



Private Sector Foundation Uganda

Environmental and Social Management System (ESMS)

December 2023

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ABBREVIATIONS

CAO:	Chief Administrative Officer
CBOs:	Community Based Organizations
CEO:	Chief Executive Officer
COC:	Code of Conduct
CSOs:	Civil Society Organizations
E&S:	Environmental and Social
ESCP:	Environmental and Social Commitment Plan
ESF:	Environmental and Social Framework
ESIA:	Environmental and Social Impact Assessment
ESMF:	Environmental and Social Management Framework
ESMP:	Environmental and Social Management Plan
ESMS:	Environmental and Social Management System
FBOs:	Faith-Based Organizations
GBV:	Gender-Based Violence
GFF:	GROW Financing Facility
GOU:	Government of Uganda
GRC:	Grievance Redress Committee
GRM:	Grievance Redress Mechanism
GROW:	Generating Growth Opportunities and Productivity for Women Enterprises
LC:	Local Council
LMP:	Labour Management Plan
MDAs:	Ministries, Departments and Agencies
MGLSD:	Ministry of Gender, Labour and Social Development
MOLG:	Ministry Local Government
MPS:	Minimum Package of Services
MTTI:	Ministry of Tourism, Trade and Industry
NEMA:	National Environment Management Authority
OPM:	Office of Office Minister
OSH:	Occupational Safety and Health

PDM:	Parish Development Model
PFI:	Participating Financial Institution
PIT:	Project Implementation Team
PLHIV:	People Living with Human Immunodeficiency Virus
PPE:	Personal Protective Equipment
PSC:	Project Steering Committee
PTC	Project Technical Committee
PWD:	People with Disability
RPF:	Resettlement Policy Framework
RWC:	Refugee Welfare Committee
SCA:	Survivor Centred Approach
SEA:	Sexual Exploitation and Ab
SEP:	Stakeholder Engagement Plan
SH:	Sexual Harassment
SVAC:	Sexual Violence Against Children
UIA:	Uganda Investment Authority
VMGs:	Vulnerable and Marginalized Groups

DEFINITION OF TERMS

1. **Emergency Preparedness Plan:** This refers to the steps taken to ensure the safety of workers or other groups of people before, during and after an emergency or natural disaster.
2. **Emergency:** Is an abnormal incident posing a threat to the safety of workers, the environment or property at a facility or site that can be brought under control using the resources and procedures for emergency response in place for the facility or site.
3. **Environment:** This means the surroundings in which a person, animal, plant, or organization operates, including air, water, land, flora, fauna, humans, and their interaction.
4. **Environmental and Social Commitment Plan (ESCP):** is an instrument that sets out the material measures and actions required for the project to meet the environmental and social standards (ESSs) over a specified timeframe. It forms part of the legal agreement that will include, as necessary, obligations of the Borrower to support the implementation of the ESCP.
5. **Environmental and Social Impact Assessment (ESIA) or full ESIA:** is an instrument to identify and assess the potential environmental and social impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures. Where required, the ESIA is prepared prior to the commencement of the project.
6. **Environmental and Social Impact Assessment:** An analytical process that systematically examines the likely environmental and social impacts of a proposed project, evaluates alternatives, and designs appropriate mitigation, management and monitoring measures, taking into account interrelated socio-economic, cultural, and human health impacts, both beneficial and adverse.
7. **Environmental and Social Management Framework (ESMF):** is an instrument that examines the risks and impacts when a project consists of a series of subprojects and risks and impacts cannot be determined until the subprojects' details are identified. The ESMF sets out the principles, rules, standards, and procedures to assess the environmental and social risks and impacts.
8. **Environmental and Social Management Plan (ESMP) or partial ESIA:** is an instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental and social impacts or to reduce them to acceptable levels; and (b) the actions needed to implement these measures.
9. **Environmental and Social Management System (ESMS):** is a set of policies, procedures, tools, and internal capacity to assess, manage and monitor environmental and social risks and impacts of subprojects, as well as the overall portfolio risk in a responsible manner.
10. **Environmental and Social Risks** are potential negative consequences to an activity that result from its impacts (or perceived impacts) on the bio-physical environment (air, water, soil,

biodiversity) or socio-economic environment (e.g., employees, customers, residents).

11. **Environmental aspect:** is an element of an organization's activities, products or services that can interact with the environment.
12. **Environmental impact:** Any change to the environment, whether adverse or beneficial, wholly or partially resulting from a project's activities, products, or services.
13. **Environmental issues:** are defined as problems within the planet's systems (air, water, soil, etc.) that have developed because of human interference or unsustainable use of the planet's biodiversity.
14. **Environmental Risk Assessment:** A systematic process for identifying and estimating the likelihood or probability of an adverse or hazardous outcome or event and its consequence on human health or the environment.
15. **Exclusion List:** is a list that defines the types of projects that a project does not finance, either directly or indirectly, through participating financial institutions (PFIs).
16. **Gender Based Violence (GBV):** 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 private spaces (IASC, 2015).
17. **Gender Equality:** This is when women and men have the same or equal enjoyment of socially valued goods, opportunities, resources and rewards. Where gender inequality exists, it is generally women who are excluded or disadvantaged in relation to decision-making and access to economic and social resources.
18. **Gender Equity:** Is the process of being fair to everyone, both male and female. To ensure fairness, strategies, and measures must often be available to compensate for women's historical and social disadvantages that prevent women and men or boys and girls from otherwise operating on a level playing field. Equity leads to equality.
19. **Gender Inequality:** The unequal and unfair access to resources and opportunities because of the socially defined differences and roles between women and men in a given society or setting.
20. **Gender Mainstreaming:** Is a conscious approach by an organization to take into account gender equality concerns in all policy, programme, administrative and financial activities as well as organizational structures and procedures.
21. **Gender:** Social and cultural constructs of roles, attributes, opportunities, privileges, status, access to, and control over resources and benefits between women and men, boys and girls in a given society.

- 22. Grievance Redress Committee (GRC):** is a special committee put in place at the project or subproject management unit as part of the GRM throughout the project/ subproject life cycle.
- 23. Grievance Redress Mechanism (GRM):** is a set of processes and procedures designed to receive and resolve concerns and grievances of project-affected parties arising in connection with the project using an understandable and transparent process that provides timely feedback to the complainants in a language they understand, without any retribution and monitor the implementation of taken decisions. The grievance mechanism is proportionate to the risks and impacts of the project and operates in an independent and objective manner.
- 24. Grievance Redress Service (GRS):** is an avenue for project affected parties (individuals and communities) to submit complaints associated with a Donor-financed project to the World Bank) and give him a reasonable opportunity to respond. The GRS enhances the World Bank's responsiveness and accountability to project- affected communities by ensuring that grievances are promptly reviewed and addressed.
- 25. Incident:** A negative event resulting from failure to comply with identified Safeguards measures OR conditions that occur as a result of unexpected or unforeseen risks or impacts during project implementation. It may have an impact on people's property or the environment.
- 26. Labor Management Plan (LMP):** is an instrument or document that describes the requirements and expectations in terms of compliance, monitoring, roles, and responsibilities, reporting and capacity building with regard to labour and working conditions in the project.
- 27. Minimum Package of Services:** This is a set of services that are required by the majority of survivors of GBV. The MPS includes: psychosocial support, emergency medical care, safety and security and legal redress. The MPS is accessed by GBV survivors based on their needs and informed choices.
- 28. Project Brief:** A summary statement of the likely environmental impacts of a proposed project.
- 29. Project:** means the eligible activities/ projects financed by BRD directly or on-lending through PFI under financing conditions stipulated on the loan Agreement signed between the Client and BRD.
- 30. Sexual Exploitation and Abuse (SEA):** 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.

31. **Sexual Harassment:** Unwelcome sexual advances, demands for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. Demands for sexual favours before one can access services and benefits is a form of sexual harassment.
32. **Sexual Violence Against Children:** Any acts of a sexual nature committed against a child. These include defilement and exposing a child to pornography.
33. **Social aspects:** Social issues include labor rights, employee health and safety, community health and safety, nuisance and noise, resettlement, human rights, cultural heritage, and historical sites;
34. **Social Exclusion:** This is the likelihood that some population groups may not optimally benefit or may not benefit at all from the skilling opportunity because of their disadvantaged position in society driven by different factors. These groups in the Uganda context include women, people with disability (PWD), the elderly, people living with HIV (PLHIV), and the youth, among others. Social exclusion is not necessarily a deliberate decision to exclude some groups but may be the lack of deliberate and targeted efforts to reach out to the voiceless, vulnerable, weak, and marginalized.
35. **Social impact:** is any change, whether adverse or beneficial, that solves or at least addresses social challenges resulting from a Project's activities, products, or services.
36. **Stakeholder Engagement Plan (SEP):** is an instrument designed to identify and communicate with project stakeholders, both project-affected parties and other interested parties to enhance project acceptance, improve the E&S sustainability of projects and make a significant contribution to successful project design and implementation.
37. **Subprojects:** are the eligible activities/ projects financed by the GROW project through PFI under financing conditions stipulated on the sub-loan Agreement signed between the Client and PFI.
38. **Survivor Centered Approach** A strategy for supporting GBV including SVAC and 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 necessary, with the informed consent of the survivors.
39. **Sustainable Development:** Development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs.
40. **Sustainable Use:** Use of environmental resources in a way and at a rate that does not lead to long term decline of those resources, thereby maintaining their potential to meet the

needs and aspirations of present and future generations.

41. **Waste:** Any substance or object dumped, abandoned, discarded, disposed of, intended, or required by law to be disposed of.
42. **Wetlands:** Areas permanently or seasonally flooded by water, where plants and animals have become adapted, and these areas are gazetted as such.

1. INTRODUCTION

1.1 Private Sector Foundation Uganda (PSFU)

Private Sector Foundation Uganda (PSFU) is the umbrella organization for the private sector in Uganda. Founded in 1995, the PSFU's mandate includes advocacy, capacity building, and trade development. PSFU has over the years, since its inception, partnered with Government to implement several projects funded by development agencies such as the World Bank.

1.2 Generating Growth Opportunities and Productivity for Women Enterprises (GROW) Project

The GROW project is a government of Uganda Project, funded through a World Bank grant of USD 217m. The project development objective (PDO) is to increase access to entrepreneurial services that enable female entrepreneurs to grow their enterprises in targeted locations, including host and refugee districts. The Project Development Objective will be implemented through four components: The project will be implemented in all the districts and cities of Uganda and will specifically also target refugee hosting districts and Refugee Resettlements. It has four components namely:

Component 1: Support for Women empowerment and enterprise development services.

- **Subcomponent 1A:** Supporting creation and strengthening of women platforms, community mobilization, and mindset change.
- **Subcomponent 1B:** Support for core business development for micro and small enterprises.
- **Subcomponent 1C:** Support for trade/sector specific skills.
- **Subcomponent 1D:** Women entrepreneurship work placement program.

Component 2: Access to finance for women entrepreneurs.

- **Subcomponent 2A:** Grant support for micro enterprises through business competition.
- **Sub-component 2B:** Facilitating access to credit for enterprise growth.
- **Subcomponent 2C:** Sustainable loan products and processes for women entrepreneurs.

Component 3: Enabling infrastructure and facilities for women enterprise growth and transition.

- **Subcomponent 3A:** multi-purpose service and production facilities to boost women enterprise productivity.
- **Sub-component 3B:** Enabling access to gender-inclusive workplace infrastructure.

Component 4: Program management, policy innovation, and evidence generation.

Implementation Arrangements: The project will be implemented by the Ministry of Gender, Labour and Social Development (MGLSD) in partnership with the Private Sector Foundation Uganda (PSFU). The PSFU will specifically implement subcomponents IC, 2B, and 2C and co-implement component 4. Subcomponents 2B and 2C will be implemented through Participating Financial Institutions (PFIs). Other collaborating entities will include OPM, MoLG, MTTI, UIA, and Local Governments, among others. All the entities will play roles consistent with their mandate under the decentralization policy. Appropriate partnerships will be established with Private Sector Organizations, NGOs, FBOs, and Cultural Institutions.

1.3 The National Environmental and Social Context

Several studies and reports, such as the National Environment Management Authority (NEMA) National State of the Environment Report of 2022, indicate that all aspects of the environment in Uganda are under threat because of the ongoing degradation of the environment. Studies and reports such as the Uganda Bureau of Statistics (UBOS), Labour Force Survey of 2021, and Uganda Demographic and Health Survey (UDHS) of 2022 also indicate several social, health, and safety challenges in Uganda.

1.4 What is the PSFU ESMS

The PSFU Environmental and Social Management System (ESMS) is a set of inter-related policies, laws, guidelines, processes, procedures and tools that enable PSFU to implement, monitor and report on projects and programmes in compliance with agreed environmental and social standards of Government and development partners funding the projects. For coherence, the ESMS is presented in a single document with reference to other supporting tools and documents where necessary.

1.5 Purpose and Objectives of the PSFU ESMS

The purpose of the ESMS is to help PSFU integrate environmental and social safeguards into its core business activities and improve its overall operations in line with its mandate. This will promote sustainable development and ensure compliance with environmental and social

standards of national institutions such as NEMA and international development partners such as the World Bank.

This ESMS provides a framework to identify, assess, and evaluate environmental and social risks and impacts associated with subprojects that will be funded -through PFIs - to ensure that decisions to disburse funds to PFIs by PSFU are well grounded. The ESMS will also guide monitoring and reporting on PFIs and subprojects to ensure compliance with environmental and social requirements.

In keeping with the exclusion list, the additional purpose of the ESMS is to ensure funding is not provided to subprojects with E & S risks and impacts that are irreversible or difficult to mitigate. It is to ensure that E & S risks and impacts associated with eligible subprojects are reduced to acceptable levels and to achieve environmental and social benefits wherever possible.

The specific objectives include:

- i. To support mainstreaming of Environmental and Social (E&S) risk and impact management into GFF of the GROW Project
- ii. To support assessment of the ESMS of PSFU and PFIs and to identify capacity building requirements in both entities
- iii. To set out how PFIs will assess and manage environmental and social risks and impacts associated with the subprojects they will finance
- iv. To promote good environmental and social management practices in the subprojects the PFI will finance
- v. To promote good environmental and sound human resources management within PFIs
- vi. Ensure PFI and sub projects compliance with the World Bank Environment and Social Framework (ESF) and the relevant national policy and legal framework.
- vii. To guide, with adjustments where necessary, the management of E&S risks and impacts associated with the overall PSFU portfolio and projects funded by other development partners.

1.6 Scope of the ESMS

The sectors to be supported by the GROW project, as elaborated in the GROW project documents, include Agriculture, Manufacturing & Exports, Tourism, and Hospitality, among others. All the intervention areas are anticipated to have E&S risks and impacts of different levels, which will be assessed at all implementation levels. The ESMS is for guiding management of E&S risks and impacts associated with the GFF under the World Bank funded GROW project. It may, however, be applicable to other projects and programmes funded by PSFU and other development partners with modifications were necessary.

