than Ugandan law; therefore, in cases where benefits are greater, the World Bank’s ESS5 will apply and in all cases, **“the higher of the two standards will be followed in all RAPs prepared for the GROW Project, since the higher standard also satisfies the requirements of the lesser standard. In this case, the World Bank ESS5 will be followed since it is higher on application of these policies.”**

Table 1: Comparisons of Ugandan Laws and the World Bank Standards on Resettlement and Compensation

Types of Affected Persons/ Lost Assets	Ugandan Law	World Bank’s ESS5	Comparison/Gaps	Strategy / Applicable standard
Land Owners	<p>The Constitution of Uganda, 1995 vests all land directly in the Citizens of Uganda, and states that every person in Uganda has the right to own property. Ugandan law recognizes four distinct land tenure systems, customary tenure, freehold tenure, leasehold tenure, and mailo tenure.</p> <p>Customary land owners are entitled to compensation based on the open market value of the unimproved land</p>	<p>Land-for-land exchange is the preferred option; however, in cash compensation mechanisms can also be provided compensation is to be based on replacement cost.</p>	<p>The legal right to resettlement is applicable only to those with proprietary interest in the affected land.</p> <p>Customary land holds property and ownership.</p> <p>Entitlement for payment of compensation at replacement cost is essentially based on the right of ownership or legal user/occupancy rights.</p>	<p>Market value is based on recent transactions and thus if alternative property is purchased within a reasonable period of the payment of compensation, it is likely that market value will reflect replacement value. However, local inflation in price land or construction materials can affect what is determined as replacement cost. If this is not reflected in recent transactions, market value may not reflect replacement value which must be achieved in the payment of compensation.</p>
Land Tenants/Squatters	<p>Ugandan law does not make any specific accommodation for squatters or illegal settlers, and compensation is based on legal occupancy.</p> <p>The Land Act treats lawful occupants and bonafide occupants as statutory tenants of the registered owner. Under Section 29 of the Land Act, “lawful occupant” means a person who entered the land with the consent of the registered owner, and includes a purchaser; or a person who had</p>	<p>The ESS5 explicitly states that the affected persons cannot be denied compensation /resettlement assistance based on the lack of legal title. Bank projects, therefore, need to make provisions for helping squatters / encroachers achieve the objectives of the Bank’s ESS5. The methodology to be used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation for</p>	<p>There is no distinction or discrimination made on the basis of gender, age, or ethnic origin between Ugandan law and World ESS5 However, there is no explicit equivalence on the specific requirements for enforcing non-discrimination, including the requirement that particular attention be paid to the needs</p>	<p>The Project to avoid resettlement or minimize displacement of people Dialogue with policy makers will be initiated to explore the possibility of giving compensation at replacement value to illegal tenants for any improvements/ investments they have undertaken in the affected land</p>

Types of Affected Persons/ Lost Assets	Ugandan Law	World Bank's ESS5	Comparison/Gaps	Strategy / Applicable standard
	<p>occupied land as a customary tenant but whose tenancy was not disclosed or compensated for by the registered owner at the time of acquiring the leasehold certificate of title. "Bona fide occupant" means a person who before the coming into force of the Constitution had occupied and utilised or developed any land unchallenged by the registered owner or agent of the registered owner for twelve years or more; or had been settled on land by the Government or an agent of the Government, which may include a local authority.</p> <p>For the avoidance of doubt, a person on land on the basis of a licence from the registered owner shall not be taken to be a lawful or bona fide occupant under this section. Any person who has purchased or otherwise acquired the interest of the person qualified to be a bona fide occupant under this section shall be taken to be a bona fide occupant for the purposes of this Act.</p>	<p>land, natural resources and other assets under local law and such supplementary measures as are necessary to achieve replacement cost for what is lost.</p> <p>For those without formal legal rights to lands or claims to such land that could be recognized under the laws of the country, the government should provide resettlement assistance in lieu of compensation for land, to help improve or at least restore those affected persons' livelihoods.</p>	<p>of vulnerable groups among the displaced.</p> <p>Those without formal legal rights or claims to such lands are not entitled to be resettled or compensated.</p>	
Land Users/Licensees	<p>Licensees are granted authority to use land for agricultural production, usually limited to annual crops. They have no legal security of tenure or any proprietary right in the land.</p> <p>The Land Act, section 29(5) clearly states that for the avoidance of doubt, a licensee shall not taken to be a lawful or bonafide occupant.</p> <p>Not entitled to land compensation. Entitled to compensation for crops</p>	<p>Receive compensation for assets (crops, improvements) other than land and other losses and income must be restored.</p>	<p>Ugandan law meets Bank requirements</p>	<ul style="list-style-type: none"> Compensated for assets (crops, improvements) other than land and other losses

Types of Affected Persons/ Lost Assets	Ugandan Law	World Bank's ESS5	Comparison/Gaps	Strategy / Applicable standard
Owners of non-permanent buildings	<p>Mailo tenure involves the holding of land in perpetuity. It was established under the Uganda Agreement of 1900. It permits the separation of ownership of land from the ownership of developments on land made by a lawful occupant.</p> <p>Owners of non-permanent buildings are entitled to compensation based on rates set by District Land Boards.</p>	Compensation for structures should cover full replacement cost exclusive of depreciation and inclusive of all fees (such as construction permits and title charges) and labour costs	There appears to be a significant difference between Ugandan laws and Bank policy. Those without formal legal rights or claims to such lands and/or semi-permanent structures are not entitled to resettlement assistance or compensation.	<p>Project will provide compensation based on replacement value. This will include the payment of government valuation rates and payment of a disturbance allowance</p> <p>Dialogue with policy makers will be initiated to explore the possibility of including labor and relocation expenses prior to displacement</p>
Owners of permanent buildings	Valuation of buildings is based on open market value for urban areas and depreciated replacement cost in the rural areas.	Entitled to in-kind compensation or cash compensation at full replacement cost including labor and relocation expenses, prior to displacement	Values based on depreciated replacement cost do not reflect full replacement cost/value	Project will provide compensation based on replacement value. This will include the payment of government valuation rates, the payment of a disturbance allowance, and a top up allowance (based on the current inflation rate) to compensate for the rise in construction materials.
Timing of compensation payments	Once the assessment office takes possession, the land immediately becomes vested in the Land Commission, according to the Land Acquisition Act. However, the Land Act Cap 227 (section 42) provides compulsory acquisition must comply with the provisions of the Constitution (article 26)	Implement all relevant resettlement plans before project completion and provide resettlement entitlements before displacement or restriction of access. For projects involving restrictions of access, impose the restrictions in accordance with the timetable in the plan of actions.	There is no equivalence on implementing all relevant resettlement plans before project completion or on providing resettlement entitlements before displacement or restriction of access.	Project to pay prompt, adequate and fair as per Ugandan law. As per ESS5 all compensation payments must be made prior to land being taken for use by the project.
Calculation of compensation and valuation	According to the Land Act, Cap 227 (section 77), the value of customary land shall be the open market value of the unimproved land. Value of the buildings shall be at open market value for urban areas and depreciated replacement cost for rural areas. The crops and buildings of	Affected persons will be given compensation calculated at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods	There are no equivalent provisions on relocation assistance, transitional support, or the provision of civic infrastructure.	Compensation calculated at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods will be applied

Types of Affected Persons/ Lost Assets	Ugandan Law	World Bank's ESS5	Comparison/Gaps	Strategy / Applicable standard
	a non-permanent nature are compensated at rates set by District Land Boards.		The basis of compensation assessment is not stated in the Land Acquisition Act (an old law due for review), although the Constitution provides for 'prompt, fair and adequate' compensation. (article 26)	
Relocation and resettlement	Both The Constitution, 1995 and The Land Act, 1998 gives the government and local authorities power to compulsorily acquire land. The Constitution states that "no person shall be compulsorily deprived of property or any interests in or any right over property of any description except" if the taking of the land necessary "for public use or in the interest of defense, public safety, public order, public morality or public health."	To avoid or minimize involuntary resettlement and, where this is not feasible, to assist displaced persons in improving or at least restoring their livelihoods and standards of living in real terms relative to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher	Ugandan laws do not appear to make provisions for avoidance or minimizing of involuntary resettlement	Project will provide compensation based on replacement value. This will include the payment of government valuation rates and payment of a disturbance allowance. This will only be resorted to if resettlement cannot be avoided or minimized
Completion of resettlement and compensation	Privately owned land's value is negotiated between the owner and the developer. In rural areas, land is valued at open market value, buildings are valued at replacement cost, and a 15% to 30% disturbance allowance must be paid if six months or less notice is given to the owner.	Implement all relevant resettlement plans before project completion and provide resettlement entitlements before displacement or restriction of access. For projects involving restrictions of access, impose the restrictions in accordance with the timetable in the plan of actions.	There is no equivalence between Ugandan law and World Bank policies on implementing relevant resettlement plans before project completion or on providing resettlement entitlements before displacement or restriction of access.	The project will conform to WB and best practices during implementation of the RAP.
Livelihood restoration and assistance	There are no explicit provisions under resettlement or relocation for livelihood assistance.	Livelihood restoration and improvement programs will commence in a timely fashion in order to ensure that affected persons are sufficiently prepared to take advantage of alternative livelihood opportunities as the need to do so arises. Livelihoods and living standards are to be restored in real terms to pre-displacement levels or better	Ugandan policy and legislation would need to be aligned with Bank policy to effectively guarantee rights of all affected persons of involuntary resettlement.	Livelihood restoration will include options and alternatives from which affected persons may choose. The project will provide transitional allowance.

Types of Affected Persons/ Lost Assets	Ugandan Law	World Bank's ESS5	Comparison/Gaps	Strategy / Applicable standard
Consultation and disclosure	<p>There are no explicit provisions for consultations and disclosure but there are guidelines issued by separate ministries (e.g. roads and energy).</p> <p>The Land Acquisition Act, however makes provision for an enquiry whereby the affected person can make formal written claim and the assessment officer is obliged to conduct a hearing before making his award.</p>	Consult project-affected persons, host communities and local NGOs, as appropriate. Provide them opportunities to participate in the planning, implementation, and monitoring of the resettlement program, especially in the process of developing and implementing the procedures for determining eligibility for compensation benefits and development assistance (as documented in a resettlement plan), and for establishing appropriate and accessible grievance mechanisms.	While the consultation requirement is inherent in the EIA, it contains a number of differences with the requirements of Bank Standard ESS5.	Affected persons should be given opportunities to participate fully in all the phases of the resettlement process and their suggestions taken into consideration in any decisions that are arrived at
Grievance mechanism and dispute resolution	The Land Act, 1998 states that land tribunals must be established at all districts. The Land Act empowers the Land Tribunals to determine disputes and it provides for appeal to higher ordinary courts. The Land Acquisition Act provides for the aggrieved person to appeal to the High Court.	Establish appropriate and accessible grievance mechanisms.	In both cases existence of grievance resolution mechanisms are acknowledged. However, EESS places emphasis on such grievance mechanisms taking into account the availability of judicial recourse and community and traditional dispute settlement mechanisms.	Grievance committees to be instituted will not replace the existing legal process in Uganda rather it seeks to resolve issues quickly so as to expedite receipt of entitlements and smooth resettlement without resorting to expensive and time-consuming legal action. If the grievance procedure fails to provide a settlement, complainants can still seek legal redress.
Vulnerable groups	The 1995 Uganda Constitution stipulates that: "the State shall take affirmative action in favour of groups marginalised on the basis of gender, age, disability or any other reason [...] for the purpose of redressing imbalances which exist against them". This regulation is not fully described in the context of resettlement and land acquisition.	Particular attention should be paid to the needs of vulnerable groups among those displaced such as those below the poverty line, landless, elderly; women and children and indigenous peoples and ethnic minorities.	Both the Ugandan Constitution and ESS 7 favour vulnerable groups. However, the Ugandan law, vulnerable groups are not fully described in the context of resettlement and land acquisition.	Special attention will be paid to vulnerable persons affected and necessary measures will be provided in the entitlement matrix of the RAP.

3 SOCIAL-ECONOMIC BASELINE INFORMATION OF THE GROW PROJECT AREAS

3.1 Introduction

Information on various social and economic indicators about the target area is crucial in planning and implementing of project intervention to maximize the benefits expected and at the same time mitigates the adverse risks and impacts anticipated from the project. The socio-economic information further forms the baseline for future monitoring and evaluation of the project impacts towards the targeted groups Social-Economic background²

3.2 Project Location

The GROW Project will be a Nation-wide project and thus, the rationale for selecting project areas will be devised by the respective PITs under its implementation. Marginalised and vulnerable communities or groups including unemployed female youth, older women, disabled women, GBV survivors or those at risk of GBV, refugee women and women in refugee host communities shall be critically looked at. Refugee camps are already known and may be targeted where the project activities are undertaken within their proximity. This will be based on the assessment to determine level of vulnerability of the various communities.

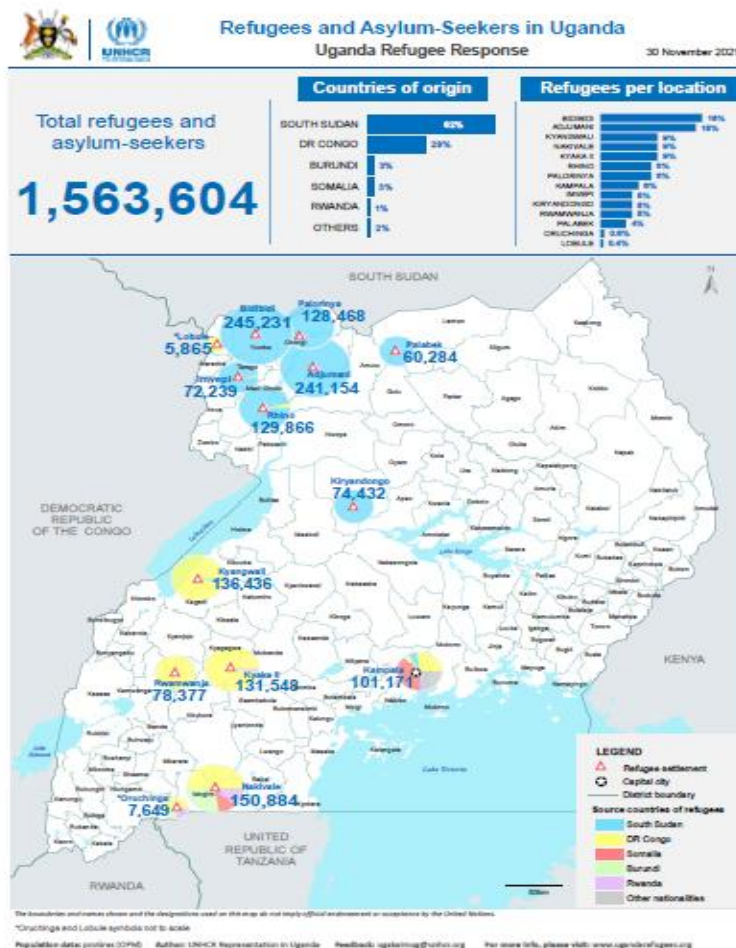


Figure 1: Project location

² Source: UBOS - Population Census statistics 2014

3.3 Population and Population Characteristics

According to Uganda Bureau of Statistics (UBOS) 2019 estimates, the population of Uganda is 41.58 million, with females constituting about 51% of that population. While 73% of population live in rural areas, the rest of the population resides in the urban settings. Uganda houses rich ethnic diversity, with most of its population constituted by 4 major groups - Bantu, Nilotic, the Nilo Hamites and the Hamites. These are distributed into 11 geographical or statistical divisions of the country. The UBOS UNHS report 2020/2021, shows the sub-regional population distribution. These sub-regions are Buganda South, Buganda North, Kampala, Busoga, Bukedi, Elgon, Teso, Karamoja, Lango, Acholi, West Nile, Bunyoro, Toro, Kigezi and Ankole. Buganda South had the highest percentage of the population (13%) followed by Buganda North (11%) and Busoga (10%) respectively while Karamoja had the lowest (3%) followed by Kigezi and Kampala (4% each respectively). The population size and distribution are a reflection of the number of people that are likely to be impacted by the project. The number of beneficiaries from the GROW Project will be determined upon the confirmation of the project areas within which the project will be implemented.

The results indicate that overall, in Uganda the highest percentage of household heads were in the age groups 25 – 34 years and 35 – 44 years (24% each). Thirteen percent of household heads were in the age group 65 years and above with a higher percentage of female headed households (19%) compared to male headed households (10%). A negligible proportion of households were headed by persons aged less than 18 years. Considering marital status of the household heads, overall, the majority (57%) were married in monogamous unions or living together as if married. Disaggregation by sex shows wide variation in marital status of household heads (details on marital status is presented in section 3.3.1 below). Considering education level, the findings show that overall; the highest percentage of household heads (36%) had some primary level of education but had not completed primary level. Disaggregation by sex shows that the highest percentage of both male and female household heads (37% and 36% respectively) had some primary level of education but had not completed primary level.

3.3.1 Marital Status

The national data from UNHS 2020/2021 indicate that overall 46 percent of persons aged 15 years or older had never married. Nearly four in every ten were in monogamous unions (37%), while six percent were in polygamous unions. Disaggregation by sex shows that 41 percent of females had never married compared to 51 percent of their male counterparts. A higher percentage of males (38%) were in monogamous unions than females (35%). Females were more likely to be widowed (8%) than males (1%). Similarly, females were more likely to be divorced/separated (8%) than males (4%). Polygamy was most common among age groups 35 – 44 years and 45 – 54 years (15% each) and in the Karamoja sub-region (27%) and lowest in Kigezi, Kampala and Buganda North sub-regions (at 3% each). Widowhood on the other hand increased with increasing age and the percentage was highest in the age group 65 years and above (40%). The proportion of the widowed was highest in Karamoja sub-region (8%).

3.3.2 Disability Status amongst the population

The National Council on Disability Act 2003 defines disability as permanent or substantial functional limitation of daily life activities caused by physical, mental or sensory impairment and environmental barriers resulting in limited participation. The 2019/20 UNHS collected information on disability for all persons aged 5 years and above based on whether an individual had some form of difficulty to prevent him/her from doing any form of activity in the six domains of seeing, hearing, communicating, remembering/concentrating, walking/climbing and self-care. Considering all persons aged 5 years and above, only one percent had a lot of difficulty/can't see at all. Among adults, the most common types of disability were A lot of difficulty/can't see at all and a lot of difficulty/can't remember/concentrate at all (2% each respectively). Generally, the percentages of persons with disabilities in the six domains stood at three percent among persons who were five years and above. Considering all persons aged 5 years and above, only one percent had a lot of difficulty/can't see at all. Among adults, the most common types of disability

were A lot of difficulty/can't see at all and a lot of difficulty/can't remember/concentrate at all (2% each respectively).

3.3.3 Education and Literacy

Close to eight in ten persons aged 10 years and above (76%) were able to read with understanding and write meaningfully in any language. Literacy rates for residents in urban areas were much higher than for the rural counterparts (85% and 73% respectively). The literacy levels were much lower among females in rural areas (68%) than in the urban areas (82%). The Sub-Regions of Kampala, Buganda South, Ankole, Elgon and Buganda North had a larger proportion of their population literate persons in the range of 93 percent to 81percent. Karamoja had the least proportion of literate persons in the age group of 10 years and above. at 40.3% in general and with a female – male distribution of 22.6 to 30.4% respectively.

3.3.4 Employment and Livelihoods

Uganda's female labour force participation rate is generally low estimated at 44.9% compared to 61.2% for men. This implies that 55.1% of working age females are outside the labour force. The majority of those outside the labour force are preoccupied with family responsibilities and many are engaged in subsistence agriculture (National Labour forced Survey 2016/17, UBOS, 2018).

