

International Bank for Reconstruction and Development  
International Development Association

**FIRST PROGRESS REPORT  
ON THE IMPLEMENTATION OF MANAGEMENT'S ACTION PLAN IN RESPONSE  
TO THE  
INSPECTION PANEL INVESTIGATION REPORT (INSP/106710-UG) ON THE  
REPUBLIC OF UGANDA  
TRANSPORT SECTOR DEVELOPMENT PROJECT – ADDITIONAL FINANCING  
P121097**

March 30, 2017

**FIRST PROGRESS REPORT**  
**IMPLEMENTATION OF MANAGEMENT ACTION PLAN**

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## **ABBREVIATIONS AND ACRONYMS**

ARSDP	Albertine Regional Sustainable Development Project
CGV	Chief Government Valuer
CSO	Civil Society Organization
ECPR	Emergency Child Protection Response
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
GBV	Gender-based Violence
GIFMS	Grievance, Inquiries, Feedback Management System
GoU	Government of Uganda
GRM	Grievance Redress Mechanism
GMC	Grievance Management Committee
IDA	International Development Association
IPC	Interim Payment Certificate
Km	Kilometer
MAP	Management Action Plan
MoGLSD	Ministry of Gender, Labor and Social Development
NERAMP	North Eastern Road-Corridor Asset Management Project
NGO	Nongovernmental organization
OMS	Operational Manual Statement
OP/BP	Operational Policy/Bank Procedures
PCN	Project Concept Note
RSR	Rapid Social Response
SBD	Standard Bidding Document
SPD	Standard Procurement Document
TSDP	Transport Sector Development Project
UNRA	Uganda National Roads Authority
VAC	Violence Against Children

### **Currency Unit (as of March 30, 2017)**

#### **Uganda Shilling**

1 UGX = 0.00027 US\$

1 US\$ = 3,566 UGX



## EXECUTIVE SUMMARY

- i. On October 13, 2016, Management submitted its Report and Recommendation, including a detailed [Management Action Plan \(MAP\)](#), developed in response to the Inspection Panel's [Investigation Report](#) No. INSP/106710-UG on the Uganda Transport Sector Development Project – Additional Financing (P121097). On November 22, 2016, the [Bank's Board considered both reports](#) and approved the Management Action Plan (MAP).
- ii. This is the first Progress Report to the Board of Executive Directors (the Board) on implementation of the MAP, covering activities and information available for the period October 13, 2016 to March 21, 2017.
- iii. The Transport Sector Development Project (TSDP, or “the Project”) aimed to improve the connectivity and efficiency of the transport sector through: (1) improved condition of the national road network; (2) improved capacity for road safety management; and (3) improved transport sector and national road management.
- iv. In its Report and Recommendation in response to the Inspection Panel Investigation Report, Management committed to a detailed set of actions – at the local, national and global levels – to address the impacts suffered by project communities and to improve the capacity of the Government of Uganda (GoU) and the Bank to better manage the types of issues that arose under the Project. Management also acknowledged serious weaknesses in the preparation, implementation and supervision of the Project. The Bank failed to identify and plan for the full range of social impacts that a project of this size and scope could have in a poor, rural area with many pre-existing and well-identified vulnerabilities. Insufficient community consultation before and during implementation, as well as a failure to assign preparation and supervision teams with the requisite experience and skills, made the Bank slow to grasp the depth and scale of negative impacts while they were occurring and slow to act decisively through supervision and the exercise of remedies.
- v. Since the submission of its Report and the in-depth review of lessons learned which followed, Management has undertaken steps on two fronts – both project-level and system-wide, to address these issues. At the Project level this has included steps to provide support: for the victims of child abuse; to complete the compensation process; to address construction issues; to support capacity building of the implementing agency; and support for response to gender-based violence (GBV). These are discussed in more detail below.
- vi. At the systemic level, steps have been taken to improve operational performance throughout the project life cycle, build staff capacity, and undertake systems improvements. Environmental and social provisions in procurement contracts for civil works have been strengthened and staff guidance on labor influx has been issued. These more systemic issues have been addressed in the Bank's “[Lessons Learned and Agenda for Action](#)” Report.
- vii. Over the last 4 months, substantial progress has been made in many areas, as summarized below:

- (1) The Bank, through the Emergency Child Protection Response (ECPR) facility, implemented by the Uganda-based BRAC, a globally reputable nongovernmental

organization (NGO), has continued to meet key commitments in addressing the material and psychosocial needs of the identified victims of sexual abuse in the Project area;

- (2) The Bank has secured, on behalf of the Government of Uganda (GoU), a Rapid Social Response (RSR) Grant to provide local governments and communities in the Project area with support to strengthen their capacity to prevent and respond to gender-based violence (GBV). As of March 20, 2017, GoU had issued requests for Expressions of Interest to a number of Civil Society Organizations (CSOs) active in the field of GBV prevention and response in Uganda, inviting them to participate in the provision of such services in the Project area. In addition, in October 2016, the GoU requested support of US\$40 million from the International Development Association (IDA) for an operation to address GBV in a systematic manner throughout Uganda. The proposed IDA-supported operation is currently on an accelerated preparation schedule;
- (3) As of March 10, 2017, 94 percent of eligible people who are affected by land acquisition and/or resettlement under the Project have now received compensation. UNRA has committed to complete this process by April 28, 2017, including placing into an escrow account funds to compensate those whose cases remain outstanding at that time;
- (4) The GoU is financing with its own funds the remaining Project works. As of February 28, 2017, the progress in the completion of physical works stood at 92 percent. Construction works are on track to be completed by April 30, 2017, and UNRA has made substantial progress in ensuring the Contractor undertakes the necessary corrective measures to address problems related to: (i) road access, (ii) drainage, (iii) damaged community water sources, (iv) installation of road safety measures, (v) damage to structures from blasting, and (vi) unsafe location of transmission lines, and (vii) educating contract workers on a proper code of conduct especially in reference to gender based violence. Corrective measures on the physical aspects above are expected to be fully implemented by the completion of the road works at the end of April 2017;
- (5) UNRA has also made substantial progress in developing both an UNRA-wide Grievance Redress Mechanism (GRM) and GRMs specific to various ongoing road projects;
- (6) A report on “[Lessons Learned and Agenda for Action](#)” from the TSDP – Additional Financing and their implications for Bank-supported projects in similar situations, has been prepared and disseminated. This report was the result of the Bank’s special review of lessons learned from the Project and is not part of this progress reporting on the implementation of the Management Action Plan.
- (7) A general review of environmental and social safeguards performance in all relevant Bank-financed projects in Uganda has been completed, as well as a

- complementary review with a specific focus on the risks of sexual abuse involving minors, and child labor;
- (8) Environmental and social provisions in contracts for contractors as well as supervising engineers have been strengthened Bank-wide for civil works carried out in, or near, vulnerable communities and in other high-risk situations;
  - (9) A guidance note for Bank staff has been disseminated on issues associated with labor influx, and based on the above guidance, a portfolio-wide review of projects across the Bank is being carried out to ensure that pertinent issues are being appropriately addressed where they arise; and
  - (10) A Global Gender-Based Violence Task Force has been formed to strengthen the institution's response to instances of GBV encountered as part of its operations. The Task Force includes a range of members from academia, NGOs, foundations, UNICEF, and government. The Task Force is expected to deliver its report in June 2017, and the Bank will follow up on its recommendations.

viii. ***For background:*** A Credit from IDA for the Project, in the amount of US\$190.0 million to the Republic of Uganda (Borrower), was approved by the Board of Executive Directors of the World Bank on December 10, 2009 and became effective on July 15, 2010. An Additional Financing, in the amount of US\$75.0 million, was approved on June 16, 2011. That Additional Financing was to provide resources to upgrade the existing Kamwenge – Fort Portal Road (66 km) from gravel to bitumen standard. On October 22, 2015, the Bank suspended the unwithdrawn amount of the Credit due to the Borrower's non-compliance with its obligation to implement the Project in conformity with environmental and social standards and practices, and on December 22, 2015, the Bank cancelled the unwithdrawn amount of the Credit. The Bank also suspended financing for civil works in two other Projects implemented by the Uganda National Roads Authority (UNRA), the implementing agency, pending a review of the organization's capacity.

ix. In response to a Request for Inspection of the TSDP – Additional Financing, which was registered on September 28, 2015, the Inspection Panel (“the Panel”) recommended an investigation, which was approved by the Board on January 8, 2016. The Request raised numerous serious allegations, including road workers' sexual misconduct with minor girls and their resulting pregnancies, the increased presence of sex workers in the community, the spread of HIV/AIDS, sexual harassment of female employees, child labor, increased dropout rates from school, inadequate resettlement practices, fear of retaliation, lack of community participation, poor labor practices, and lack of road safety. On August 4, 2016, the Panel issued its report outlining the findings of the investigation.

x. ***The next Progress Report to the Board.*** The next progress report will be submitted in 12 months, or whenever the MAP is completed, whichever occurs first. Should significant developments of concern occur within this period, the progress report would be advanced to take account of that.