1.7 Requirements for Participating Financial Intermediaries (PFIs)

PSFU will provide funding to Participating Financial Intermediaries (PFIs) for onward granting and lending to subprojects engaged in diverse activities, each with its own environmental and social risk profile. PSFU will apply to all PFIs the following applicable E&S requirements for business activities to be financed:

As a condition of eligibility to receive financing from PSFU, each PFI will put in place and maintain an Environmental and Social Management System (ESMS) based on World Bank ESF requirements (ESS9).

The PFI's ESMS will include the following elements: (a) environmental and social policy, (b) clearly defined E&S risk identification, assessment, and management procedures, (c) organizational capacity and competency, (d) monitoring and review of E&S risks of individual transactions and the portfolio, and e) external communications mechanism and stakeholders' engagement including a grievance redress mechanism (GRM). The ESMS will be endorsed by the PFI's senior management and have adequate resources dedicated to its implementation;

As part of the above elements under (ii), the PSFU E & S team will provide technical support where necessary to assist the development of an ESMS at the PFI level, and the E&S instruments must include:

- i. A screening process for subprojects based on the exclusion activities;
- ii. An E&S risk categorization system which clearly defines risk categories;
- iii. Applicable E&S requirements should be listed depending on the level of risk associated with business activities financed;
- iv. PFI's ESMS will incorporate an appropriate E&S due diligence process taking into consideration provisions of PSFU ESMS;
- v. PSFU will require PFI's to maintain labor management procedures in line with national laws and World Bank ESF requirements on Labor and Working Conditions;
- vi. All PFIs are required to ensure subproject compliance with E & S project briefs, screening reports, ESIA or ESMP studies, and reports from sub-projects after clearance of the assessment studies /ESIAs by NEMA or district authorities,
- vii. Based on the agreement with PSFU for reporting regularity, PFIs will prepare and submit to PSFU an E&S report on the implementation progress of its ESMS. This will include information on the E&S risk profile for its financed subprojects and the implementation

progress of E&S measures for specific financed subprojects. See chapter 6 for details of this report.

The PFI shall notify PSFU in writing of any significant accidents or incidents associated with financed subprojects within 24 hours from when the PFI was notified of the incident. The subprojects must report any such accidents or incidents to the PFI immediately after they are brought to their attention.

1.7.1 Assessment of ESMSs of PFIs

The adequacy of PFI ESMS as summarized in 1.6 above, will be determined during the ESMS assessment of PFIs by PSFU. Following the PFI ESMS assessment, measures for enhancing the ESMS of PFI to the satisfaction of PSFU will be agreed upon and included in a time bound action plan agreed on by the PSFU and the PFI. Funds will not be disbursed by PSFU to PFIs until agreed measures are implemented to the satisfaction of PSFU. See the tool for ESMS assessment of PFIs in Annex 1.

1.8 Components of the PSFU ESMS

The PSFU ESMS consists of the following components, which are elaborated in chapters 2, 3, 4, 5, and 6

- i. Environmental and Social Policy Framework
- ii. Environmental and Social Management Procedures
- iii. Stakeholder Engagement and Grievance Management
- iv. Organizational Capacity and Competency
- v. Monitoring and Reporting

2. THE ENVIRONMENTAL AND SOCIAL POLICY AND LEGAL FRAMEWORK

2.1 National Policies and Laws

The Government of Uganda has put in place several policies and laws for protecting the environment and managing different social, health and safety risks and impacts. The GROW Project and all project implementers and actors, including PSFU, PFIs, and subprojects, will comply with these policies and laws. Refer to the GROW Project ESMF for the list of National policies and laws.

2.2 International Conventions and Protocols

In addition to national laws and policies, the PSFU, PFIs, and subprojects are obliged to comply with international conventions and protocols on environmental and social issues that Uganda is a signatory to. Refer to the GROW Project ESMF for the list of Conventions and Protocols.

2.3 The World Bank Environmental and Social Standards

The Government of Uganda GROW project is funded by the World Bank. The project will, therefore, comply with the World Bank Environmental and Social (ESF). The project triggered all the ten standards of the ESF. ESS 9 is on Financial Intermediaries, which will be contracted by PSFU for onward granting and lending to subprojects. The World Bank ESF consists of 10 Environmental and Social standards listed below:

- i. **ESS 1:** Assessment and Management of Environmental and Social Risks and Impacts
- ii. **ESS 2:** Labor and Working Conditions
- iii. **ESS3:** Resource Efficiency and Pollution Prevention and Management
- iv. **ESS 4:** Community Health and Safety
- v. **ESS 5:** Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- vi. **ESS 6:** Biodiversity Conservation and Sustainable Management of Living Natural Resources
- vii. **ESS 7:** Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- viii. **ESS 8:** Cultural Heritage
- ix. **ESS 9:** Financial Intermediaries (FIs)
- x. **ESS 10:** Stakeholder Engagement and Information Disclosure

All the ten standards were triggered for the GROW Project, and as part of complying with ESS9, the PSFU, PFIs, and subproject beneficiaries of PFI loans and grants will also comply with all the other nine standards in a manner that is appropriate and proportionate.

2.4 PSFU Environmental, Social and Governance Policy



Environmental, Social and Governance Policy

1. Private Sector Foundation Uganda

Private Sector Foundation Uganda (PSFU) is the umbrella organization for the private sector in Uganda. Founded in 1995, PSFU mandate includes advocacy, capacity building and trade development. The PSFU has over the years, partnered with Government to implement several projects funded by development partners such as the World Bank.

2. The PSFU Environmental, Social and Governance Policy Statement

Aware of the global and national trends in environmental and social (E&S) risks and impacts, the role of good governance in accelerating development and shared prosperity, the national and international policy and legal framework for managing E&S risks and impacts and promoting good governance, PSFU shall:

- i. Mainstream environmental and social (E&S) risk and impact management in all projects, programmes, planning, budgeting and other operations of PSFU, based on the national and international policy and legal framework and international best practice,
- ii. Adhere to and uphold all the pillars of good governance in all its operations and advocate for members to pursue the same goal,
- iii. Not undertake or support projects and programmes that have environmental and social risks and impacts that cannot be reversed or risks and impacts that are difficult to mitigate or offset
- iv. Promote environmentally and socially sustainable business growth among PSFU members. This includes adoption of green practices and sustainable utilization of natural resources
- v. Ensure that all partners such as Financial Intermediaries that will participate in implementation of projects led by PSFU have Environmental and Social Management System (ESMS) for compliance with Government of Uganda environmental and social requirements (E&S) and those of the development partners where applicable. PSFU will train such partners in E&S requirements including establishing protocols for monitoring and reporting on compliance with the requirements,

- vi. Ensure transparent and gender inclusive employment of staff at PSFU who shall have clear written terms and conditions of employment which include non-discrimination, fair treatment and freedom of association. Child and forced labour shall be avoided,
- vii. Ensure the health and safety of its own employees and advocate with PSFU members and other partners to protect the health and safety of their employees at work,
- viii. Pursue a zero-tolerance policy against gender-based violence (GBV) including sexual exploitation and abuse (SEA) and sexual harassment (SH) in all its operations. Advocate for PSFU members to pursue a similar policy on this vice. Where GBV cases including SEA and SH occur, respond or advocate for responding to such cases in a manner that is consistent with principles of the survivor centred approach through established mechanisms such as the Ministry of Gender Labour, Social Development (MGLSD) GBV referral pathway.
- ix. Ensure or advocate for inclusion of vulnerable and marginalized groups (VMGs) in projects and programmes managed by PSFU, PSFU members and other partners. Such groups shall also be protected from adverse project or programme related E&S risks and impacts,
- x. Enhance the capacity of PSFU staff and advocate for PSFU members to also enhance the capacity of their staff in environmental and social risk and impact management and good governance based on the national policy and legal framework and international best practice
- xi. Advocate for or undertake evidence generation on the outcomes of effectively managing environmental and social risks and impacts and good governance on business growth, profitability and labour productivity
- xii. Ensure that PSFU environmental, social and good governance policy commitments are communicated to all staff and members of PSFU. This will include roles and responsibilities in implementation of the policy,
- xiii. Monitor and report on environmental, social and governance aspects of PSFU projects and programmes, advocate for self-monitoring and reporting to relevant entities on similar issues by PSFU members.

The PSFU Board of Directors shall oversee implementation of this policy. The Chief Executive Officer (CEO), PSFU is responsible for operationalizing and monitoring the policy and reporting to the Board.

Signed

Name: Stephen Asimwe (Mr)

Signature:

Date:

14/DEC/2023

Chief Executive Officer

2.5 PFI Environmental and Social Policy

Each PFI will be required to have an Environmental and Social Policy approved and signed at the highest level. The Policy must be sufficient to direct and guide the management of E&S risks and impacts associated with subprojects. This will be determined during the ESMS assessment of PFIs by PSFU. See the tool for ESMS assessment of PFIs in Annex 1.

3. ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT PROCEDURES

PSFU is committed to ensuring that all PFI funded sub projects under the GROW project are implemented sustainably taking into consideration environmental and social aspects. In this regard, PSFU has put in place E&S assessment procedures for impact prediction, mitigation, and management.

The environment and social assessment and management procedures will be undertaken in accordance with national laws and World Bank requirements. The following sections clarify management procedures and steps taken at PSFU to make sure that funded and implemented subprojects are environmentally and socially friendly.

3.1 Mainstreaming E & S into GROW Financing Facility (GFF)

In keeping with the PSFU Environmental and Social policy, E&S risk and impact management has been mainstreamed into the GROW Financing Facility (GFF) manual, tools, RFP for PFI, evaluation criteria for PFI proposals, subproject loan and grant applications to PFIs, etc. The following GROW project E&S instruments accessible from MGLSD and PSFU websites will guide the E&S mainstreaming:

- i. Environmental and Social Management Framework (ESMF)
- ii. Resettlement Policy Framework (RPF)
- iii. Vulnerable and Marginalized Groups' Framework / Plan (VMGF/P)
- iv. Stakeholder Engagement Plan (SEP)
- v. Labour Management Plan (LMP)
- vi. Environmental and Social Commitment Plan (ESCP)

3.2 Labour Management Procedures

A Labour Management Plan (LMP) applicable to MGLSD and PSFU implemented GROW project subcomponents was developed as one of the conditions for GROW project effectiveness. The LMP stipulates measures the MGLSD, PSFU, PFIs, and contractors employed under the GROW project must comply with. The LMP is consistent with World Bank ESF and national policies and laws. The PSFU has a Manual that guides its human resource management practices and is consistent with national policies and laws and the World Bank ESS2 on Labour and Working Conditions. All PSFU PIT staff so far hired have contracts that are consistent with the LMP, national labour policies and laws, and the World Bank ESF.

3.3 Procedures for Inclusion of VMGs

In keeping with the World Bank ESS7 and as required by the GROW Project ESCP, the MGLSD will develop the Vulnerable and Marginalized Groups Plan (VMGP). The plan to be developed by 31st March 2024 will include procedures for ensuring inclusion and non-discrimination of eligible VMGs (VMG Women Entrepreneurs) who include ethnic minorities, namely the IK, BATWA, TEPETH, and BENET. Other VMGs include PWD, female youth, the elderly, and PLHIV.

3.4 Emergency Preparedness Procedures

In addition to the recording and reporting environmental and social incidents and accidents, as detailed in section 6.4 of this ESMS, an Emergency Preparedness and Management Plan (EPMP) as per MGLSD guidelines has been developed for GROW project activities. The EPMP is aimed at ensuring that the project and sub project activities are prepared for various types of emergencies that are likely to threaten the safety or health of employees and the general public. The PSFU, PFIs, and subprojects will put in place EPMPs that are appropriate and proportional to the level of risk as revealed by the vulnerability assessment referred to in 3.3.2 below.

3.4.1 Specific Objectives of the Emergency Preparedness and Management Plan

The specific objectives are to:

- i. reduce human injury and damage to property and the environment in the event of an emergency,
- ii. prevent fatalities and injuries,
- iii. reduce damage to buildings, equipment and other infrastructure,
- iv. protect the environment and the community,
- v. accelerate the resumption of normal operations.

3.4.2 Vulnerability Assessment

The EPMP at PSFU, PFI, and subproject levels will be based on regular vulnerability assessment, indicating how likely an emergency may occur, What means are available to stop or prevent it, and what is necessary in case it occurs.

Guided by the vulnerability assessment, the EPMP at PSFU, PFI and subproject levels generally includes:

- i) An outline of all possible emergencies, consequences, required actions, written procedures and the available resources
- ii) pre-emergency preparations, provisions for alerting and evacuating staff, handling casualties and containing danger
- iii) Detailed lists of personnel including their home telephone numbers, their duties, and responsibilities
- iv) Floor Plans / layout of the building including evacuation routes and service conduits i.e. gas, power and water lines.

- v) **Resources:** The resources needed will vary from organization to organization and will also depend on the assessment of vulnerability. The PSFU Productivity Centre during construction and operation will require most of the resources listed below but most subprojects may not. The resources generally include:
 - Medical supplies, first aid kits, etc.
 - Auxiliary communication equipment
 - Power generators
 - Respirators
 - Chemical and radiation detection equipment
 - Mobile equipment
 - Emergency protective clothing
 - Fire-fighting equipment
 - Rescue equipment
 - Trained personnel in emergency management

3.4.3 Emergency Drills & Exercises

Emergency drills shall regularly be carried out. The drills provide an opportunity to practice emergency response and enhance the staff's ability to implement the facility's Emergency Plan when necessary. The more familiar people are with something, the better able they are to perform a task under pressure and in difficult circumstances.

3.4.4 Actions in Case of an Emergency

The possible required actions in case of an emergency include;

- i) Declare the emergency
- ii) Sound the alert

- iii) Evacuate the danger zone
- iv) Close main shut-offs
- v) Call for external aid; fire department, police, local authorities, neighbours, hospitals, etc.
- vi) Initiate rescue operations
- vii) Attend to casualties
- viii) Fight fire, if any

3.5 Environmental and Social Screening Procedures

Screening is the first step for environmental and social (E&S) assessment for all projects submitted to PFIs for financing.

The two-step exercise starts with the assessment of the eligibility of the proposed project for PSFU financing against its exclusion list of activities. See Exclusion List in Annex 2. These will be set out in the legal agreement between the PSFU and PFIs and between PFIs and the subprojects. The second step consists of the determination of the extent to which the project's environmental and social analysis is required. This exercise helps to identify environmental and social risks associated with the proposed subproject and assess the quality of the project design. It also facilitates informed decision making by providing a clear and well-structured analysis of the effects and consequences of the proposed actions and determines whether a full ESIA, Project Brief, / ESMP or simple screening tool is required before grant or loan approval.

E&S risk and impact screening will initially be done by sub projects seeking funding from PFIs. PFIs will review the screening and accompanying documents as part of the loan and grant application evaluation process. PSFU has developed a tool for E&S screening to be used by grant and loan applicants. The subproject E&S screening tool presented in Annex 3 will be shared with contracted PFIs that will, in turn, share the tool with loan and grant applicants. The tool will be shared during the information sharing session with shortlisted FIs invited to submit proposals to act as PFIs.