The women who participate in the labour force face specific barriers, constraints and challenges such as sociocultural norms that affect their career and business progression. Whereas labour under-utilisation is high in Uganda, the composite under-utilisation is higher among women (39.0%) compared to men at 31.5%. The unemployment rate is also higher among the women (11.4%) compared to 8.2% for men. In addition, many women (50.5%) aged 18-30 years are not in Education, Employment or Training (NEET) compared to 29% for their male counterparts (National Labour forced Survey 2016/17, UBOS, 2018). This implies that more women than men are not realising their full economic potential.

On the part of those in employment, women are also disproportionately disadvantaged. Out of every 100 women who are in employment, only 26 (26.3%) are in paid employment compared to 40.8% for men. Even then, most of those in paid employment are involved in low status poorly paid jobs. The implication is that 73.7% of the women in employment are self-employed. It is important to note that a large proportion of women in self-employment (22.2%) are compelled by family while 38.1% joined self-employment because they could not find a job. This implies that majority are in non-satisfactory self-employment and would want to change the job if there was an opportunity. The women in self-employment status in Uganda are own account workers (57.8%), employers (1.7%) and contributing (14.1%). The employers and own account workers constitute the women in entrepreneurship.

Majority of households, about one in every seven, obtained their livelihood from subsistence farming with a majority in rural areas (82%). Households that depended on employment earnings for their livelihood accounted for 16 percent while those that depended on commercial farming were only 2%.

3.3.5 Women in business in Uganda

According to results from the Uganda Household Survey 2009/10, 75.9% of Ugandans were self-employed, including 86.2% of working women and 72.1% of working men (UBOS, 2013, p. 18).⁸ The self-employment rate is also high among the 18-30 age-group: 61.5% among young women and 52.5% among young men (UBOS, 2013, p. 19). Relatedly, according to MTIC, (2017/18), gender disaggregated data in Uganda is not easy to obtain due to the informality of most business operations. It is estimated that 53% of the businesses in the country operated informally³. Businesses in the Trade sub-sector employed the majority (42.32%) people in the country, in 2011 of which 68% were male while 32% were female. In the same year, majority of the male employees were in the Trade sub-sector (41.53%), followed by the Accommodation & Food services sub-sector with 14.32%. Further, out of the total number of females employed, 44.10% were in the Trade sub-

³ TRADE AND INDUSTRY SECTOR STATISTICAL ABSTRACT,2017/18

sector followed by 22.51% in the Accommodation & Food Services sub-sector; Education, Health & Social (8.93%); Recreation & Personal (7.79%), among others. As of 2011, there were a combined 1,076,534 in comparison to only 477,230 females. Therefore, the interventions by projects such as UWEP and now GROW are justified to help women scale up their economic activities and boost their growth opportunities.

Table 2: Employment Statistics

Sector	Male			Female		
	2001	2007	2011	2001	2007	2011
Agriculture & Forestry	9,736	28,407	31,317	5,047	7,689	9,779
Forestry			683			138
Fishing	903	1,012	13,873	96	73	235
Mining & Quarrying	1,235	1,493	3,192	374	149	742
Food Processing		39,633	50,745		8,766	12,611
Other Manufacturing	70,588	32,456	88,352	16,543	6,522	22,560
Utilities	2,829	2,738	2,161	615	484	483
Construction	6,633	8,993	14,398	707	1,257	2,251
Trade	102,222	46,776	447,064	76,053	12,173	210,477
Transport, Storage & Communications	10,161	17,665	13,483	3,737	3,291	2,830
Accommodation & Food Services	16,269	32,796	154,167	37,862	17,662	107,436
Information & Communication			14,401			3,863
Financial & Insurance	4,742	13,537	27,135	3,358	5,729	11,772
Real Estate & Business	15,871	27,540	53,124	4,308	5,096	14,135
Education, Health & Social Services	13,353	51,746	81,546	13,646	28,122	42,630
Recreation & Personal	16,706	13,003	80,893	10,524	4,544	35,288
Total	271,248	317,795	1,076,534	172,870	101,557	477,230

Furthermore, the UBOS 2019, national household survey provides information on women and men employers (self-employed who employ others) and independent workers without employees (self-employed, working on their own account). **The first category is more likely to represent entrepreneurs.**

According to the 2019/2020 UNHS report, women are underrepresented in the population of employers compared to men (5% vs.7%) and overrepresented in the population of own-account workers (47% vs 36%)(UBOS 2021a)

Table 3: Women Entrepreneurship in Uganda

	UNHS 2019/2020		UNHS 2016/17	
	Employers (%)	Independent workers (without employees) (%)	Employers (%)	Independent workers (without employees) (%)
Overall	6.4	42.3	44.3	50.3
Sex				
Male	7.4	37.6	5.5	43.8
Female	5.0	47.3	2.9	57.6
Residence				
Urban	8.8	37.5	3.5	56.6
Rural	5.1	43.9	5.9	37.0

Special groups				
Youths (ages 18-30)	4.2	36.3		46.5

Women entrepreneurs typically operate smaller firms than men and are more likely to operate in non-capital intensive and less profitable sectors. For example, a World Bank study found that businesses owned by men are 3.1 times larger and earn 2.5 times more than female-owned firms (Campos et al. 2014). In 2014, only 6 per cent of female entrepreneurs in Uganda were operating in male-dominated sectors (referred to as sectoral “crossovers), even though male-dominated sectors tend to be more lucrative, and women who “crossover” into male-dominated industries tend to earn as much money as men do (Campos et al. 2014). The key enabling factors allowing these women to successfully enter male-dominated fields were access to social networks to provide information and exposure to new lines of business; a male role model or an avenue for gaining experience in the sector, often through a male family member; and technology (Campos et al. 2014).

3.3.6 Ownership of Houses

About 73% of the households owned their houses with majority of the households (83%) being in rural areas. Overall about 62% of the households owned agricultural land and this was most predominant among households in rural areas (about 71%) with the proportion being higher among the male headed household (63%) compared to the female headed households (49%).

3.3.7 Distribution of Households by type of dwelling unit and residence

Type of dwelling unit 67% of households resided in detached dwelling units while 12% resided in semidetached dwellings. The residence differentials show that proportion of households that lived in Tenements was five times more in urban (37%) than in rural areas (8%).

3.3.8 Land Tenure and Land Use in Uganda

In Uganda, land can either be owned in perpetuity or for a given period of time. The Land Act, cap 227 identifies four forms of land tenure systems in Uganda which include: Customary, Leasehold, Freehold and Mailo. The mailo land tenure system is similar to the freehold except that for the former, the occupants are obliged to pay an annual nominal ground rent. Although Uganda’s statutory laws grant men and women equal rights to land and other property regardless of their marital status, application of these laws has not supported equitable distribution and benefits. This is partly due to weak institutional capacity of the legal system, particularly in rural areas, that hampers effective enforcement and administration of the laws (ICRW, 2011). Women ownership of land is still limited due to gender disparities and cultural practices driven by patriarchy. Practices around marital property and inheritance, in particular, continue to be dominated by customs that impose serious constraints on women’s ability to own and control land resources. These customs limit the user rights of land by women to their relationships with the male family members (heads), thereby making their user rights secondary to those of the men, who tend to have rights to land as a right at birth. Women are also vulnerable to land grabbing, and denial of land rights is usually exacerbated by events such as the loss of a spouse or parent. In consideration of this situation, it will be important during the implementation of the GROW Project that women’s right to access to, ownership of and titling of land shall be promoted. The GROW sub projects will support equitable benefits among male and female members of households. The consent of both women and men of the households will be sought prior to sub project implementation in order to ensure that the opinions and views of the women and other vulnerable family members are considered in the management of project impacts and benefits.

3.3.9 Vulnerable and Marginalised Groups

Uganda uses aboriginality, to the exclusion of other factors, as the only method of identifying Vulnerable and Marginalised Populations. The VMGs in Uganda include ethnic minorities, refugees and the associated host communities, people living with disabilities, female youth, elderly females, people living with HIV, survivors and those at risk of GBV. Two ethnic minority groups in Uganda have been identified according to the World Bank’s ESS7 on the identification of VMGs. They include traditional hunters and gathers’ communities. of the

Ik who live on the edge of the Karamoja - Turkana region along the Uganda - Kenya border in Kaabong District, Karamoja, Batwa who live mainly in south-western Uganda, Benet who live in Kween District on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, and Tepeth living in Mount Moroto and neighbour the Turkana and the Pokot of Kenya.

The Constitution of the Republic of Uganda also makes provisions to ensure that VMGs are protected and their interests promoted in various government programs. Government has formulated and implemented a number of policies, programmes and enacted laws intended to improve livelihoods of vulnerable and marginalized groups.

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

In areas where large GROW sub-projects will be implemented; specific groups may be uniquely vulnerable, lack capacity to cope with uncertainty and risks. Their lifestyle is often characterized by low levels of asset ownership and risk of chronic poverty. Moreover, they face discrimination and stigmatization and suffer the multiple effects of poverty, vulnerability, discrimination and powerlessness.

There are varying socio-demographic characteristics that any development intervention should consider. Most of the features demonstrate limited opportunities to access basic development opportunities. Generally, power and gender relations between the men and the women favour men as superior and women continue to suffer very high time burdens in pursuing their livelihood strategies (Uganda Gender Policy, 2007). All consultations with men and women revealed the prevalence of this form of negative masculinity. Both men and women largely do the gender ascribed jobs in the community, largely the traditional subsistence cultivation of traditional crops.

VMG communities have significant cultural sites. Although some of these sites have been gazetted as National Parks or Tourist sites, most members of vulnerable and marginalized groups still rely on them for subsistence and livelihoods. These will, however, be ascertained as the (sub) projects are developed.

3.3.10 GBV prevalence in Uganda

According to the UN report, (2006), Gender-based violence is defined as any act of violence that results in physical, sexual, or psychological harm or suffering to women, girls, men, and boys, as well as threats of such acts, coercion, or the arbitrary deprivation of liberty. The 2016 Uganda Demographic and Health Survey revealed that up to 22% of women aged 15 to 49 in the country had experienced some form of sexual violence. The report also revealed that annually, 13% of women aged 15 to 49 report experiencing sexual violence. This translates to more than 1 million women exposed to sexual violence every year in Uganda. Violence against women and girls (VAWG) constitutes a major obstacle to the empowerment of women (UNFPA 2010).

Prevalence rates of GBV in Uganda are high compared to both global and regional averages. Overall, 51 percent of all women and 52 percent of all men aged 15-49 in Uganda reported experiencing physical or sexual violence (by any perpetrator) at least once since the age of 15. Similarly, one in five women (22%) and men (20%) have also experienced physical violence (UDHS 2016). By comparison the global average prevalence rates for violence against women (physical or sexual) aged 15-49 is estimated by the World Health Organization (WHO) at 35.6 percent and the regional (Africa) average is 37.7 percent. In most cases (60 percent), perpetrators were intimate partners. Furthermore, the 2016 Uganda Demographic and Health

Survey (UDHS) data indicates that beyond Intimate Partner Violence (IPV) Non-Partner Sexual Violence (NPSV) and child sexual abuse are the two most prevalent forms of GBV.

Table 4: Driver and Sustainers of SGBV in rural areas

Drivers	Maintainers	Effect
Restricted livelihood opportunities /Unemployment	Idleness	High alcohol consumption -promiscuity, infidelity, defilement, rape in and out of marriage. Sex as entertainment - nothing else to do to fill time.
	Inverted power relations.	Women main providers and heads of families as most men abandon them and abdicate responsibility.
	Lack of money	Barter sex/commercial sex – young girls barter/sell sex for favors such financial help, food and other basic necessities-rural areas inclusive which has under-age commercial sex workers especially on transit routes for long haulage truck drivers, contract workers in rural areas among others
Limited services (health care, SGBV information)	Limited and inaccessible use of health care services	Infrequent use of services. Limited diagnosis and treatment of SGBV, Assault and STIs.
Culture of silence	Culture of the of the locals –rape and defilement are not common normally and it is a taboo to speak about them hence not reported such not spoken about or reported. Ignorance of the dangers of sexual violence on the side of the girls	Shame Problem of rape and defilement is frequently hidden and solved traditionally.
	Fear of bringing shame and disharmony on HH and concerned families.	SGBV – marital rape continues in marriage
Parent’s perception of their girls as a source of income	Culture of silence and inaction from local authorities.	Under-age marriages continue

Source: Review of various documents

3.3.11 Violence Against Children

Violence against children includes all forms of violence against people under 18 years old, whether perpetrated by parents or other caregivers, peers, romantic partners, or strangers. Violence against children, entails physical, sexual, and emotional violence, which has devastating effects on physical and mental health of children⁴. According to UNICEF country profiles report (2019), nearly one in five children experienced physical violence by a parent, adult caregiver, or other adult relative (girls, 18.7%; boys, 21.7%) in the past 12 months. About one in five girls (18.2%) and one in four boys (25.1%) experienced physical violence by a peer in the past 12 months. Additionally, 15% of the boys and 34% of the girls had been subjected to child marriage by their parents before the age of 18. Of 18-24-year-old Ugandans, one in three girls (35%) and one in six boys (17%) reported experiencing sexual violence during their childhoods. This included 11% of girls experiencing pressured or forced sex. Relatedly, of Ugandans ages 13-17 years, one in four girls (25%) and one in ten boys (11%) reported sexual violence during the survey period as was the case for 18-24-year-old females

⁴ <https://www.who.int/news-room/fact-sheets/detail/violence-against-children>

who had sex before age 18, one in six (15%) reported exchanging sex for material support in childhood⁵. As such, the project should devise mechanisms that help to respond to the vices of violence, abuse, neglect and exploitation of children during and after its lifetime.

3.3.12 Health

Realisation of economic rights depends on health status of the population. Women's access to health services remains limited by a number of factors, including the burden of work, cost of the services, gender dynamics, location of the health facilities, etc.

Health facilities in Uganda include Hospitals and Health Centres (IV, III and II). The health facilities are unevenly distributed across the regions of the country, whereby 45 % of the health care facilities are located in the central region. The western region has the highest number of Regional Referral Hospitals and Health Centre IVs while the Eastern region has the highest number of Health Centre IIIs. Between 2016/17 and 2017/18, there was a reduction in the number of Health Centre IIs and General Hospitals while there was a six-fold increase in the number of clinics. There have been efforts to upgrade HC IIs to HCIIIs to cater for aspects including provision of maternity services for women. It is worth noting that most of the facilities remain poorly equipped with some having no access to basics such as electricity. According to the National Budget Framework Paper for FY 2019/2020, the budgetary allocation to the health sector for the FY 2019/2020 stood at 8.9% as a share of the national budget for FY 2019/2020. Also, worth noting was that 54% of the budget for the sector was to be bridged through Development partner support.

⁵ Uganda Violence Against Children Survey Findings from A National Survey. Ministry of Gender, Labour and Social Development August 2018

4 STAKEHOLDER CONSULTATION, PARTICIPATION AND DISCLOSURE PLAN

To gather views on the potential benefits, design, scope, risks and mitigation measures for the proposed Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project, stakeholders from sixteen (16) institutions were consulted in the period between December 2021 and February 2022. This was the first (1st) phase of stakeholder consultations. The consultations were carried out as part of project preparation. The stakeholder engagements guided the preparation of GROW Project safeguards documents such as the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Stakeholder Engagement Framework (SEF), Vulnerable and Marginalised Group Framework (VMGF) and Environmental and Social Commitment Plan (ESCP).

4.1 Stakeholders engaged

The respective stakeholder that were consulted in the first phase (phase 1) are summarised in **Table 5** below. A total of 116 individuals participated in the consultations and of these, 57 (49.1%) were men and 59 (50.9%) were women, which was an almost balanced representation. The stakeholder consultation meeting attendance lists for phase 1 are presented in **Annex 6**. The stakeholder consultation meeting attendance list for phase 2 is presented in **Annex 7**.

Table 5: Summary of Stakeholders Engaged during phase 1 of the consultations

S/N	Institution Consulted	Male	Female	Total
1	Ministry of Gender, Labour and Social Development (MGLSD)	5	10	15
2	Ministry of Finance, Planning and Economic Development <ul style="list-style-type: none"> • Uganda Investment Authority (UIA) • National Planning Authority 	2	3	5
3	Private Sector Foundation Uganda (PSFU)	5	2	7
4	Office of the Prime Minister (OPM)	2	2	4
5	Ministry of Trade, Industry and Cooperatives	3	2	5
6	Ministry of Agriculture, Animal Industry and Fisheries	2	2	4
7	Ministry of Lands, Housing and Urban Development (MLHUD)	3	5	8
8	Ministry of Tourism, Wildlife and Antiquities (MoTWA) <ul style="list-style-type: none"> • Department of Museums and Monuments (DMM) • Uganda Wildlife Authority (UWA) 	1	1	2
9	Ministry of Water and Environment <ul style="list-style-type: none"> • National Forestry Authority (NFA) • National Environment Management Authority (NEMA) 	3	2	5
10	Makerere University Business School (MUBS) <ul style="list-style-type: none"> • Other Higher institutions of learning – Kyambogo University, Makerere University 	1	1	2
11	Private Sector <ul style="list-style-type: none"> • Private Sector Foundation Uganda (PSFU) • Commercial Banking and Financial Institutions • Non-Governmental Organisations (NGOs) • Uganda Manufacturers Association (UMA) 	4	3	7
12	Development Partners, <ul style="list-style-type: none"> • WB • UNDP • UNHCR 	6	6	12
13	VMGs Representative Organisations; <ul style="list-style-type: none"> • Organisations of people with disability - NUDIPU, • Women’s disability group, etc. 	2	2	4
14	Civil Society Organisations:	3	2	5

	<ul style="list-style-type: none"> • Women Organisations, Faith Based Organisations (FBOs) • Religious and Cultural Organisations • Gender Activists 			
15	Ministry of Local Government <ul style="list-style-type: none"> • Randomly Selected Local Governments 	5	6	11
16	Local communities with potential beneficiaries of the project <ul style="list-style-type: none"> • Community members • Women 	10	10	20
	Total	57	59	116

Table 6: Summary of Key Issues Raised by GROW Stakeholders_Phase 1 of Consultations

S.N	Valued Design, Environmental and Social Component (VESC)	Recommendations and comments
1	Project Design	<ol style="list-style-type: none"> 1. The Project Implementation Teams (PITs) to engage the Uganda Wildlife Authority (UWA) during the GROW project / sub project design for those located close to or within Protected Areas to avoid impacting on critical habitats such as breeding grounds and nesting sites. 2. Follow the mitigation hierarchy i.e. Avoidance (divert the sub projects), Minimize (choosing the best location options, avoid the existing tourism / wildlife areas) and follow UWA Guidelines for the design of Biodiversity Offsets. 3. Alternative project designs should be explored to ensure that the project does not adversely impact the tourist value of the protected areas. 4. The designs should be aligned with the culture of the people. 5. Livelihood options should be proposed by the affected households and involve the VMGs in the design of the GROW Project. 6. Align the components under the GROW Project with another World Bank financed Forest Landscape Project, to ensure synergies and avoid duplication of resources and efforts. 7. Assess the characteristics of the VMGs and use this information in the design of the GROW Project. 8. The design of the Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project should be aligned to ensure synergies and avoid institutional conflicts. 9. Clear implementation modalities of all the components should be developed in partnership with the Office of the Prime Minister, District Local Governments and other key stakeholders prior to project implementation. 10. Projects with multiple Implementation Units have a risk of implementation delays and conflicts. These risks should be managed. 11. The PITs should use the same pre-existing structures for effective project implementation of the GROW Project. 12. Buy Uganda and Build Uganda (BUBU) should be factored in the design and implementation of GROW Project to escalate the 13. Project design should also give assign sufficient funds for institutional support to help in monitoring the project since some of the beneficiaries are in hard-to-reach areas and accessing them is very difficult. intended benefits.
2	ESIA Studies	Ensure that ESIA studies undertaken and approvals granted prior to project implementation.