# **First Progress Report on the Implementation of Management’s Action Plan in Response to the Inspection Panel Investigation Report on the Uganda Transport Sector Development Project**

## **I. INTRODUCTION**

1. This is the first Progress Report to the Board of Executive Directors (the Board) on implementation of the [Management Action Plan \(MAP\)](#) in response to the Inspection Panel [Investigation Report](#) No. INSP/106710-UG on the Uganda Transport Sector Development Project – Additional Financing (P121097), covering activities and information available for the period October 13, 2016 to March 21, 2017.
2. **The Project.** The Project Development Objective of the Transport Sector Development Project was to improve the connectivity and efficiency of the transport sector through: (a) improved conditions of the national road network; (b) improved capacity for road safety management; and (c) improved transport sector and national road management. In Uganda, road infrastructure is the dominant transport mode, accounting for ninety percent of passenger and freight traffic. The implementing agency was the Uganda National Roads Authority (UNRA).
3. A Credit from the International Development Association (IDA) for the Project, in the amount of US\$190.0 million, was approved by the Board of Executive Directors of the World Bank (“the Board”) on December 10, 2009 and became effective on July 15, 2010. An Additional Financing, in the amount of US\$75.0 million, was approved on June 16, 2011. This Additional Financing was to provide resources to upgrade the existing Kamwenge – Fort Portal Road (66 km) from gravel to bitumen standard.
4. **Request for Inspection.** On December 19, 2014, the Inspection Panel (“the Panel”) received a Request for Inspection of the Uganda Transport Sector Development Project – Additional Financing (the “Project” or “TSDP”), sent by community members from Bigodi<sup>1</sup> in Uganda. As a number of the issues raised in the Request had not previously been communicated to Management, the Panel did not register the Request, to provide Management with an opportunity to address the concerns.
5. On September 11, 2015, the Panel received another Request for Inspection (“the Request”) from three representatives of the Bigodi and Nyabubale-Nkingo communities in Uganda (“the Requesters”), raising similar concerns to those set forth in the December 19, 2014 Request. The Request was registered on September 28, 2015. The Requesters stated that they were not satisfied with Management’s actions to address the concerns, and raised numerous serious allegations, including road workers’ sexual relations with minor girls and resulting pregnancies, the increased presence of sex workers in the community, the spread of HIV/AIDS, sexual harassment of female employees, child labor, increased dropout rates from school, inadequate resettlement practices, fear of retaliation, lack of community participation, poor labor practices, and lack of road safety.

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<sup>1</sup> Bigodi is a town center along the Kamwenge to Fort Portal Road that is being upgraded under the Project.

6. ***Project cancellation.*** Management responded to the claims raised in the Request on December 17, 2015, with proposed actions to address the issues, and subsequently provided several updates on the progress of implementation support to the Panel. After informing the Board, on December 21, 2015, the World Bank Group President, Jim Yong Kim, announced both the intended cancellation of funding to the unwithdrawn amount of the Credits<sup>2</sup> and a set of immediate follow-up actions. On December 22, 2015, the Bank cancelled the unwithdrawn amount of the Credits.<sup>3</sup>

7. In its Report to the Board on January 8, 2016, the Panel found the Request eligible for inspection and recommended that the Executive Directors authorize an investigation, which they did. In line with its mandate, the Panel investigation focused on the allegations of harm arising from instances of noncompliance by the World Bank with its operational policies and procedures. On August 4, 2016, the Panel issued its investigation report.

8. ***Summary of Panel findings.*** The Panel's investigation concluded that there was non-compliance with respect to the following:

- (a) OP/BP 4.01 on Environmental Assessment, for not undertaking an institutional assessment, and a failure to define suitable institutional strengthening measures, to address UNRA's weak capacity in environmental and social issues;
- (b) OMS 2.20 on Project Appraisal, for not having properly assessed the provisions for adequate cooperation between all entities involved in Project implementation;
- (c) OP/BP 4.01 on Environmental Assessment, for not ensuring adequate consultation both prior to and during implementation with Project-affected communities;
- (d) OP/BP 4.01 on Environmental Assessment, for not ensuring the design or implementation of appropriate mitigation measures to protect the community and workers against construction impacts;
- (e) OP/BP 10.00 on Investment Project Financing, for allowing Project implementation to continue despite the serious compliance failures and harm repeatedly identified in supervision reports;
- (f) OP/BP 4.12 on Involuntary Resettlement, for reliance on verification sampling rather than a full census to identify Project-affected people, despite the passage of nearly two years, and for not ensuring the undertaking of an adequate vulnerability assessment, and the identification of necessary assistance programs targeting vulnerable groups;
- (g) OP/BP 4.12 on Involuntary Resettlement, for allowing road construction to commence before Project-affected people were compensated, for compensation

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<sup>2</sup> Original Financing (Credit No. 4679-UG) and Additional Financing (Credit No. 4949-UG).

<sup>3</sup> Original Financing (Credit No. 4679-UG) and Additional Financing (Credit No. 4949-UG).

- amounts that were frequently insufficient due to failure to assess the full impact of the road on land-take, and lack of livelihood restoration assistance;
- (h) OP/BP 4.12 on Involuntary Resettlement, for inadequately supervising Project resettlement implementation leading to different instances of harm to communities along the road;
  - (i) OP/BP 4.12 on Involuntary Resettlement, for not requiring the establishment of a grievance redress mechanism (GRM) that included employing a Resettlement Action Plan Implementation Consultant with field presence along the road in collaboration with a local nongovernmental organization (NGO) to monitor effectiveness of the plan;
  - (j) OP/BP 4.01 on Environmental Assessment and OMS 2.20 on Project Appraisal, for not properly assessing the risks and inadequately appraising human health and safety and social impacts of the Project related to GBV and child protection;
  - (k) OP/BP 4.01 on Environmental Assessment, for the lack of appropriate mitigation measures to address social impacts related to GBV and child protection, which resulted in serious and long-term harm to the community;
  - (l) OP/BP 10.00 on Investment Project Financing, for failing to detect the serious harm suffered by women and children of the community during supervision of Project implementation, or to propose measures for redressing such harm; and
  - (m) OP/BP 10.00 on Investment Project Financing, for Management's overall supervision of the Project, including its actions in response to the Request received in December 2014.

## II. MANAGEMENT ACTION PLAN

9. The MAP aimed to address the findings of the Panel. The MAP included the following key actions:

- (a) ***Remediation for child victims of abuse:*** This action was aimed at ensuring remediation for the child victims of abuse, by increasing the support provided through the “Emergency Child Protection Response” (ECPR) facility – initiated in December 2015; through the extension of the contract of the NGO, BRAC; and through a grant from the Rapid Social Response (RSR) multi-donor trust fund for about US\$1 million.
- (b) ***Strengthening community response to GBV within Project communities:*** In parallel with the above action, Bank support was to be provided to local governments and affected communities in the Project area to strengthen their capacity to prevent and respond to GBV. The Project area would be one of the targeted areas of support under the RSR Grant, which was expected to be

operational by January 2017. Within the Project area, the RSR Grant would support: (i) efforts to reduce social acceptance of GBV through community-based behavioral change interventions; (ii) strengthening referral systems for youth at risk; and (iii) enhancing the capacity of community-based facilitators such as village health teams, local council leaders, crime preventers, and religious and cultural leaders to respond to GBV.

- (c) ***Resettlement Compensation:*** The GoU committed to complete land acquisition and compensation payments to Project-affected people, in line with national laws and Bank policy requirements, by no later than April 28, 2017. The satisfactory completion of this process is an important step in addressing issues from the past experience. To address continuing delays in completing this process, as well as other resettlement issues noted in the Panel's Report, the Bank would:
- (i) Recruit qualified experts to work directly with UNRA to assist it to (1) determine the reasons for the continued delays in payment of compensation and put in place an effective strategy for addressing them as necessary; (2) ensure that all outstanding and new claims are appropriately addressed; (3) determine whether there were impacts that have not previously been taken into account (livelihoods/loss of business income, vulnerable groups) for which compensation or assistance may be required; (4) ensure continuing consultation with Project-affected people and a well-functioning grievance mechanism; and (5) monitor implementation and provide fortnightly progress reports.
  - (ii) Recruit a separate expert to conduct an audit to confirm satisfactory implementation of the process under (i) at its completion.
  - (iii) Assign one or more Kampala-based Bank specialists to monitor and support the above process, with oversight from a Bank Lead Social Development Specialist.
- (d) ***Construction defects that have livelihood and safety impacts:*** The Bank would continue to support UNRA and the Supervising Engineer, to ensure that the Contractor fulfills its contractual obligations, and takes the necessary corrective measures to address ongoing problems, including those related to: (i) road access, (ii) drainage, (iii) damaged community water sources, (iv) incomplete installation of road safety devices, (v) damage to structures from blasting, and (vi) unsafe location of transmission lines. Such measures continue to be obligations of the Contractor and are covered by the Notice to Correct but remained incomplete at the time of cancellation. Effective management of the Contractor and satisfactory completion of these corrective measures were noted as key indicators in the reappraisal of the suitability of UNRA to implement Bank-financed projects, and a key input into any future Management decision to lift the suspension of civil works components of the Albertine Regional Sustainable Development Project (ARSDP) and North Eastern Road-Corridor Asset Management Project (NERAMP). As such, the Bank would:

- (i) Require that UNRA obtain Contractor remediation, no later than November 30, 2016.
  - (ii) If Contractor remediation was not completed satisfactorily by the above date, require UNRA itself to undertake the necessary corrective actions by no later than March 1, 2017 (if needed through a third party contractor), deducting the cost from the amount due under the contract.
  - (iii) Provide the services of an independent technical advisor to evaluate the quality and completeness of the corrective measures, and to seek feedback from the community that the problems have been rectified.
- (e) **Workplace and traffic accidents:** The Bank would work with UNRA to ensure that outstanding payments to victims of traffic accidents were made and that compensation amounts were appropriate and in line with national laws and regulations. The Bank would procure an independent technical advisor to assist UNRA in reviewing compensation amounts and calculating any additional compensation required, by January 1, 2017. If it was determined that additional compensation needed to be paid by the Contractor, UNRA would insist on Contractor compliance with this obligation. If any required payment was not made, the GoU committed to pay the required amount from its own resources, deducting the payment from the amount due under the contract.
- (f) **Wages and working conditions:** The Bank would continue to support UNRA and the Supervising Engineer, to ensure that the Contractor fulfils its contractual obligations and takes the necessary corrective measures to address contract deficiencies and working condition problems. Improvement in the management of the Contractor is a key indicator in the reappraisal of the suitability of UNRA to implement Bank-financed projects, and a key input into any future Management decision to lift the suspension of civil works in the ARSDP and NERAMP. The Bank would fund an independent technical advisor to assess Contractor compliance with pertinent labor regulations. UNRA committed to require the Contractor to undertake any corrective measures identified as a result of the advisor's assessment.
- (g) **Grievance mechanisms and consultation:** The Bank would support UNRA to develop an accessible and effective, UNRA-wide GRM. This would include the development of a grievance redress process manual that would document the hierarchy of reporting levels and define the roles and responsibilities for each level. This work would benefit from the diagnostic of UNRA's existing GRMs, which the Bank undertook in April 2016. For the roll-out of this GRM, the Bank would (i) provide training and orientation for UNRA field-based staff; (ii) conduct workshops for relevant local officials and communities to establish/reactivate local grievance redress committees; (iii) distribute standardized tools to record, report and manage grievances; and (iv) provide technical support to UNRA in establishing contact centers with full-time community liaison officers in communities along Project roads. For the Project area, UNRA had already (i)

activated a call center and set up a hot line; (ii) distributed and displayed posters with hotline numbers at prominent places in road communities; and (iii) recruited three community liaison officers (and is in the process of recruiting more), who are sensitizing grievance redress committees and conducting house visits in affected communities along the Kamwenge-Fort Portal Road. For the remainder of the construction of the Kamwenge-Fort Portal Road, Bank social specialists would continue to work with UNRA to ensure that a functional complaints mechanism, including hotline, is available and accessible for the affected communities.