3.6 PSFU E&S Risk Classification

Before approving any sub project for funding and based on the screening results, sub projects will be categorized by PFIs based on their E&S risks and impacts. PSFU has developed an E &S risk categorization matrix in Annex 4.

3.7 PFI E & S Risk Classification

The E&S risk rating/ categorization system of PFIs under the GFF is not different from that used by PSFU. The risk rating/ categorization matrix developed by PSFU as per Annex 4 will be shared with PFIs for application to loans and grants (subprojects). The E&S risk rating/ categorization will be based on the E&S screening carried out by loan and grant applicants.

A sample of screening and categorization reports per PFI shall be reviewed by PSFU for quality assurance and timely technical support.

3.8 Environmental and Social Tools Preparation, Review, and Decision-Making Procedures

Subprojects (loan and grant applicants) will, using a simplified tool (see Annex 3) provided by PSFU/PFIs, screen their subprojects for E & S risks and impacts.

The screening for E&S risks/impacts will determine if the subprojects require full ESIA, project brief or simple screening report. The ESIA, project brief or ESMP study, if required, will be undertaken by consultants on behalf of the sub-projects and will be submitted by subproject proponents to NEMA for review, disclosure, and issuance of certificate if they meet requirements. Where required, Subproject proponents (Wes) may access technical and financial support for the preparation of the ESIA through BDS under subcomponent IC of the GROW project. Preparation of Screening reports is also the responsibility of subproject proponents and will be approved by District Environment Officers.

The PFI will undertake a two-stage review process regarding the E & S assessment of the application for a loan or grant. It will verify that the applicant's business activities are not among those on the exclusion list (See Annex 2). If the eligibility stage is passed, the PFI will also review the E & S documents, including NEMA approval /certificate where required and the district approval submitted by subprojects as part of the application for grants or grants.

If the E & S documents are authentic and the loan or grant is approved, the PFI will, as part of subproject monitoring, ensure that the agreed E&S risk and impact management measures as stipulated in the NEMA certificate or district approval of the screening report are complied with.

3.9 Environmental and Social Due Diligence

As stated above, PFIs will review E&S screening submitted by subprojects, and depending on the outcomes of E&S screening, further E&S Due Diligence (ESDD) may be required for some

subprojects to review any potential E&S risks associated with the business activities. The E&S requirements to meet the requirements of this ESMS and any necessary ESDD will be set out in the legal agreement between the PFI and the sub-borrower.

To provide support to PFIs in assessing the E&S risks and impacts during the subproject appraisal process, PSFU will review a sample of ESDD reports from each PFI for quality assessment. PSFU will also continuously review the capacity of PFIs to manage E&S risks and impacts and the ability to propose remedial actions to comply with E&S requirements.

3.10 Integrating Environmental and Social Requirements into Agreements

The agreements between PSFU and PFIs will include E & S requirements. This will also apply to agreements between PFIs and grant and loan beneficiaries. Requirements will include:

- i. Use all reasonable efforts to ensure the E&S performance of the sub-projects and PFIs follow the PSFU Environmental and Social Policy and requirements of development partners as applicable
- ii. Implement the E&S mitigation and management measures specified in the approved ESIA and NEMA certificate where applicable, project brief or screening report
- iii. Provide periodic E&S reports to PFIs (by grantees/loanees) and to PSFU by PFIs as scheduled and agreed format that will be provided by PSFU.
- iv. Report incidents and accidents in accordance with the Government of Uganda and World Bank requirements. A reporting format will be provided by PSFU.

4. STAKEHOLDER ENGAGEMENT AND GRIEVANCE MANAGEMENT

4.1 Stakeholder Engagement Under GROW Project

PSFU is committed to identify its stakeholders for every specific project such as GROW, provide timely and accessible information to them; and, give them the opportunity to express their views and concerns about the project and its impacts/risks at different stages in the project life cycle. This is to ensure meaningful, effective, and informed participation of stakeholders in the design and implementation of all PSFU programmes and projects. The project stakeholders, including loan and grant beneficiaries, individuals affected by the proposed project activities surrounding the community, and other interested parties, will be involved through information disclosure, consultation, and informed participation in a way proportionate to the risks and impacts on affected parties. This engagement will contribute to building trust, credibility, and local support, as well as increasing ownership.

Effective stakeholder engagement as an ongoing process should take into account the following important parameters:

- i. Identify stakeholders who would be directly or indirectly impacted by the project;
- ii. Be aware of what issues are important to each group; Engagement should be stronger and more frequent with groups that are severely affected;
- iii. If dealing with a representative for the group, make sure that the representative legitimately represents the interests of the affected groups and communities;
- iv. Engage with stakeholders in their own communities or places where they feel comfortable;
- v. Provide an opportunity for two-way dialogue that provides an opportunity to provide feedback to PSFU and PFIs;
- vi. Keep a record of questions, comments, and suggestions from stakeholders to adapt action plans and improve the project implementation process;
- vii. Report back on how their inputs have been considered;
- viii. Avoid generating expectations that will not be fulfilled;
- ix. Develop a GROW project specific Stakeholder Engagement Plan to guide the engagement process, where needed.

The aforementioned principles are upheld in the GROW project stakeholder engagement plan (SEP) disclosed on the MGLSD and PSFU websites. The SEP will guide GFF stakeholder

engagement activities at the level of PSFU, PFIs, and grant and loan beneficiaries, as summarized below.

4.1.1. Responsibility for Stakeholder Engagement

4.1.1.1 Overall Responsibility

Under the GROW project, MGLSD has the overall responsibility for execution and oversight over Stakeholder Engagement as per the GROW project stakeholder engagement Plan (SEP) and communication strategy. In this regard, MGLSD will provide oversight, technical support, and coordination to all stakeholder engagement activities under the GROW project in partnership with its implementing partner, PSFU.

4.1.1.2 Stakeholder Engagement by PSFU

The PSFU, under the overall guidance of MGLSD and in line with the overall GROW project Stakeholder Engagement Plan (SEP) and communication strategy, will plan and execute stakeholder engagement activities for the GFF. PSFU will also assess the stakeholder component of PFI ESMS and provide technical support to PFIs for enhancing their PFIs' capacity for stakeholder engagement. Monitoring and reporting on PFIs by PSFU, will include assessing PFI in executing stakeholder engagement. See chapter 6 for details.

4.1.1.3 Stakeholder Engagement by PFIs

PFIs will also execute stakeholder engagement activities as part of their tasks. This will include disseminating information to potential loan and grant beneficiaries under the GFF, including E&S requirements. PFI proposals submitted to PSFU to be selected as PFIs will include the plan for disseminating information to potential loan and grant beneficiaries and other stakeholders. PFIs will also provide technical support to loanees and grantees. Where E & S risks and impacts associated with activities of a PFI loan or grant beneficiaries are elevated, the PFI will work with the loan or grant beneficiary in stakeholder engagement. Monitoring and reporting on loan and grant beneficiaries of PFIs, will include assessing if loan or grant beneficiaries are executing stakeholder engagement as necessary.

4.1.1.4 Stakeholder Engagement by Loan and Grant Beneficiaries

Grant and loan beneficiaries whose PFI funded business activities (subprojects) are associated with risks and impacts will be required by PFIs to disseminate information to the communities in the subproject area of influence. This will include project activities and the associated risks, impacts, benefits to the community, and mitigation and enhancement measures. Information regarding where and how to report grievances associated with the subproject and how the grievances will be resolved will also be disseminated by the grant or loan beneficiary.

4.1.1.5 Disclosure of the ESMS

After endorsement and approval by PSFU Management, the PSFU ESMS shall publicly be disclosed to PSFU and PIT staff and other stakeholders by PSFU Management. This will be done through methods stated in the SEP, which include disclosure on the PSFU and MGLSD websites. All PSFU, MGLSD PIT, and other staff and stakeholders, will also be informed about any necessary changes in ESMS procedures. The PFI ESMS, after approval by PFI management and PSFU, will also be disclosed by PFI Management as above.

4.2 Grievance Redress Mechanism

In keeping with GOU and World Bank (ESS10) policies, the GROW project will establish a Grievance Redress Mechanism (GRM)

4.2.1 Definition of a Grievance

A grievance is a complaint, an issue, concern, problem, dispute, or claim (perceived or actual) related to the project that an individual, community, group, or institution wants the proponents and its implementers to address, redress, or resolve at any time of the project implementation or after project implementation. For World Bank funded projects such as GROW, the time frame for resolving a grievance is up to one year after the project or sub-project closure.

4.2.2 Definition of a Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) is a system or set of structures, procedures, or processes by which complaints, queries, or clarifications about a project are reported, received, attended to, and feedback provided.

One of the components of the GRM is the Grievances Redress Committee (GRC) which comprises individuals with the specific task of analysing grievances to provide a solution or recommend a referral.

4.2.3 Objectives of GFF Grievance Management

The objectives of GFF grievance management are to:

- i. Receive and resolve GFF related grievances in the most effective and efficient manner
- ii. Build trust between the GFF proponents and managers, such as PSFU and PFIs, and the stakeholders, including communities in general
- iii. Provide feedback to those affected by actions of GFF proponents and managers such as PSFU and PFIs on the resolution of their grievances.
- iv. Use grievances as feedback for improving GFF implementation arrangements.

4.2.4 Scope of GFF Grievance Management

The GRM will handle all GFF related complaints/grievances arising from actions and inactions of PSFU, PFIs, and grant and loan beneficiaries. The GRM at PSFU and PFI will be established as part of the ESMS.

4.2.5 Anticipated GFF Related Grievances

Anticipated grievances associated explicitly with the GFF include those related to:

- i. Grant and loan applicants not selected for funding
- ii. Delayed disbursement of approved grant and loan funds
- iii. Cancellation of approved grants and loans
- iv. Unexplained bank charges

- v. SEA, SH, and Demands for sexual favours before or during the process of accessing loans from PFIs
- vi. Adverse impacts on Community health, safety, and security caused by business activities of grant and loan beneficiaries
- vii. GBV associated with women economic empowerment

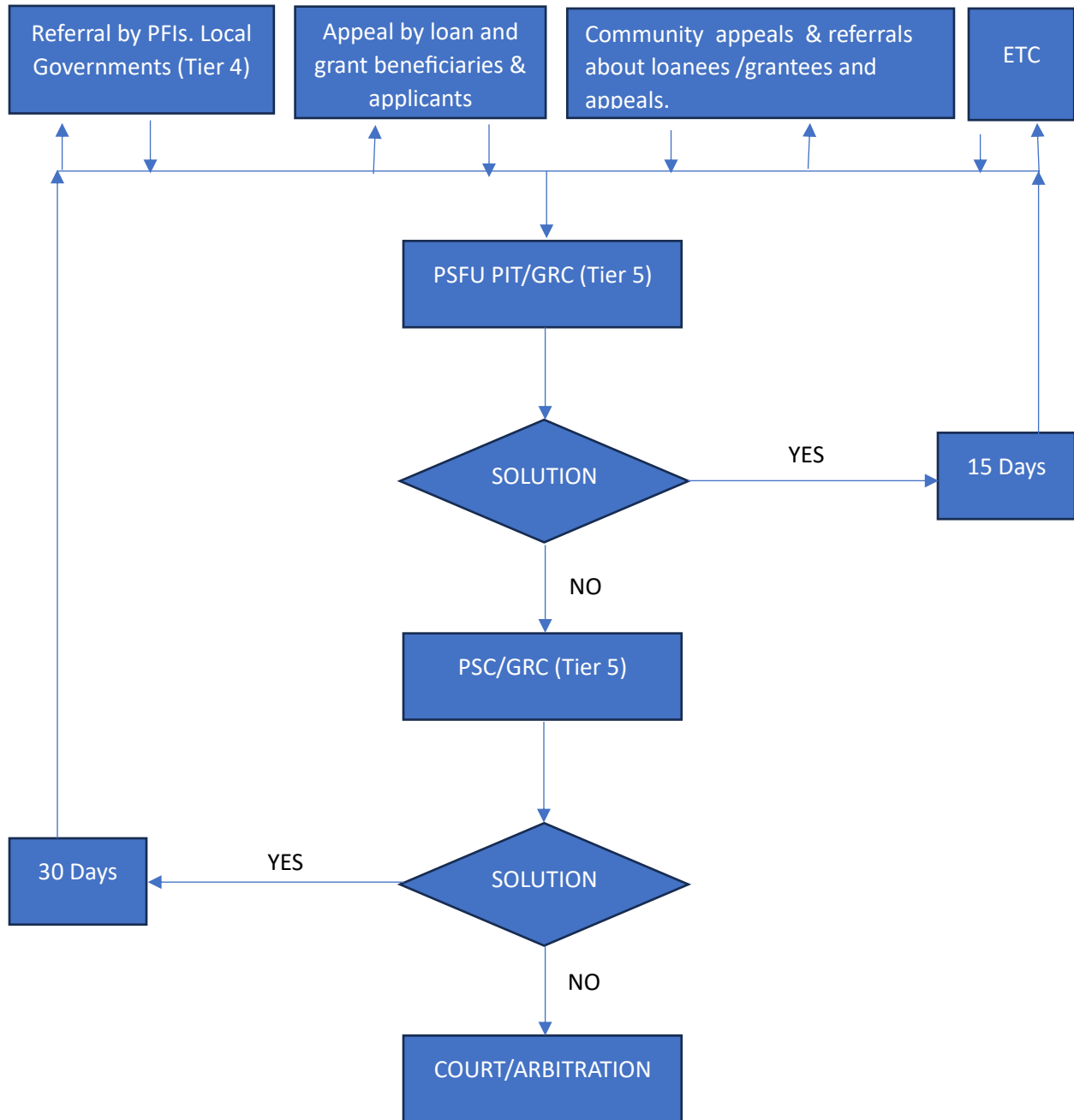
4.2.6 Responsibility for Grievance Management

As is the case with stakeholder engagement, MGLSD will have overall strategic responsibility for the management of grievances under the GROW project. PSFU will, however, have delegated responsibility to ensure grievances associated with the GFF are prevented and those lodged are managed effectively and efficiently.

4.2.6.1 *Management of Grievances at PSFU*

The PSFU PIT GROW Project Senior Management Team, headed by the Project Coordinator, will be part of Tier 5 of the GROW Project GRM. They will constitute a GRC at PSFU PIT. All GFF related grievances referred to PSFU PIT by complainants or referral by PFIs or Districts will be attended to by the GROW PIT Senior Management Team headed by the Project Coordinator (GRC). Where necessary, the PSFU PIT, acting as the GRC, will seek guidance from the PTC. The PSFU PIT will resolve any grievances received and give a written response to the complainant within 15 working days of receiving the grievance. PSFU PIT may refer grievances to PSC. Complainants not satisfied with the decision of the PSFU PIT (GRC) may also appeal to the PSC. Assessment of the PFI ESMS by PSFU will include assessment of the PFI GRM. The PSFU PIT will also be responsible for supporting PFIs to enhance the capacity of their GRMs. Training of PFI GRMs will include the SCA for managing GBV related grievances which include SEA and SH. In the figure below, uptake and resolution, referral, and appeal pathways for grievances at PSFU PIT are presented.