	M&E	The project will work with local governments to ensure that the project is a success since they will be carrying out most of the verification and monitoring of these projects
3	Influx of Labour, and Working Conditions	<ol style="list-style-type: none"> 1. GROW Project to develop a Labour Force Management Plan to ensure workers are given contracts, have descent and safe working conditions and are allowed to bargain collectively. 2. Document the number of jobs and quality (casual, semi-skilled and skilled labour) that will be created by GROW Project. 3. The project should employ locally available labour and expertise to the greatest extent. 4. Document the jobs created by the GROW Project so that the impact of the project can be further emphasized. 5. GROW Project should use the existing labour force management frameworks e.g. District Labour Officers. 6. Undertake skilling of the rural people in order for them to participate in the project. The PWDs, Youth, Women, and Girls should be trained to take up off-grid project opportunities. 7. Sourcing for Service providers should be done locally and fairly especially for off-grid projects. 8. The project should put in place measures to avoid Gender Based Violence (GBV) and Violence Against Children (VAC).
4	Health and Safety of workers and communities	<ol style="list-style-type: none"> 1. The two PITs to work with the Department of Occupational Safety and Health (DOSH) in the monitoring and supervision of Service providers to ensure workers' and community health and safety are properly managed during GROW Project implementation. 2. Infrastructure such as schools, water supply schemes and health centres should be designed with participation of both host communities and VMGs.
6	Loss of Land and Restrictions in Land Use	<ol style="list-style-type: none"> 1. Where necessary, the PITs should acquire land prior to project implementation. 2. Adequate and timely compensation should be provided to project affected communities, if any. 3. Cut-off dates should be communicated earlier to the Project Affected Communities.
7	Environment, Biodiversity and Natural Resources Management	<ol style="list-style-type: none"> 1. The GROW Project should not be implemented among communities that encroach/occupy protected areas as this may legitimize their illegal occupation. 2. Natural resources, wildlife, Forestry and Biodiversity Experts should be part of the ESIA studies especially for sub-components close to or within protected areas such as Forest Reserves and National Parks. 3. There is a potential risk of hazardous and non-hazardous waste e.g. electronic waste being generated. GROW Project should include E-waste management strategies in the ESMF. 4. Reuse, and recycling of waste should be prioritised for waste management. 5. NFA is already conducting projects in forested areas that are home to indigenous groups such as the Batwa and it has entered into arrangements such as collaborative forest management with the adjacent communities to help support and enhance their livelihoods
8	Vulnerable and Marginalised Groups	<ol style="list-style-type: none"> 1. The vulnerable groups were identified as female-headed households, people with disabilities (PWDs), the elderly, child headed households, women at risk, and people with diseases. 2. The ethnic minorities were also recorded among the marginalized communities in Uganda. The people who live in Islands were also identified as marginalized.

		<ol style="list-style-type: none"> 3. Consider the refugee camps as a nucleus for the project be designed to cater for the Refugee Host District. 4. Study the viability of all proposed sub projects in relation to VMGs 5. Consider increasing the grant component to enhance the services to the VMGs. 6. There is need to include the vulnerable and marginalized groups in this intervention to ensure that they are extricated from the pangs of poverty.
9	Physical and intangible Cultural heritage	<ol style="list-style-type: none"> 1. Engage the Department of Culture at MGLSD to develop the capacity on culture management during GROW Project. 2. Always engage the Department of Culture in advance to avoid emergency response when cultural aspects impede project activities. 3. Engage caretakers of the intangible sites. 4. Work with the Local Leaders and the Cultural institutions during the mapping and relocation process for of Physical Cultural Resources (PCRs). 5. Support appeasement ceremonies during relocation of PCRs. 6. Support the MoTWA to introduce cultural resource centres for Refugee camps and other VMGs. 7. Support relocation of the PCRs
10	Financial intermediation	<ol style="list-style-type: none"> 1. Repossession of products that are acquired on loans by beneficiaries should be minimized through due diligence and sensitization of beneficiaries of the GROW Project. 2. The Private sector will largely partner in the implementation of the project to effectively represent the interests of their members. 3. A clear subsidy should be provided in the project design for the project beneficiaries.
11	Stakeholder Engagement and Information Disclosure	<ol style="list-style-type: none"> 1. Undertake stakeholder analysis before selection of partnerships. 2. Engage the Uganda Wildlife Authority as one of the key stakeholders during project design and implementation monitoring. 3. Engage the Ministry of Water and Environment since it has positive impact in the environmental conservation. 4. Consult the Department of Culture at MGLSD 5. Consult the Department of Museums and Monuments. 6. Consult cultural institutions such as Buganda Kingdom and other Cultural Institutions in the countryside on the management of cultural artefacts. 7. Consult Worldwide Fund for Nature (WWF) Uganda Country Office during the project design. WWF has implemented many projects and documented lessons, challenges and opportunities. 8. Use the appropriate language during stakeholder engagements. 9. GROW Project should develop and implement Stakeholder Engagement Plans. 10. Use Free Prior and Informed Consent (FPIC) during stakeholder engagement.
12	Waste and duplication of resources	<ol style="list-style-type: none"> 1. Project will work to provide credit to already existing entities which are already, and small medium level as opposed to start ups at micro level. 2. There is need to benchmark this project from previous projects. 3. There is need to ensure that all these interventions being made do not overlap to minimize waste and duplication since there are already existing government led interventions such as UWEP and

		now the Parish Development Model.
13	Synergies from similar interventions	1. There is need to show synergies between different projects that are running such as the Parish Development Model, GROW and INVITE
14	Land acquisition	<ol style="list-style-type: none"> 1. On the issues of land -UIA has previously donated land to women for example in Soroti and Namanve but the women entrepreneurs haven't taken possession owing to the cost of carrying out the associated studies and assessments. 2. Recently, UIA, embarked on a land mobilization drive across the country and from this they were able to get land from various regions such as West Nile, Lango with Nebbi donation 511 acres, Madi Okollo 515 acres, Yumbe 1224 acres, Pader 500 acres, Dokolo 200 acres, Oyam 54, Lira 300, Ankle sub-region 25 acres, Kigezi 6 acres, Rukunigri 203 acres, Kisoro 620, Tooro 502 and Nakasongola 640 acres 3. Before the UIA take possession of land due diligence studies such as ESIA and RAP are undertaken in compliance with national laws and international best practices. 4. Regarding grievances -UIA noted that they normally encounter grievances especially those related to land take and acquisition but use existing structures at district and community level to resolve any issues that arise.
15	Innovation	<ol style="list-style-type: none"> 1. There need to give space and opportunities to potential beneficiaries who come up with new innovations 2. There is need to include enterprises that are borne out of local innovation such groups making bags, tiles, and other construction materials out of plastics.

Table 7: Summary of Key Issues Raised by GROW Stakeholders_ Phase 2 of Consultations

Stakeholder	Issues/concerns	Response/Action plan
National Planning Authority	There is need to ensure that all these interventions being made do not overlap to minimize waste and duplication since there are already existing government led interventions such as UWEP and now the Parish Development Model.	Project will work to provide credit to already existing entities which are already and small medium level as opposed to start ups at micro level.
Ugandan Investment Authority	The project is yet to come out and explicitly indicate the type of Common- User facilities that it intends to establish	For now, what is clear, the Common User facilities will include child care facilities, machines, lavatories and the like.
	UIA already has similar structures/spaces for SMEs but they aren't being utilized by the intended beneficiaries.	
	There is need to have an assessment to inform the establishment of these Common User Facilities	The project will carefully study make practical recommendations to inform establishment of these Common User facilities.

	There is need to show synergies between different projects that are running such as the Parish Development Model, GROW and INVITE	Noted
	There is need to have proper guidelines on how to link users to the common user facilities.	These guidelines will be shared before project implementation commences
	As part of its investment strategy, UIA preserves space for SME growth across the country.	
	UIA also needs to know the linkage between of PDM, GROW and INVITE projects to see where it can plug-in and help to inform project implementation.	Noted
	On the issues of land -UIA has previously donated land to women for example in Soroti and Namanve but the women entrepreneurs haven't taken possession owing to the cost of carrying out the associated studies and assessments.	MGSLD will further engage with UIA as explore ways of how best the GROW project can utilize this opportunity of available land to enhance women's growth opportunities.
	Recently, UIA, embarked on a land mobilization drive across the country and from this they were able to get land from various regions such as West Nile, Lango with Nebbi donation 511 acres, Madi Okollo 515acres, Yumbe 1224 acres, Pader 500 acres, Dokolo 200 acres, Oyam 54 acres, Lira 300 acres, Ankole sub-region 25 acres, Kigezi 6 acres, Rukunigri 203 acres, Kisoro 620, Tooro 502 acres and Nakasongola 640 acres.	Noted, MGSLD will explore how it can ride on this to mitigate the risks involved in land take and acquisition.
	Before the UIA take possession of land due diligence studies such as ESIA and RAP are undertaken in compliance with national laws and international best practices.	Noted, where required GROW will also conduct the requisite due diligence studies to comply with the national laws and World bank standards specifically ESS1, ESS5, ESS10 and any other Environment and Social Standards that may apply in line with WB ESF framework,2017.
	Land is only given out to potential users after undertaking the required due diligence studies.	Noted
	Regarding grievances -UIA noted that they normally encounter grievances especially those related to land take and acquisition but use existing structures at district and community level to resolve any issues that arise.	Noted, GROW project will also recommend a Grievance Redress Mechanism in cognizance of the existing grievance redress structures such especially at district and community level.
Ministry of Finance Planning and Economic Development	The General feeling is that there is a duplication of interventions from UWEP	Unlike UWEP, GROW has been designed in such a way that it provides credit to already existing entities owned by women which are already at small medium level as opposed to start ups at micro level.
Ministry of Local Government	There is need to include the vulnerable and marginalized groups in this intervention to ensure that they are extricated from the pangs of poverty.	All components will integrate disability inclusion, using best practices on how to best run entrepreneurs and jobs platforms for women with disabilities and digital platforms for female entrepreneurs
	The project should have updated gender disaggregated data to inform the design and implementation of the GROW project.	Review and analysis of data regarding entrepreneurship in Uganda will be done and presented in the safeguards documents to inform project design and implementation.

	<p>On the issue of DLGs capacity to implement such projects- The DLGs have the capacity and structures to help in project implementation and monitoring. However, they need to be involved right from inception so that they can have full appreciation of the project objectives, intended out comes and target groups.</p>	Noted
Ministry of Trade, Industry and Cooperatives	Women should be encouraging to formalize businesses so that they can tap into this government led intervention.	Noted
	There is need to teach the women entrepreneurs value addition skills for purposes of competitiveness and growth in business	Noted-Through training, the project intends to deliver Core course and sector specific training to respective women’s groups and through these trainings they will be equipped with various skills such as processing, marketing branding and the like.
	Women entrepreneurs should be encouraged to join business forums to ensure that they get free mentorship and expert views and ideas on the dos and don’ts’ of where they can pick crucial tips for business growth and success	Noted
Ministry of Tourism, Wildlife and Antiquities	Does the project intend to support any startups?	Women in Tourism will be supported at both group level and individual level
	Will there be any form of capacity building for the women entrepreneurs?	Peer learning is going to be encouraged- the GROW project will provide structured peer support to women entrepreneurs who are serious about growing their businesses, with mentoring and guidance from lead female entrepreneurs
	There are serious issues of GBV specifically in the tourism sector that need to be mitigated.	Given the scope of this project, GBV policy and action plan with activities that reflect the priorities and needs identified by the communities and GBV actors to mitigate the risk of GBV on the project.
	There are also cases of child labour especially in recreational areas such as clubs, restaurants in rural areas	The project should have a child protection to serve as a guiding instrument for child protection
	Need to sensitize the business community specifically women entrepreneurs about the need to employ skilled personnel.	Noted, project proponent will ensure that the respective entrepreneurs are equipped with the requisite skills. Employment of skilled manpower is crucial for competitiveness and productivity in the tourism industry since in largely depends on skill levels, professionalism, commitment, passion, loyalty and soft skills of the workers
Ministry of Gender Labour and Social Development	The project will work with local governments to ensure that the project is a success since they will be carrying out most of the verification and monitoring of these projects	Noted
	Project beneficiaries can be given autonomy to change the business portfolio for as long as they notify the monitoring officer-to spread the risk and make the intervention more sustainable.	Noted

	The project should have officer stationed where it has a foot print so that they can efficiently issues that arise in each respective region.	The project will establish functional human structures for purposes of implementing and monitoring the activities of the beneficiary groups.
	Verification of applicants is very important and this will be only possible with the help of district structures such as the (District Executive Committee, District Technical Planning Committee, Sub- County Executive Committee and Sub-County Technical Planning Committee	Noted
	Project design should also give assign sufficient funds for institutional support to help in monitoring the project since some of the beneficiaries are in hard-to-reach areas and accessing them is very difficult.	Noted
	On the issue of training -There is need to have a proper training structures and personnel, from experience, the trainings delivered in the previous projects under UWEP were found to be inadequate. marketing, book keeping, Value addition and packaging training cannot be entrusted by grassroots trainers	The project will conduct training to enhance human endowment by supporting training in topics known to improve the success of women entrepreneurs
	The project should also include the Vulnerable and marginalized groups for example under UWEP, Indigenous groups in Bundibugyo and Kabale such as the Batwa, IK in Kaabong were considered for funding Majority are involved in agriculture, art and craft, weaving, tailoring and embroidery and cosmetology.	Noted
	Regarding management of E&S Safeguards -The project should make it categorically clear, that no enterprise will access credit if it is involved in a business that degrades the environment, such as sale of charcoal, fire wood, sale of alcoholic beverages which cause social disharmony.	Noted
	There is also need to sensitize the men to help diffuse and alleviate any misconceptions about women enhancing and boosting their enterprises. Most men have a tendency of abdicating responsibility once they realize that their spouses are earning an income.	Before implementation sensitization will be carried in beneficiary communities and men will be invited to fully appreciate the objectives of the project.
	The project should also try as much as possible to diffuse GROW from local politics to prevent it from being hijacked.	Noted -Project will be implemented based on the guidelines and governance structures established
	The project also needs to be implemented in a phased-out manner to avoid to ensure success, a lot of issues are picked up as the project progresses, therefore the project is able to find remedies for the challenges encountered along the way.	Noted
	Regarding OHS-there is need to carry OHS for livestock keepers, crops farmers and these issues should be verified by the CDO using a standard checklist from MGLSD	OHS issues are part of the project and will be addressed as and when required to safeguard all involved from harm.
UNDP	Project should follow the Do No Harm principle, to ensure that through this intervention social and environment risk aren't triggered and where it is inevitable mitigate measures for negative effects on the social fabric should be instituted especially among the Vulnerable and Marginalized groups such as indigenous persons, the old, sick and infirm, refugees among others.	Noted
	There need to give space and opportunities to potential beneficiaries who come up with new innovations	Noted -where feasible new innovations will be supported as long

		as they fulfil the requirement of the implementing entity.
	Need to ensure that all these groups are formalized for traceability and sustainability purposes.	All groups to established will be formalized and legally registered.
	How deliberate is the project about helping vulnerable and marginalized groups?	All components will integrate disability inclusion, using best practices on how to best run entrepreneurship and jobs platforms for women with disabilities and digital platforms for female entrepreneurs.
	Is the project targeting youth led-groups?	Yes-the project will target all groups as long as they're registered and fully operational.
	There is need to include enterprises that are borne out of local innovation such groups making bags, tiles, and other construction materials out of plastics.	Noted
Makerere University Business School	There is need to understand the level where entrepreneurs are	Noted
	Training materials for all the targeted groups will need to be translated and simplified for easy understanding.	Noted, this will help to ensure that beneficiaries can easily acquire skills and knowledge regardless of their literacy levels.
	Peer learning will need to be used by the project so that entrepreneurs can have hands on experience	Noted- the project intends to use peer learning to enable sharing ideas and experiences. Similarly, entrepreneurs will have access to mentors that would support their enterprise growth and transition
	The project will need to carry out a needs assessment a have a clear understanding of the training needs.	Noted, this will help to assess the specific training needs of the potential beneficiaries.
	The project should have a ToT (Training of trainers) strategy in the respective regions to help train the various women led entrepreneur groups	For purposes of extending the training to rural areas and hard to reach areas, the project intends to use this strategy to ensure that quality trainings are delivered to all groups
	There is need engage husbands to be part of the training so that they can appreciate what the project objectives and goals	Before implementation sensitization will be carried in beneficiary communities and men will be invited to fully appreciate the objectives of the project.
	The project proponent can work reputable NGOs and CSOs such as Council for Economic Empowerment for Women of Africa - Uganda Chapter (CEEWA- U) who have experience of working with women entrepreneurs.	Noted
Kyambogo University	The project should have mitigation measures for Gender based violence.	The project will have GBV action plan to guide on how best GBV issues can be handled
	What type of women are being targeted?	The women being supported are those who businesses are at small and medium and need their businesses to be transitioned to the next stage of business growth
	There is need to benchmark this project from previous projects.	Noted

	Specifically what type of vulnerable groups are being targeted?	Vulnerable groups include the disabled, refugees and indigenous and marginalized groups such as the Batwa and IK
Makerere University Kampala	The project should explore options of a teaching and learning center for the children in the child care center	Noted
	The project should consider training care givers for the children.	Noted
	Training should be carried out with due consideration to the different literacy levels.	Noted
NEMA	There is need to follow the law when deciding on the assessments to be done especially for infrastructure projects.	Before implementation the respective laws and international best practices regarding Environmental and social safeguards will be followed through the requisite assessments
	There need to have proper identification of impacts, this will guide on the type safeguards documents that have to be prepared such as ESIA, Project briefs, RAP and the like.	Noted
PSFU	Sensitization should be carried out within the beneficiary communities on risks associated with the project.	The project proponent will have a stakeholder engagement plan to guide the sensitization and area specific community outreach activities related to the project.
	The project will use existing structures to prepare for prevention and response to risk associated the project such as sexual exploitation and assault	Noted
	There is need to incorporate environmental and social sustainability in the project	Noted, all these will be followed to the letter through various E& S studies related to the project activities.
	The project also needs to come out strongly on issues related to GBV	The project will have GBV action plan to guide on how best GBV issues can be handled. Specifically, WB guidance noted 2018 on management of GBV risks will be used together with MGSLD guidelines on GBV.
UNDP	What happens when the resources are siphoned by the men?	The project will use existing structures to ensure that it mitigates against the risk of siphoning of credit accessed to enhance business growth.
	There is need to carry out community wide sensitization and invite the men to be part of these sensitizations.	Noted
	What are the project objectives of GROW, how different are they from UWEP?	GROW is targeting already established businesses while UWEP was focusing on start ups
	Is there a component on mentorship and coaching of selected women entrepreneurs?	
NFA	NFA is already conducting projects in forested areas that are home to indigenous groups such as the Batwa and it has entered into arrangements such as collaborative forest management with the adjacent communities to help support and enhance their livelihoods	Noted
NUDIPU	There is need to build capacity of project personnel on issues related with disabled persons	MGLSD and MLG will support training and technical assistance for local government staff on all issues related to the project

	Will this credit be for paying back?	Yes the project will be for paying back and the proposed interest rate is between 6-8% p.a
	The Common User Facilities should have assistive devices for the visually impaired, rumps for those with wheel chairs to enable them access and utilize these facilities	Noted
	There is need to give the beneficiaries proper training	Noted
	Training materials should be designed and produced to benefit all including the disabled, the visually impaired and the illiterate.	Noted
	What specific measures are to mitigate loss and ensure that successes are scaled up?	The project will put in place appropriate mechanisms to ensure that beneficiaries are held accountable in case they default on payment.
	How can the project leverage from the so many women with disabilities that NUDIPU has mobilized from VSLA groups and have started IGA under the iSAVE inclusive economic empowerment program?	This is noted, further consultations will be held with NUDIPU to ensure that the groups referred to fit the selection criteria.
Micro finance Support Center	Is there room for partnerships to work with the project?	MGSLD will engage various stakeholders to see how best it can co-opt them to support the successful implementation of the project.
	Can women operating in SACCOs be able to access credit and training from the project?	All women entrepreneurs who fulfil the selection requirements will benefit from credit and training offered by GROW
IRCU	We hope that the terms and conditions are favourable for the potential beneficiaries	MGSLD is mindful of the economic situation of the groups and targeted beneficiaries and will ensure that the terms and conditions of accessing credit are fair to all.