- (h) ***Anti-retaliation:*** The Bank should obtain commitments from UNRA and the GoU to sustain their efforts in preventing retaliation. This would include periodic publication of high-level Government statements on the importance of anti-retaliation; radio talk shows providing strong messages on anti-retaliation and broadcasting public service messages about the child helpline number 116 and an UNRA hotline; re-publication by UNRA of its own anti-retaliation statement, which was published in the Daily Monitor on June 2, 2016; and engagement by UNRA with civil society partners, to disseminate anti-retaliation messages and to collaborate in monitoring and reporting any instances of threatened retaliation, should they occur. The Bank would monitor the GoU's actions in this regard, and communicate the need for correction if required.

- (i) ***Suspension of UNRA's civil works portfolio, while working with UNRA to build its environmental and social management capacity:*** The Bank cancelled the Credits for TSDP and suspended the financing of the civil works components of two other projects (ARSDP and NERAMP) implemented by UNRA. The suspensions would remain in place until the Bank received evidence that the GoU and UNRA had adequate capacity to adhere to required standards and practices. The fulfillment of agreed actions was required prior to the reappraisal of the suitability of UNRA to implement Bank-financed projects, and any future Management decision to lift the project suspensions. The Bank, together with other development partners, would continue to provide advice to UNRA as it undertakes to fulfill the agreed measures and, in this connection, to build capacity in the following areas: (i) reform of UNRA's institutional structure; (ii) contract administration and management; (iii) procurement; (iv) financial management; (v) environmental and social management – including a strengthened land acquisition system and processes; and (vi) communications and citizen engagement.

- (j) ***Working with UNRA and the GoU on addressing endemic social issues more systematically:*** Funding was approved from the RSR Trust Fund for a grant to enhance social protection systems in reaching child victims of sexual and gender-based violence. The grant was expected to be operational by January 2017 and would be implemented in several districts, including along the Kamwenge-Fort Portal Road. It would follow a three-pronged approach, which involved: (i) providing technical assistance for the national social protection system to reach child victims of abuse and those at risk of GBV; (ii) developing GRMs to improve outreach to child victims of abuse and populations at risk of GBV; and (iii)

enhancing the capacity and coordination of a national social protection system to protect child victims of abuse and of GBV. On a broader scale, the GoU expressed interest in working with the Bank and other partners to address the problem of GBV countrywide. After discussions with the Bank, the President of Uganda announced that he would launch a Presidential campaign to combat violence against women and girls. This coincided with the approval of the “National Policy on Elimination of Gender Based Violence for Uganda” in September 2016 by the Cabinet. In support of such a national GBV response and implementation of the new national policy, the Bank would provide technical assistance to the GoU in developing the following key inputs, building on the Bank-supported GBV diagnostic that was expected to be finalized by the end of October 2016: (i) “service-gap analysis,” (i.e., assessing gaps between existing standards for service provision to GBV victims and actual service availability and quality at district level); (ii) costing of a scalable approach to the provision of GBV response and prevention services; and (iii) identifying optimal institutional modalities for the delivery of such services. Finally, in order to strengthen the anti-GBV agenda within the Bank’s project portfolio in Uganda, one or more key projects in the portfolio would be restructured to include measures for addressing social risks, including GBV and child protection efforts. The first such project would be an ongoing electricity sector operation, the Uganda Electricity Sector Development Project, which would be restructured to include a component on social engagement in order to ensure meaningful communication with communities before contractors initiate work.

- (k) ***Safeguard portfolio reviews of Ugandan projects, with specific focus on child labor/abuse.*** The Bank would finalize a general review of environmental and social safeguards performance in all relevant Bank-financed projects in Uganda, as well as a complementary review with a specific focus on the risks of sexual abuse involving minors, and child labor. Recommendations from both reviews would be made public.
- (l) ***Procurement and contract management:*** Management recognized that environmental and social provisions in contracts for contractors as well as supervising engineers needed to be strengthened for civil works carried out in, or near, vulnerable communities and in other high-risk situations. A series of measures were to be piloted, including:
- As part of the bidding process for civil works:
    - (i) Applicants/Bidders would be required to declare any civil works contracts that have been suspended or terminated by the Employer for reasons related to environmental or social safeguards (including health and safety issues) compliance in the past five years. This information would be used to inform additional due diligence that may be required prior to contract signing.

- (ii) Specifications in the bidding documents would be strengthened to set out clear expectations with respect to environmental or social safeguards.
  - (iii) Bidders would be required to submit a plan for addressing environmental and social risks as part of the bidding process as well as a code of conduct for their workers based on a template to be provided by the Bank.
- As part of contracts for civil works:
    - (i) Contractors would be required to post an environmental and social performance bond that the contracting entity could cash should a contractor fail to remedy cases of environmental and social noncompliance. The bond should be for a reasonable amount which, in combination with the current performance bond, would normally not exceed 10 percent of the contract amount. The bond would be cashable based on failure to comply with the Engineer's Notice to Correct the said defects.
    - (ii) A provisional sum could be included in civil works contracts to be used as agreed between the contracting entity and the contractor in cases where contractors have fully met all environmental and social obligations under the contract and propose to further enhance environmental and social outcomes. The parties' agreement on the use of the provisional sum would be subject to the Bank's No Objection.
    - (iii) Civil works contractors and supervising engineers would be required to include dedicated staff with appropriate qualifications and experience to manage specific social and environmental impacts.
  - As part of contracts for supervising engineers:
    - (i) Clients would be required to share all progress and other technical reports received by the supervising engineers with the Bank.
- (m) ***Global review and staff guidance on labor influx issues:*** A guidance note for staff was prepared by a Bank-wide working group and internal review was completed on October 4, 2016. Consultation with external public and private sector stakeholders was to be completed by November 15, 2016. The guidance note would be issued and staff training would be initiated by December 1, 2016. Based on the above guidance, a portfolio-wide review of projects across the Bank would be conducted to ensure that pertinent issues are appropriately addressed where they arise. All Task Team leaders would be required to review civil works contracts that they manage with a view to (i) the size and characteristics of any labor influx; (ii) the existence and implementation of any mitigation measures in

the environmental and social management plan; and (iii) whether problems identified in the environmental and social management plan or similar to those arising under the TSDP have arisen, or are likely to do so. Where needed, project-specific action plans responding to the findings of this review would be prepared and implemented.

- (n) ***Global Gender-Based Violence Task Force:*** The World Bank Group President would form a Global Gender-Based Violence Task Force to strengthen the institution's response to instances of GBV encountered as part of its operations. The Task Force would include a range of members from academia, NGOs, foundations, UNICEF, and government. The Task Force was expected to deliver its report within nine months, and the Bank would follow up on its recommendations.
- (o) ***Internal review of lessons learned:*** Management commissioned a report on the lessons that can be learned from the Uganda Transport Sector Development Additional Financing and their implications for future Bank projects in similar situations. The report would be made public by the end of October 2016.

### **III. PROGRESS OF MANAGEMENT ACTION PLAN IMPLEMENTATION**

10. ***MAP implementation to date.*** Over the past four months, substantial progress has been made in MAP implementation, as summarized below.

11. ***Remediation for child victims of abuse:*** The Bank, through the ECPR facility, implemented by the globally reputable Uganda-based NGO, BRAC, has continued to meet key commitments in addressing the material and psychosocial needs of the identified victims of sexual abuse in the Project area.

12. In November 2016, there were 12 girls reported as victims of child sexual abuse associated with workers on the Project road. As of March 1, 2017, the number of victims alleged to have been abused by workers on the Project road was 13 in total (an increase of one since November 2016). The system to help identify and deal with cases of sexual misconduct identified in the Project area is not limited to incidents associated with road workers. it is broadly focused. In that regard, in the report of November 2016, there were also 17 girls that had allegedly been abused by perpetrators not associated with the road construction. As of March 1, 2017, that number was reported to be 121. The considerable increase in the number of girls self-identifying as victims of child sexual abuse is associated with the increased and proactive outreach in the Project area during the establishment of centers to support economic empowerment and livelihoods for adolescent girls ("girls' clubs") under the Bank-financed package of support implemented through BRAC. As noted in the November response, the Bank continues to focus its activities not only on supporting victims of child sexual abuse, but also on addressing the underlying factors contributing to this endemic problem.

13. Using the Bank-supported ECPR facility, all 134 victims of child sexual abuse identified to date have received direct support. The particular support provided under ECPR is tailored to

the specific needs and circumstances of each victim and may include: (a) psychosocial support, including counseling and guidance and, in some instances family counseling; (b) medical support, including pre- and post-natal care where relevant; (c) reintegration into formal schooling for several of the victims of abuse; (d) livelihood support, in the form of a monthly stipend to take care of basic needs for those in abject poverty; and (e) vocational training. Caregivers are also being assisted through income-generating activities that will allow them to better support the victims of child sexual abuse. As of March 21, 2017, ECPR support was in the process of being extended until the end of April 2017 at which point financing of the activities being implemented by BRAC will fall under the RSR Grant, thereby continuing the initiatives commenced under the ECPR, while also expanding and deepening them through strengthening community responses to GBV within Project communities.