FIGURE 1: GRIEVANCE UPTAKE, MANAGEMENT, AND REFERRAL AT PSFU PIT



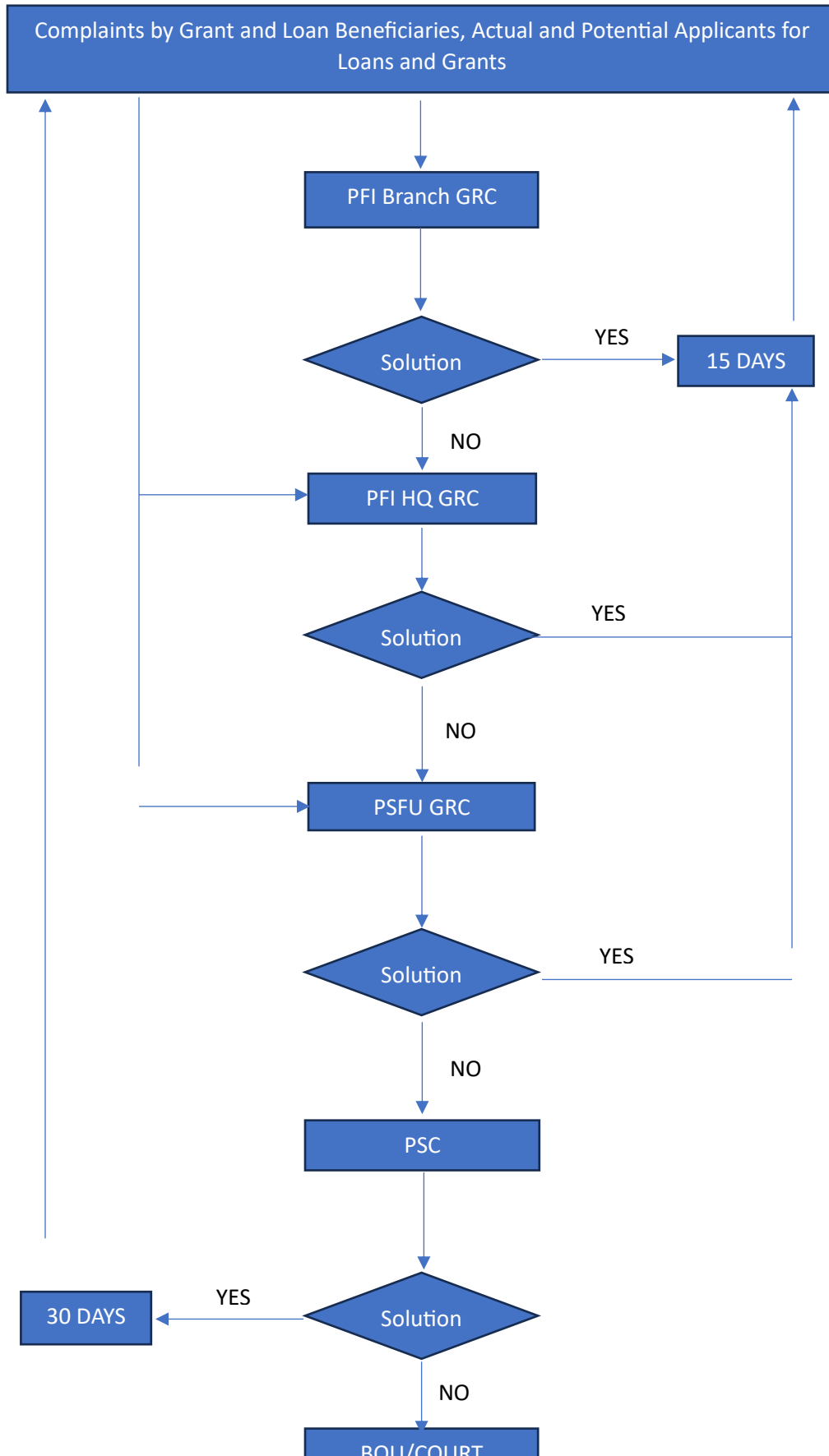
4.2.6.2 *Management of GFF Related Grievances at PFIs*

PFIs will establish GRMs to be the point of first instance for receiving and resolving grievances related to their actions or inactions. These will mainly be grievances by loan and grant applicants or potential applicants and loan and grant beneficiaries. Those with grievances about actions or inactions of grant and loan beneficiaries, such as suppliers and workers who have not been paid, will be advised through stakeholder engagement sessions to present grievances first to the loan and grant beneficiaries and, if redress is not achieved, to use tiers 1-4 of the District GRM. If such grievances are received by the PFI, the first option for the PFI is to refer the complainant to the relevant tier (Office) of the District GRM. For example, labour related grievances will be referred to the District Labour Officer.

To the extent possible, an existing organ of the PFI should take on the role of the GRC but will be oriented by PSFU on the management of GFF related grievances. The PFI GRM, which will be decentralized to PFI branches for some grievances, will resolve any grievances received and give a written response to the complainant within 15 working days of receiving the grievance.

Complainants who are not satisfied with the decision of the PFI GRM at the PFI branch level may appeal to the PFI GRM/GRC at the national level. If not satisfied with the decision of the PFI decision at the national level, complainants may appeal to the PSFU PIT. If not satisfied with the decision of the PSFU PIT, complainants may appeal to the PSC and thereafter to the Bank of Uganda or courts of law. If not satisfied with the decision of the PSC. The referral pathway for grievances related to actions or inactions of the PFI at HQ and branch levels is presented below.

FIGURE 2: UPTAKE, RESOLUTION, AND REFERRAL/APPEAL FOR GRIEVANCES LODGED TO PFIs BY GRANT AND LOAN BENEFICIARIES, ACTUAL AND POTENTIAL APPLICANTS FOR GRANTS AND LOANS



4.2.6.3 Management of Grievances by Loan and Grant Beneficiaries

Loan and grant beneficiaries will establish GRMs to be the point of first instance for receiving and resolving grievances related to their actions or inactions. The GRMs will be appropriate and proportionate to the level of E &S risks and impacts associated with the business activities of the Loan and grant beneficiaries and the expected number of grievances.

To the extent possible, an existing organ of the Loan and grant beneficiaries should take on the role of the GRM but will be oriented by the PFIs on the management of GFF related grievances. Training will include the SCA for referral of GBV related grievances, which include SEA and SH, to providers of the minimum package services in the MGLSD GBV referral pathway.

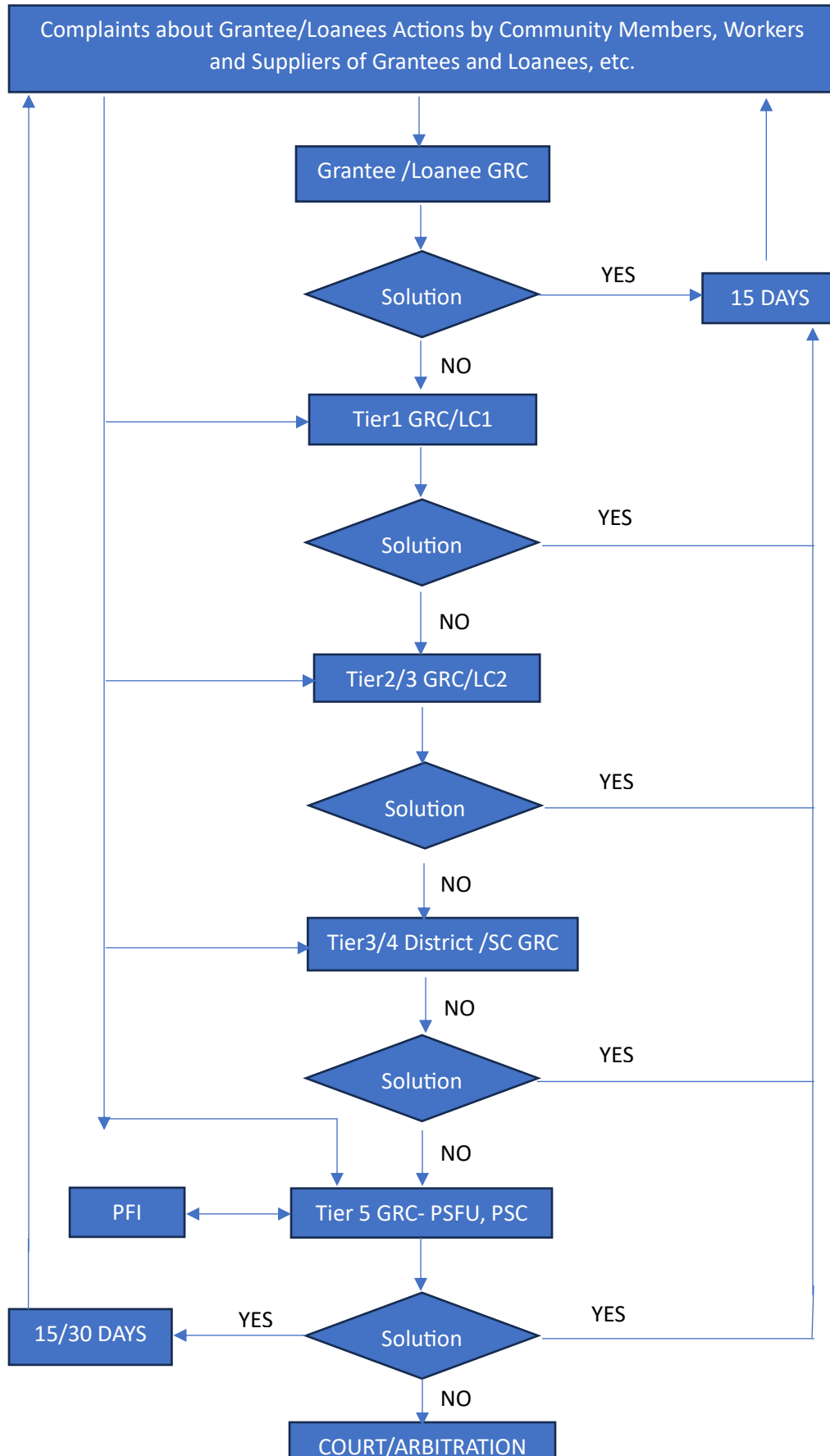
The GRM will be disclosed to stakeholders in the subproject area of influence by loan and grant beneficiaries. Disclosure will include where and how to report grievances and how the grievances will be resolved.

The GRM of Loan and grant beneficiaries will resolve any grievances received and give a written response to the complainant within 15 working days of receiving the grievance. Complainants not satisfied with the decision of the GRM may appeal to Tiers 1-4 of the GROW project GRM as summarized in the figure below. Tiers 1 is the (village) LC1, Tier 2 is the Parish (PDM Technical Committee), Tier 3 is the subcounty and Tier 4 is the district level.

4.2.6.4 Management of Grievances in RHDs and Refugee Resettlements

In RHDs, GFF related grievances will follow the channels indicated above (PSFU and PFI). The exception is the management of GFF related grievances specifically in Refugee Resettlements where the existing grievance management system will apply as it already does in the management of grievances such as GBV and other issues. For example, all non criminal cases of GBV and other grievances triggered by or related to GFF and affecting refugees in the Refugee Resettlement, will be attended to by the Refugee Welfare Committee (RWC). The RWC has 3 tiers RWC 1-RWC 3. Issues not resolved at RWC 1 are escalated up to RWC 3. Issues not resolved at RWC 3 are escalated to the Refugee Department at the Office of the Prime Minister. In the case of GFF, issues (not about PFIs) not resolved at OPM will be escalated to PSFU PIT, with the final referral or appeal level being the PSC, after which one may seek legal redress through courts of law. See the process at PSFU and PFI for managing grievances about the actions or inactions of PFIs, which will also be followed when refugee women grant and loan applicants or beneficiaries have grievances about PFIs. As part of their ESMS, PFIs will be required to demonstrate a GRM that is sensitive to the unique circumstances of refugees.

FIGURE 3: UPTAKE, RESOLUTION, APPEAL, AND REFERRAL OF COMPLAINTS ABOUT GRANTEE/LOANEE ACTIONS BY COMMUNITY MEMBERS, WORKERS, AND SUPPLIERS OF GRANTEES AND LOANEEES, ETC



4.2.7 The Grievance Value Chain

At each tier or entity, grievance management will be a two-stage process. This will take into account the principle of proportionality and appropriateness with simple grievances not requiring much processing. As appropriate, the first stage will involve the following main steps:

- a) Uptake of grievances;
- b) Screening of grievances; and
- c) The GRC Hearing Procedure.

The second stage will involve the following steps:

- a) Implementing the agreed actions to resolve the grievance
- b) Closure of grievances;
- c) Grievance monitoring data base, and
- d) Feedback to complainants and other stakeholders

The steps above are summarized below.

i. Uptake of Grievances

Any aggrieved party may lodge a grievance or complaint. The Focal Person will receive grievances and complaints by email, telephone, letter, WhatsApp, or walk-in and assess them to determine if they are related to GFF and within the mandate of the entity to which they have been submitted. Grievances not related to GFF will not be received, but guidance will be provided to “complainants.”

For written grievances, the complainant who can read and write will complete a grievance registration form (See Annex 6) available at designated PSFU, PFI, grant and loan beneficiary offices, and website(s). An example of a grievance log has been provided (See Annex 7). Details of grievances or complaints logged verbally will be captured per the particulars of the grievance log.

The Grievance Officer/Focal Person for grievances will review the received grievances and record them in a Grievance Register. To simplify the process of lodging a grievance, a variety of grievance log-in channels will be used, such as a dedicated phone number, websites, e-mails, in-person, anonymous, and suggestion box, among others.

A copy of the logged grievance will be signed by the aggrieved person and the Grievance Officer/Focal Person for Grievances.

ii. Grievance Screening

All grievances will be screened by the Focal Person for Grievances at PSFU, PFI, grant, and loan beneficiary levels to ensure they are appropriately managed. This includes being channeled to the right offices. Some grievances may be resolved and responded to without a meeting of the GRC by the responsible action officers, while others may need to be referred to other tiers of the GRM. Information needs for resolving grievances, and the need to work with other partners in resolving different grievances will also be determined at this stage. The urgency of addressing different grievances will also be assessed. This will determine which grievances will be attended to first, keeping in mind the maximum time frame for addressing all grievances received.

iii. The Grievance Resolution Process

Once a grievance has been logged and screened, the GRC will be engaged to define a solution to the grievance. The GRC at all levels will be fair, objective, transparent, and gender sensitive in resolving grievances. Retaliation of any kind against a complainant will not be tolerated. Where necessary, confidentiality will be observed, especially when requested by the complainant even when submitting a grievance or complaint to the Focal Person or any other entry point selected by the complainant. Anonymous grievances will, therefore, also be investigated by the GRC, and appropriate action will be taken. Internal procedures of the GRC include but are not limited to reviewing reports and other relevant documents and interacting with the complainant and other parties who may assist in the process of finding a solution. Where necessary, the GRC will consult with officials of Government Ministries, Department and Agencies (MDAs), and other parties to ensure a well-informed decision is made. For each grievance, the GRC will determine whether additional investigations are warranted. If so, additional information will be collected before the next GRC meeting.