5 POTENTIAL (RESETTLEMENT) SOCIAL RISKS AND IMPACTS AND MITIGATION MEASURES

The proposed Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project is likely to result in both positive and adverse impacts. The detailed impact analysis and development of mitigation measures will be undertaken during the Environmental and Social Impact Assessment (ESIA) and Resettlement Action Plan (RAP) for sub-projects under Components 1 and 3.

This section presents the likely potential resettlement risks and impacts that may arise before, during and after the implementation phase of the projects, which include:

5.1 *Loss of Residential Land and Housing*

Project-related land acquisition or restrictions on land use may cause physical displacement through the loss of residential land and structures used for housing. This can lead to loss of shelter which needs to be compensated for to avoid impoverishment of affected households. Physical displacement as a result of GROW is expected to be limited due to the nature of the proposed activities and preference for siting common user facilities on existing government land.

5.2 *Loss of Other Structures*

Land acquisition may result in loss of or damage to other structures including toilets, storage facilities etc which while not residential can contribute to the standard of living of PAP and therefore need to be compensated for regardless of if houses are impacted. Loss of other structures may occur if they are located in project corridors etc (while not necessarily resulting in physical displacement)

5.3 *Loss of Agricultural Land / Pasture Land, Trees and Crops*

People may own or use land on which they grow crops and trees including commercial trees as a source of income or for subsistence. Loss of access to land for growing crops can have long term implications for livelihoods which need to be compensated for. Standing crops also need to be compensated for regardless of land ownership and if the impact is temporary or permanent in order to maintain livelihoods.

5.4 *Loss of or Disruptions to Businesses*

The proposed infrastructure for the GROW project is likely to affect livelihoods of some PAPs. It is envisaged that some people might have business activities along the project corridor i.e kiosks, shops and road side businesses such as carpentry and retail businesses. These, when implementing the project might be affected through temporary or permanent economic displacement eg as a result in reduced access or from permanent land take which will need to be compensated for.

5.5 *Community institutions and social networks are weakened*

Relocation of PAPs as a result of GROW infrastructure Project might lead to individual households moving to areas where they are separated from their social networks or other community institutions that support their livelihoods and way of life.

6 ELIGIBILITY CRITERIA

6.1 Eligibility Criteria for Compensation

Determination of the eligibility of the bona fide occupants of the properties to be compensated shall be done through a transparent and legal process, taking into consideration all the existing laws of Uganda and local customs and standards of the World Bank notably ESS5. In case of inconsistency between these standards, the one most advantageous to the PAP(s) shall apply.

Compensation at replacement cost for buildings, crops and trees will be paid only to those persons, who prior to the cut-off date:

- a) have formal legal rights to land or assets;
- b) Who do not have formal legal rights to land or assets, but have a claim to land or assets that is recognized or recognizable under national law; or
- c) Who have no recognizable legal right or claim to the land or assets, they occupy or use.

6.2 Categories of Project Affected People (PAPs)

The likely numbers of persons who may be affected and displaced during implementation of the GROW project activities cannot be accurately estimated. However, the Project Affected Persons (PAPs) or the persons likely to be displaced economically or physically can generally be categorized into the following main groups.

6.2.1 Affected Households

A household will be affected if one or more of its members are affected by the project activities. This will be either in the form of loss of property or use of land loss of other assets, or access to services or socio-economic resources. Affected household members may include:

- i. Any member of the household whether men, women, children, dependent relatives, friends and tenants,
- ii. Vulnerable individuals who may be too old or ill to farm or perform any duties with the others,
- iii. Members of the household who are not residents because of cultural rules, but depend on one another for their livelihood,
- iv. Other vulnerable people who cannot participate, for physical or cultural reasons; in production, consumption, or co-residence.
- v. Disabled people who may be attached to a particular service centre.

6.2.2 Vulnerable Households

One of the objectives in the decentralization policy of Uganda targets empowering women by removing restrictive practices on women's participation in decision-making processes that affect them. Particular attention will be paid to impacts on vulnerable members of communities such as women, widows, children, the disabled, female and child-headed households, and internally displaced people. Internal conflicts, historical marginalization, poor infrastructure, and diseases still affect the region, with significant impacts on human welfare and quality of life.

6.2.2.1 Elderly

The elderly people farm or engage in other productive activities as long as they are physically able to. Their economic viability does not only depend on how much land they farm or how much they produce

because, by producing even small amounts of food to “exchange” with others, they can subsist on cooked food and generous return gifts of cereal from people such as their kin and neighbours.

6.2.2.2 Women

Women may depend on husbands, sons, brothers or others for support. In many cases too, women are the main breadwinners in their households, yet in some communities in Uganda, women cannot own land. Also, as mothers and wives, they need access to health service facilities. Women are central to the stability of the household. They will not be resettled in a way that separates them from their households as the survival of their households depends on them. Furthermore, the decentralization policy of Uganda recognizes the plight of women and seeks to encourage employment and the involvement of women in decision-making. Their compensation will take into account all these factors by involving them in the decision-making processes regarding compensation. The needs and problems of the women are likely to be different both in character and magnitude from those of men, particularly in terms of social support, services, employment and means of survival. Female heads of households are eligible for the same benefits as their male counterparts but they will need special attention if they lack resources, educational qualifications, literacy and other skills, or work experience compared to men.

6.2.2.3 Children and Child-headed Households

Children and adolescents (especially girls) are important elements in addressing vulnerability. Intergenerational ties link experiences between one generation and the next to the extent that fateful intergenerational experiences get transferred from one generation to the next. This means experiences related with social, symbolic and economic capital (especially high birth and illiteracy rates, and rigid social norms) make children and young girls more vulnerable than others. In many households, due to drop in income and living standards, children may never return to school, instead they are drafted into the labour market or early marriages or into prostitution. The situation even gets worse when children suddenly find themselves in situations where they are the sole bread earners for their younger siblings. This is even truer now in the HIV/AIDS pandemic where many families have had older (parents) breadwinners wiped out. To cope with the sudden social change, older siblings become ‘foster’ parents to their young siblings without any experience family making.

Among the affected households, the child headed households are clearly the most vulnerable and consequently they will need special attention in terms of possible loss of livelihood and shelter, development and relocation assistance and management of compensation funds.

6.3 Entitlements

Entitlements for compensation shall be based on the eligibility criteria and the various categories of losses identified during RAP preparation. Unless otherwise indicated, provision of compensation and other entitlements and the extension of assistance will be made to PAP households and individuals as the case may be. Special attention shall be paid to ensure that the women in the household have equal access to compensation (eg through the use of shared bank accounts). Women landholders whether or not they are heads of households, shall be compensated directly.

Cash compensations can be made for all forms of compensation as agreed by the PAP. The PAPs will be paid via three alternative channels depending on their preference. The three alternatives to choose from for payment of compensation will be: mobile money via the Government E-Cash platform, bank payments or physical cash payments at the village level using mobile banking.

The Entitlement Matrix below shows the types of affected people, the types of losses, and the forms and amounts of compensatory actions that will be taken for each type.

Table 8: Entitlement and Compensation Matrix (Replacement cost)

No.	Category of loss	Category of PAP	Basis of Entitlement	Packages/Assistance
1.	Agricultural Land: Permanent loss of agricultural land	Titled Land: Held under a registered title deed	This procedure is based on Section 59 of the Registration of Titles Act, Cap-230 laws of Uganda; which states that a Certificate of title shall be conclusive evidence that the person named in the certificate is the owner of the named piece of land.	Compensation – for the area of the affected land based on the prevailing replacement cost of land + disturbance allowance (15% or 30%). and other assistance associated with relocation activities.
		Untitled Land: Held under customary ownership, and not yet registered	Entitled to compensation based on Market Value of land as apportioned + disturbance allowance (15% or 30%) See Land Act sec.77 (2)). However, where a PAP chooses physical replacement of land, an alternative land is given. Customary land is also valued in accordance with market value of comparable land.	Replacement rates determined by the valuers Since most projects being in the rural area where most of the affected land is not registered, reliance of ownership shall be based on the local leaders as well as confirmation from the affected PAPs.
		Land held without formal land rights	Have no claim to agricultural land compensation except compensation for improvements made on the land they occupied and used for agricultural purposes.	Compensate them for the loss of assets other than land, such as dwellings and other improvement to the land at replacement cost. Provision of resettlement assistance.
		Rented Land: Land rights obtained temporarily as per customary rental agreement	Have NO CLAIM to land, entitled to compensation for improvements + disturbance allowance (15% or 30%) See Land Act sec.77(2)	The renters should be compensated for any expenditure on renting the land and be assisted to find replacement land to rent
2.	Residential Land: Permanent loss of residential land	Titled Land: Land held under a registered title deed	Cash compensation based on Market Value-Land Act Sec.77 (1b) + disturbance allowance (15% or 30%) See Land Act sec.77 (2). This procedure is based on Section 59 of the Registration of Titles Act, Cap-230 laws of Uganda; which states that a Certificate of title shall be conclusive evidence that the person named in the	Current Replacement Cost Determined by the valuer on case by case basis

No.	Category of loss	Category of PAP	Basis of Entitlement	Packages/Assistance
			certificate is the owner of the named piece of land.	
		Land held without formal land rights	Provide arrangements to allow them to obtain adequate housing with security of tenure.	Provide relocation assistance in lieu of compensation for land sufficient for them to restore their standards of living at an adequate alternative site.
		Untitled Land: Land held under customary and not registered	Cash compensation based on Market Value-Land Act Sec.77 (1b) + disturbance allowance (15% or 30%) See Land Act sec.77 (2). To ascertain ownership of the affected pieces of land and other affected properties, reliance is based on the local political and Administrative structures of the area.	-Current Replacement Cost
3.	Structures: Loss of immovable assets	Residential houses: Habitable houses used as a permanent primary residence	To ascertain ownership of the affected pieces of land and other affected properties, reliance is based on the local political and Administrative structures of the area.	Compensation for the entire structure at replacement cost as determined by the valuation committee without deduction for salvaged building materials Free transport for those who operate business in moveable containers such as fork lifting containers to relocation sites.
		Non-residential structures: Business premises, walls, fences, animal pens, etc.	Compensation in cash for affected portion of the structure including the cost of restoring the remaining structure as determined by the valuation committee with no depreciation no deductions for salvage building materials.	Determined by the valuer on case by case basis depending on location Free transport for those who operate business in moveable containers such as fork lifting containers to relocation sites.
4.	Crops and Trees: Loss of crops and commercial trees	Standing non perennial crops: Removal or destruction of crops whether permanent or temporary land loss; Includes	Cash compensation based upon District Compensation Rates + disturbance allowance (15% or 30%) See Land Act sec.77 (2). (Rates for crops are determined on a net or an expected one season output).	Cash compensation based upon District Compensation Rates + disturbance allowance (15% or 30%) See Land Act sec.77 (2). (Rates for crops are determined on a net or an expected one season output).

No.	Category of loss	Category of PAP	Basis of Entitlement	Packages/Assistance
		damage to crops during construction		Where time allows, claimant should be given an opportunity to harvest crops that are due for harvesting.
		Standing perennial crops	Cash compensation based upon District Compensation Rates + disturbance allowance (15% or 30%) See Land Act sec.77 (2). (Rates for crops are determined on a net or an expected one season output). Where time allows, claimant should be given an opportunity to harvest crops that are due for harvesting.	Cash compensation based upon District Compensation Rates + disturbance allowance (15% or 30%) See Land Act sec.77 (2). (Rates for crops are determined on a net or an expected one season output). Where time allows, claimant should be given an opportunity to harvest crops that are due for harvesting.
5.	Loss of Income	Business owner	Supplementary Assistance based: <ul style="list-style-type: none"> • average net monthly profit, • monthly rent passing, • equivalent of rent advance to be refunded • monthly wages earned, 	Value of income lost as well as the value of establishment of access to the same opportunities
		Landlord	Compensation for the entire structure at replacement cost as determined by the valuation committee without deduction for salvaged building materials. Free transport for those who operate business in moveable containers such as fork lifting containers to relocation sites.	Determined by the valuer on case by case basis depending on location
6.	Disturbance and Moving Assistance	Physically impacted households (whether owner-occupied or tenant)	Resettlement assistance equivalent to the entire structure at replacement cost. Free transport for those who choose to relocate elsewhere.	Provide relocation assistance suited to the needs of each group of displaced persons
7.	Loss of livelihoods	Farmers	Livelihood restoration based on a livelihood restoration needs assessment to determine the best enterprise.	MGLSD the implementing agency to implement livelihood restoration for the PAPs
8.	Existing or Project Induced Vulnerability	Identified existing and potentially	Provide resettlement assistance and livelihood restoration measures after conducting a needs assessment.	MGLSD the implementing agency to implement

No.	Category of loss	Category of PAP	Basis of Entitlement	Packages/Assistance
		vulnerable households		livelihood restoration for the PAPs
9.	Loss of sense of place	Impacted households	Constant engagement and provision of Psychosocial assistance to the impacted households	MGLSD the implementing agency to implement livelihood restoration for the PAPs

6.4 Assistance for Vulnerable Groups

In addition to these entitlements, households who are found in difficult situations and are at greater risk of impoverishment as identified by the census undertaken as part of RAP preparation will be provided with appropriate assistance by the project. It is not possible to provide an exhaustive list of such persons at this project preparatory stage. Assistance to these vulnerable groups of people may include:

1. Food, temporary accommodation, or medical subsidy;
2. Employment referrals or priority employment in project activities;
3. Assistance during the process of accessing their compensation payments e.g. going to the bank with the person open accounts through which their compensation cash will be channelled to.
4. Assistance in financial literacy training especially for women and assistance in compensation payment to avoid misuse
5. Assistance in the post payment period to secure the compensation money and reduce risks of robbery;

Women comprise a disproportionately large number of the poor in the country due to gender discrimination which limits women's access to resources and opportunities necessary to improve the standard of living for themselves and their families. As a result, women are often the first to suffer when resettlement is planned or executed badly. Women with children also have less physical mobility to travel to find ways of earning a livelihood. One of the immediate and practical initiatives to be considered is ensuring that compensation entitlements for a particular household are issued in the name of both spouses. Refer to the Vulnerable and Marginalized Groups Framework (VMGF) for details on this.

7 SUB-PROJECT SCREENING

7.1 Project Screening

ESS5 requires that all Bank-financed operations are screened for potential impacts, and that the required compensation work is carried out on the basis of the screening results before project implementation begins. Potential socio-economic impacts that will require mitigation measures, resettlement and compensation will have to be identified. The project will be screened to answer the critical questions below:

- i. Will involuntary resettlement, land acquisition, or loss, denial or restriction of access to land and other economic resources be caused by implementation of the project?
- ii. Will the project result in the permanent or temporary loss of crops, trees, fruits and household or business infrastructures such as houses, granaries, outside toilets, kitchens, market booths, and other structures;
- iii. Will the project result in loss of community structures (such as churches, wells, schools, sacred sites, etc...)?

7.2 Preparation of Resettlement Action Plans

The screening process is a very important component of several activities that contribute to the preparation of the Resettlement Action Plan (RAP). – refer to the structure presented in Annex 2 below. The RAP will have to specify the procedures it will follow and the actions it will take to properly resettle and compensate affected people and communities. It will have to identify the full range of people affected by the project and justify their displacement after consideration of alternatives that would minimize or avoid displacement. Preparation and submission of the Resettlement Action Plan to the relevant local government authorities and World Bank comprises the following steps:

Step 1: The program investment activities to be undertaken and the locations of the investments will undergo preliminary evaluation by MGLSD and PSFU on the basis of the project objectives.

Step 2: Sub-project leaders/ MGLSD/PSFU and implementing contractors will approach the communities impacted through the local government authorities with the view to arriving at a consensus on possible sites for the type of facility to be adopted.

Step 3: The Local Communities authorities (village councils, parish/sub-county county and district development committees) will undertake their inter-communal consultations in order to review and understand the project.

Step 4: The environmental and social screening process which will be initiated/managed by MGLSD and PSFU Environmental and Social Safeguards staff in conformity with the provisions of the ESMF and the RPF screening process. The process will determine:

- i. whether any resettlement will be required at the chosen site and if so
- ii. whether alternative sites are available,
- iii. whether any loss of land, assets or access to economic resources will occur and
- iv. Whether a RAP needs to be prepared.

Step 5: On the basis of analysis of the matrix emanating from the screening process a final selection of the optimum site presenting the least negative environmental and social impacts including resettlement /loss of assets will be made by MGLSD and PSFU.

Step 6: Where loss of assets cannot be avoided, a RAP will be prepared.

7.2.1 Establishing a Cut Off Date

In accordance with World Bank ESS5, **a Cut-off Date** will be determined, taking into account the likely implementation schedule of the activities. To ensure consistency between Ugandan legal requirements and WB environment and social standards, **this cut-off date should be the date that the census starts because it is when the PAPs are identified and hence notification to owners/occupiers as provided under the Land Act, 1995.** Once the relevant approvals have been provided the Project Implementation Team from MGLSD and PSFU will develop a compensation program.

The **entitlement cut-off date** refers to the time when the census begins i.e. assessment of persons and their property in the sub-project area is carried out, once the sub-project area has been identified. At around the same time, the site-specific socio-economic study will take place. After the cut-off date, no new cases of affected people will be considered. The establishment of **a cut-off date** is required to prevent opportunistic invasions/rush migration into the chosen land areas thereby posing a major risk to the project. The dates will then be communicated to the community through their respective representatives at the village level, sub counties and at the districts.

Where there are clearly no identified owners or users of assets, the respective Regional Lands Board and Land Use Administration will notify the community leaders and representatives to help to identify and locate the land users. These leaders and representatives will also be charged with the responsibility to notify their members about the established cut-off date and its significance. The user(s) will be informed through both formal notifications in writing and by verbal notification delivered in the presence of the community leaders or their representatives.

7.2.2 Resettlement Action Plan

In the event that involuntary resettlement cannot be avoided, a comprehensive Resettlement Action Plan will be prepared by Sub Project Leaders/MGLSD/PSFU for the respective sub-projects. The RAP shall, among others:

1. Establish method for determining a cut-off date for compensation. It should be the date of notification to owners/occupiers as provided under the Lands (land act) Act, 1995. It should further be noted that the cut-off date needs to be widely disseminated and in a timely manner.
2. Provide description of different categories of impacted people determined by degree of impact and assets lost.
3. Define criteria to be used in identifying who is eligible for compensation for each category of population impacted consistent with ESS 5 and this RPF and implemented in the RAPs including:
 - a. A user-friendly eligibility criterion, so that those applying the principles to the project “on the ground” will be able to quickly identify whether people affected are eligible for compensation, and how.
 - b. A description of who will judge eligibility in difficult cases, for example by the use of neighborhood or village committees, or outside experts, and how such processes will work.
 - c. A definition of categories of people eligible under national law or the requirements of World Bank ESS 5.
4. Elaborate on amount of losses, ownership status, tenancy status, and any other relevant information.
5. Carry out inclusive consultations with affected persons and all other relevant stakeholders
6. Include an Entitlement Matrix that will set out the following:
 - a. - The different categories of people that may be affected by the project, and show the

- types of losses such people may suffer, whether to income, rights of access, housing, water sources, proximity to work, and others, and including combinations (house and land, for example).
- b. A definition the unit of compensation – individuals, families, collectives (or all three, because some losses may be sustained by individuals, others by the community as a whole or by associations within it such as religious or farmers’ groups).
7. Including an implementing mechanism including M&E schedule
 8. Provide guidance on the establishment of a Grievance Redress Mechanism.
 9. Describe the budget available for implementing the RAP (plus contingencies)

As a general guide the RAP must:

1. Sufficiently justify resettlement as unavoidable.
2. Be based on the baseline study reports and inventory of assets (census and socio-economic studies).
3. Uphold the principle of full replacement cost for lost assets, as well as improvement of livelihoods in compensating and assisting affected persons.
4. Contain deliberate activities and mechanisms to enhance capacity to efficiently manage the resettlement process. This must include strengthening existing capacity of all project implementing institutions especially MGLSD and PSFU which will be involved in resettlement and compensation.