14. In addition to meeting the immediate material needs of the victims of child sexual abuse, the Bank is working in the Project area districts (Kabarole and Kamwenge) to strengthen community response to GBV, including child sexual abuse, through the RSR Grant that became effective in January 2017 (see paragraph 16 below).

15. The Bank has continued to monitor legal redress regarding child sexual abuse cases in the Project area. No new cases have been reported to the justice system since October 2016. To date, 45 cases in the Project area have been reported to police for investigation. Of these, 32 cases had sufficient corroborating evidence to facilitate follow up. Four convictions have been secured and, of these, one conviction was of a road worker. Of the remaining cases, six remain pending (one is in court and, in five cases, suspects are still being traced). The rest of the cases have been dismissed by the court or closed by the Resident State Attorney (deemed untenable due to a lack of evidence or assistance from the community). A core objective of the RSR Grant is to reduce community barriers to seeking help and justice for the victims of GBV, including victims of child sexual abuse.

16. ***Strengthening community response to GBV within Project communities:*** Beyond the direct support to victims of child sexual abuse outlined above, the Bank secured, on behalf of the GoU, the US\$1 million RSR Grant, which was signed and became effective on January 18, 2017 and will continue to be implemented until December 2018. Under this Grant, GoU will provide local governments and communities in the Project area with support to strengthen their capacity to prevent and respond to GBV. The Grant will enhance the provision of prevention programs and response services for the victims of child sexual abuse and those at risk of sexual violence in the Project area in Kamwenge and Kabarole districts. Activities include: (a) community campaigns to reduce social tolerance of GBV, (b) enhancing systems of support to victims of GBV (i.e., coordinating health, police, justice services), and (c) strengthening community support system capacity to respond to GBV, including village health teams, local council leaders, and religious and cultural leaders.

17. In addition, in October 2016, the GoU requested IDA support of US\$40 million for an operation to address GBV in a systematic manner throughout Uganda. The IDA-funded

operation will support the implementation of the National Policy on the Elimination of Gender Based Violence throughout the country (see paragraph 34 below).<sup>4</sup>

18. ***Resettlement compensation:*** UNRA, on behalf of the GoU, has committed to completing land acquisition and compensation payments to Project-affected people, in line with national laws and Bank policy requirements, by April 28, 2017. As of March 27, 2017, 94 percent of 2,960 Project-affected people had received compensation; the remaining 6 percent (177 people) had not yet been paid. Of those outstanding, payments to 49 Project-affected people are currently in process and are expected to be paid by April 28, 2017. UNRA plans to transfer the estimated amounts for the remaining 127 affected people (4 percent of the total) into the recently opened escrow account by April 28, 2017, to be paid out as the remaining cases are resolved.

19. The Bank has recruited qualified experts to assist UNRA to complete compensation on the Kamwenge-Fort Portal road, ensure continuing consultation and develop a well-functioning GRM. It is also retaining a consultancy firm to conduct an audit of the compensation process once it is complete. A locally recruited consultant is monitoring the above process with oversight of the Lead Social Development Specialist.

20. ***Construction defects that have livelihood and safety impacts:*** UNRA has made substantial progress in ensuring the Contractor undertakes the necessary corrective measures to address problem related to: (a) road access, (b) drainage, (c) damaged community water sources, (d) road safety measures, (e) damage to structures from blasting, and (f) unsafe location of power lines. See the attached table for details of progress to date on the individual issues.

21. The independent technical advisor, hired by the Bank, completed his investigations and his report was received by the Bank on March 9, 2017. The Bank has reviewed the document and has reverted back to the advisor with factual technical comments to the report. A revised version will be provided to Management and UNRA by the independent technical advisor. Notwithstanding, the independent advisor verified compliance with the items in the “Notice to Correct” and confirmed that UNRA’s reports were correct. The independent advisor also verified the progress made by the Contractor on installation of access points, provision of drainage, review of accidents and compensation, and water sources. He actively compared the Project road with a major national road in the country (Kampala-Fort Portal Road) and noted that several technical provisions, like access and drainage, had been implemented with better standards on the Kamwenge-Fort Portal Road.

22. On the other hand, the advisor was also critical of all the parties’ performance including the Client, Contractor, Supervision Engineer and the Bank. The contention was that more stringent action needed to be taken against the Contractor earlier, and payments suspended until he complied. The advisor also highlighted the set of contractual management shortcomings that occurred at the time of contract signing and in particular those related to the approval of the Environmental and Social Management Plan (ESMP) and the incorporation of the environmental and social safeguards requirements into the contract. In the opinion of the independent advisor,

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<sup>4</sup> The Project Information Document can be found at:  
<http://documents.worldbank.org/curated/en/969261479207993111/pdf/ITM00184-P160447-11-15-2016-1479207990338.pdf>

these shortcomings should have been addressed more extensively in the set of actions included in the “Notice to Correct,” and to this end, he made a number of specific suggestions for improvement. The formalization of the contractual framework has recently taken place with the signing of the updated contract with the Contractor.

23. ***Workplace and traffic accidents:*** With UNRA’s agreement, the Supervising Engineer engaged an insurance expert to review and determine the adequacy of compensation paid for accident victims. The expert reviewed the cases associated with 41 accidents. No additional payments were recommended in 18 cases. Of the remaining 23 outstanding cases, additional payments were recommended for 12 cases, and further documentation was requested to make a final determination for the other 11 cases.

24. For the cases which warranted additional payment, it was recommended to increase the original payment from about 27.92 million UGX to about 166.39 million UGX, a difference of 138.47 million UGX. The Contractor accepted the recommendations made by the insurance expert and was instructed by UNRA through the Supervising Engineer to implement them. UNRA withheld money from the Contractor’s interim payment certificate (IPC) 16, and a procedure to compensate the victims was developed. The Bank team and independent technical advisor received a copy of the insurance expert’s report, and provided comments. UNRA and the Supervising Engineer agreed to take these into account in the final compensations. For any cases not paid directly by the Contractor, UNRA will deduct the payments from the Contractor’s IPC.

25. The latest update from the Supervising Engineer indicates that 11 victims out of the 23 outstanding cases have received their compensation payments (of these 9 were paid by UNRA through deductions from the Contractor’s payments, and 2 were paid by the Contractor). However, by March 17, 2017, two additional cases have been identified bringing the number of cases from 23 to 25. The Contractor has been asked to provide details for these additional victims. Once all information and documentation is received, the insurance expert will make a final determination on all remaining cases. This issue remains as one of the outstanding issues recorded as partially compliant in the Notice to Correct, and is being followed up.

26. ***Wages and working conditions:*** Uganda has no legal minimum wage requirement. Prior UNRA and Bank team review of this issue found the rates paid to be similar to those for other road construction works in the western region of the country. Work permits are being addressed, and workers have been issued with contracts and identity cards. They are also being provided with the necessary worker welfare amenities, have been accorded the necessary rights and are subject to obligations as per Ugandan labor laws.

27. ***Grievance mechanisms and consultation:*** As of March 27, 2017, UNRA had fulfilled its commitment to establishing all the elements of an accessible and effective GRM along the Kamwenge-Fort Portal and Kyenjojo-Kabwoya (under the ARDSP) roads. UNRA has adopted a new grievance redress policy and guidance to be mainstreamed throughout its operations, which is in use along Kamwenge-Fort Portal and Kyenjojo-Kabwoya (under the ARDSP) roads. UNRA is establishing grievance management committees (GMCs) at the community, sub-county and district levels along the roads. It also launched a bespoke Grievance, Inquiries, Feedback Management System (GIFMS), which has web-based and smartphone interfaces (termed “UNRA Speed App”) that allow UNRA staff to capture and consolidate feedback.

28. As of March 27, 2017, a total of 18 GMCs had been established, trained, and were operating along the Kamwenge-Fort Portal road. Based on GIFMS data, 58 grievances have been recorded along the Kamwenge-Fort Portal road since December 2016. Forty-nine of these grievances (84 percent) related to resettlement issues, such as concerns over valuations, under- or non-payment of compensation, or delays in receiving compensation payments. Twenty of these grievances (35 percent) had been responded to as of March 10, 2017. While road construction is due to be completed by the end of April 2017, the GRM will remain in place until the end of the indemnity period, 12 months after completion. Similar efforts are being undertaken along the Kyenjojo-Kabwoya road.

29. To assist UNRA in the work it has undertaken to put the GRM in place, the Bank has (a) provided training and orientation for UNRA field-based staff; (b) facilitated the development of training content for and training of GMCs and relevant local officials to establish/re-activate local GMCs; (c) distributed standardized tools to record, report and manage grievances; and (d) provided technical support to UNRA in developing a community engagement strategy and action plan which includes improving the design of contact centers with full-time community liaison officers in communities along the Project roads. The Bank also continues to provide support to UNRA to improve its GIFMS.

30. The Bank will continue to support the development, refinement and implementation of this system-wide GRM through the RSR Grant.

31. **Anti-retaliation:** The GoU has mainstreamed a zero-tolerance approach to retaliation. The Bank has ensured that anti-retaliation measures are built into the nascent UNRA-wide GRM now under implementation. Moreover, where complaints are registered with the Bank, the Bank seeks assurances that complainants suffer no retaliation. During a field visit in late March 2017, Bank Management was able to confirm from the chair of the GMC in Bigodi community (who was among the Requesters) that community members no longer perceive any threat of retaliation.