The GRC members will prepare and sign the meeting minutes, including their actions for resolving the grievance. The GRC, through the appropriate office, will communicate the decision of the GRC to the complainant within the stipulated time frame upon receipt of the grievance.

iv. Implementation of the Agreed Actions

The solution to the grievance agreed with the complainant will be implemented. Some actions agreed on may require working with other partners, hence the need to build partnerships with state and non-state actors as part of the strategy for managing GFF related grievances. The time frame for implementing the agreed actions will depend on the nature of the actions. This should, however, be done as soon as possible.

v. Closure of Grievances

A grievance will be considered “resolved” or “closed” when a resolution satisfactory to both parties has been reached and after corrective measures have been successfully implemented. When a proposed solution is agreed upon between the PSFU, PFI grant or grant and loan beneficiary, and the complainant, the time needed to implement it will depend on the nature of the solution. Once the solution is being implemented or has been implemented to the satisfaction of the complainant, a complaint closure form will be signed by both parties and appropriately witnessed. It will (closure form) state that the complainant considers his/her grievance closed. The grievance will be archived in the PSFU, PFI, or grant and loan beneficiary grievance database. PSFU, PFI, grant, and loan beneficiary may, however, consider the grievance closed if all the necessary procedures have been followed even when the complainant has not agreed but has **not lodged an appeal**. Grievances where an appeal has been lodged cannot be considered closed.

vi. Grievances of a Criminal Nature

Grievances of a criminal nature, such as SEA, will **NOT** be resolved by PSFU, PFI, loanee, and grantee GRCs. Such grievances will be referred to law enforcement agencies of the Government. In addition, non-criminal GBV related grievances will be managed in a manner that is consistent with the principles of the survivor centred approach (SCA). The SCA also applies to the referral of GBV cases of a criminal nature to providers of the Minimum Package of Services (MPS) in the MGLSD GBV Referral pathway. Confidentiality and survivor self-determination are among the key pillars of the SCA. The MPS includes psychosocial support, medical care, safety/ and security, and legal /justice for GBV survivors who, on their own will, opt for legal redress. The District Probation and Welfare Officer will be engaged as soon as possible on issues related to the violation of children’s rights, including Sexual Violence Against Children (SVAC). The MGLSD, PSFU, and PIT E&S teams will ensure that the training of GRMS/GRCs includes the basics of the SCA as soon as the GRMs/GRCs are put in place at all levels.

vii. Grievance Monitoring and Data Base

The GRM focal points at PSFU, PFI, and loan and subproject levels will be responsible for ensuring the GRM is monitored and reported on. Grievance monitoring and reporting will be included in periodic reports of PSFU, PFIs, and subprojects. Refer to chapter 6 for the details.

GROW project MIS at MGLSD and PSFU will have a provision for a grievance database of all GFF-related grievances. The database will contain the name of the individual or organization lodging a grievance (if the complainant did not request confidentiality), the date and nature of the grievance, any follow-up actions taken, the solutions and corrective actions implemented by any relevant party, the outcome and how and when this decision was

communicated to the complainant. Codes (**not names**) to be used for GBV survivors who are attended to, including those referred to providers of the MPS.

viii. Feedback to Complainants and Other Stakeholders

This will involve the users of the GRM and the public at large being informed about the results of investigations and the actions taken on grievances. This will be done as part of ongoing stakeholder engagement by PSFU, PFIs, grant, and loan beneficiaries using approaches and within timelines stated in the overall GROW Project Stakeholder Engagement Plan (SEP) and the GFF Communication Plan to be developed as part of the PSFU ESMS.

4.3 Disclosure of the GRM

During stakeholder engagements referred to in 4.1 above, PSFU, PFIs, and PFI loan and grant beneficiaries will disclose the GRM and explain to stakeholders the alternative ways of lodging grievances and how grievances will be resolved.

The GRM procedures will also be disclosed through the Project's website and advertised on billboards/posters in each district/sub-county office, clearly visible to the public. Information material on GRM will also be made available at different locations in districts/sub-counties, as well as refugee resettlements covered by the project.

The GRM will be disclosed as early as possible, with reminders throughout the Project or subproject lifecycle. It will be disclosed in a culturally appropriate manner in English and other local languages in respective districts in a format that is understandable to all stakeholders, stating the following specific information:

- i) Anyone can raise complaints, grievances, concerns, ask questions, or make comments or suggestions related to the Project;
- ii) Anyone can contact the GRM focal point using the GRM focal point's contact details provided;
- iii) the GRM focal point is responsible for receiving complaints, grievances, concerns, questions, comments, and suggestions and for responding to the person or generally via the Project's website on an anonymous basis;
- iv) the GRM focal point will confirm receipt of the complaint, grievance, concern, question, comment, or suggestion, either providing a preliminary answer or confirming the expected timing to provide an answer and
- v) by using this grievance mechanism, the complaint, grievance, concern, question, comment, or suggestion with respect to GFF will be received, and every effort will be made to answer the complaint, grievance, concern, question, comment, suggestion and engage with the complainant to mitigate any complaint, grievance, concerns to the extent possible.

Disclosure of the World Bank Grievance Redress Service (GRS): The World Bank's Grievance Redress Service (GRS) will also be disclosed.

Any Project or GFF Affected Person may submit complaints to existing PSFU, PFI project-level, or community level grievance redress committees, through the various grievance redress mechanisms or the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project related issues. Project workers may also submit their complaint to the World Bank's independent Inspection Panel, which determines whether harm occurred or could occur as a result of the World Bank's non-compliance with its policies and procedures.

Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projectsoperations/products-and-services/grievance-redressservice>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

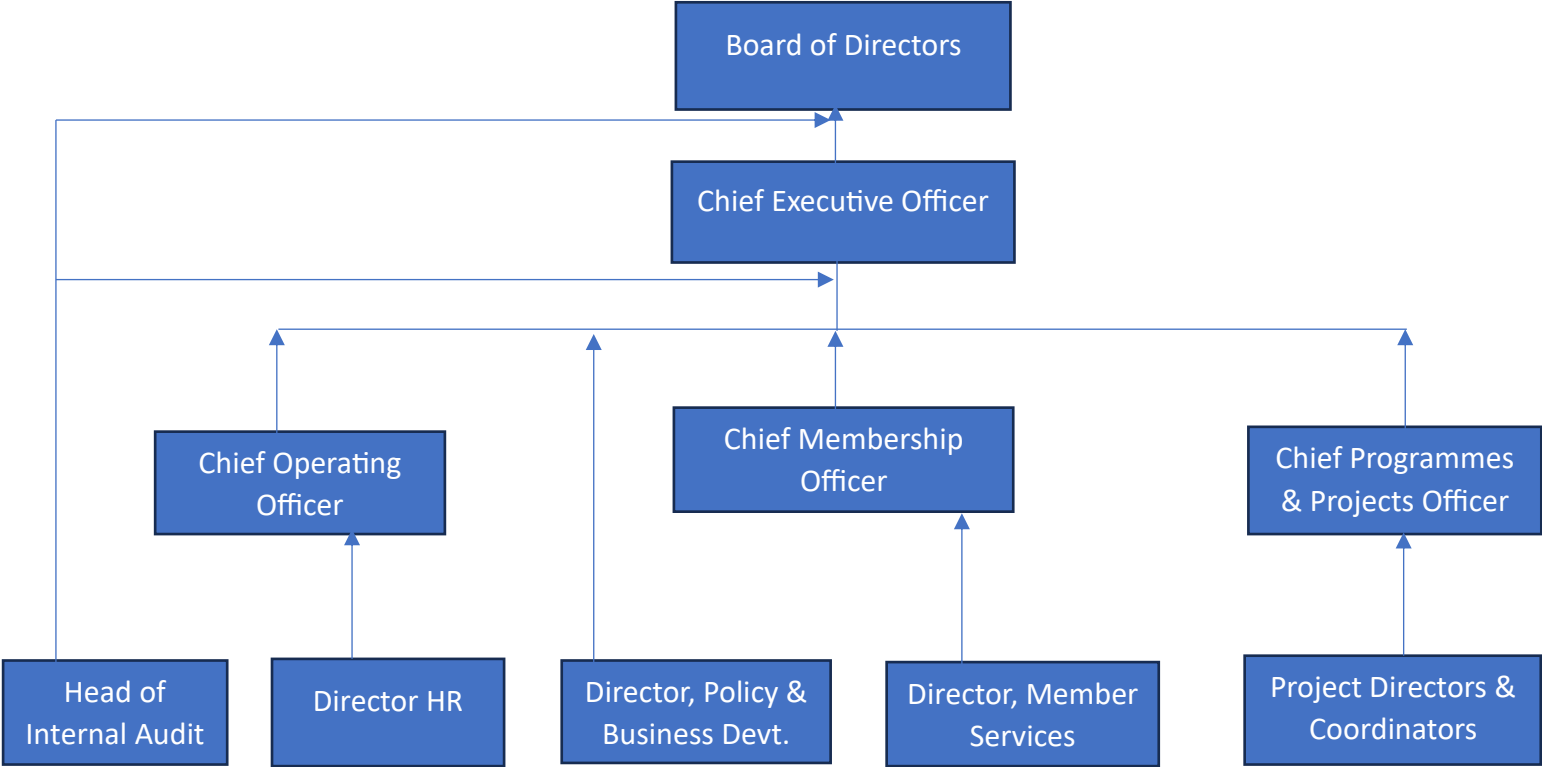
5. ORGANIZATIONAL CAPACITY AND COMPETENCY

5.1 PSFU E&S Management Roles and Responsibilities

5.1.1 PSFU E&S Organizational Structure at Board and Management Level

The implementation and management of the ESMS will follow the approved operational management structures of PSFU as stipulated in PSFU governance and operational manuals. At the PSFU policy level, the Board is responsible for providing strategic oversight for the implementation of the Environmental and Social Policy. The CEO, PSFU is responsible for operationalizing the policy through the PSFU management structure. The Head of HR at PSFU is specifically responsible for ensuring the implementation of HR policies in compliance with the Government of Uganda's employment policies and laws. The Organogram for ESG at PSFU is presented below.

PSFU Organogram for ESG



5.1.2 E&S Organization Structure at GROW Project Management Level

5.1.2.1 Staffing

The PIT at PSFU is responsible for implementing GROW project subcomponents 2B and 2C in a manner that complies with the Government of Uganda’s environmental and social policies and the World Bank ESF, specifically ESS9. The PSFU PIT is headed by the Project Coordinator, whose terms of reference include ensuring the Government of Uganda and World Bank E&S policies are complied with.

Specifically, the PIT has employed an Environmental Specialist, a Gender Specialist, and a Social Development Specialist whose day-to-day roles and tasks are focused on ensuring the GROW project components under PSFU, namely 1C, 2B, and 2C, are compliant with relevant Government of Uganda environmental and social policies and the World Bank ESF. The tasks of the three specialists include supporting PFIs and the subprojects under PFIs to comply with the Government of Uganda’s environmental and social policies and the World Bank ESF. This includes capacity building. The details of the PSFU E&S team terms of reference are attached in the table below.

Position	Roles and Responsibilities
Environmental Specialist	<p>Key Result Areas:</p> <ul style="list-style-type: none"> i) Development and implementation of systems and processes for environmental and social due diligence under GROW and ensuring their adequacy and compliance at all levels. ii) Reviewing and strengthening existing data and data bases on environment at agency levels aimed at ensuring their adequacy for efficient and effective reporting on the implementation of the safeguards. iii) Developing and reviewing the environment safeguards screening, reporting, and other tools and forms to be used by GROW. iv) Ensuring the assessment of the performance of agencies, enterprises, and contractors on environmental safeguards compliance. v) Preparation of input to the quarterly and annual reports; vi) Leading GROW environment dialogue and strengthening PSFU knowledge and capacity to implement environmental

Position	Roles and Responsibilities
	<p>measures. This will include training the relevant PSFU units and other implementers on mainstreaming environmental aspects in the development projects.</p> <p>Duties and Responsibilities:</p> <ul style="list-style-type: none"> i) Support the development, maintenance, and operation of the environment compliance monitoring system, including reporting the progress of implementation of environment management. ii) Provide technical guidance to Private Sector Foundation Uganda/GROW and its implementing agencies and other stakeholders on ensuring aspects of Environment compliance measures are implemented and adhered to. iii) Undertake stakeholder engagement and consultations on all sub-projects. iv) Support the collection, analysis, and utilization of environmental information at the National and enterprise level v) Coordinate and Support preparation of periodic project progress reports with adequate input on project performance on environment guidelines. vi) Undertake periodic training and capacity building of key GROW implementers at National and enterprise levels on implementing environmental guidelines under the project, including orienting them on the application of the Environment Management Framework (EMF) vii) Ensure adequate environment records and documentation are kept (including photographs) of works and sub projects and adequate documentation of stakeholders consultations and land affirmations viii) Assist in developing ToR for the environmental impact assessments, environmental audits and management plans for specific GROW sub components. ix) Advise Management on strategies for strengthening the implementation of environmental measures

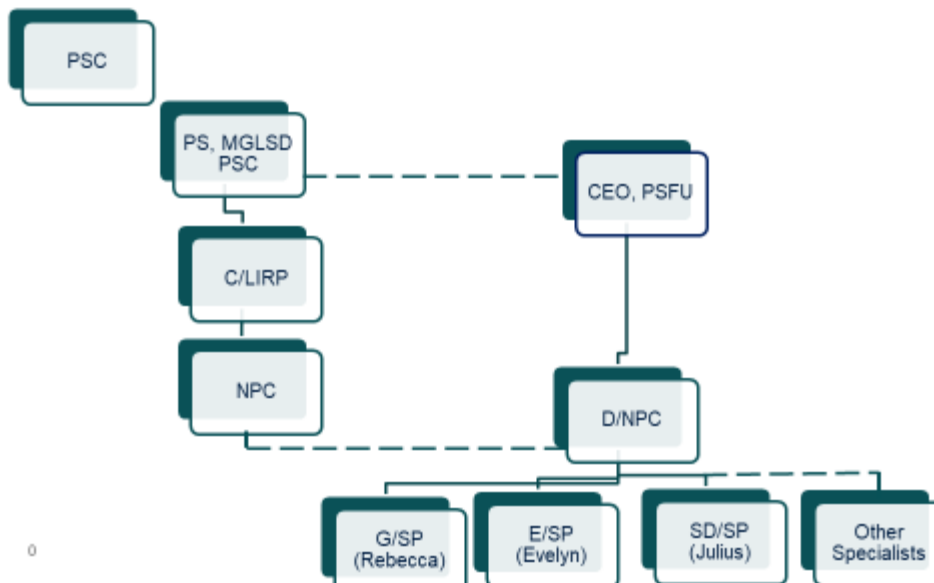
Position	Roles and Responsibilities
	<ul style="list-style-type: none"> x) Generate specific outputs (deliverables) as determined from time to time in the respective projected work plans for each quarter xi) Undertake environmental monitoring and supervision of project works, including the development of monitoring checklists and compilation of progress reports to ensure compliance with the relevant environmental requirements. xii) Support mainstreaming environmental requirements, including OHS compliance, into the bidding documents and training.
Gender Specialist	<ul style="list-style-type: none"> a) Define critical gender issues with regard to the GROW Project components and interventions. b) Take the lead in the initiation, implementation, and monitoring of activities on the establishment and strengthening of Women Entrepreneurs Platforms at national, regional, and sub-regional levels and support other specialists to address gender concerns across all project components. c) Oversee the implementation of community mobilization and mindset change to mitigate the risks of GBV and engage male champions in gender transformative activities. d) Take lead in initiation, implementation and monitoring of project activities on women economic empowerment. e) Track all gender related information and issues for all GROW project components and ensure data is entered into the MIS. f) Support the PIT at PSFU in identifying policy and regulatory constraints for further consideration and action on policy reforms. g) Support the PIT at PSFU in the implementation of activities under business development, including review of the Core Course curriculum, skills training, and apprentice program. h) Take the lead on activities under the infrastructure sub-component relating to gender inclusion and childcare. i) Offer direct and remote technical support to the project team at the national and district levels, including ensuring women’s economic empowerment activities are undertaken in line with the project core values, principles and approaches, international standards, and best practices. j) Take part in the development and review of the Project Operations Manual and other necessary documents and manuals. k) Participate in the preparation of consolidated project Annual Work Plans and Budgets.