The process of preparing the resettlement action plans, in line with the requirements of above, will involve the following:

- i. A census and a social economic survey shall be carried out to identify PAPs and the prevailing baseline conditions of the project area.
- ii. The census will generate information about the Impacted Persons, their entitlements regarding compensation and rehabilitation assistance as required.
- iii. Disturbances, especially those affecting income-earning activities and impact on asset inventory and valuation should be properly recorded with the view to compensation or replacement in case of resettlement.
- iv. Based on the census and inventory of losses, and in consultation with the Impacted Persons, a time-phased action plan with a budget for provision of compensation, and other assistance as required, shall be prepared.

To ensure transparency of procedures, PAPs shall be informed of the method of valuation employed to assess their assets albeit that compensation shall be no less than full replacement cost, in accordance with ESS5. All payments of Compensation, Rehabilitation Assistance, as the case may be, shall be made by the MGLSD and PSFU in the presence of the PAP(s) in question, their spouses where applicable (disclosure must also have been done in the presence of spouses) and a witness, and local officials. MGLSD and PSFU in collaboration with sub-project leaders will be responsible for preparing the RAP, carrying out a census of PAPs and the affected properties, and implementing the resettlement process and compensation. The District Local Governments will monitor this process and give advisory services as required.

The project must keep documentation and provide reports that detail what actions were taken in these areas. Vulnerable people will be identified at census stage. Each RAP developed under GROW Project will make precise provisions with respect to assistance to vulnerable groups, for example amongst assistance possibilities listed above.

7.2.3 Physical Cultural Resources Management Plan

The World Bank's ESS8 on cultural heritage also applies to this project. It is important that the respective Resettlement Action Plans also identify the process for addressing impacts on cultural property (for example, sacred sites). The Department of Monuments and Museums in the Ministry of Tourism, Wildlife and Heritage acknowledges that physical cultural heritage in Uganda has not been surveyed adequately and that potential monuments and other cultural resources may exist which are not known to it, implying that this is an area requiring further consideration in the project screening process to assist in recognizing potential resources. It is for this reason that impacts to such resources will be avoided given the complexity of addressing resettlement at such sites.

7.3 Jurisdiction of the Framework

The following will apply in the implementation of this framework:

- i. Compensation will be limited to valuations made after the cut-off date, which is, the date the census starts and the date PAPs sign a form detailing the affected properties.
- ii. All land conflicts will be resolved in a transparent (open) manner and in a manner that is not coercive. Attempts will be made to resolve conflicts at the village, traditional authority or district level. Where this is not possible, legal recourse can be had to State legal institutions on land ownership in Uganda.

8 LAND ASSET CLASSIFICATION, VALUATION AND COMPENSATION

Valuation and compensation are based on rates set at district level for crops and non-permanent structures. These rates, which are enacted by District Land Boards, are established and updated at district level but approved by the Chief Government Valuer.

Under the 1998 Land Act, the District Land Tribunal shall, in assessing compensation referred to in paragraph (b) of subsection (1) of section 77 take into account the following:

- a) The value of the buildings, which shall be taken at market value in urban areas and at full replacement cost in rural and urban areas;
- b) The value of standing seasonal crops on the land, excluding annual crops which could be harvested during the period of notice given to the owner, tenant or licensee.

In addition to compensation assessed under this section using existing District rates for crops/trees and full replacement cost for assets, there shall be paid as a Disturbance Allowance of fifteen per cent or if less than six months' notice to give vacant possession is given, and thirty percent of any sum assessed under subsection (1) of this section.

8.1 Valuation for State Owned Land

The land asset types identified under Ugandan Law are State Lands and Lands under traditional or customary rights.

State owned land may be allocated for free or sold on a commercial basis to individuals or communities by the Minister responsible for land administration. For cases where the state-owned land is being used by the public (for instance as settlements, for farming, for grazing or any other productive activity,) the individual or the community would be expected to be paid compensation for any developments they have made on such land. Privately owned property, would have to be compensated for land and other permanent property at the market value. The general guiding principle is that whoever was using the land to be acquired would be provided with alternative land of equal size and quality.

8.2 Calculation of Compensation at Full Replacement Cost

8.2.1 Determination of Crop Compensation Rates

Market prices taking into consideration replacement value for cash crops would have to be determined for each type of crop and tree lost. Compensation for Cultural Assets including Graves

The project should as much as possible avoid affecting such sites. Nevertheless, should land with such sites be traversed, relics should be relocated as much as possible or else or compensated for, in close consultation with affected communities, and the customary rituals should be performed beforehand. Related costs should be included in the budget of the relevant RAP. The project implementing agencies will use the services of a Cultural Resources Specialist to assist in coming up with appropriate measures and compensation rates for these sites whenever the need arises.

8.3 Specific Compensation Components

- 8.3.1 The extent of land acquisition impact could not be established since the technical designs and details have not yet been developed and the land needs have not yet been fully identified. These impacts will be determined when the RAPs for the sub projects are prepared.**
Compensation for Buildings and Structures

Compensation for buildings and other structures will be paid by replacement costs for labour and construction materials of these structures including fences, water and sanitation facilities, etc. will be used to calculate the values. Where part of the compensation is to be paid in cash the applicable replacement costs for construction materials will be used to calculate the values. Alternatively, compensation will be paid in-kind for the replacement cost without depreciation of the structure. The project will survey and update construction material prices on an on-going basis.

8.3.2 Compensation for Seasonal crops

According to Ugandan compensation regulations, seasonal crops (maize, beans, tomatoes) which could be harvested during the period of notice to vacate (3 or 6 months) given to land landowners/ occupiers are excluded from compensation unlike perennial crops such as coffee, bananas, fruit or timber trees. Valuation rates for these crops take into account the possible income generated from them.

8.3.3 Compensation for Perennial crops, trees including fruit trees and public trees

Given their significance to the local subsistence economy, perennial crops and trees including fruit trees will be compensated on a combined replacement value. Fruit trees commonly used for commercial purposes in Uganda will be compensated at replacement value based on age of the tree.

8.4 Key Valuation Methods

In Uganda, values for compensation of assets are determined by the Chief Government Valuer. The process, however, normally takes consideration of depreciation and the market values. The World Bank standard of compensation at full Replacement Cost shall be adopted instead in cases where there is absolutely no way to avoid acquisition of land.

9 PROCEDURE FOR DELIVERY OF COMPENSATION

9.1 Consultation and Public Participation

Consultation and public participation with the PAPs will be needed as part of the preparation of the RAPs and throughout RAP implementation. This consultation and public participation will be on-going process that will be expected to continue in all stages. This will ensure that all affected individuals and households are well informed and adequately involved in the entire compensation and resettlement process.

9.2 Notification of Land Resource Holders

All PAPs identified in the census will be informed through the consultation process above. Consultation and information should not be limited to clearly identified owners or users of land to be impacted. MGLSD, PSFU and the respective local government administrations through the lands officers and the local council leaders of the respective communities where the land is located will be solicited to help identify owners or users in order to sensitize them on the project and its implications.

9.3 Documentation of Holdings and Assets

MGLD and PSFU through a consulting firm will undertake a detailed census and social economic survey of all losses that will result for each household, enterprise, or community affected by the GROW project sub-projects when identified, (regardless of their legal status). The survey will have to account for loss of physical assets as well as loss of income (temporary or permanent) resulting from economic displacement of household members from employment or income-generating resources. Assets held collectively, such as water sources, livestock grazing areas, irrigation systems, cultural resources, sacred sites and community structures will be recorded separately.

The local government structures i.e. the LGs and the lower councils (LCs 1-3) will assist the RAP implementation team with all verification of data and information related to the PAPs during the compensation payment processes.

9.4 Procedures for Payment of Compensation

In case of cash compensation, payment will be made in the following ways:

- (a) By agreement between the MGLSD's REP and the PAPs or entities (individuals /households /communities:
 - i. The MGLSD and PSFU will offer compensation in cash or kind complying with the entitlement matrix at full replacement cost to the entity who may accept that amount as compensation payable to the PAP;
 - ii. Such sums will be disbursed directly to the beneficiary entity with the relevant records of payments consigned to the RAPs
- (b) By court order on the amount of compensation where this has been the subject of litigation between the MGLSD represented by Solicitor General or PSFU and the Affected Entity.
- (c) Compensation to women landholders shall be paid to them directly & where male head of household is paid cash compensation, women of the family shall be part of the joint account where compensation is channelled to.

9.5 Role of Office of Chief Government Valuer

The application of the valuation exercise on ground will be done in the presence of at least two local council leaders with the participation of the affected persons. Values assigned to assets must be based on the full replacement costs. Where this is not possible, a Government Valuer will be engaged to do

this. In the event that a Government Valuer handles this process, the depreciation cost will not be imputed and the consent of the affected person on the outcome of the process must be sought in order to arrive at agreements on the total profile of losses and compensation.

10 MANAGEMENT AND MONITORING OF RPF IMPLEMENTATION

10.1 Setup of Resettlement Management Teams

The Resettlement Management Teams will be setup to implement the sub-project RAPs and will consist of three teams namely:

MGLSD and PSFU Social and Environmental Safeguards Team – The team will be responsible to ensure that all safeguards are conformed to during the resettlement process. This will include ensuring that compensations payable to PAPs are made in line with the provisions and procedures of this RPF and the relevant RAP prepared hereafter.

Grievance Redress Committee (GRC) - The Grievance Redress Committee will be responsible for receiving and logging complaints and resolving disputes. The GRC will work with the MGLSD and PSFU to resolve each grievance or dispute to ensure that redress actions are implemented. If affected persons are not satisfied with the grievance redress structures, they will be entitled to seek redress through the District Land Tribunals or Ugandan Courts of Law. It is important that the GRC be set up as soon as resettlement plan preparation starts. Disputes can arise from census operations and it is therefore important that the mediation mechanisms be available to cater for claim, disputes and grievances at the early stage.

PAP Committee (PC) - Under the guidance and coordination of the MGLSD and DSFU Safeguards Team, the PC will be formed after the formation of the MGLSD Resettlement Unit which will act as a voice PAPs. The committee shall comprise of following: two PAP representatives, LC representative, District Valuer, District Surveyor, District Land Adjudication and Settlement Officer and District Community Development Officer and Sub-County Community Development Officers. It would be appropriate to establish these committees at sub county level.

The PC will be concerned with the following;

- i. **Public Awareness:** - includes extensive consultation with the affected people so that they can air their concerns, interests and grievances.
- ii. **Compensation:** - involves ratifying compensation rates and also serves as dispute resolution body to negotiate and solve any problem that may arise relating to resettlement process. If it is unable to resolve any such problems, will channel them through the appropriate grievance procedures laid out in this RAP.

Monitoring and Evaluation Team - The Monitoring and Evaluation Team will be responsible for the monitoring of the RAP implementation program to ensure that stated targets are met and project affected persons are duly compensated in line with the RAP requirements. This team will be comprised of MGLSD and PSFU PITs with an external independent party to conduct an audit of the process. The two PITs will be reporting to the Overall Steering Committee.

11 GRIEVANCE PROCEDURES

This chapter explains the procedures for settling or redressing grievances and complaints from the PAPs or other aggrieved parties in the course of project management (and majorly implementation). The grievances and complaints could be about land expropriation, resettlement, activities associated with the construction, social issues or any other subject related to the project. For effective implementation of the project, grievances and complaints should be redressed from project start through end of monitoring. All grievances and complaints should be recorded and processed at all stages of the project implementation.

Sometimes complaints and grievances arise from lack of information. Information on resettlement and progress of the project will be provided to PAPs. Providing information about the resettlement and progress of the project to the public, PAPs as well as other stakeholders will increase their understanding of the process and will provide answers to their concerns.

According to World Bank ESS5 an independent grievance mechanism should be established for Project Affected Persons. It requires establishment of appropriate and accessible grievance mechanisms to resolve disputes in connection with resettlement and compensation.

11.1 *Grievance Redress Mechanism*

This may be set up through local authorities, including a resettlement or land committee, and through community leaders. All Project Affected Persons will be informed about how to register grievances or complaints, including specific concerns about compensation and relocation. The Project Affected Persons shall also be informed about the dispute resolution process, specifically about how the disputes will be resolved in an impartial and timely manner.

The RAP implementation team will submit a report containing a summary of all grievances. A transparent mechanism to file complaints on a local level will be instituted, with clear responsibilities to ensure that PAPs receive a response to their complaint within a specified period. Disagreements will be settled in a negotiation process. If negotiations fail will there be a possibility to approach civil court. During consultation, survey and compensation, the PAPs shall be notified orally or in writing about their rights and the procedure of introducing a complaint. The grievance mechanism shall be locally implemented at the village level.

11.2 *Aim of Grievance Redress Procedure*

The grievance redress procedure aims at settling/redressing any grievance or complaint by the PAPs as promptly and fairly in a manner acceptable to all parties concerned. Grievances are useful indicators of a project performance therefore have to be treated with the due care they deserve. A high number of grievances may be an indicator of poor work practices. Likewise, a low number of grievances may not necessarily mean everything is working out smoothly.

The following guiding principles shall be followed during grievance and complaint redressing;

- Resolve PAPs grievances and complaints in a straightforward and accessible manner;
- Identify and implement appropriate and mutually acceptable actions to redress complaints;
- Make sure complainants are satisfied with outcomes of the corrective actions; and
- Resort to judicial proceedings only if necessary.

11.3 *Types of Grievances*

During the implementation of the project, there is a likelihood of disputes/disagreements arising between MGLSD and PAPs because of either construction or expropriation or resettlement activities. **Table 11** below

highlights some of the likely grievances/disputes that could arise during the various phases of the implementation of the GROW project.

Table 9: Grievances Likely to Occur during implementation of Project Activities

During Construction	During expropriation	Resettlement Disagreements
<ul style="list-style-type: none"> • Damage to buildings and assets • Disruption or damage to local roads • Closure of pathways • Damage to un expropriated assets such as land, crops and trees • Failure to reinstate immovable assets after temporary use such as occurs during establishment of easements or property rental • Nuisance from dust, noise and vibration • Disruption or damage to water sources and infrastructure • Water course alteration • Increase in traffic loads • Health problems, injuries and accidents • Damage to utility infrastructure • Misconduct of project personnel and workers • Unfair recruitment of employees to project related jobs 	<ul style="list-style-type: none"> • Disputed compensation (land, crops and immovable asset) amounts • Disputed survey measurements • Improper identification of property owners • Unregistered land users • Disputed compensation for tenants and occupants • Loss of income to traders due to loss of commercial facilities or decrease in customers • Misconduct of project personnel and workers 	<ul style="list-style-type: none"> • Failure to get entitlements yet the place of occupancy is taken or somehow indirectly affected • Need to get into project assisted resettlement when it had not been applied for • Problems between resettlers and residents in the new sites

11.4 Grievance Procedures

Nationally, there is no resettlement policy that relates to land acquisition which should have set out procedures for addressing grievances. This RPF has proposed a three-stage grievances redress mechanism consisting of Village Grievance Committees, Land Tribunals and Courts of Law to resolve disputes and complaints arising from the implementation of the project. Based on experience from the previous RAP implementation processes, the following agencies will play key roles in the grievance settlement

In a first step, complaints resolution will be attempted at the community level. The negotiations shall be undertaken in the presence of a Grievance Officer and community leaders. If the grievance persists, a grievance reporting form, shown in **Annex 3** shall be submitted to the grievance committee t. The grievance committee shall comprise of:

- The Grievance Officer,
- Sub-County Chief or Community Development Officer,
- A Political Leader,
- Two Elders,
- A Religious Leader, And
- At Least Two Representatives of the PAPs (One male and one female preferred).

The grievance committee comprises of different stakeholders in order to strengthen its credibility. This guarantees that mutual interests are served and disputes and contradictions are resolved. Project Affected Persons will have the option to choose a different representative or directly liaise with MGLSD staff, responsible for grievance redress. Vulnerable households will have the support of their individual community development worker and legal support.

It is hoped that the grievance committee will settle with the aggrieved party. A decision will be taken within a specified period. In case of failure of the grievance redress system, the PAPs can submit their case to the appropriate court of law. The different categories and resolution mechanisms are highlighted in table 5 below.

The aggrieved person (PAP) will be encouraged to proceed with the grievance as outlined below.

- Contact the Grievance Officer during periodical site visits in person or via designated telephone number or via the community leader.
- Lodge complaint and provide information on the case.
- Agree with the Grievance Officer on resolution of grievance.
- Agree with the Grievance Officer on time limit for grievance resolution.
- If grievance is resolved, sign form to acknowledge resolution of grievance.
- If grievance is not resolved submit a grievance form to the Grievance Committee. Grievances have to be resolved within an agreed and specified period of time in a scheduled agreement.
- Sign form to acknowledge that grievance has been resolved.
- If not satisfied with above mentioned procedure, involve an appropriate third party and seek redress in court of law.

Table 10: Categorization and Mechanism of Grievance Resolution

Type of Grievance		Mechanism of Resolution of Grievance
1	Project limits complainant's access to land or resource.	Lodge grievance with Grievance Officer and seek resolution at community level in presence of community leader.
2	Project activities have led to damage of personal property.	Lodge grievance with Grievance Officer and seek resolution at community level in presence of community leader. If grievance is unresolved it will be submitted to Grievance Committee.
3	Project activities have led to damage of social infrastructure.	Lodge grievance with Grievance Officer to be submitted to Grievance committee.
4	Project activities have led to disruption of livelihood activities.	Lodge grievance with Grievance Officer to be submitted to Grievance committee.
5	Project has led to accidents.	Lodge grievance with Grievance Officer and seek resolution at community level in presence of community leader.
6	Unfair compensation.	Lodge grievance with Grievance Officer to be submitted to Grievance committee and subsequently to court of law if grievance is not resolved.

The Project Affected Persons will be informed of the existence of the grievance resolution mechanism during the RAP disclosure for their input and refinement. This will also enable them to fully understand their rights. The grievance mechanism will be perceived by the community as transparent and responsive to their customary ways of resolving problems. Participation of affected communities will help ensure greater trust and buy-in from them. It will also create a sense of shared ownership and responsibility for the outcomes. When grievances occur, the related institutions including village committees should keep records of grievances and make them available for inspection and verification, if required. The RAP implementation team will keep all records of grievances lodged.

Estimates from the valuation exercises will be presented and justified by the respective valuers (MGLSD's and the Complainant's) in a Court of Law. On the one hand, the Chief Government Valuer will defend the initial value—on behalf of MGLSD and government, whilst on the other, the complainants' valuer justifies their estimate. The Court will make a decision on the value to be compensated upon which MGLSD will make arrangements for further payment to the complainant. MGLSD will meet the costs of the Court activities under this project.

If the complainant is not satisfied with the decision of the Court (initial will be a magistrate's court), they can appeal to the High Court. The RAP Consultant will provide a summary of this due process to the RAP desks, so that this information can be passed on to the complainants at all times.

The grievance resolution mechanism is outlined in Figure 2 below.