32. **Notice to Correct.** The latest update of March 17, 2017, from the Supervising Engineer shows that the Contractor has made good progress addressing the issues laid out in the Notice to Correct, dated October 21, 2015. Out of 36 issues in the Notice to Correct, 34 are now compliant and 2 are partially compliant (blasting operations at stone quarry, and work place accidents and compensation). Progress is being made on all these issues and full compliance should be attained before April 30, 2017. The GoU and UNRA in particular have made significant advances in building capacity for environmental and social management. As of February 28, 2017, all of the following were nearing completion: hiring of the required environmental and social experts, project management experts, and communications specialists as per the approved positions in UNRA's restructuring; Notice to Correct issues on the Kamwenge-Fort Portal road; and compensation payments on both the Kamwenge-Fort Portal Road, and the Kyenjojo-Kabwoya road section. The Bank also undertook a procurement and financial management post review audit, and found the existing UNRA arrangements to be broadly acceptable with minor actions recommended for UNRA management attention. The Bank team will also check on completion of the post-review actions during The Bank team checked on completion of the post-review actions during the high level mission for the reappraisal of UNRA (March 20-31, 2017). UNRA reported that these issues have been addressed. The Bank procurement and financial management staff have been asked to confirm this in a post-review follow-up.

33. ***Environmental and Social Management Systems:*** The Environmental and Social (E&S) Management System and the Land Acquisition Management System have both been strengthened substantially with support from Bank staff and consultants, as well as from consultants provided by other development partners. UNRA has developed a progressive E&S policy and clear guidelines for its implementation in practice; has revised internal procedures to incorporate E&S issues in all relevant processes and aspects of work flow; and has set up systems based on information and communication technology (ICT) to track the implementation of E&S measures in UNRA programs. Staffing in UNRA's E&S unit has doubled from three in February 2016 to six as of March 2017, and a further doubling is planned by April 28, 2017. This is in addition to the five sociologists and three environmental specialists UNRA has hired on a contractual basis. The Land Acquisition Unit had only two staff prior to January 2016, which increased to five in February 2016 and to 30 as of March 2017, at which time UNRA was in the process of hiring 40 additional staff for land acquisition. UNRA has also computerized its Right of Way Management System (RoWMIS) up to the stage of grievance redress, and this system is now being used for all new projects in Uganda.

34. ***Working with UNRA and the GoU on addressing endemic social issues more systematically:*** As noted above, the RSR Grant is under implementation and the GoU requested IDA support to address GBV in a systematic manner throughout Uganda. The IDA-funded operation will support the implementation of the National Policy on the Elimination of Gender Based Violence. Preparation is taking place on an accelerated schedule. In addition, social risk management components with a specific focus on GBV prevention are being integrated into energy and transport operations through restructuring of the existing IDA portfolio in Uganda (see paragraph 36).

35. The RSR Grant includes support for prevention programs and response services related to sexual violence against children (VAC) in selected locations in Kamwenge and Kabarole Districts. It focuses on: (a) improving access by child victims of sexual violence to a minimum package of services, (b) preventing VAC and GBV; and (c) strengthening capacity of the Ministry of Gender, Labor and Social Development (MoGLSD) and district authorities to coordinate, monitor and ensure quality of services for GBV victims. Recruitment of implementing NGOs, hiring of a project coordinator and signing of MoUs with district authorities is ongoing, and project implementation is expected to commence by the end of April.

36. The following IDA-supported operations in Uganda are in the process of being restructured to introduce social risk management components with a focus on GBV: (a) the Electricity Sector Development Project (US\$120 million) is currently being restructured to include a US\$1.5 million component focusing on prevention of GBV, strengthening the identification of potential cases through GRM and establishing referral mechanisms for victims around project sites; and (b) NERAMP (US\$234.80 million under implementation) includes a comprehensive set of activities to address GBV, child protection, and occupational health and safety.

37. ***Safeguard portfolio reviews of Bank-financed projects in Uganda, with specific focus on child labor/abuse:*** The Bank has completed a general review of environmental and social safeguards performance in all IDA-supported projects within the Uganda portfolio, and a complementary review with a specific focus on the risks of sexual abuse involving minors, and

child labor. The recommendations of both reviews have been made public through the "[Uganda TSDP AF - Lessons Learned and Agenda for Action Report.](#)"

38. The review of environmental and social safeguards performance made a number of recommendations to improve safeguards performance across the Uganda portfolio. The review noted the need to improve community consultation and GRMs in almost all projects. The review also resulted in project-specific action plans to address identified deficiencies across the portfolio. Since the review, both the Bank and the GoU have undertaken a number of measures to strengthen management of safeguards issues in the Uganda portfolio.

39. The Bank's independent review of the Uganda portfolio assesses the risks of sexual abuse of minors and child labor under other projects. While the review found a number of factors specific to Uganda that heightened the risks and recommended a number of systemic improvements, no additional incidents of child abuse were found. The review recommended improvements in project design, implementation and staffing in the Uganda portfolio to take account of child protection risks.

40. ***Procurement and contract management:*** Environmental and social provisions in contracts for contractors as well as supervising engineers have been strengthened Bank-wide for civil works that are carried out in, or near, vulnerable communities and in other high-risk situations; As of February 27, 2017, the Bank had updated the revised works-related Standard Procurement Documents (SPDs) to reflect lessons learned from the Uganda TSDP and shared them with all operational staff. The new conditions and requirements clarify standards, accountability, and remedies, while also providing incentives for good performance on key Environmental, Social, Health and Safety (ESHS) related aspects of works contracts. This added focus is expected to also contribute to overall successful contract performance and value for money throughout the procurement and contract management process. Training sessions are being organized for staff and Guidance Notes on the application of these new provisions will be prepared.

41. ***Global review and staff guidance on labor influx issues:*** A guidance note for staff "Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labor Influx" was issued on December 1, 2016, and disseminated to all Bank operational staff. Based on the above guidance, a portfolio-wide review of projects across the Bank is being carried out to ensure that pertinent issues are being appropriately addressed where they arise. The review is expected to be completed in April 2017. Procurement documents have been amended to reflect lessons learned from the TSDP and include enhanced ESHS provisions. An approach for implementing effective "Codes of Conduct" by companies to address GBV and VAC has been developed and is being pilot tested. Additional guidance has been prepared to improve occupational health and safety measures and will be tested in the second quarter of 2017.

42. ***Global Gender-Based Violence Task Force:*** A Global Gender-Based Violence Task Force has been formed to strengthen the institution's response to instances of GBV encountered as part of its operations. The Task Force includes a range of members from academia, NGOs, foundations, UNICEF, and government. The Task Force is expected to deliver its report in June 2017, and the Bank will follow up on its recommendations.

43. ***Internal review of lessons learned:*** A report on “Lessons Learned and Agenda for Action” from the Uganda TSDP – Additional Financing and the implications of those lessons for future Bank projects in similar situations, has been prepared and discussed with the Board on November 21, 2016. The report was subsequently made public and disseminated to all staff. To further disseminate the TSDP experience and lessons learned, extensive communications and outreach have been undertaken in Uganda including with CSOs, with the media, with development partners working in the transport sector, and with the Local Development Partners Group in general. The intention has been to share the lessons learned from the TSDP experience, and to discuss the different measures and options available to address GBV, and other social, labor, environmental and contractual issues in the transport projects of all development partners in the country.

#### **IV. NEXT STEPS**

44. ***The next Progress Report to the Board.*** The next progress report will be submitted in 12 months, or when the MAP is completed, whichever occurs first. Should there be significant developments of concern that occur within this period, the progress report would be advanced to take account of that.

## Implementation of Management Action Plan

<b>Proposed Actions</b>	<b>Status Update as of March 2017</b>
<b>1. Remediation for child victims of abuse</b>	
<p>The Bank-funded Emergency Child Protection Response (ECPR) has made progress in meeting immediate material needs and addressing the psychosocial needs of the victims of sexual abuse, without discriminating between cases associated with road workers and those associated with other perpetrators.</p> <p>This assistance, which has been implemented by reputable NGOs (BRAC and TPO), will be continued at least for the next twenty-four months through the following modalities:</p> <ul style="list-style-type: none"> <li>• BRAC's contract has been extended through April 2017. BRAC will continue to support: (i) life skills training, school reintegration for girls who have dropped out of school, financial literacy and apprenticeships; (ii) psychosocial support and counseling for victims of sexual violence and their families; (iii) health care support, including adolescent sexual and reproductive health services, which includes screening and, as necessary, treatment of sexually transmitted infections, hygiene education, etc.; (iv) in-kind support to victims of abuse to meet basic needs; and (v) support in seeking legal redress.</li> <li>• Following the completion of the BRAC contract, the above support will continue under the RSR Trust Fund Grant (described in Action 10, below).</li> </ul> <p>Management notes the recent improvements in Government efforts to identify and hold perpetrators legally accountable, and also notes that the GoU has committed to provide the Bank with regular updates on steps that it has taken to ensure that</p>	<p>The Bank, through the ECPR facility, implemented by the globally reputable Uganda-based NGO, BRAC, has continued to meet key commitments in addressing the material and psychosocial needs of the identified victims of sexual abuse in the Project area.</p> <p>The particular support provided under ECPR is tailored to the specific needs and circumstances of each victim and may include: (a) psychosocial support, including counseling and guidance and, in some instances family counseling; (b) medical support, including pre- and post-natal care where relevant; (c) reintegration into formal schooling for several of the victims of abuse; (d) livelihood support, in the form of a monthly stipend to take care of basic needs for those in abject poverty; and (e) vocational training. Caregivers are also being assisted through income-generating activities that will allow them to better support the victims of child sexual abuse. As of March 21, 2017, ECPR support was in the process of being extended until the end of April 2017 at which point financing of the activities being implemented by BRAC will fall under the RSR Grant, thereby continuing the initiatives commenced under the ECPR, while also expanding and deepening them through strengthening community responses to GBV within Project communities.</p> <p>Moreover, in addition to meeting the immediate material needs of the victims of child sexual abuse, the Bank is working in the Project area districts (Kabarole and Kamwenge) to strengthen community response to gender-based violence (GBV, including child sexual abuse) through the RSR Grant that became effective in January 2017 (see Action 2 below).</p> <p>The Bank has continued to monitor legal redress regarding child sexual abuse cases in the Project area. No new cases have been reported to the justice system since October 2016. To date, 45 cases in the Project area have been reported to police for investigation. Of these, 32 cases had sufficient corroborating evidence to facilitate follow up. Four convictions have been secured and, of these, one conviction was of a road worker. Of the remaining cases, six remain pending (one is in court and, in five cases, suspects are still being traced). The rest of the cases have been dismissed by the court or closed by the Resident State Attorney (deemed untenable due to a lack of evidence or assistance from the community). A core objective of the RSR Grant is to reduce community barriers to seeking help and justice for the victims of GBV, including victims of child sexual abuse.</p>