Position	Roles and Responsibilities
	<ul style="list-style-type: none"> l) Support the development and implementation of the GROW's communication strategy. m) Review safeguard instruments and reports under the project. n) Coordinate with the Gender Specialist of MGLSD.
Social Development Specialist	<ul style="list-style-type: none"> a) Take lead in the implementation of all GROW project social risk management related agreed actions as it is in the ESCP. b) Prepare, Adopt, and Implement ESS 10, Stakeholder Engagement Plan (SEP) in accordance with the Stakeholder Engagement Framework (SEF). c) Implement the Resettlement Policy Framework. d) Identify and mitigate project related social risks including in Refugee Host Community locations and other RHC beneficiaries. e) Review the planning and procurement procedures to ensure that (i) the social requirements are included and costed in contract documents, (ii) social safeguards milestones are included in the contractor's certificates for payment, and (iii) social conditions of approval on the NEMA certificate and other statutory approvals are well considered. f) Support the development and implementation of a structured project stakeholder engagement plan with clear timelines and approaches. g) Take the lead in the preparation and implementation of the Grievance Redress Mechanism. This will include support to the establishment of GRCs and enhancing their capacity to record, report, resolve, refer, and follow up on closure of grievances related to the project, including those resulting from involuntary resettlement and injurious affection due to projects. h) Ensure the clarity, robustness, and completeness of necessary social mitigation plans, including RAPS, LRP, LMP, VMGP, and other social action plans. i) Sensitize staff and other Stakeholders, including contractors and communities, on the social Safeguards requirements for GROW Project infrastructure projects; including the rights and obligations of all the parties involved. This will include sensitization on the importance of identifying and addressing all social issues that may negatively result from project implementation. j) Support local governments and other implementing agencies in the dissemination of information regarding addressing the social

Position	Roles and Responsibilities
	<p>impact of infrastructure projects to users and residents prior to, during, and after the execution of works</p> <ul style="list-style-type: none"> k) Participate in all site meetings and provide technical guidance on the above-mentioned areas among other social related concerns. l) Prepare regular and ad-hoc social reports for management action and discuss with the project management, implementing agencies, and World Bank as may be required. m) Contribute to the development of new tools and methodologies for addressing social risks and impacts in all related projects. n) Carry out baseline, beneficiary satisfaction, and social accountability/citizen engagement surveys in project areas. o) Plan and take part in training key technical staff of PSFU and participating Local Governments in social management and Resettlement Policy Framework management, Child Protection, and gender responsiveness. p) Take part in the development and review of the Project Operations Manual and other necessary documents and manuals. q) Supervise, appraise, and provide guidance to staff supporting the social safeguard function under the project. r) Perform any other duties as may be assigned from time to time by the Deputy Project Coordinator.

In addition, the PSFU PIT for GROW Project has employed an M&E Specialist whose terms of reference include supporting the identification of E&S indicators and development of monitoring and reporting templates for different implementers and beneficiaries including PFIs, loans, and grant beneficiaries. The M&E Specialist will also support the training of PFIs in E&S reporting. The PSFU PIT reporting arrangement for the E&S team is presented below.

GROW Project Environment and Social (E&S)Team at PSFU P.I.T.



5.1.2.2 Short Term Consultants

The PSFU has a provision for short term consultants who will be engaged from time to time based on identified needs, to provide technical support to PSFU or PFIs in E&S Risk and impact management.

5.1.3 District Community Development Officers (DCDOs)

The DCDOs, under the overall leadership of the CAO, are the focal points for GROW at the District level. Among the terms of reference for the DCDO, is the coordination of implementation of measures for mitigating project related E&S risk and impacts at the district level. The DCDOs will work closely with other officers to ensure GFF and overall GROW project compliance with E&S requirements. The officers include the District Environment Officer, Probation and Welfare Officer, the District Health Officer, the District Labour Officer, the District Commercial Officer, the District Planner, the Community Development Officer, Culture, the Community Development Officer, and Gender. Other entities such as FBOs and CBOs may be coopted when deliberating on GROW including GFF related E&S risk and impact management.

5.1.4 Mindset Change NGOs

Mindset change NGOs will be hired under the GROW project to assist in addressing social –cultural norms impeding women enterprises from growing. PSFU will also work through these NGOs to address E&S risks and impacts associated with GFF loans and grants accessed from PFIs.

5.1.5 Actors in MGLSD GBV Referral Pathway

Actors in the MGLSD GBV Referral pathway will also be mobilized by DCDOs, PSFU PIT, and the Mindset Change NGO to play a role in mitigating E&S risks and impacts, such as GBV associated with GROW project activities, including those associated with grants and loans given out by PFIs. The actors comprise MDAs, including local government departments, CSOs, FBOs, and CBOs. See MGLSD GBV Referral Pathway in Annex 8.

5.2 Training in E&S

The PSFU PIT E&S team has been trained in the World Bank ESF and other areas relevant to E&S risk and impact management.

Additional training in E&S has been planned for PSFU PIT E&S Teams, PFIs, Grant and Loan Beneficiaries in E&S as follows:

- i) **PSFU PIT and other Staff:** Training to enhance the capacity of PSFU PIT and other personnel in E&S risk and impact management is one of the commitments in the GROW project ESCP. Areas of training include:
 - World Bank ESF
 - Implementation of the Stakeholder Engagement Plan (SEP), including stakeholder mapping and its monitoring and evaluation
 - Implementation of Labour Management Procedures (LMP)
 - Implementation of Grievance Redress Mechanisms (GRM)
 - Employee’s health and safety, including First Aid courses for employees
 - Emergency preparedness and response
 - Implementation of Environmental and Social risks management practices identified by Project actors during Project implementation.
 - SEA/SH and GBV including GBV referral pathway, survivor centered approach
 - HIV/AIDs
 - Incident or accident reporting procedures
 - Implementation of the VMGP (FPIC, Grievance Management)

- Child labor and child protection restrictions.
 - COVID-19 Prevention and Mitigation Measures
- ii) **PFI, grant, and loan beneficiaries:** Areas of training for PFIs, grant, and loan beneficiaries include:
- General World Bank ESF requirements.
 - ESMS requirements
 - Implementation of SEP, LMP, and GRM, and oversight
 - E&S risk screening and mitigation
 - Gender and GBV aspects in the Project.
 - SEA/SH
 - Child labor and child protection.
 - Incident or accident reporting procedures
 - Monitoring and reporting on ESMS implementation
 - Measures for prevention and mitigation of communicable diseases such as COVID-19, EBOLA, and HIV/AIDS

A training plan with training materials will be developed and implemented. As part of their ESMS, PFIs will be required to share information on completed and planned training in E&S.

5.3 Information Sharing on ESMS Before PFI Proposal Submission

All financial institutions that will be requested to submit proposals after evaluation of their expression of interest (EOI) will, at least 3 weeks before the proposal submission date, be invited for an information session. During the session, information on PFI ESMS, as required by the RFP, will be shared. This is to ensure all potential applicants have the exact and accurate information on the ESMS and are given ample time to prepare good proposals and put in place ESMSs by the time proposal evaluation, including due diligence, is done.

5.4 Funding for E&S

5.4.1 PSFU Budget for E&S

The PSFU PIT has a provision in its GROW budget for training PFIs in E&S risk and impact management, among other areas.

5.4.2 Innovation Grants

Enhancing capacity in E&S risk and impact management is one of the areas that PFIs may seek support for from PSFU under subcomponent 2C innovations grants.

5.4.3 Business Development Services for E&S Compliance

GROW is an integrated project with options for the referral of beneficiaries under one subcomponent to services under other subcomponents. In this regard, beneficiaries under the GFF who may require support to comply with E&S requirements, including obtaining NEMA and other E&S certificates will be referred to business development Services (BDS) under the subcomponent IC (Sector Specific Skilling) of the GROW project. Such services will be paid for by the project (PSFU) on behalf of loan and grant beneficiaries.

6 MONITORING, REPORTING and ESMS REVIEW

This chapter outlines the monitoring, reporting, and notification associated with the implementation of the ESMS at PSFU, PFI, and at the level of grant and loan beneficiaries. PSFU and PFIs will work closely to identify and agree on the monitoring and reporting requirements and procedures. In this regard, PSFU will design E&S monitoring systems with easily measurable indicators and E&S performance criteria for supervising the implementation of the relevant E&S instruments during all phases of GFF activities implemented through PFIs.

6.1 Monitoring and Reporting by PSFU

PSFU will develop and maintain a regular program and procedures for the supervision of PFIs under the GFF, based on a clearly defined set of E&S performance criteria included in the PSFU ESMS and agreements with PFIs. PSFU will periodically review the adequacy and implementation effectiveness of its own and PFIs' ESMSs, including the processes and the results of the E&S due diligence conducted by the PFIs on sub projects (PFI grant and loan beneficiaries)

PSFU will prepare and submit quarterly reports to the World Bank on the E&S performance of subprojects financed through PFIs. The report will include information on (i) risk category of subprojects funded, (ii) information on E&S issues associated with subprojects, (iii) E&S performance of sub-projects at PFI, (iv) changes in risk categorization, (v) cases of non-compliance, (vi) corrective action taken, (vii) pending E&S issues and reason, as well as (viii) way forward and recommendation. The report will also provide information on challenges encountered with the PSFU ESMS implementation and any revisions made to address shortcomings in the process.

Following the assessment of the ESMS of PFIs, an Environmental and Social Action (ESAP) elaborating how the PFI will address identified gaps in its ESMS will be developed for review and approval by PSFU. The approved PFI ESAP will form part of the basis for monitoring and reporting on the PFI ESMS by PSFU.

6.2 Monitoring and Reporting by PFIs

PFIs will have the primary responsibility to monitor and report on their ESMS and the E&S performance of subprojects funded through the GFF. On a quarterly basis, PFIs will report to PSFU on the implementation and performance of the ESMS based on agreed indicators. The report will cover the six parameters of the PFI ESMS. In addition, the PFI quarterly report to PSFU will include results or findings of PFI monitoring of subprojects (grant and loan beneficiaries). See Annex 5 for the tool that will be used to monitor the E&S performance of subprojects and

thereafter report to PSFU. The PFI E&S monitoring of subprojects will not be an audit but support supervision carried out jointly by PFI E&S and Loan and grant beneficiaries to identify progress and remedial action where necessary. The PSFU E&S team will, where necessary, also provide ongoing technical support to PFIs in supporting loan and grant beneficiaries to ensure compliance with E&S requirements.

6.3 Monitoring and Reporting by Grant and Loan Beneficiaries

It is the responsibility of grant and loan beneficiaries to comply with E&S requirements and to manage E&S risks and impacts associated with their business activities. This will be included in loan agreements they will sign with PFIs. However, as stated in 6.2 above, PFIs and loan and grant beneficiaries will jointly monitor subprojects/business activities for E&S compliance. Loan and grant beneficiaries will also be linked to district level resources such as the officers responsible for health, environment, labour, culture, probation, and welfare, among others. This will enhance their compliance with E&S requirements. See Annex 5 for the template that, will be used by PFIs and subprojects to jointly monitor the E&S performance of subprojects and report to PFIs.

6.4 Reporting Incidents and Accidents

The GROW project PIT led by the Project Coordinator shall promptly report to the World Bank and any other MDAs, as required by national policies and laws, any GROW project related serious and severe environmental and social incidents and accidents. The reporting shall be done within 24 hours of being notified by PFI or any other entity of such incidents and accidents. PFIs shall also immediately report to the PSFU such incidents and accidents after being made aware of such incidents and accidents. In addition, subprojects shall report to PFIs subproject related severe and serious incidents and accidents as soon they occur.

Severe and serious environmental and social incidents and accidents include but are not limited to:

- Any fatality
- Incidents that caused or may cause great harm to the environment, workers, communities, natural or cultural resources,
- Natural disasters, pollution, floods, landslides, etc
- Incidents that may result in high levels of lasting damage or injury, incidents that require an urgent and immediate response,
- Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Gender-Based Violence, Violence Against Children (VAC), forced and child labours

The template below will be used by PSFU to report incidents and accidents to the World Bank.

Template for Reporting Incidents and Accidents	
Date of Report	
Name, location, and type of Subproject	
Amount of approved funding for the subproject	
Date and time of the incident	
Description of the incident, accident, or issue	<ul style="list-style-type: none"> • Type and full description of accident or incident (environmental, social, fatality or spill, etc.) • Number and names of persons involved (Anonymity/confidentiality required for GBV/SEA/SVAC incidents)
Cause	<ul style="list-style-type: none"> • What led to the incident or accident
Response to date	<ul style="list-style-type: none"> • Any initial investigations • Action taken by PSFU, PFI, and or subproject, including reporting to regulatory and law enforcement MDAs, referral to providers of the MPS for GBV related incidents in full compliance with principles of the survivor centred approach (SCA)
Recommendations and additional measures required	<ul style="list-style-type: none"> • This may include additional investigations and support for survivors, etc. • Recommendations for prevention of reoccurrence of the incident /accident

6.5 ESMS and the Management Information System

The project (GROW) will establish a Management Information System (MIS) to capture relevant information on all project components, including the GFF. The MIS that will also be accessible by PSFU will include information on the performance of the ESMS at PSFU, PFI, and loan and grantee levels. Information such as the E&S risk categorization of loan and grant beneficiaries, among other E&S parameters, will be included in the MIS. The PSFU E&S team at PSFU is working with the M&E Specialist to ensure the design of the MIS includes key aspects of the ESMS and its performance at PSFU and PFI levels.