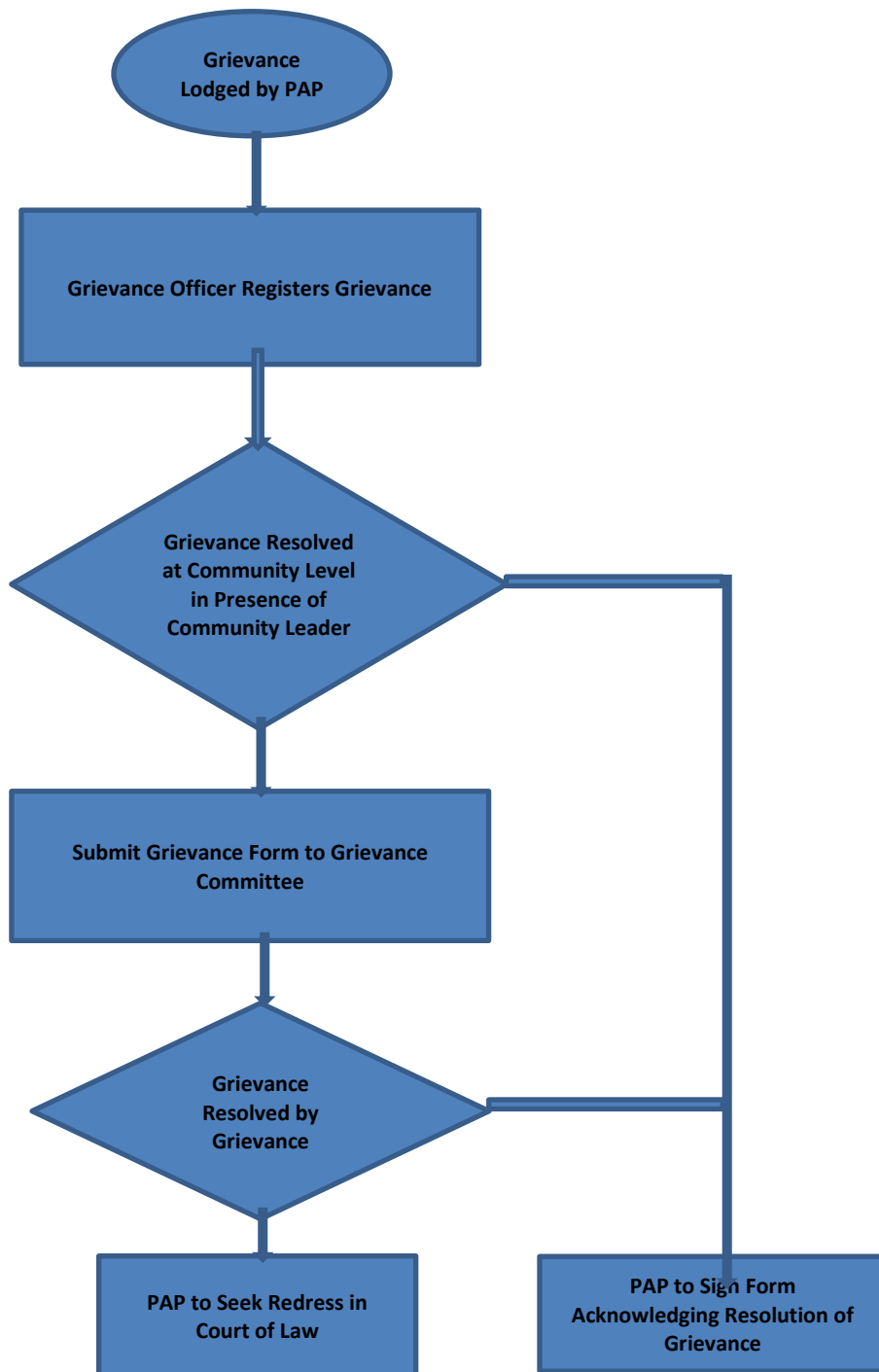


Figure 2: Flow chart for grievance redress mechanism

12 MONITORING, EVALUATION AND REPORTING

This chapter presents the monitoring, evaluation and reporting framework for the GROW Project. It provides the background of monitoring evaluation and reporting framework; and underscores the importance and the approach that will be adopted for its implementation. Additionally, some best practices are presented if the best outcomes are to be realized in the process.

A monitoring system is a project management tool. It provides regular reports to project management regarding the outcomes of the involuntary resettlement operation and the well-being of the resettled population. The purpose is not only to document success but also to identify the need for corrective actions if things are not going well.

12.1 Background to Monitoring, Evaluation and Reporting Framework

The purpose of monitoring and evaluation is to report on effectiveness of the RAP implementation, covering disbursement of compensation, resettlement and effectiveness of public involvement, amongst others. Monitoring and purposeful evaluation will be key factors for successful resettlement activities. Monitoring will also entail evaluation of effectiveness of the grievance management process. The monitoring framework proposed in the RAP includes a review of financial disbursements, compensation complaints and grievance redress, adherence to compensation payment schedule and support to vulnerable PAPs. Specifically, the M&E is intended to achieve the following objectives:

Monitoring: Will consider the progress of the implementation of the RAP, including the progress of key procedures such as compensation, resettlement etc. Specific consideration will be given to:

- Any emerging social or economic difficulties faced by the affected persons during resettlement process
- Compliance and completion of the resettlement program.

Evaluation: Will consider the results and outcomes of the resettlement program, through an assessment of the impact of the resettlement programme on affected households, their incomes, standards of living, environmental issues, etc. The focus during the implementation of the resettlement programme will be on the compilation of baseline data on the affected households that will enable the comparison during evaluation missions.

12.2 Approach

Monitoring of implementation by the RAP consultant will be carried out at different levels regularly. At the process level, inputs and outputs will be measured. These will include for example, the amount of compensation paid out, progress on the re-construction of buildings and improvements, grievance cases successfully dealt with. Specific cases or situations arising during resettlement will be documented. Programme efficiency will be monitored and discussed regularly with the RAP implementation Steering Team and ways to improve it will be identified.

The World Bank will provide guidance and comments on compliance and completeness of the resettlement programme from the review of quarterly progress reports and during Resettlement Steering Team discussions in which updates will be presented. Evaluation of the programme by definition will consider long term impacts. During the resettlement program itself, focus will be on ensuring that the appropriate baseline information is recorded. The bulk of the information has been gathered during the socio-economic census of this update process. Key indicators shall be identified and agreed upon, to be collected more systematically for the end of project evaluation. Lessons from the evaluation will be widely shared.

Monitoring is based on two components:

- I. **Internal Monitoring** - undertaken by the RAP implementation unit/Monitoring Officer in the Planning Department of MGLSD, and

- II. **External Monitoring** - undertaken by development partners, community development officers and/or environmental focal persons at district level and other national stakeholders.

12.2.1 Internal Monitoring Process

The specific objectives and tasks of the internal monitoring process include:

- Identification of suitable indicators,
- Measurement of indicators at appropriate intervals,
- Creation of a mechanism to analyze m & e data against a pre-resettlement baseline, and
- Setting up a system to regularly respond to m & e findings by adapting existing measures or by modifying implementation processes.

This monitoring process will be used to analyze progress and changes at regular intervals. It shall be linked to the various stages of the RAP, as described below.

During Resettlement

During resettlement, M & E will focus on resettlement issues that include:

- Number of families that have been compensated,
- Number of people who have acquired legal papers to new property,
- Number of business owners who have restored their businesses and
- Efficiency and effectiveness of grievance redress mechanism.

After Resettlement

Post resettlement, monitoring will focus on rehabilitation issues and status of each of the measures should be assessed, for example:

- Success level of restoration of livelihoods,
- Success level of restoration of assets, and
- Efficiency and effectiveness of grievance redress mechanism.

Key Activities and Responsibilities

The key activities and responsibilities in the internal monitoring process are given below:

i) **Set up a System**

The RAP implementation team will provide a monitoring form to be completed regularly by the M & E Officer at each agreed local government. The information collected will be entered into a database for further analysis and compilation into quarterly reports.

ii) **Ongoing Monitoring**

The M & E Officer for each location will be in charge of regular monitoring of the implementation process. This will involve:

- Feedback and inputs from the implementation officers,
- Review of the resettlement database,
- Receipt of reports from the grievance officer,
- Receipt of information from local representatives and
- Direct consultation with the resettled community at each location.

iii) **Regular Reports**

Consolidated regular reports with key findings from the ongoing monitoring should be submitted to the implementation team and discussed at agreed intervals, and action points drawn up. This regular progress review should aim at ensuring that important issues are immediately and appropriately rectified.

iv) **Vulnerability Assessment**

It is essential that vulnerability is closely monitored in order to provide timely support to susceptible households. A vulnerability assessment shall occur as part of, say, quarterly auditing of all households. Those households that are most vulnerable shall be prioritized for monthly auditing and targeted assistance. This may be undertaken by the implementation officer. Key activities under vulnerability assessment are:

- Develop a set of criteria to identify vulnerable households (this is intended to act as a guideline only and should be modified as appropriate),
- Conduct quarterly visits to vulnerable households to assess key needs/issues, for example, unemployment, and
- Develop a plan to address identified issues with full participation from the members of the affected household.

12.2.2 External Monitoring Process

In addition to the internal monitoring process, external monitoring of the resettlement process should be undertaken through an external monitoring panel appointed by MGLSD. Ministry of Gender, Labour and Social Development will liaise with relevant ministries and development partners to form an external monitoring panel to undertake external monitoring of resettlement mid-term and at end of resettlement. These will focus on reviewing the process to-date and making necessary recommendations for modification to existing rehabilitation measures and other processes, for example, grievance. This will allow modifications to the process and design of packages that would help improve the effectiveness of implementing the RAP.

The objectives of external monitoring are:

- To Assess Overall Compliance with the RAP,
- To Verify That Measures to Restore or Enhance Project Affected Persons' Quality of Life and Livelihood Are Being Implemented and To Gauge Their Effectiveness And
- To Assess the Extent to Which the Quality of Life and Livelihood of Affected Communities Have Been Restored.

The external monitoring process will be informed by internal monitoring reports prepared by MGLSD, and also through independent surveys and consultations conducted by the evaluation agency. The evaluation system will be based on process and outcome indicators given in the following sections.

Process Indicators

Process indicators measure effectiveness of processes, i.e. consultations and grievance, and inputs like people, equipment and materials, and identify areas where improvements to existing processes are required. These may include the following:

- Transparency of the implementation process,
- Adequacy of staff and capacity of the implementation agencies,
- Compliance of the resettlement process with Ugandan Law and World Bank Standards,
- Effectiveness of the grievance process,
- Adequacy and effectiveness of public involvement, and

- Effectiveness of the internal monitoring mechanism.

Key Activities and Responsibilities

The activities of the external monitoring panel are given below as:

- Review of internal monitoring procedures and reporting to ascertain whether these are being undertaken in compliance with the RAP.
- Review internal monitoring records as a basis for identifying any areas of noncompliance, any recurrent problems or potentially disadvantaged groups or households.

12.3 Evaluation

The evaluation component will consider the results and outcomes of the resettlement program, through an assessment of the impact of the resettlement programme on affected households, their incomes, standards of living, environmental issues etc. The focus during the implementation of the resettlement programme will be on the compilation of baseline data on the affected households that will enable the comparison during evaluation missions.

A few simple socio-economic measures will be established and monitored annually for a representative sample of the affected persons. These could include income, household expenditure, land holding, employment provided by the project, etc. These indicators will be measured internally by the Directorate of Community Services. A qualified evaluator should be hired to carry out the reviews based on indicators measured by MGLSD. One review could take place at mid-term to provide for refining the process. The second review could take place two years after RAP completion to ensure that learning informs the design of the Phase 2 RAP preparation. Affected communities should be consulted through meetings and focus group discussions. Leaders from affected communities should also be consulted. Evaluation reports should be shared widely and publicly disclosed.

Outcome Indicators

Outcome indicators will assess effectiveness of the resettlement and changes that have occurred to the communities' standard of living. Suggested Key outcome indicators during evaluation exercises include those given in the **Table 13** below.

Table 11: Key Outcome Indicators of Resettlement

Category	Indicator
Funds disbursement	<ul style="list-style-type: none"> • Number of PAPs paid. • Amount of money disbursed. • Number of PAPs not paid in prescribed time (respective quarter). • Reasons for not paying PAPs who are due for payment. • Projected disbursements in the next quarter.
Restoration of and assets and livelihoods	<ul style="list-style-type: none"> • Number of PAPs who have benefited from related entrepreneurial training. • Number of businesses restored. • Reasons for not re-establishing businesses. • Number of NGOs that have been linked to PAPs.
Public involvement	<ul style="list-style-type: none"> • Number of community level meetings. • Participation rates of local leaders and community in resettlement • Process disaggregated by gender.
Grievance management	<ul style="list-style-type: none"> • Number of grievances received. • Number of grievances resolved (at what level).

	<ul style="list-style-type: none"> • Number of complaints reported to other government oversight bodies and outcomes including how grievances were resolved. • Number of grievances referred to Uganda Courts of Law. • Number of outstanding grievances and reasons for not resolving them.
Custody of legal documents	<ul style="list-style-type: none"> • Land title deeds received. • Land title deeds returned to owners.
Resettlement of vulnerable PAPs	<ul style="list-style-type: none"> • Number of vulnerable PAPs resettled. • Kind of special assistance provided.

12.4 Compliance and Completeness Audit

This audit is suggested here to ensure that there will be compliance to: the requirements contained in the RAP, the Ugandan law and to World Bank policies. Here the suggestion would be quarterly external reviews about one-week in duration each during compensation and resettlement, and a final review and audit after all compensation has been completed.

Compliance reviews: The objectives of the quarterly compliance reviews will be:

1. To assess the overall compliance with the RAP and applicable legislation and requirements particularly:
 - Compliance with the eligibility criteria as described in the RAP
 - Actual delivery of entitlements (compensation and resettlement packages) as described in this RAP
 - Compliance with the implementation mechanisms as described in the RAP
2. To verify that measures to restore or enhance affected people's quality of life and livelihood are being implemented and to assess their effectiveness
3. To assess the extent to which the quality of life and livelihoods are being restored in an appropriate manner.

Completion audit: The purpose of the completion audit is to establish whether MGLSD has implemented all the activities needed to ensure compliance with resettlement commitments defined by the RAP and applicable policies, and whether compensation and resettlement can be deemed complete. A key objective of the RAP is that compensation, resettlement and other mitigation measures should lead to sustainable restoration or enhancement of the affected persons' quality of life and income levels.

The completion audit will be carried out by the same auditor as the compliance audit. Based on data collected during this review and other data collected during implementation, the auditor will form conclusions on the issues stated above

12.4.1 Evaluation and RAP Completion Report

This report will be prepared and submitted to the funding agency six months after the completion of compensation. During RAP implementation the consultant will submit to MGLSD quarterly progress reports, after completion of resettlement, a final report will be submitted to MGLSD prior to preparation of the project implementation report. The report shall indicate effectiveness of project implementation and disbursement of compensation payments, effectiveness of public consultations and socio-economic impact of the transmission line. This report will give overall assessment of the RAP process indicating activities undertaken, success of mitigation actions, monitoring and lessons learnt.

The RAP Implementation Report shall include but not be limited to the following information:

- Background to the RAP preparation including a description of the project activities, scope of impacts, number of affected persons and estimated budget;
- Update of its implementation with actual numbers of displaced persons by segments, compensation paid, issues/ complaints raised and solutions provided;
- Complaints status;
- Early assessment of the impacts of resettlement and compensation on affected categories at the time of report production;
- Total sum disbursed;
- Lessons learned from the RAP Implementation; and
- Annexes (Lists of affected persons, List of persons compensated, Maps, and infrastructure drawings, etc.)

13 ORGANIZATIONAL FRAMEWORK

13.1 Institutional Framework for the Implementation of the GROW Project

The GROW Project will be implemented under a two-tier arrangement i.e. the national and sub national levels. At the national level, MGLSD will be the Lead Implementation Agency but working in close collaboration with MoFPED /PSFU and Makerere Business School will also have specific roles in the implementation as spelt out below. These will form the Project Implementation Unit (with technical support staff).

At the lower level will be the district teams that will work in close collaboration with the district coordinators and district implementation support teams that include the Commercial Officer and Labour Officer to coordinate with the Parish Development Model Infrastructure

Roles and responsibilities of key players

The key implementing agencies in the GROW Project under which the RPF and RAP are to be implemented include the following:

13.1.1 Ministry of Gender, Labour and Social Development (MGLD)

This is the principal political head responsible for gender, labour, and social development. The ministry is responsible for policy formulation, planning and development on social sector issues in Uganda. The mandate of the ministry is to empower citizens to maximize their individual and collective potential by developing skills, increasing labour productivity, and cultural enrichment to achieve sustainable and gender-sensitive development. It is comprised of the following administrative directorates: Labour, Employment and Occupational Safety; Social Protection; and Gender & Community Development which promote issues of social protection, gender equality, equity, human rights, culture, decent work conditions and empowerment for different groups such as women, children, the unemployed youth, internally displaced persons, the older persons and persons with disabilities.

The other external players are stated below:

13.1.2 Ministry of Finance, Planning & Economic Development

The Ministry of Finance, Planning and Economic Development derives its mandate and functions from the 1995 Constitution of the Republic of Uganda and other related subordinate laws, including the Budget Act (2001), the Public Finance and Accountability Act (2003) and acts establishing agencies and auxiliary organizations. Accordingly, the Ministry plays a pivotal role in the co-ordination of development planning; mobilization of public resources; and ensuring effective accountability for the use of such resources for the benefit of all Ugandans. MoFPED will play overarching role of impact monitoring of the GROW Project especially changes in livelihood indicators. Accordingly, the Poverty Monitoring and Analysis Unit in the Ministry undertake regular M&E of GROW Project to assess the impact of the initiatives on the quality of life of the people. MGLSD's REP will coordinate its monitoring and evaluation strategies and operations with the MoFPED.

13.1.3 Private Sector Foundation Uganda (PSFU)

PSFU is Uganda's apex body for the private sector made up of 81 business associations, corporate bodies and the major public sector agencies that support private sector growth. Since its founding in 1995, PSFU has served as a focal point for private sector advocacy as well as capacity building and continues to sustain a positive dialogue with Government on behalf of the private sector. Right from its inception, PSFU has been Government's implementation partner for several projects and programmes aimed at strengthening the private sector as an engine of economic growth.

The PSFU will be responsible for implementing component 3 of the GROW project and will ensure all land for the benefit of sub-projects is acquired in accordance with the law.

13.1.4 Ministry of Local Government

The Ministry of Local Government is involved in sensitization campaigns at the local level and also advocates for local governments and the rural population to benefit from the project. MGLSD will work closely with the Ministry of Local Government to forge strong linkages with local authorities in the various Local Governments within the project areas.

13.1.5 Ministry of Health

The MoH and health facilities are key factors in the MGLSD GBV referral pathway for responding to GBV including SVAC. This includes providing medical care to GBV survivors and collecting forensic evidence used in prosecuting GBV cases when the survivors choose to seek legal redress in keeping with principles of the survivor centred approach (SCA).

13.1.6 Ministry of Education and Sports

The mandate of the Ministry of Education and Sports (MoES) is to provide quality education and sports services in the country, which are constitutional obligations for the Government of Uganda. The Education and Sports sector therefore is one of the country's key social service delivery sectors and schools. Schools and other training institutions will be among the targeted beneficiaries as a means of improving the quality of education. Some vocational training institutions under the MoES like the various DITs spread across the country will play a role in skilling under the GROW project. These will be determined across the various sub-regions of the country when their proximity to the sub-project areas will have been determined.

13.1.7 Ministry of Water and Environment

The Ministry of Water and Environment, Department of Water Development (DWD), aims at improving water supply services through the adaptation of appropriate energy packages to water supply systems in small towns and rural growth centres. Access to water for production will be vital for some sub-projects under the GROW project.