Proposed Actions	Status Update as of March 2017
<p>cases of GBV are vigorously investigated and addressed by the appropriate law enforcement authorities. The importance of this issue was stressed in September 2016 in an exchange of letters between the President of the Bank and the President of Uganda.</p>	
<b>2. Strengthening community response to GBV within Project communities</b>	
<p>In parallel with Action 1, Bank support will be provided to local governments and affected communities in the Project area to strengthen their capacity to prevent and respond to GBV.</p> <p>The Project area will be one of the targeted areas of support under the RSR Trust Fund, which is expected to become effective in January 2017 (see Action 10, below). Within the Project area, the RSR will support: (i) efforts to reduce social acceptance of GBV through community-based behavioral change interventions; (ii) strengthening referral systems for youth at risk; and (iii) enhancing the capacity of community-based facilitators such as village health teams, local council leaders, crime preventers, and religious and cultural leaders to respond to GBV.</p>	<p>Beyond the direct support to victims of child sexual abuse described above, the Bank has secured, on behalf of the GoU, an RSR Grant of around US\$1 million which was signed and became effective on January 18, 2017. Under this Grant, GoU will provide local governments and communities in the Project area with support to strengthen their capacity to prevent and respond to GBV. As of March 20, GoU had issued requests for Expressions of Interest to a number of CSOs active in the field of GBV prevention and response in Uganda, inviting them to participate in the provision of such services in the Project area. Implementation will continue until December 2018. The project will enhance the provision of prevention programs and response services for the victims of child sexual abuse and those at risk of sexual violence in the Project area in Kamwenge and Kabarole districts. Activities include: (i) community campaigns to reduce social tolerance of GBV, (ii) enhancing systems of support to victims of GBV (i.e., coordinating health, police, justice services), and (iii) strengthening community support system capacity to respond to GBV, including village health teams, local council leaders, and religious and cultural leaders.</p>
<b>3. Resettlement compensation</b>	
<p>The GoU has committed to complete land acquisition and compensation payments to Project-affected people, in line with national laws and Bank policy requirements, by no later than March 2017. The satisfactory completion of this process is one of the conditions for the reappraisal of the suitability of UNRA to implement Bank-financed projects, and any future Management decision to lift the suspensions of the civil works components of the ARSDP and NERAMP.</p> <p>To address continuing delays in completing this process, as well as other resettlement issues noted in the Panel's Report, the Bank will:</p> <ul style="list-style-type: none"> <li>(i) Recruit qualified experts to work</li> </ul>	<p>UNRA, on behalf of the GoU, is committed to completing land acquisition and compensation payments to Project-affected people, in line with national laws and Bank policy requirements, by April 28, 2017.</p> <p>As of March 27, 2017, 94 percent of 2,960 Project-affected people had received compensation; the remaining 6 percent (177 people) had not yet been paid compensation. Reasons for delays in payment included instances in which: estates of deceased persons had absent or disputed claimants; claimants had insufficient documentary evidence of identification to open a bank account to enable an electronic funds transfer; or claimants disputed assessed compensation amounts. UNRA confirmed on March 21, 2017 that the escrow account has been opened. Of the outstanding compensation amounts, payments to 49 Project-affected people are currently in process and are expected to be paid by April 28, 2017. UNRA plans to transfer the estimated amounts for the remaining 127 affected people (4 percent of the total) into the escrow account by April 28, 2017, to be paid out as the remaining cases are resolved.</p> <p>Progress since the Management Report to the Board:</p>

Proposed Actions		Status Update as of March 2017			
		Total Project-affected people	Remaining to be compensated	% complete.	
		Sept 2016	2,844	574	80%
		Mar 2017	2,960	177	94%
		<p>To assist the GoU to complete compensation on the Kamwenge-Fort Portal road, the Bank:</p> <ul style="list-style-type: none"> <li>(i) Has recruited qualified experts to assist UNRA to validate the list of Project-affected people and complete the process of compensation along the Kamwenge-Fort Portal road, ensure continuing consultation of Project-affected people and develop a well-functioning GRM.</li> <li>(ii) Is in the process of retaining a consultancy firm to conduct an audit to confirm the satisfactory completion of compensation for Project-affected people. The audit will commence when the compensation process is complete.</li> <li>(iii) Has assigned a locally recruited consultant to monitor and support the above process with oversight of the Lead Social Development Specialist.</li> </ul>			
<p>(ii) Recruit a separate expert to conduct an audit to confirm satisfactory implementation of the process under (i) at its completion.</p> <p>(iii) Assign one or more Kampala-based Bank specialists to monitor and support the above process, with oversight from a Bank Lead Social Development Specialist.</p>					
<b>4. Construction defects that have livelihood and safety impacts</b>					
<p>The Bank will continue to support UNRA and the Supervising Engineer, to ensure that the Contractor fulfills its contractual obligations, and takes the necessary corrective measures to address ongoing problems, including those related to: (i) road access, (ii) drainage, (iii) damaged community water sources, (iv) incomplete installation of road safety devices, (v) damage to structures from blasting, and (vi) unsafe location of transmission lines.</p> <p>Such measures continue to be obligations of the Contractor and are covered by the Notice to Correct but remain incomplete. Effective management of the Contractor and satisfactory completion of these corrective measures are key indicators</p>		<p>UNRA, on behalf of the GoU, has made substantial progress in ensuring the Contractor undertakes the necessary corrective measures to address problem related to: (i) road access, (ii) drainage, (iii) damaged community water sources, (iv) road safety measures, (v) damage to structures from blasting, and (vi) unsafe location of power lines.</p> <p>The independent technical advisor, hired by the Bank, completed his investigations in country, and on the road, and held meetings with affected community members. The draft report, which will provide an independent review of the status of implementation of the corrective measures, was received by the Bank on March 9, 2017. The Bank has reviewed the document and has reverted back to the advisor with factual technical comments to the report. This report will be shared with Management and UNRA upon receiving the new version by the independent technical advisor. Notwithstanding, the independent advisor verified compliance with the items that are part of the "Notice to Correct" and confirmed that the reports provided by UNRA, by end December 2016, were correct.</p> <p>The independent advisor also verified with the Contractor, the progress made on installation of access points, provision of drainage, review of accidents and compensation, and water sources. He actively compared the Project road with a major national road in the country (Kampala-Fort Portal Road) and noted that several technical provisions, like access and drainage, had been implemented with better</p>			

Proposed Actions	Status Update as of March 2017
<p>in the reappraisal of the suitability of UNRA to implement Bank-financed projects, and a key input into any future Management decision to lift the suspension of civil works components of the ARSDP and NERAMP.</p> <p>Therefore, the Bank will:</p> <ul style="list-style-type: none"> <li>• Require that UNRA obtain Contractor remediation, no later than November 30, 2016.</li> <li>• If Contractor remediation is not completed satisfactorily by the above date, require UNRA itself to undertake the necessary corrective actions by no later than March 1, 2017 (if needed through a third party contractor), deducting the cost from the amount due under the contract.</li> <li>• Provide the services of an independent technical advisor to evaluate the quality and completeness of the corrective measures, and to seek feedback from the community that the problems have been rectified.</li> </ul>	<p>standards on the Kamwenge-Fort Portal Road.</p> <p>On the other hand, the advisor was also critical of all the parties' performance including the Client, Contractor, Supervision Engineer and the Bank. The contention was that more stringent action needed to be taken against the Contractor earlier, and payments suspended until he complied. Details of progress to date on the individual issues are presented below:</p> <ul style="list-style-type: none"> <li>• <b>Access points:</b> Construction of access points is ongoing as per the design review report and will continue until the end of construction (end April 2017). Most of the access points (both pedestrian and vehicular) have already been built on the completed sections on the Kamwenge side, and construction is ongoing on the Fort Portal side. By the end of January 2017, 368 out of the planned 497 access points had been completed. In urban areas, the drainage channels are covered with concrete slab covers, and the walkways are also concreted, forming pathways to facilitate pedestrian access along the road, and to buildings and properties on the road side. Temporary access is being provided on a rolling basis as construction works progress. Furthermore, areas in front of people's properties will be shaped, refilled and compacted to enable better access between properties.</li> <li>• <b>Drainage:</b> Drainage aspects have been progressively addressed with the installation of outfall drainage channels to ensure water does not discharge into people's properties. In some instances, the affected people have requested to be compensated for the installation of these outfall channels, and UNRA is processing the compensation in order to undertake the installations. Culverts are being installed to manage the drainage system for the road, and side drains have been constructed, and lined with stone pitching in cases where the slope would generate erosion impacts. Progress on drainage provision is satisfactory; outstanding needs for drainage have been identified by the Engineer, and the Contractor has been instructed to carry out the works. These will be installed before the road works are completed.</li> <li>• <b>Damaged community water sources:</b> All damaged/impacted community water sources have been addressed. Two water sources were noted as being affected in the quarry site areas of Busoro (national water grid stand pipe) and Kiko crusher site (protected well and water pump). The Contractor provided alternative stand water pipe sources. The Contractor has also provided a protected well at Kamwenge quarry, installed a French drain to protect a community spring in Kamwenge, protected another spring at km 189+652, cleared algal blockage of a spring well at km 147+840, and installed two water connections at Lake Nyabikere. The shallow well contamination complaint in Bigodi was investigated, in the presence of the independent technical advisor. A separate report has also been prepared by the Environmental Specialist of the Supervising Engineer. The report indicated that the complaint did not have merit since the well is in a wetland section with clayey soil contamination from below, and not from the road that is much further away. The independent technical advisor concurred with the Environmental Specialist's findings. In a meeting held with the Bigodi Grievance Redress Committee on February 16, 2017, UNRA agreed to ask the Contractor to provide an alternative water source as an act of corporate social responsibility.</li> <li>• <b>Road safety measures:</b> Installation of speed control structures (speed bumps and warning signage) and permanent signs has improved significantly along the road. In road sections where the paving works have been completed, the installation of speed bumps, rumble strips, and road signs is progressing well, and has been completed for some sections. Temporary signs are being provided in areas where works are ongoing. Flag persons are found at all active construction areas. Another long-standing safety concern which has now been corrected is the use of old dilapidated trucks. These have since been removed and only road worthy</li> </ul>