6.6 GFF Beneficiary E&S Baseline Information

The ESMS will be key in collecting baseline information on beneficiaries of the GFF. PSFU M&E team will work with PFIs to collect this information, which will be included in the applications

potential beneficiaries of the GFF will submit to PFIs. Baseline E&S information to be collected by PFIs on loan and grant beneficiaries will include status regarding compliance with E&S requirements.

6.7 ESMS / E&S and the GROW Impact Evaluation

The PSFU E&S team will discuss with the GROW project impact evaluation team to include key ESMS aspects in the planned GFF impact evaluation. During the training on ESS9 organized by the World Bank, Uganda Office, it was reported by the Ecuador team who are implementing ESS9 that complying with E&S standards was a key factor in the growth of business enterprises supported by the project that included grants and loans to the enterprises.

6.8 Review and Continuous Improvement of the ESMS

PSFU will periodically revise its ESMS to ensure it remains relevant and effective over time. PSFU will also support PFIs in doing the same. The changes will not result in deviation from the World Bank ESF and applicable national legislation. The review will be done by the PSFU E&S team with technical support from the World Bank E&S team.

ANNEXES

Annex 1: PFI E&S Selection Criteria

1. Introduction

GROW Project subcomponents 2B and 2C will be implemented through PFIs. The PFIs will be selected competitively. In addition to other requirements, the PFIs must comply with E&S policies and laws of GOU and the World Bank ESF, specifically ESS9 on Financial Intermediaries.

2. The Selection Criteria

As is the case with PSFU, PFIs must demonstrate a robust ESMS based on the following parameters:

- vi. Environmental and Social Policy
- vii. Environmental and Social Management Procedures
- viii. Stakeholder Engagement and Grievance Management
- ix. Organizational Capacity and Competency
- x. Monitoring and Reporting

The five parameters and how they will be assessed by PSFU (This will be integrated in the overall PFI assessment of PFI proposals which will include marks awarded for the E&S component of the proposal)

Parameter	Assessment Questions	Findings		Comment (Includes assessor identification of areas of improvement in the assessed parameters where necessary)
		Yes	No	
Environmental and Social Policy	Does the PFI have Environmental and Social Policy approved and signed at the highest level of the PFI?			
Environmental and Social Risk Assessment and Management Procedures	Does the PFI have Labor management procedures that are consistent with national policies and laws and WB ESF applicable to its own staff?			

	Does the PFI have Exclusion list for screening of sub project activities?			
	Does the PFI have a tool for assessment of E&S risks of to be used by applicants for loans and grants			
	Does the PFI have a mechanism for classification of subprojects based on their E &S risks and impacts?			
	Does the PFI have a format of the legal agreement with subprojects that includes E&S requirements?			
Organizational structure and competency	Does the PFI have a documented organizational structure for implementing the PFI ESMS?			
	Does the PFI have a Senior officer responsible for E&S?			
	Are there other duty bearers in the PFI with responsibilities in E&S?			
	Does the PFI intend to use consultants in E&S? If yes, are there TOR for this purpose?			
	Has there been any capacity building in E&S in the PFI or is there any capacity plan for E&S?			
	Is there a Budget for E&S allocated by the PFI?			

Stakeholder Engagement and grievance management	Is there a plan and a procedure for communication of the FI ESMS Policy and procedures to staff and other stakeholders?			
	Is there a system for reaching potential borrowers and grant beneficiaries with information on grant and loan products?			
	Does the PFI have a plan for supporting loanees and grantees with elevated E&S risks and impacts in stakeholder engagement?			
	Does the PFI have a Grievance Redress Mechanism (GRM)?			
	If the PFI has a GRM, does it give special attention to GBV grievances including sexual exploitation and abuse (SEA) and sexual harassment? Special attention includes respect and dignity for and not blaming the survivor, confidentiality, survivor self-determination and access to the MPS.			
Monitoring and reporting	Does the PFI have a template and indicators for monitoring loanees and grantees in E&S and reporting to PSFU and other entities on E&S performance of the portfolio and the effectiveness of its ESMS?			
	Does the PFI have a procedure for recording and reporting serious E&S incidents and			

	accidents and to PSFU and other authorities?			
	Does the PFI have a procedure for recording and referral of GBV related incidents in a manner consistent with the survivor centered approach (SCA)?			
	Does the PFI have a plan for emergency preparedness and response?			

Annex 2: Exclusion list

The following list of activities are ineligible for financing under the GROW Project:

- Any activities resulting or anticipated to result in permanent or temporary physical or economic displacement.
- Any activities involving significant or irreversible impacts or impacts that cannot be easily mitigated.
- Any activities that have significant or irreversible impacts on cultural heritage as defined under ESS 8.
- Production or trade in any product or activity deemed illegal under Uganda’s laws or regulations or ratified international conventions and agreements.
- Production or trade in weapons or munitions
- Gambling, casinos and equivalent enterprises.
- Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (CITES)
- Production or trade in radioactive materials (this does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the Association considers the radioactive source to be trivial and/or adequately shielded).
- Production or trade in or use of unbounded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
- Drift net fishing in the marine environment using nets more than 2.5 km in length.
- Purchase of logging equipment for use in cutting forests.
- Production or trade in wood or other forestry products other than from sustainably managed forests.
- Commercial logging operations in primary tropical moist forests

- Production or trade in pharmaceuticals subject to international phase outs or bans.
- Production or trade in pesticides/herbicides subject to international phase outs or bans such as potential Ozone Depleting Substances [ODSs] that have been burned in Uganda.
- Fishing in the marine environment using electric shocks and explosive materials.
- Any activities that would curtail workers’ fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor; (iii) engaging workers in hazardous conditions (which includes construction activities) without appropriate OHS measures as per national laws and ESF/ESSs, and hiring persons under 18; (iv) discrimination/exclusion of workers based on race, color, sex, religion, political opinion, national extraction, or social origin.
- Production or trade in products containing Polychlorinated biphenyls (PCBs).
- Production or trade in ozone depleting substances subject to international phase out.
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals (includes gasoline, kerosene, and other petroleum products).
- Production or storage or packaging of inflammable material in large scale commercial quantities.
- Production or trade or use or storage of dyeing chemicals and dye intermediaries in large scale commercial quantities.
- Production or activities that impinge on the lands owned, or claimed under adjudication, by Vulnerable and Marginalized Groups, without full documented consent of such peoples.

Annex 3: Subproject E&S Screening Tool

Business Background Name: _____ Business Type: _____ Location: _____ Village /Zone /Ward: _____ Parish /Division _____ Subcounty /Town Council: _____ Municipality: _____ District/City: _____				
Section	E&S Parameter	Answer		Comments
		Yes	No	
A	Certificates and Permits			
i)	Do your business activities require any environmental or health and safety certificates and permits that are issued by			

	Government Ministries, Departments and Agencies such as NEMA?			
ii)	If your answer to i) above is yes, have you obtained the certificate(s) or permit (s) and what is the name of the certificate or permit and year of issuance ?			
B	Bio-physical Environment			
i)	Is the Business site adjacent to or within Natural habitats or legally protected areas (wetlands, riverbanks, lake shores, forests, buffer zones, nature reserves)?			
ii)	Is there an existing stream, river or lake in the proximity to the business site?			
iii)	How far is are your business activities from the protected above?			
iv)	Is the business site adjacent to a school, hospital, or densely populated community center?			
v)	Will the business activities generate waste products (including particulates, liquid or solid wastes)?			
vi)	Will waste generated by the business activities be prevented from entering water bodies or from becoming a public health problem?			
vii)	Will vegetation such as grass, trees, shrubs be removed or any surface left bare by business activities?			
viii)	Will the Business develop boreholes or water wells to tap ground water?			
ix)	Will the business involve significant excavations, demolition and movement of earth?			
x)	Will business activities pose risks to endangered species such as sheanut trees, muvule trees, crested cranes, catfish, pangolin, tortoises, leopards?			
xi)	Will the business involve significant extraction, diversion or containment of surface or ground water? For example, construction of water reservoirs			
xii)	Will the business pose a risk of introducing invasive alien species (such as new plants) that will pose a danger to crops and animals?			
xiii)	Will the proposed business activities result in significant air emissions such as gas, smoke, particulates			

	that may exacerbate climate change, bad smell, irritation of eyes and nose?			
xiv)	Will the proposed business involve the application of pesticides, herbicides, acarides and other agrochemicals?			
xv)	Does the business include activities that require significant consumption of raw materials, energy, and/or water?			
xvi)	Is the business site prone to landslides or flooding?			
xvii)	Are there any other risks to and impacts on the environment not mentioned above that your business activities may trigger or exacerbate? If yes, mention the risks and impacts			
C	Labour and Working Conditions			
i)	Does the business involve employing workers. If yes about how many workers?			
ii)	Will the business enforce the principle of equal opportunity and fair treatment among workers and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, etc?			
iii)	Will the business owner prevent child labour and forced labour throughout the business period?			
iv)	Will the business activities require workers to be hired from other districts?			
v)	Will there be social conflict in case of labour force hired from other districts ?			
vi)	Will the business result in potential increased occupational health risks (e.g., communicable infections such as Covid-19, HIV/AIDS, etc) to the workers and or the community?			
vii)	Will safety measures be put in place to protect the workforce (PPE, fire-fighting and spill-clean-up materials / chemicals available for use at the site like, sand, detergent, acid, alkali, etc)?			
D	Community Health			
i)	Will the business activities pose potential risks to community health and safety due to the transport			

	of goods to and from the business, storage, and use and/or disposal of hazardous or dangerous materials such as fuel and other chemicals?			
ii)	Will the business activity lead to increased demand on local community resources such as human resources, wood, sand, clay etc.?			
iii)	Will failure of structural elements of the business pose risks to communities? (E.g., collapse of buildings or infrastructure)?			
iv)	Will the business result in increased cases of Gender based violence at household or community level including sexual exploitation abuse or other sexual issues?			
v)	Will the business create a lot of noise and vibrations for the community?			
vi)	Will the business activity lead to air pollution?			
vii)	Will the business employ security personnel that may pose a potential risk to the safety of communities and/or individuals (e.g. due to a lack of adequate training in human rights and security or accountability)?			
viii)	Will the business put in place measures to avoid or minimize the potential for community exposure to health and safety risks (ie diseases, accidents, etc)?			
ix)	Will the business put in place measures to address emergency events such as accidents?			
x)	Are there any other risks to and impacts on community health not mentioned above that your business activities may trigger or exacerbate? If yes, mention the risks and impacts.			
E	Displacement and Resettlement			
i)	Will the business potentially involve temporary or permanent and full or partial physical displacement of people?			
ii)	Will the business possibly result in economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation) ?			
iii)	Is there a risk that the business would lead to forced evictions?			
iv)	Would the proposed business possibly affect land tenure arrangements and/or community-based			

	property rights/customary rights to land, territories and/or resources?			
v)	Will the business activity lead to community being denied access to land or natural resources?			
vi)	Do you have evidence of security of tenure on the land where the business is located? This may include land title, lease/rent agreement or land donation that is duly signed and witnessed by relevant parties such as LCs.			
vii)	Is there a risk to the business activities due to lack of security of tenure on the land where the business activity is located?			
F	Vulnerable and Marginalized Groups (VMGs)			
i)	Are any of the following ethnic minorities found in your business area? IK, TEPETH, BBENET and BATWA.			
ii)	Do you have specific plans for ensuring ethnic minorities found in your business area are benefiting from your business activities?			
iii)	Do you have specific plans for ensuring ethnic minorities found in your business area are protected from risks and adverse impacts associated with your business activities?			
iv)	Do you have specific plans for ensuring other VMGs including people with disabilities (PWD), People Living with HIV, the Elderly and female youth benefit from your business and are protected from risks and adverse impacts associated with your business activities?			
G	Cultural Heritage			
i)	Will the business activity interfere with cultural heritage sites such as graves, fetish stones or trees, shrines or other sacred sites?			
ii)	Is the Business located on unique or aesthetically valuable land?			
iii)	Will business cause encroachment on historical/cultural/religious areas?			
H	Stakeholder engagement, and Grievance Management			
i)	Will you communicate to community members in the proximity of your business the risks, impacts and benefits associated with your business			

	activities and how the risks and impacts if any will be managed?		
ii)	Do you anticipated any complaint or grievances about your business activities from the community including neighbors? If yes, what type of complaint or grievances do you anticipate		
iii)	If complaints or grievances are anticipated, will you/ your business put in place ways to receive and resolve the grievances? If yes, explant how this will be done		
iv)	Are the methods of stakeholder engagement and grievance management in line with cultural norms of ethnic minorities namely, the IK, TEPETH, BENET and BATWA and do they ensure inclusion of other VMGs such as PWD, and PLHIV?		
v)	Will communities or individuals in the business area be given the opportunity to raise their concerns regarding the business activities during the stakeholder engagement process?		
vi)	Will the business owner put in place a mechanism for receiving and resolving complaints or concerns about the business activity?		

Management Measures for E&S Risks and Impacts

For the “Yes” responses above or where E &S issues have been identified, please describe the measures that the owner of the business activity will put in place to manage the identified E&S risks and impacts or enhancement of E&S benefits. Prevention is the most preferred E&S risk and impact management strategy.

Section	E&S Risks and Impacts /issues	Management Measures	Comment
Bio-physical Environment			
Labour and Working Conditions			
Community Health and Safety			
Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
Vulnerable and Marginalized Groups (VMGs)			
Cultural Heritage			
Stakeholder Engagement and Information Disclosure			
Grievance Management			

Annex 4: E&S Risk Classification

A Summary of Risk Classification Requirements in the Environmental & Social Directive on Investment Project			
Risk Criteria			
Project type, location, sensitivity, scale	Nature & magnitude of ES risks & impacts, available mitigation	Borrower capacity and commitment	Context risk relevant to ES measures
<ul style="list-style-type: none"> • physical considerations. • type of infrastructure (e.g., dams & reservoirs, power plants, airports, roads). • volume of hazardous waste • and disposal; 	<ul style="list-style-type: none"> • impacts on greenfield sites. • impacts on brownfield sites (e.g., rehab, maintenance or upgrading). • nature of potential risks and impacts (e.g. irreversible, unprecedented or complex). • resettlement activities. • Indigenous Peoples presence. • possible mitigation measures considering the mitigation hierarchy; 	<ul style="list-style-type: none"> • capacity to manage risks and impacts <u>consistent with the ESSs.</u> • country policy, legal and institutional framework. • laws, regulations, rules and procedures applicable to the Project sector. • regional and local requirements. • technical and institutional capacity. • <u>track record of past Project implementation.</u> • financial and human resources available; 	<ul style="list-style-type: none"> • <u>other areas of risk relevant to the delivery of ES mitigation measures and outcomes</u> • depending on the specific Project and the context in which it is being developed, • including the nature of the mitigation and technology being proposed, • considerations relating to domestic and/or regional stability, conflict or security.