13.1.8 Ministry of Works and Transport

The Ministry of Works and Transport is responsible for infrastructure policy and development including roads. MGLSD and PSFU will collaborate with MoWT especially on utilization of road reserves as temporary market spaces for sub-projects.

13.1.9 National Forestry Authority (NFA) and Uganda Wildlife Authority (UWA)

Ministry of Gender, Labour and Social Development and PSFU will collaborate with NFA and UWA on utilization of protected areas in a manner consistent with the law for the benefit of GROW funded sub-projects.

13.1.10 Office of Chief Government Valuer

In the event that Government through the MGLSD seeks to acquire land for GROW project purposes, the application of the valuation exercise on ground will be done in the presence of at least two local council leaders with the participation of the affected persons. Values assigned to assets will be determined by the District Land Boards and approved by the Chief Government Valuer's office (CGV).

13.1.11 Local Government Administration Structures

District and Local Council Administration in GROW Project districts will be vital in implementation of the project by mobilizing political goodwill and sensitizing communities on the project. The District Local

Governments through the District Land Boards are also responsible for determining the compensation rates for crops and trees that are usually impacted.

13.1.12 District Community Development Officers

Ministry of Gender, Labour and Social Development and PSFU will work closely with the Local Government Authorities during project implementation. The CAO will appoint a focal point officer to coordinate project activities. Preferably, the DCDO comes in handy during the sensitization and site meetings with the PAPs given their expertise in dealing with communities. Therefore, DCDOs will work closely with the focal point officer to assist MGLSD and PSFU monitor the respective areas of the project during implementation to ensure that communities are adequately compensated, and the vulnerable categories are given special assistance. They will also attend the regular site inspection meetings for the project and assist in the handling of social safeguard issues that may arise during project implementation.

13.2 The organizational framework to implement the resettlement elements of the project is proposed as follows:

1. Ministry of Gender Labour Social Development (MGLSD) through the **Department of Community Services** should manage the whole resettlement process. The Principal Valuer in the Department of Finance should provide technical support on compensation issues. These departments and others to be involved in the resettlement implementation should be assisted to prepare and carry out their respective tasks;
2. **Resettlement desks** be established and equipped within the MGLSD and its decentralised structure to be staffed by the Community Liaison Officers from the department of gender and community development to endorse criteria and mechanisms to implement the plan and to interface with the affected population;
3. For compensation the **Chief Government Valuer (CGV)** should provide support to the Project Coordination Unit both directly, and through the MGLSD valuer. The CGV approves the valuation rates;
4. MGLSD **RAP Implementation Consultant** will provide on-going technical support to MGLSD throughout the resettlement and grievance redress processes. The Consultant shall also document this process in detail to guide future evaluation;
5. All implementing agencies in this framework should propose an individual to a **Resettlement Steering Team** which will monitor the resettlement, ensuring that goals are met and provide advice to enable more efficient and effective implementation;

Other agencies which will be involved in the programme at a secondary level are;

1. **District Land Office:** The Registrar of Titles shall be central to the validation of title owners;
2. **National Environment Management Authority:** For overall approval, review and supervision of Environmental Impact mitigation activities; and
3. **District Land Committee** To clarify on lands under its jurisdiction and advise on compensation of persons sitting on land under its jurisdiction.
4. **Local Council Leaders** to work together with RAP implementation team during the verification, disclosure and compensation payment period.

13.3 Institutional Roles and Responsibilities

The project implementation timeframe is not definite as the start date was not indicated, this being an RPF. However, all the residents in the (sub) project areas including PAPs who will be eager to be given clear timeframe as well as be furnished with the duration (months) they will be served with notices to relocate.

13.3.1 RAP Implementation

The RAP anticipates that the project implementation schedule will consist of three phases namely preparation, implementation and post implementation. The resettlement schedule for land acquisition, house demolition and relocation will be coordinated with MGLSD.

The implementation of the RAP will be undertaken by an external agency that will report to MGLSD and that calls for collaboration from all the stakeholders. This requires a properly constituted structure for the administration of the same.

The RAP Implementation schedule and key activities anticipated prior to, during and after will need to be outlined and a schedule developed, indicating the anticipated period each of the identified activities will take.

13.3.2 Organisational Responsibility

The organizational structure elaborates on the roles of various stakeholders in the implementation and administration of the RAP. It further clarifies the roles of PAPs and their responsibility in the entire exercise.

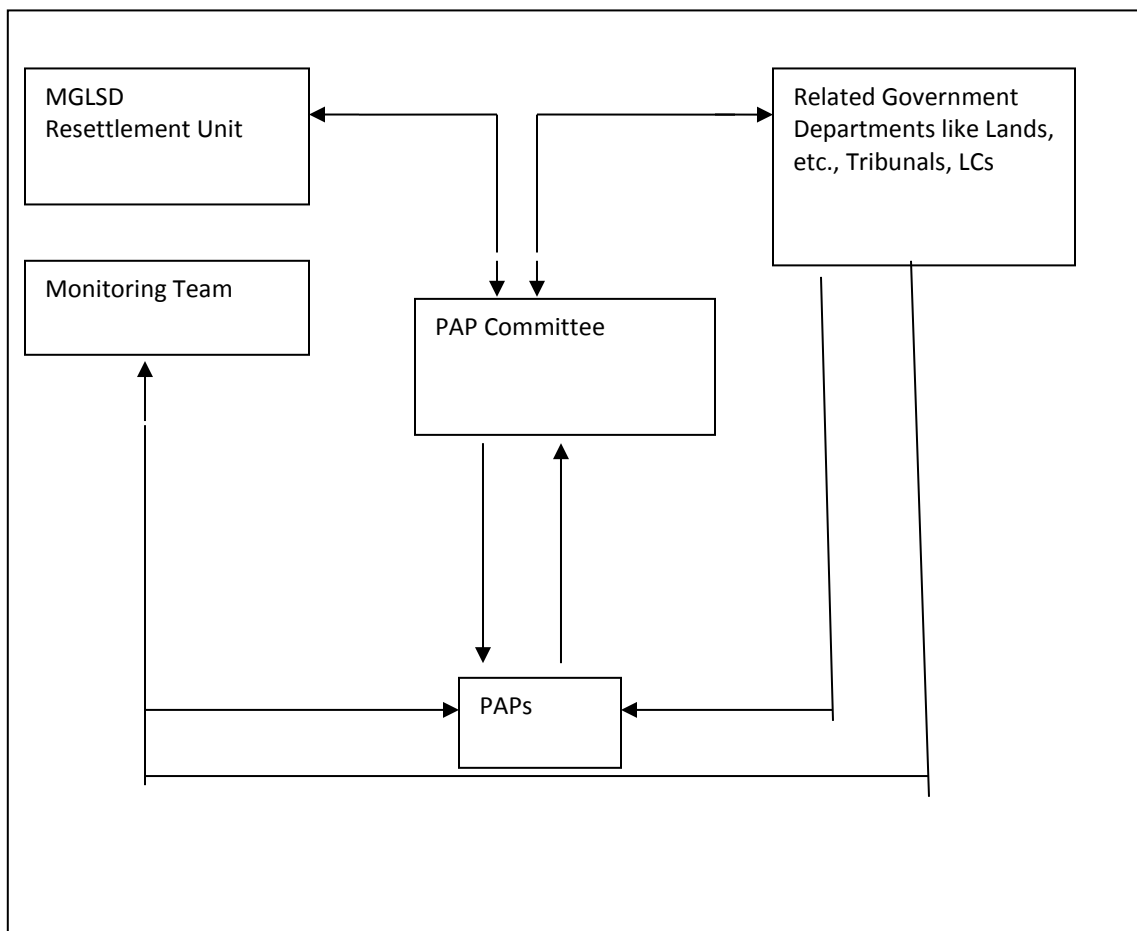


Figure 3: Organizational Responsibility

13.4 MGLSD – Resettlement Unit

The structure of the unit shall be as follows: Legal Advisor, Surveyor, Transmission line Engineer, Social-economist, Transmission line RoW and Way leaves Officer, an Environment Officer, Community Liaison Officer, Database Officer, and Registered Valuer. MGLSD Resettlement Unit will be responsible for:

- i. Oversee the implementation of the RAP
- ii. Oversee the formation of the PAP committee (PC)

- iii. Ensure maximum participation of the affected people in the planning of their own resettlement and post resettlement circumstances.
- iv. Accept financial responsibility for paying payment or compensation and other designated resettlement related costs.
- v. Ensure detailed valuation of the structures in order to determine the case-to-case value of each component of the project and agree upon a value for compensation.
- vi. Pay the people compensation to amounts agreed.
- vii. Ensure monitoring and evaluation of the PAPs and the undertaking of appropriate remedial action to deal with grievances to ensure that income restoration procedures are satisfactorily implemented.
- viii. Ensure initial baseline data is collected for the purpose of monitoring and evaluation report as per the indicators provided by the RAP.

13.5 PAP Committee (PC)

Under the guidance and coordination of MGLSD, the PC will be formed after the formation of the MGLSD Resettlement Unit which will act as a voice of the PAPs. The committee shall comprise of following: two PAP representatives, LC representative, District Valuer, District Surveyor, District Land Adjudication and Settlement Officer and District Community Development Officer and Sub- County/Parish Community Development Officers.

The PC will be concerned with the following;

- i. Public Awareness: - includes extensive consultation with the affected people so that they can air their concerns, interests and grievances.
- ii. Compensation.

Involves ratifying compensation rates and serves as dispute resolution body to negotiate and solve any problem that may arise relating to resettlement process. If it is unable to resolve any such problems, will channel them through the appropriate grievance procedures laid out in this RAP.

Related Local Government Departments

- i. Guide the compensation exercise by providing valuation approved valuation rates
- ii. Participate in the grievances that may arise
- iii. Provide the legal guidance and participate in grievance mechanism in case the PC fails.

Setting up of Resettlement Management Teams

It is important to point out that the number of likely persons to be affected by GROW Project may be small, but should the situation warrant, resettlement management teams commensurate with the extent of the impact will be set up to implement the prepared RAPs and will consist of three smaller teams namely:

Compensation Committee – The committee will comprise of representatives of the affected persons (2), Land Valuation Board, LC III and two representatives from the MGLSD/PSFU. This committee will be chaired by the representative of MGLSD. The compensation committee will be responsible for organizing and ensuring that compensations payable to PAPs are made in line with the provisions and procedures of this RPF.

Grievance Redress Committee - The GRC will be responsible for receiving and logging complaints and resolving disputes. This committee will work with the MGLSD (PCU) to resolve each grievance or dispute to ensure that redress actions are implemented. If affected persons are not satisfied with the grievance redress structures,

they will be entitled to seek redress through the DLT or Ugandan courts of law. It is important that the GRC be set up as soon as the compensation report or resettlement plan preparations start. Disputes can arise from census operations and it is therefore essential that the mediation mechanisms be available to cater for claim, disputes and grievances at an early stage.

Monitoring and Evaluation Team - The M&E team will be responsible for the monitoring of the RAP implementation programme to ensure that stated targets are met and the PAPs are duly compensated in line with the RAP requirements. This is an integral part of the monitoring process of the project. This team will be comprised of MGLSD and PSFU PITs. The two PITs will be reporting to the Overall Steering Committee.

14 RPF BUDGET AND FUNDING

14.1 Budget to Implement RAP

At this stage, it is not possible to estimate the likely number of people who may be affected. This is because the sub-projects have not yet been developed and the land impacts have not yet been fully identified. The budget will be developed from the specific social assessment studies (census and socio-economic surveys) and mitigation/livelihood restoration measures to be developed. Each sub project RAP will include a budget that will cover resettlement activities (including compensation cost for affected assets, and assistance, and provide for contingencies). The cost will be derived from expenditures relating to:

- (1) The preparation of the resettlement/compensation action plan, including the cost of consultation and outreach;
- (2) Relocation and transfer;
- (3) Income and means of livelihood restoration plan;
- (4) Administrative costs; and
- (5) Estimated contingency needs

14.2 Estimates and Funding Sources

This section presents the budget estimates for implementation of the Resettlement Action Plans (RAP). Government of Uganda will provide the funding for the RAPs and channel it through MGLSD for disbursement. This is in keeping with the current government of Uganda practice in regard to World Bank funding. However, detailed budgets will be developed during the preparation of the sub project Resettlement Action Plans (RAPs).

RPF Budget

The budget, implementation timing and responsibilities are presented in **Table 14** below.

Table 12: Proposed RAP Budget

S.N	Component	Timing	Responsibility	Amount (USD)
1	Development and implementation of Resettlement Action Plans (RAP) for different geographical regions of Uganda:	Before project implementation	MGLSD and PSFU	TBD
2	Capacity building: a) Recruitment of Environmental and Social Safeguards Specialists and Consultants b) Training District Technical Officers and in World Bank's Social and Environmental Safeguards requirements and EIA process in Uganda. c) Training MGLSD and PSFU Social and Environmental Focal Persons in World Bank's Social and Environmental Safeguards requirements and EIA process in Uganda.	Before and during project implementation	MGLSD and PSFU	TBD

	d) Training of sector Ministries, Departments and Agencies as well as refugee settlement focal persons and sub project host community leaders and technical leaders on the World Bank and national environmental and social requirements			
3	Monitoring RAP implementation process to ensure all compensation is completed and other social safeguards are adhered to.	Monitoring to be done every quarter throughout the project implementation period.	MGLSD and PSFU, Local Governments and GRCs	TBD
4	Facilitation of stakeholder engagement (one meeting every Quarter, throughout the project implementation period)	During project implementation	MGLSD and PSFU	TBD
5	RAP Audit	After project Implementation		TBD
	Total (USD)			TBD

15 ANNEXES

15.1 ANNEX 1: World Bank Resettlement Policy Framework (RPF)

This template is extracted from the ESS5—Annex 1: Involuntary Resettlement Instruments

The purpose of the resettlement framework is to clarify resettlement principles, organizational arrangements, and design criteria to be applied to sub-projects or project components to be prepared during project implementation. Once the sub-project or individual project components are defined and the necessary information becomes available, such a framework will be expanded into a specific plan proportionate to potential risks and impacts. Project activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and approved by the Bank.

The resettlement policy framework covers the following elements:

- a) A brief description of the project and components for which impacts on assets is required, and an explanation of why a resettlement policy framework rather than a resettlement plan is being prepared;
- b) Principles and objectives governing resettlement preparation and implementation;
- c) A description of the process for preparing and approving resettlement plans;
- d) Estimated displacement impacts and estimated numbers and categories of displaced persons, to the extent feasible;
- e) Eligibility criteria for defining various categories of displaced persons;
- f) A legal framework reviewing the fit between borrower laws and regulations and bank policy requirements and measures proposed to bridge any gaps between them;
- g) Methods of valuing affected assets;
- h) Organizational procedures for delivery of compensation and other resettlement assistance, including, for projects involving private sector intermediaries, the responsibilities of the financial intermediary, the government, and the private developer;
- i) A description of the implementation process, linking resettlement implementation to civil works;
- j) A description of grievance redress mechanisms;
- k) A description of the arrangements for funding resettlement, including the preparation and review of cost estimates, the flow of funds, and contingency arrangements; (l) a description of mechanisms for consultations with, and participation of, displaced persons in planning, implementation, and monitoring; and
- l) Arrangements for monitoring by the implementing agency and, if required, by third-party monitors.

15.2 ANNEX 2: OUTLINE FOR PREPARING SUB-PROJECT RESETTLEMENT PLANS (RAPs)

This template is extracted from the ESS5—Annex 1: Involuntary Resettlement Instruments

The scope of requirements and level of detail of the resettlement plan vary with the magnitude and complexity of resettlement. The plan is based on up-to-date and reliable information about:

- a) The proposed project and its potential impacts on the displaced persons and other adversely affected groups,
- b) Appropriate and feasible mitigation measures, and
- c) The legal and institutional arrangements required for effective implementation of resettlement measures.

Minimum elements of a resettlement plan

1. Description of the project/sub-project. General description of the project/sub-project and identification of the project/sub-project area.
2. Potential impacts. Identification of:
 - a) The project/sub-project components or activities that give rise to displacement, explaining why the selected land must be impacted for use within the timeframe of the project/sub-project;
 - b) The zone of impact of such components or activities;
 - c) The scope and scale of impacts on structures and other fixed assets;
 - d) Any project/sub-project -imposed restrictions on use of, or access to, land or natural resources;
 - e) Alternatives considered to avoid or minimize displacement and why those were rejected; and
 - f) The mechanisms established to minimize displacement, to the extent possible, during project /sub-project implementation.
3. Objectives: The main objectives of the resettlement program
4. Census survey and baseline socioeconomic studies. The findings of a household-level census identifying and enumerating affected persons, and, with the involvement of affected persons, surveying land, structures and other fixed assets to be affected by the project. The census survey also serves other essential functions:
 - a) Identifying characteristics of displaced households, including a description of production systems, labour, and household organization; and baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the displaced population;
 - b) Information on vulnerable groups or persons for whom special provisions may have to be made;
 - c) Identifying public or community infrastructure, property or services that may be affected;
 - d) Providing a basis for the design of, and budgeting for, the resettlement program;
 - e) In conjunction with establishment of a cut-off date, providing a basis for excluding ineligible people from compensation and resettlement assistance; and
 - f) Establishing baseline conditions for monitoring and evaluation purposes.

As the Bank may deem relevant, additional studies on the following subjects may be required to supplement or inform the census survey:

- a) Land tenure and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance, non-title-based usufruct systems (including fishing, grazing, or use of forest areas) governed by local recognized land allocation mechanisms, and any issues raised by different tenure systems in the project area;
 - b) The patterns of social interaction in the affected communities, including social networks and social support systems, and how they will be affected by the project; and
 - c) Social and cultural characteristics of displaced communities, including a description of formal and informal institutions (e.g. Community organizations, ritual groups, non-governmental organizations (NGOs)) that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.
5. Legal framework. The findings of an analysis of the legal framework, covering:
- a) The scope of the power of compulsory acquisition and imposition of land use restriction and the nature of compensation associated with it, in terms of both the valuation methodology and the timing of payment;
 - b) The applicable legal and administrative procedures, including a description of the remedies available to displaced persons in the judicial process and the normal timeframe for such procedures, and any available grievance redress mechanisms that may be relevant to the project;
 - c) Laws and regulations relating to the agencies responsible for implementing resettlement activities; and
 - d) Gaps, if any, between local laws and practices covering compulsory acquisition, imposition of land use restrictions and provision of resettlement measures and ess5, and the mechanisms to bridge such gaps.
6. Institutional framework. The findings of an analysis of the institutional framework covering:
- a. The identification of agencies responsible for resettlement activities and NGOs/CSOs that may have a role in project implementation, including providing support for displaced persons;
 - b. An assessment of the institutional capacity of such agencies and NGOs/CSOs; and
 - c. Any steps that are proposed to enhance the institutional capacity of agencies and NGOs/CSOs responsible for resettlement implementation.
7. Eligibility. Definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cut-off dates.
8. Valuation of and compensation for losses. The methodology to be used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation for land, natural resources and other assets under local law and such supplementary measures as are necessary to achieve replacement cost for them.
9. Community participation. Involvement of displaced persons (including host communities, where relevant):
- a) a description of the strategy for consultation with, and participation of, displaced persons in the design and implementation of the resettlement activities;
 - i. A summary of the views expressed and how these views were taken into account in preparing the resettlement plan;

- ii. A review of the resettlement alternatives presented and the choices made by displaced persons regarding options available to them; and
 - iii. Institutionalized arrangements by which displaced people can communicate their concerns to project authorities throughout planning and implementation, and measures to ensure that such vulnerable groups as indigenous people, ethnic minorities, the landless, and women are adequately represented.
10. Implementation schedule. An implementation schedule providing anticipated dates for displacement, and estimated initiation and completion dates for all resettlement plan activities. The schedule should indicate how the resettlement activities are linked to the implementation of the overall project.
 11. Costs and budget. Tables showing categorized cost estimates for all resettlement activities, including allowances for inflation, population growth, and other contingencies; timetables for expenditures; sources of funds; and arrangements for timely flow of funds, and funding for resettlement, if any, in areas outside the jurisdiction of the implementing agencies.
 12. Grievance redress mechanism - The plan describes affordable and accessible procedures for third-party settlement of disputes arising from displacement or resettlement; such grievance mechanisms should take into account the availability of judicial recourse and community and traditional dispute settlement mechanisms.
 13. Monitoring and evaluation: Arrangements for monitoring of displacement and resettlement activities by the implementing agency, supplemented by third-party monitors as considered appropriate by the Bank, to ensure complete and objective information; performance monitoring indicators to measure inputs, outputs, and outcomes for resettlement activities; involvement of the displaced persons in the monitoring process; evaluation of results for a reasonable period after all resettlement activities have been completed; using the results of resettlement monitoring to guide subsequent implementation.
 14. Arrangements for adaptive management: The plan should include provisions for adapting resettlement implementation in response to unanticipated changes in project conditions, or unanticipated obstacles to achieving satisfactory resettlement outcomes.