Proposed Actions	Status Update as of March 2017
	<p>trucks are now in use on the road. Safety training and induction is also being provided to all workers. All road signs, traffic calming structures, and road marking will be completed before the contract end date of April 30, 2017.</p> <ul style="list-style-type: none"> <li>• <b><i>Damage from blasting operations:</i></b> Out of the five quarry sites namely Bigodi, Katoma, Kamwenge, Kiko (allowed to operate only as a crusher site), and Busoro, only the Kiko crusher site is operational. At this quarry, affected people are being compensated on a quarterly basis after being relocated to rental accommodations at safer places nearby. The Bigodi and Katoma quarries have been closed and restored, while the Kamwenge quarry is under restoration. The UNRA land acquisition team, together with the Contractor, held a community engagement meeting for affected people at Kamwenge Quarry on January 20, 2017. A report with the final evaluation for payments was submitted for Chief Government Valuer (CGV) Clearance. An update will be provided by UNRA to the Bank when these payments are made, to bring this issue to full compliance. The Contractor performed controlled blasting at the Busoro quarry, and reached agreements with all people living in the quarry vicinity to provide safe piped water for their use, extend electricity pole coverage to the area and improve their local access road. The first two items have been completed, and the third will be completed after quarry restoration. By February 16, 2017, the Busoro site, which was the final quarry used as a source of aggregates for the road, was in the final stages of restoration.</li> <li>• <b><i>Unsafe location of power lines:</i></b> The Supervising Engineer has updated the engineering drawings indicating where power lines/conductors run above people's houses; there are 171 such houses. UNRA reported that the 105 houses for which compensation was paid earlier have now been demolished. Compensation has also been paid for the remaining 43 houses that are under conductors within the road reserve and the evacuation notices have been issued to the affected people. The Supervising Engineer also reported that 23 houses outside the road reserve have power lines that were relocated overhead due to Project activities. The relocation subcontractor has been notified of the matter and is expected to return the power lines to the road reserve before the completion of the road works.</li> </ul>
<b>5. Workplace and traffic accidents</b>	
<p>The Bank will work with UNRA to ensure that outstanding payments are made and that compensation amounts are appropriate and in line with national laws and regulations. The Bank will procure an independent technical advisor (Action 4) to assist UNRA in reviewing compensation amounts and calculating any additional compensation that may be required, by January 1, 2017. If it is determined that additional compensation needs to be paid by the Contractor, UNRA will insist on Contractor compliance with this obligation. If any required payment is not made, the GoU has committed to pay the required amount from its own resources, deducting the payment from</p>	<p>With UNRA's no objection, the Supervising Engineer engaged an insurance expert to review and determine the adequacy of compensation paid for accident victims. The insurance expert submitted its final assessment report in December 2016, for accidents that were registered earlier. The expert reviewed the cases associated with 41 accidents. No additional payments were recommended in 18 cases. Of the remaining 23 cases, additional payments were recommended for 12 cases, and further documentation was requested to make a final determination for the other 11 cases. For the cases which warranted additional payment, it was recommended to increase the original payment from about 27.92 million UGX to about 166.39 million UGX, a difference of 138.47 million UGX. UNRA reached agreement with the Contractor that these compensation payments needed to be made. The latest update from the Engineer (March 17, 2017) indicates that 11 victims out of 25 cases had been paid. Thus 14 victims remain to be paid. The insurance expert revisited the site from March 9 to 11, 2017. He made a determination on 9 of the 14 cases. Once all information and documentation is received, he will make a final determination on all remaining cases. This issue remains as one of the outstanding issues recorded as partially compliant in the Notice to Correct, and is being followed up to ensure full payments before April 30, 2017.</p>

<b>Proposed Actions</b>	<b>Status Update as of March 2017</b>
the amount due under the contract.	
<b>6. Wages and working conditions</b>	
<p>The Bank will continue to support UNRA and the Supervising Engineer, to ensure that the Contractor fulfils its contractual obligations and takes the necessary corrective measures to address contract deficiencies and working condition problems.</p> <p>Improvement in the management of the Contractor is a key indicator in the reappraisal of the suitability of UNRA to implement Bank-financed projects, and a key input into any future Management decision to lift the suspension of civil works in the ARSDP and NERAMP.</p> <p>The Bank will fund an independent technical advisor (see Action 4) to assess Contractor compliance with pertinent labor regulations. UNRA has committed to require the Contractor to undertake any corrective measures identified as a result of the advisor's assessment.</p>	<p>Uganda has no minimum wage laws. However, the works contract requires the Contractor to pay wages at rates, and observe conditions of labor, which are not lower than those established for the trade or industry where the trade is carried out. Prior UNRA and Bank team review of this issue found the rates paid to be similar to those for other road construction works in the western region of the country.</p> <p>On work permits, out of 32 expatriate workers, 20 have valid work permits, 3 have been approved to receive work permits, and 9 have special passes and are in the application review and approval process.</p> <p>Workers have been issued with contracts and identity cards. They are also being provided with the necessary worker welfare amenities, and have been accorded the necessary rights and are subject to obligations as per Ugandan labor laws.</p>
<b>7. Grievance mechanisms and consultation</b>	
<p>(i) The Bank will support UNRA to develop an accessible and effective, UNRA-wide GRM. This will include the development of a grievance redress process manual that will document the hierarchy of reporting levels and define the roles and responsibilities for each level. This work will benefit from the diagnostic of UNRA's existing grievance redress mechanisms, which the Bank undertook in April 2016. For the roll-out of this GRM, the Bank will (1) provide training and orientation for UNRA field-based staff; (2) conduct workshops for relevant local officials and communities to establish/re-activate local grievance redress committees; (3) distribute standardized tools to record, report and manage grievances; and (4) provide</p>	<p>As of March 27, 2017, UNRA had fulfilled its commitment to establishing all the elements of an accessible and effective GRM along the Kamwenge-Fort Portal and Kyenjojo-Kabwoya (under the ARDSP) roads. In particular, UNRA has adopted a new grievance redress policy and guidance to be mainstreamed throughout its operations, which is in use along these roads. UNRA is establishing grievance management committees (GMCs) at the community, sub-county and district levels along the Kamwenge-Fort Portal and Kyenjojo-Kabwoya roads. On December 1 2016, UNRA launched a bespoke Grievance, Inquiries, Feedback Management System (GIFMS), which has web-based and smartphone interfaces (termed "UNRA Speed App") that allow UNRA staff to capture and consolidate feedback.</p> <p>As of March 27, 2017, a total of 18 GMCs had been established, trained, and were operating along the Kamwenge-Fort Portal road. Based on GIFMS data, 58 grievances have been recorded along the Kamwenge-Fort Portal road since December 2016. Forty-nine of these grievances (84 percent) related to resettlement issues, such as concerns over valuations, under- or non-payment of compensation, or delays in receiving compensation payments. Twenty of these grievances (35 percent) had been responded to as of March 10, 2017. While road construction is due to be completed by the end of April 2017, the GRM will remain in place until the end of the indemnity period, 12 months after completion. As of March 27, 2017, UNRA has established and trained 37 GMCs along the Kyenjojo-Kabwoya road, of which three are at the district level, 10 are at the sub-county/township level, and 23 are at the community level. Based on GIFMS data, 39 grievances have been recorded along the Kyenjojo-Kabwoya Road since December 2016. Almost all of these grievances (37 cases, or 95 percent) related to resettlement issues, such as concerns over valuations, delays in</p>

Proposed Actions	Status Update as of March 2017
<p>technical support to UNRA in establishing contact centers with full-time community liaison officers in communities along Project roads.</p> <p>(ii) For the Project area, UNRA has already (1) activated a call center and set up a hot line; (2) distributed and displayed posters with hotline numbers at prominent places in road communities; and (3) recruited three community liaison officers (and is in the process of recruiting more), who are sensitizing grievance redress committees and conducting house visits in affected communities along the Kamwenge-Fort Portal Road. For the remainder of the construction of the Kamwenge-Fort Portal Road, Bank social specialists will continue to work with UNRA to ensure that a functional complaints mechanism, including hotline, is available and accessible for the affected communities. This will not depend on the completion of the longer-term measures set out under (i).</p>	<p>receiving compensation payments, or damages to existing structures. Eleven of these grievances (25 percent) had been responded to as of March 10, 2017.</p> <p>To assist UNRA in the work it has undertaken to put the GRM in place, the Bank has (a) provided training and orientation for UNRA field-based staff; (b) facilitated the development of training content for and training of GMCs and relevant local officials to establish/re-activate local GMCs; (c) distributed standardized tools to record, report and manage grievances; and (d) provided technical support to UNRA in developing a community engagement strategy and action plan which includes improving the design of contact centers with full-time community liaison officers in communities along the Project roads. The Bank also continues to provide support to UNRA to improve its GIFMS.</p> <p>The Bank will continue to support the development, refinement and implementation of this system-wide GRM through the RSR Grant.</p>
<b>8. Anti-retaliation</b>	
<p>The Bank has obtained commitments from UNRA and the GoU to sustain their efforts in preventing retaliation. This will include periodic publication of high-level Government statements on the importance of anti-retaliation; radio talk shows providing strong messages on anti-retaliation and broadcasting public service messages about the child helpline number 116 and an UNRA hotline; re-publication by UNRA of its own anti-retaliation statement, which was published in the Daily Monitor on June 2, 2016; and engagement by UNRA with civil society partners, to disseminate anti-retaliation messages and to collaborate in monitoring and reporting any instances of threatened retaliation, should they occur. The Bank will monitor the GoU's actions in this</p>	<p>Supported by Uganda's Whistleblowers Protection Act, 2010, the GoU has mainstreamed a zero-tolerance approach to retaliation. The Bank continues to follow progress in this regard. The Bank has ensured that anti-retaliation measures are built into the nascent UNRA-wide GRM now under implementation. Moreover, where complaints are registered with the Bank, the Bank seeks assurances that complainants suffer no retaliation. While one new allegation of retaliation against an NGO operating in Kabarole District had been made in February 2017, as of March 21, the incident was reported by GoU and the NGO concerned to have been resolved to the satisfaction of the NGO. During early stages of the Request for Inspection, the Bank reached out to provide contact details to the community so that it can inform the Bank directly of any allegations of retaliation against complainants or Requesters. During a field visit in late March 2017, Bank Management was able to confirm from the chair of the GMC in Bigodi community (who was among the Requesters) that community members no longer perceive any threat of retaliation.</p>