High Risk Classification

<ul style="list-style-type: none"> • complex • large to very large scale in • sensitive location(s) 	<ul style="list-style-type: none"> • wide range of significant adverse risks and impacts • long term, permanent and/or irreversible, impossible to avoid entirely. • <u>some cannot be mitigated or require complex, unproven mitigation, sophisticated social analysis.</u> • high in magnitude and/or in spatial extent (large to very large area or population); • significant adverse cumulative or transboundary impacts; high probability of serious adverse effects to human health and/or the environment • high value and sensitivity (e.g. protected and internationally recognized areas) • high value, sensitive lands or rights of Indigenous Peoples and other vulnerable minorities • Intensive or complex involuntary resettlement or land acquisition • Impacts on cultural heritage or densely populated urban areas. 	<ul style="list-style-type: none"> • uncertain, conflicting agency jurisdiction • legislation, regulations not addressing risks and impacts. • changes to applicable legislation are being made. • enforcement is weak. • limited experience of implementing agencies. • challenges and concerns about track record regarding ES issues • significant stakeholder engagement capacity, commitment, track record concerns 	<ul style="list-style-type: none"> • factors outside project control impacting ES performance and outcomes
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	<ul style="list-style-type: none"> • may give rise to significant social conflict, harm or human security risks. • a history of unrest in area or sector, concerns about use of security forces 		
Substantial Risk Classification			
<ul style="list-style-type: none"> • not as complex • Large to medium scale • not such sensitive location 	<ul style="list-style-type: none"> • some significant risks and impacts • mostly temporary, predictable and/or reversible • possibility of avoiding or reversing but with substantial investment and time • may give rise to limited degree of social conflict, harm, human security risk. • medium in magnitude and/or in spatial extent (medium to large area and population) • less severe, more readily avoided /mitigated cumulative and/or transboundary impacts. • medium to low probability of serious adverse effects to human health and/or the environment (with known and reliable mechanisms to prevent or minimize) • lower effects on areas of high value or sensitivity • <u>more readily available and reliable mitigatory and/or compensatory measures</u> 	<ul style="list-style-type: none"> • uncertain, conflicting agency jurisdiction • legislation, regulations not addressing risks and impacts. • changes to applicable legislation are being made. • enforcement is weak. • in some respects, limited experience of implementing agencies. • some concerns about track record regarding ES issues readily addressed. • some stakeholder engagement concerns readily addressed 	

Moderate Risk Classification			
<ul style="list-style-type: none"> • no activities with high potential for harming people or environment • located away from sensitive areas 	<ul style="list-style-type: none"> • risks and impacts not likely to be significant. • not complex and/or large • predictable and expected to be temporary and/or reversible. • low in magnitude. • site-specific, without likelihood of impacts beyond the project footprint. • low probability of serious adverse effects to human health and/or the environment • Routine safety precautions are expected to be sufficient to prevent accidents. • <u>easily mitigated in a predictable manner</u> 		
Low Risk Classification			
	<ul style="list-style-type: none"> • Minimal or negligible risks to and impacts on human populations and/or the environment • few or no adverse risks and impacts and issues • No further assessment after screening 		

Annex 5: Subproject E&S Monitoring Template

1. General information	Client's name/Business name:
	Industry Sector:
	Specific Type of Business:
	Location:
	Number of employees:
	Loan/grant size:
2. Risk Category (put a tick on correct category)	
	High:
	Substantial:
	Moderate:
	Low:
3. Compliance with the Environmental and Social Management Plan (as in loan agreement) or National polices and laws	<p>a) Does the project have the required permits/ESIA Certificate where applicable?</p> <p>i) Yes</p> <p>ii) No</p> <p>b) Please provide more relevant details</p> <p>b) Explain any required action/recommendations regarding the permits/certificates?</p> <p>c) List both compliant and non-compliant E&S activities and actions required</p> <p>d) List any other outstanding issues: (If completion dates are not met, state reasons and new agreed completion dates) with reference to the developed Corrective Action Plan if any.</p>
4. New risks and impacts identified	List any new risks and identified impacts and the mitigation measures
5. Site incident and accident report and status.	Provide a summary of the serious incidents and accidents as per ESIRT reported during the month.
6. Stakeholder engagement	<p>Please list any Stakeholder engagement activities carried out to include:</p> <p>i) Type and number of stakeholders met disaggregated by gender, VMG status (disability, ethnic minority, etc)</p> <p>ii) Date of meeting and venue</p> <p>iii) Issues discussed and agreed actions</p>

7. Grievance Management	Number and type of grievances received, resolved and outstanding disaggregated by gender and proposed actions for the outstanding (Confidentiality to be observed for GBV grievances)
8. Change in risk categorization	Does the client/subproject risk profile require change in E&Scategorization? i) Yes ii) No If yes, provide justification and specify new risk category where applicable
9. Additional Information	Please provide any other information regarding E&S risk and impact management in the suberect

Name, date & Signatures of:

1. PFI E&S monitoring staff
2. Loan or grant beneficiary representative
3. Date.....

Annex 6: Grievance Registration Form

GRIEVANCE FORM	
Date:	
Reference Number:	
Full Name (optional and can be left blank for anonymous grievances):	
ID Number (Optional and can be left blank for anonymous	
CONTACT INFORMATION:	By Post: <i>Please provide mailing address.</i>

<p><i>(Please mark how you would like to be contacted: mail, telephone, email, in person)</i></p>	<p>By Telephone:</p> <p>By Email:</p>
<p>TYPE OF GRIEVANCE:</p>	<p>Individual:</p> <p>Group:</p>
<p>DESCRIPTION OF INCIDENCE OR GRIEVANCE:</p>	<p><i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i></p>
<p>HAS THIS GRIEVANCE BEEN RAISED PREVIOUSLY BY YOU OR ANYONE ELSE?</p>	<p>No</p> <p>Yes</p> <p>Details:</p>
<p>DATE OF INCIDENCE GRIEVANCE:</p>	<p>One-time incidence/grievance (date ...)</p> <p>Happened more than once (how many times ...)</p> <p>On-going (currently experiencing problem)</p>
<p>WHAT WOULD YOU LIKE TO SEE HAPPEN TO RESOLVE THE PROBLEM?</p>	
<p>Signature:</p> <p>Date:</p> <p>Please return this form to: Grievance Manager <i>[Add details of contact]</i></p>	
<p>ASSESSMENT CATEGORY</p>	

GRIEVANCE ACCEPTED Yes / No
RESPONSE/ FOLLOW UP (SUMMARY OF RESPONSE AND CORRECTIVE ACTIONS TAKEN)
RESPONSE TO APPLICATION Date: Person: Observations:
CORRECTIVE ACTION AND SIGN-OFF Applicant satisfied with corrective action: Yes / No (Details) Is further action required: No / Yes (Details) If yes, date sign-off received from Application:

Annex 7: Grievance Close Out Form

Grievance Number.....
 Date of Submission of the Grievance.....

Verification of corrective action and sign off.

Description of the grievance:	
Description of immediate actions taken to resolve the grievance	
Description of long term action required (if necessary)	

Communication date of the proposed solution to Aggrieved parties/complainant	
Has the grievance been resolved (Yes/No)	

Signed:

Complainant's name.....

Signature.....

Date.....

Representative of Responsible Party:

Title.....

Name.....

Signature.....

Date.....

OPTION 1		
SERVICE PROVIDER	SERVICE PACKAGE	REFERRAL PATHWAY
<p>Report to Local Council 1 (LC1) for cases relating to physical assault without injuries, economic violence, verbal/emotional abuse.</p> <p>Note: The LC court is not allowed to hear or intervene in any sex related case like rape, attempted rape, defilement, attempted defilement, Sodomy Such cases are reported directly to police.</p>	<ul style="list-style-type: none"> • The community or the victim/survivor reports the case to LC1. • The LC can mediate and where mediation fails, it hears the case as a court. • The LC1 court serves hearing notice to survivor and perpetrator. • Hearing of case takes place in public if the case is not sensitive. • Decision of court is reached by consensus. • Where consensus fails, judgment is recorded and the person who is not happy with the decision appeals to LC2 within 14 days. • Where a child is involved in the case, he/she is referred to Probation office for action on child's welfare. • LC court may make a written referral to Police or Magistrate where perpetrator is a repeat offender. 	<pre> graph TD EP[Entry Point] --> LC1((LC 1)) LC1 --> Police((Police)) LC1 --> Probation((Probation office/Community Dev't Officer, CSOs and FBOs)) LC1 --> Magistrates((Magistrates Court)) LC1 --> Medical((Medical Care)) LC1 --> Shelter((Shelter, Legal Aid, Counseling)) </pre>

OPTION 2

SERVICE PROVIDER	SERVICE PACKAGE	REFERRAL PATHWAY
<p>Report to Police</p> <p>Note:</p> <ul style="list-style-type: none"> • All capital offences (rape, aggravated defilement, murder). are reported to police and any other cases of GBV. • In case of rape and defilement, the victim/survivor should not bath/wash clothes before medical examination. • The victim/survivor must be taken for medical examination and provision of PEP and ECP within 72 hours/3dayS to prevent HIV infection, and to avoid pregnancies. The service provider follows up the case. 	<ul style="list-style-type: none"> • Victim/community report the case to the Police officer. • Police officer fills in part (a) of PF3, gives victim/survivor a reference number, and refers her to a medical/health practitioner. • Victim/survivor is examined, and medical practitioner fills in part (b) of PF3. • If it is a sexual assault case, the police fill in part (a) of PF24 A. • The police refer the accused to a Health/Medical Practitioner. • Police may refer a case involving a child to the probation office. • Police may refer a victim/survivor to a shelter or for psychosocial counseling. • Police continues with investigations and forwards the case to Directorate of Public Prosecutions for prosecution before the Court. • The Court hears the case until its concluded. 	<p style="text-align: center;">Entry Point</p> <pre> graph TD EP[Entry Point] --> P[Police] P --> MC[Medical Care] P --> MagC[Magistrates Court] P --> SLAC[Shelter, Legal Aid, Counseling] P --> PO[Probation office/Community Dev't Officer, CSOs and FBOs] PO --> SLAC </pre>

OPTION 3

SERVICE PROVIDER	SERVICE PACKAGE	REFERRAL PATHWAY
<p>Report to Medical/Health Practitioner</p> <p>Note:</p> <ul style="list-style-type: none"> • The Victim/survivor in critical condition should be taken for medical care before reporting to police or any other service provider. At the same time, there should be collaboration to have Police Form 3 and 24A filled. • In case of rape/defilement, the victim/survivor should not wash before medical examination. • The victim/survivor must be medically examined, treated and provided with PEP and ECP within 72 hours/ 3days to prevent HIV infection and to avoid pregnancies. • The service providers should follow up the cases. 	<ul style="list-style-type: none"> • Medical/Health Practitioner receives victim. • Medical/Health Practitioner offers required medical assistance to the victim/survivor including provision of PEP/ECP • If Medical/ health practitioner suspects GBV, she/he accurately documents the visit of the victim. • Inform the victim/survivor of options available within the support system. • Makes herself/himself available to testify in court regarding the case where necessary 	<pre> graph TD EP[Entry Point] --> MC[Medical Care, Health Units I, II, III, IV, General Hospital, Referral Hospital] MC --> SLAC[Shelter, Legal Aid, Counseling] MC --> P[Police] P --> MCourt[Magistrates Court] </pre>

OPTION 4

SERVICE PROVIDER	SERVICE PACKAGE	REFERRAL PATHWAY
<p>Report to traditional /religious/ community leaders, CSOs. Note:</p> <ul style="list-style-type: none"> • In case of economic and/or emotional abuse the traditional/religious/community leaders may handle the case. • Traditional/community/religious leaders shall not handle capital and sexual offences. They must be referred to the police. • In case of defilement and rape, the victim/survivor must be taken for medical examination, treatment and provided with PEP and ECP within 72 hours/3 days to prevent HIV infection and to avoid unwanted pregnancies. • The service providers should follow up the cases. 	<ul style="list-style-type: none"> • The victim/survivor, the complainant or her/his relatives reports the case to cultural/religious leaders. • The leaders invite the perpetrator for a meeting. • Leaders discuss the issues and may give advice to the parties. Advice may include counseling, reconciliation, restitution, apology, or any other advice that the leaders may deem fit. • If victim/survivor has been injured, refer to a health center for medical care. She may also be referred to other service providers depending on her rehabilitation needs. 	<pre> graph TD EP[Entry Point] --> CL[Community Leaders, CSOs] CL --> MC[Medical Care] CL --> P[Police] MC --> S[Shelter] P --> S P --> MCourt[Magistrates Court] </pre>

OPTION 5

SERVICE PROVIDER	SERVICE PACKAGE	REFERRAL PATHWAY
<p>Report to Psychosocial Service Provider (CSOs, CBOs, Probation Officer Legal Aid Clinics)</p> <p>Note</p> <ul style="list-style-type: none"> • A victim/survivor can report directly for Psychosocial, Legal Aid, legal services Probation Officer etc. • The victim/survivor must be taken for medical examination and treatment, provided with PEP and ECP within 72 hours/3 days to prevent HIV infection and to avoid pregnancies. • The service providers should follow up the cases. 	<ul style="list-style-type: none"> • A victim/survivor's file is opened. • Receive counseling, provision of shelter in case it is needed. • Refer either to the police, if the victim has not reported the case, or to a health center or government hospital in case of defilement or rape, for the required medical report. • Accompany and support victim/survivor at police and court meetings. • The service provider follows up the case. • You may provide skills training 	<pre> graph TD EP[Entry Point] --> PO[Probation Officer, Psychosocial, Legal Aid] PO --> MC((Medical Care)) PO --> S((Shelter)) PO --> P([Police]) MC --> P P --> MCourt((Magistrates Court)) </pre>

OPTION 6

SERVICE PROVIDER	SERVICE PACKAGE	REFERRAL PATHWAY
<p>Report to the Magistrate Court</p> <p>Note:</p> <ul style="list-style-type: none"> • A victim/survivor can report directly to a magistrate court. • The victim/survivor can be referred to a shelter or medical care 	<ul style="list-style-type: none"> • A victim’s complaint is recorded in writing. • Summons are issued to the perpetrator. • Court hears the case to its conclusion 	<pre> graph TD EP[Entry Point] --> MC((Magistrates Court)) MC --> PLA((Psychosocial, Legal Aid)) MC --> S((Shelter)) MC --> P((Police)) MC --> MCare((Medical Care)) </pre> <p>The diagram illustrates the referral pathway starting from an 'Entry Point' (indicated by a blue arrow) leading to a central black circle labeled 'Magistrates Court'. From this central node, four red arrows point to four other nodes: an orange circle for 'Psychosocial, Legal Aid', a blue circle for 'Shelter', a dark blue circle for 'Police', and a yellow circle for 'Medical Care'.</p>

DIAGRAM FOR REFERRAL PATHWAY FOR GBV CASE