Additional planning requirements where resettlement involves physical displacement

When project circumstances require the physical relocation of residents (or businesses), resettlement plans require additional information and planning elements. Additional requirements include:

1. Transitional assistance: The plan describes assistance to be provided for relocation of household members and their possessions (or business equipment and inventory). The plan describes any additional assistance to be provided for households choosing cash compensation and securing their own replacement housing, including construction of new housing. If planned relocation sites (for residences or businesses) are not ready for occupancy at the time of physical displacement, the plan establishes a transitional allowance sufficient to meet temporary rental expenses and other costs until occupancy is available.
2. Site selection, site preparation, and relocation. When planned relocation sites are to be prepared, the resettlement plan describes the alternative relocation sites considered and explains sites selected, covering:
 - a. Institutional and technical arrangements for identifying and preparing relocation sites, whether rural or urban, for which a combination of productive potential, locational advantages, and other factors is better or at least comparable to the advantages of the old sites, with an estimate of the time needed to acquire and transfer land and ancillary resources;

- b. Identification and consideration of opportunities to improve local living standards by supplemental investment (or through establishment of project benefit-sharing arrangements) in infrastructure, facilities or services;
 - c. Any measures necessary to prevent land speculation or influx of ineligible persons at the selected sites;
 - d. Procedures for physical relocation under the project, including timetables for site preparation and transfer; and
 - e. Legal arrangements for regularizing tenure and transferring titles to those resettled, including provision of security of tenure for those previously lacking full legal rights to land or structures.
3. Housing, infrastructure, and social services. Plans to provide (or to finance local community provision of) housing, infrastructure (e.g. water supply, feeder roads), and social services (e.g. schools, health services); plans to maintain or provide a comparable level of services to host populations; any necessary site development, engineering, and architectural designs for these facilities.
 4. Environmental protection and management: A description of the boundaries of the planned relocation sites; and an assessment of the environmental impacts of the proposed resettlement and measures to mitigate and manage these impacts (coordinated as appropriate with the environmental assessment of the main investment requiring the resettlement).
 5. Consultation on relocation arrangements. The plan describes methods of consultation with physically displaced persons on their preferences regarding relocation alternatives available to them, including, as relevant, choices related to forms of compensation and transitional assistance, to relocating as individual households families or with pre-existing communities or kinship groups, to sustaining existing patterns of group organization, and for relocation of, or retaining access to, cultural property (e.g. places of worship, pilgrimage centres, cemeteries).
 6. Integration with host populations. Measures to mitigate the impact of planned relocation sites on any host communities, including:
 - a. Consultations with host communities and local governments;
 - b. Arrangements for prompt tendering of any payment due the hosts for land or other assets provided in support of planned relocation sites;
 - c. Arrangements for identifying and addressing any conflict that may arise between those resettled and host communities; and
 - d. Any measures necessary to augment services (e. G. Education, water, health, and production services) in host communities to meet increased demands upon them, or to make them at least comparable to services available within planned relocation sites.

Additional planning requirements where resettlement involves economic displacement

If land acquisition or restrictions on use of, or access to, land or natural resources may cause significant economic displacement, arrangements to provide displaced persons with sufficient opportunity to improve, or at least restore, their livelihoods are also incorporated into the resettlement plan, or into a separate livelihoods improvement plan. These include:

- i. Loss of access to land or resources. For those whose livelihood is affected by loss of land or resource use or access, including common property resources, the resettlement plan describes means to obtain substitutes or alternative resources, or otherwise provides support for alternative livelihoods
- ii. Support for alternative livelihoods. For all other categories of economically displaced persons, the resettlement plan describes feasible arrangements for obtaining employment or for establishing a business, including provision of relevant supplemental assistance including skills training, credit,

licenses or permits, or specialized equipment. As warranted, livelihood planning provides special assistance to women, minorities or vulnerable groups who may be disadvantaged in securing alternative livelihoods.

- iii. Consideration of economic development opportunities. The resettlement plan identifies and assesses any feasible opportunities to promote improved livelihoods as a result of resettlement processes. This may include, for example, preferential project employment arrangements, support for development of specialized products or markets, preferential commercial zoning and trading arrangements, or other measures. Where relevant, the plan should also assess the feasibility of prospects for financial distributions to communities, or directly to displaced persons, through establishment of project-based benefit-sharing arrangements.
- iv. Transitional support. The resettlement plan provides transitional support to those whose livelihoods will be disrupted. This may include payment for lost crops and lost natural resources, payment of lost profits for businesses, or payment of lost wages for employees affected by business relocation. The plan provides that the transitional support continues for the duration of the transition period.

15.3 ANNEX 3: SAMPLE GRIEVANCE AND RESOLUTION FORM

Template of complaints registration forms

Complaint No.: _____ Village: _____ Sub county: _____

District: _____ Project Name: _____

(To be filled by Secretary of Village GRC)

Complaints Registration Forms

Name of Complainant: _____

NIN or village IDs: _____

Contact Address: _____

Contact Number: _____

Nature of Grievance or Complaint:

Environmental:

Social:

VAC:

Gender:

Health & Safety:

Labour Influx:

Other:

Details of grievance or complaint:

Details of Action taken by the GRC:

Was the complainant satisfied? If no, what actions have been taken?

Complainant

Recipient

Village GRC

MGLSD-
REP GRC

Signature : _____

Signature : _____

Signature : _____

Name: _____

Name: _____

Name: _____

Dated: _____

Dated: _____

Dated: _____

Members Present

What are the recommended follow up actions?

15.4 ANNEX 4: TEMPLATE OF GRIEVANCE LOG OF VILLAGE LEVEL GRC

Date:

/___/_____

Complaint No. Registration

**Date
Reference
Name of
Village Name**

**No.
Complainant**

Summary of Complaint:

Summary of supporting documents:

Summary of 1st Hearing

Summary of Field Visit's:

Summary of 2nd Hearing

Decision of the GRC

* Supporting documents include copy of certificate of title or land purchase agreements, witness statements, photographic documentation etc.

15.5 ANNEX 5: RELEVANT LOCAL LEGISLATION AND GUIDELINES

Property Rights and Land Rights	Law / Regulation
<p>The Constitution (1995) provides for</p> <ul style="list-style-type: none"> ➤ Restoration of all private tenure regimes, divested the state and the Uganda ➤ The right of every person in Uganda to own property ➤ Land Commission of radical title to all land and vested this directly in the citizens of Uganda. ➤ The government and local authorities have statutory power to compulsorily acquire land. 	<p>Constitution 1995, Article 26 Article 237 Article 26(2) and Article 237(2)</p>
<p>There are four land tenure systems in Uganda, as recognized by Ugandan law. Mailo, Freehold, Customary, and Leasehold.</p>	<p>Land Act 1998</p>
<p>All land is vested in the citizens of Uganda.</p>	<p>Land Act 1998</p>
<p>Customary tenure:</p> <ul style="list-style-type: none"> ➤ Is governed by rules generally accepted as binding and authoritative by the class of persons to which it applies, in other words, “customary regime” is not governed by written law. ➤ Is owned in perpetuity ➤ Customary occupants are occupants of former public land, and occupy the land by virtue of their customary rights; they have propriety interest in the land and are entitled to certificates of customary ownership ➤ Certificates for customary ownership may be acquired, through application to the Parish Land Committee and eventual issuance by the District Land Board 	<p>Land Act 1998</p>
<p>Freehold tenure:</p> <ul style="list-style-type: none"> ➤ Derives its legality from the Constitution and its incidents from the written law ➤ Involves the holding of land in perpetuity or of a period less than perpetuity fixed by a condition ➤ Enables the holder to exercise, subject to the law, full powers of ownership. 	<p>Land Act 1998</p>
<p>Mailo tenure:</p> <ul style="list-style-type: none"> ➤ Has roots in the allotment of land pursuant to the 1900 Uganda Agreement ➤ Derives its legality from the Constitutions and its incidents from the written law ➤ Involves the holding of land in perpetuity 	<p>Land Act 1998</p>

Property Rights and Land Rights	Law / Regulation
<ul style="list-style-type: none"> ➤ Permits the separation of ownership of land from the ownership of developments on land made by a lawful or bona fide occupant ➤ Enables the holder to exercise all the powers of ownership, subject to the rights of those people occupying the land at the time of the creation of the mailo title and their successors. <p>Leasehold tenure:</p> <ul style="list-style-type: none"> ➤ Is created either by contract or by operation of the law ➤ Is a form under which the landlord or lessor grants the tenant or lessee exclusive possession of the land, usually for a period defined and in return for a rent. ➤ The tenant has security of tenure and a proprietary interest in the land 	<p>Land Act 1998</p>

Property Rights and Land Rights	Law / Regulation
"Licence" or "Share Cropper"	Land Act 1998
<ul style="list-style-type: none"> ➤ Although only these later forms of tenure are legally defined under the Land Act, the context of common law also recognizes the statute of "licensee" or "sharecroppers", these terms having similar meanings in practice. Licensees are persons granted authority to use land within for agricultural production. Traditionally, such production would be limited to annual crops. Licensees have no legal security of tenure of any proprietary right in the land. Their tenure is purely contractual. 	
<p>The minister responsible for land may authorize any person to enter upon land and survey the land dig or bore the subsoil or any other thing necessary for ascertaining whether the land is suitable for a public purpose.</p>	Land Acquisition Act (1965)
<p>Fixing the value for land in Uganda depends on whether it is public (Government owned) or privately owned according to land tenure types indicated in the section of land acquisition. If it is public land, the Chief Government Valuer's office fixes the rates of compensation. However, if it is owned privately, the developer will negotiate with the owner and agree on the amount to pay for the land to be acquired.</p>	Land Act of 1998 as amended in 2004
<p>Value for customary land is open market value, buildings on land is taken to be on replacement costs in rural areas, 15% and 30% (of total sum assessed) disturbance allowance is to be paid if less than six months or six months' notice respectively is given up to vacant possession.</p>	Land Act of 1998 as amended in 2004
<p>It is the responsibility of the developer to engage a professional Valuer to carry out an assessment of all structures and assets in the affected area. However, rates for structures/buildings in urban areas are fixed by the Chief Government Valuer's Office</p>	None cited
<p>The Town and Country Planning Act of 1964 gives broad powers to planning authorities at the national and local level to take land, against compensation, for public purposes within an approved planning area.</p>	Town and Country Planning Act 1964
<p>Each District Land Board adopts its own compensation rates. As a result, variation exists among the different districts. The rates are reviewed each year.</p>	None cited

Property Rights and Land Rights	Law / Regulation
<p>Article 26(2) of the Constitution provides that: “No person shall be compulsorily deprived of property or any interests in or any right over property of any description except where the following conditions are satisfied.</p> <ul style="list-style-type: none"> ➤ The taking of possession or acquisition is necessary for public use or in the interest of defence, public safety, public order, public morality or public health and ➤ The compulsory taking of possession or acquisition of property is made under a law which makes provision for: <ul style="list-style-type: none"> ○ Prompt payment of fair and adequate compensation, prior to the taking or acquisition of the property, and ○ A right of access to a court of law by any person who has an interest or right over the property. 	Constitution (1995), Article 26(2)
“Where the assessment officer takes possession of land, the land shall immediately by the operation of this act be vested in the land commission free from all encumbrances”	Land Acquisition Act, section 7(2)
“The <i>Uganda Land Commission shall hold and manage any land in Uganda which is vested in or acquired by the government in accordance with the constitution and perform such other functions as may be prescribed by or under this Act or any other enactment.</i> ”	Land Act (2004) Section 49 as amended specifically under subsections (a) and (d)
The Government or Local Government may acquire land in public interest.	Article 237(1)
Prompt payment of fair and adequate compensation prior to the taking possession or acquisition of the property.	Constitution 1995
Prompt payment of fair and adequate compensation to all interested parties on the land.	Electricity Act (1999), Part VIII
Compensation for affected people should be determined according to the Land Act (1998) and the Land Acquisition Act (1965).	Electricity Act (1999)
Electricity Regulatory Authority has the power to handle claims for compensation for land acquired.	Electricity Act (1999)
The Government is supposed to pay compensation (cash) to any person who suffers damage as a result of any action. Any dispute as to the compensation payable is to be referred by the Attorney General to court for decision.	Land Acquisition Act (1965)
The basis for compensation is depreciated replacement costs for rural properties and market values for urban properties.	Land Act (1998) Section 78
Each District Land Board adopts its own compensation rates. As a result, variation exists among the different districts. The rates are reviewed each year.	None cited
Land Tribunals must be established at all local governments and all land disputes must first be processed through them before any resort can be made to ordinary courts.	Land Act (1998), Article 75
Traditional authority mediators retain their jurisdiction over land disputes.	Land Act (1998), Article 89

15.6 ANNEX 6: SUMMARY MATRIX OF STAKEHOLDERS CONSULTED _PHASE 1 OF CONSULTATIONS

Consultations Held Physically, Telephonically, Email, Etc.

S/N	Name	Gender	Designation	TELEPHONE / EMAIL	ENTITY
1	Domisiano Owor	M	Senior Wild Life Officer (Swo)	+256701332400- owordon@gmail.com	MoTWA
2	Micheal Mugaba	M	Wild Life Officer (W0)	+256775338632 Michealmugaba7@gmail.com	MoTWA
3	James Mboijana	M	Tourism Development Officer (Tdo)	+256772579760 Jmboijana2@gmail.com	MoTWA
4	Alex Asimwe	M	Commissioner		
5	Eva Katusabe	F	OSH Inspector		
6	Rebecca Nabwire	F	Principal Labour Inspector		
7	Harriet Asibazuyo	F	Senior Equity Officer		
8	Ritah Nakonde	F	Labour Officer		
9	Diana Ninsiima	F	Environment Officer		
10	Openy Geofrey	M	Risk Manager		
11	Susan Muwanga	F	Principal Gender Officer		
12	Dr. Paul Okiror	M	Enviromental Specialist	+256782224828 p.okiror@energy.go.ug	MGLSD
13	Catherine Ajiambo	F	Research Officer (Ro)	+256782499093 Catherineajiambo@gmail.com	RO
14	Noel Komunda	M	Gender Specialist	+256751027127 noel.komunda@gmail.com	MGLSD
15	Dorothy Achan	F	Social Safeguards Specialist (S.S.S)	+25677247201 Dorothy.achan1@gmail.com	MGLSD
16	Francis Xavier Ochandi	M	Sociologist	+256704526428 Frankxavie256@gmail.com	MGLSD
17	Nakabiri Grace	F	Sociologist	+256777360784 nakabiragrace@gmail.com	MGLSD
18	Brenda Owomugisha	F	Safe Guard	+256773187290 b.owumugisha@energy.go.ug	MGLSD
19	Julius Byenkya Atwoki	M	Social Risk Management Specialist		PSFU
20	Elisha Lugoloobi	M	Transaction Execution Specialist	+256701407330 elugoloobi@PSFU.or.ug	PSFU
21	Peter Makero	M	Eniromental Specialist	+256758289019 makeropeter@gmail.com	PSFU
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47	Amon Mugume	M	Natural Scientist	amugume@yahoo.com	UGANDA MUSEUM

15.7 ANNEX 7: SUMMARY MATRIX OF STAKEHOLDERS CONSULTED _PHASE 2 OF CONSULTATIONS (VIRTUAL)

Stakeholder	Key personnel consulted	Contact	Date	Method of Engagement		Gender		
						Male	Female	Total
Uganda Investment Authority	Ms. Winnie Lawoko-Olwe,	0752230303	23/02/22	Virtual (Zoom)	Meeting		1	3
	Ms. Susan Nakibuuka	0782749568	23/02/22	Virtual (Zoom)	Meeting		1	
	Ms. Eria Kaweireku	0772697592	23/02/22	Virtual (Zoom)	Meeting	1		
Ministry of Finance, Planning and Economic Development	Ms. Azizah Nabitalo	0779311292	23/02/22	Virtual (Zoom)	Meeting		1	1
National Planning Authority	Ms. Judith Mutabazi	0777919566	23/02/22	Virtual (Zoom)	Meeting		1	1
Ministry of Local Government	Ms. Ruth Kashaga Development Officer	0787897945	23/02/22	Virtual (Zoom)	Meeting		1	1
Ministry of Trade Industries and Cooperatives	Mr. Stephen Mbogo Kirya	+256702172770	23/02/22	Virtual (Zoom)	Meeting	1		1
Ministry of Tourism, Wildlife and Antiquities	Ms. Harriet Kizza	0752354888	23/02/22	Virtual (Zoom)	Meeting		1	1
Office of the Prime Minister	Mr. Peter Malinga	0772392187	24/03/22	Virtual (Zoom)	Meeting	1		1
United Nations Development Programme	Ms. Harriet Karusigarira	0704986308	24/03/22	Virtual (Zoom)	Meeting		1	1
Kyambogo University	Kebirungi Harriet	0772835518	24/03/22	Virtual (Zoom)	Meeting		1	3
	Ms. Grace Muhoozi	0702487890	24/03/22	Virtual (Zoom)	Meeting		1	

	Ms. Lilian Namubiru		24/03/22	Virtual (Zoom)	Meeting		1	
Makerere University Business school	Dr. Diana Ntamu	0772370007	24/03/22	Virtual (Zoom)	Meeting		1	1
National Forestry Authority	Byaruhanga Julius	077292520	25/03/222	Virtual (Zoom)	Meeting		1	3
	Margret Kyohairwe	0782 730 799.	25/03/222	Virtual (Zoom)	Meeting		1	
	Julian Nyamusana,	0772379205	25/03/222	Virtual (Zoom)	Meeting		1	
National Environmental Management Authority	Leila Akello Gonasa	0782730799	25/03/222	Virtual (Zoom)	Meeting		1	1
United Nations Development Programme	Beatrice Mugambe	0704986308	25/03/222	Virtual (Zoom)	Meeting		1	1
Inter Religious Council of Uganda	Irene Nakasolya	0772351955	25/03/222	Virtual (Zoom)	Meeting		1	4
	Patrick N. Barasa,	0784215793	25/03/222	Virtual (Zoom)	Meeting	1		
	Caroline Tusiime		25/03/222	Virtual (Zoom)	Meeting		1	
	Caroline Bunga Idembe		25/03/222	Virtual (Zoom)	Meeting		1	
National Union of the Disabled Persons of Uganda-NUDIPU.	Asale Deborah	0774032821	25/03/222	Virtual (Zoom)	Meeting		1	5
	Oyuu Iyute Deborah,	0772646195	25/03/222	Virtual (Zoom)	Meeting		1	
	Oyuki Yofisa -	0782948459	25/03/222	Virtual (Zoom)	Meeting	1		
	Sarah Ojirot	0751658970	25/03/222	Virtual (Zoom)	Meeting		1	
	Popuras Aisu		25/03/222	Virtual (Zoom)	Meeting		1	
Total								28