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regard, and communicate the need for correction if required.	
<b>9. Suspension of UNRA's civil works portfolio, while working with UNRA to build its E&amp;S capacity and meet other reappraisal conditions</b>	
<p>The Bank has cancelled the Credits for TSDP and suspended the financing of the civil works components of two other projects (ARSDP and NERAMP) implemented by UNRA. The suspensions will remain in place until the Bank receives evidence that the GoU and UNRA have adequate capacity to adhere to required standards and practices. Measures have been agreed as conditions for reappraisal of UNRA's capacity and for consideration of any future lifting of suspension. The fulfillment of all agreed actions is required prior to the reappraisal of the suitability of UNRA to implement Bank-financed projects, and any future Management decision to lift the project suspensions.</p> <p>The Bank, together with other development partners, will continue to provide advice to UNRA as it undertakes to fulfill the agreed measures and, in this connection, to build capacity in the following areas:</p> <ul style="list-style-type: none"> <li>(i) Reform of UNRA's institutional structure;</li> <li>(ii) Contract administration and management;</li> <li>(iii) Procurement;</li> <li>(iv) Financial management;</li> <li>(v) Environmental and social management – including a strengthened land acquisition system and processes;</li> <li>(vi) Communications and citizen engagement.</li> </ul>	<p>Financing for the UNRA civil works portfolio remains suspended. The GoU and UNRA in particular have made significant advances in building capacity for environmental and social management and meeting the conditions for reappraisal. As of February 28, 2017, all of the following were nearing completion: hiring of the required environmental and social experts, project management experts, and communications specialist, as per the approved position in UNRA's restructuring; Notice to Correct issues on the Kamwenge-Fort Portal road; and compensation payments on both the Kamwenge-Fort Portal Road, and the Kyenjojo-Kabwoya road section.</p> <p>The Bank has also undertaken a procurement and financial management post review audit, and found the existing UNRA arrangements to be broadly acceptable with minor actions recommended for UNRA management attention. The Bank team checked on completion of the post-review actions during the high level mission for the reappraisal of UNRA (March 20-31, 2017). UNRA reported that these issues have been addressed. The Bank procurement and financial management staff have been asked to confirm this in a post-review follow-up.</p> <p>The Environmental and Social (E&amp;S) Management System and the Land Acquisition Management System have both been strengthened substantially with support from Bank staff and consultants, as well as from consultants provided by other development partners. UNRA has developed a progressive E&amp;S policy and clear guidelines for its implementation in practice; has revised internal procedures to incorporate E&amp;S issues in all relevant processes and aspects of work flow; and has set up systems based on information and communication technology (ICT) to track the implementation of E&amp;S measures in UNRA programs. Staffing in UNRA's E&amp;S unit has doubled from three in February 2016 to six as of March 2017, and a further doubling is planned by April 28, 2017. This is in addition to the five sociologists and three environmental specialists UNRA has hired on a contractual basis. The Land Acquisition Unit had only two staff prior to January 2016, which increased to five in February 2016 and to 30 as of March 2017, at which time UNRA was in the process of hiring 40 additional staff for land acquisition. UNRA has also computerized its Right of Way Management System (RoWMIS) up to the stage of grievance redress, and this system is now being used for all new projects in Uganda.</p> <p>The latest update of March 17, 2017, from the Supervising Engineer shows that the Contractor has made good progress addressing the issues laid out in the Notice to Correct, dated October 21, 2015. Out of 36 issues in the Notice to Correct, 34 are now compliant and 2 are partially compliant (blasting operations at stone quarry, and work place accidents and compensation). Progress is being made on all these issues and full compliance should be attained before April 30, 2017. On compensation for blasting operations at the quarries, agreements have been made and compensation is being paid at both the Busoro quarry and Kiko crusher site. The Kamwenge Quarry remains. A report of all grievances and proposed compensation was prepared by district authorities and submitted to UNRA, which indicated that the total compensation required to be paid to affected people was UGX 32,400,000. The Contractor submitted a report indicating that total payments made to affected people amounted to UGX 97,945,000. Despite these payments, the affected people had remained unsatisfied. Given this disparity, UNRA informed the community in the field visit of January 4-5, 2017 that the office of the CGV would provide a final assessment and verdict. The UNRA team has been working with the consultant and Contractor to prepare a</p>

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	<p>compensation report that will be submitted to the CGV for final review.</p> <p>On workplace accidents, see Action 5 above.</p>
<b>10. Working with UNRA and the GoU on addressing endemic social issues more systematically</b>	
<p>Funding has been approved from the RSR Trust Fund for a grant to enhance social protection systems in reaching child victims of sexual and gender-based violence. The grant is expected to be operational by January 2017 and will be implemented in several districts, including along the Kamwenge-Fort Portal Road. It will follow a three-pronged approach, which involves: (i) providing technical assistance for the national social protection system to reach child victims of abuse and those at risk of GBV; (ii) developing grievance redress mechanisms to improve outreach to child victims of abuse and populations at risk of GBV; and (iii) enhancing the capacity and coordination of a national social protection system to protect child victims of abuse of GBV.</p> <p>On a broader scale, the GoU has expressed interest in working with the Bank and other partners to address the problem of GBV countrywide. After discussions with the Bank, the President of Uganda has announced that he will launch a Presidential campaign to combat violence against women and girls. This coincides with the approval of the “National Policy on Elimination of Gender Based Violence for Uganda” in September 2016 by the Cabinet.</p> <p>In support of such a national GBV response and implementation of the new national policy, the Bank will provide technical assistance to the GoU in developing the following key inputs, building on the Bank-supported GBV diagnostic that is expected to be finalized by the end of October 2016:</p> <ul style="list-style-type: none"> <li>(i) “Service-gap analysis,” (i.e., assessing gaps between existing standards for service provision to GBV victims of abuse and actual service</li> </ul>	<p>The RSR Grant became effective on January 18, 2017. In addition, in October 2016, the GoU requested IDA support of US\$40 million for an operation to address GBV in a systematic manner throughout Uganda. The IDA-funded operation will support the implementation of the National Policy on the Elimination of Gender Based Violence. It will include comprehensive behavior change, communication and awareness interventions focusing on the prevention of GBV. Preparation is taking place on an accelerated schedule, with a view to the GoU finalizing preparation of the project so that Management can present it to the Board as soon as possible. Project design has been informed by the GBV diagnostic that was completed in August 2016 and a recently completed gap analysis of GBV service provision. In addition, social risk management components with a specific focus on GBV prevention have been integrated into energy and transport operations through restructuring of the existing IDA portfolio in Uganda.</p> <p>The RSR Grant includes support for prevention programs and response services related to sexual violence against children (VAC) in selected locations in Kamwenge and Kabarole Districts. It focuses on: (i) improving access by child victims of sexual violence to a minimum package of services, (ii) preventing VAC and GBV; and (iii) strengthening capacity of the MoGLSD and district authorities to coordinate, monitor and ensure quality of services for GBV victims. Recruitment of implementing NGOs, hiring of a project coordinator and signing of MoUs with district authorities is ongoing, and project implementation is expected to commence by end of April.</p> <p>The following IDA-supported operations in Uganda are in the process being restructured to introduce social risk management components with a focus on GBV: (i) the <i>Electricity Sector Development Project</i> (US\$120 million) is currently being restructured to include a US\$1.5 million component focusing on prevention of GBV, strengthening the identification of potential cases through GRM and establishing referral mechanisms for victims around project sites; and (ii) the <i>North Eastern Road Corridor Asset Management Project</i> (US\$234.80 million under implementation) includes a comprehensive set of activities to address GBV, child protection, and occupational health and safety.</p>

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<p>availability and quality at district level);</p> <p>(ii) Costing of a scalable approach to the provision of GBV response and prevention services; and</p> <p>(iii) Identifying optimal institutional modalities for the delivery of such services.</p> <p>Finally, in order to strengthen the anti-GBV agenda within the Bank's portfolio in Uganda, one or more key projects in the portfolio will be restructured to include measures for addressing social risks, including GBV and child protection efforts. The first such project will be an ongoing energy sector operation, the <i>Uganda Electricity Sector Development Project</i> that will be restructured to include a component on social engagement in order to ensure meaningful communication with communities before contractors initiate work.</p>	
<b>11. Safeguard portfolio reviews of Ugandan projects, with specific focus on child labor/abuse.</b>	
<p>The Bank is conducting a general review of environmental and social safeguards performance in all relevant projects in Uganda, as well as a complementary review with a specific focus on the risks of sexual abuse involving minors, and child labor. Recommendations from both reviews will be made public.</p>	<p>The Bank has completed a general review of environmental and social safeguards performance in all IDA-supported projects within the Uganda portfolio, and a complementary review with a specific focus on the risks of sexual abuse involving minors, and child labor. The recommendations of both reviews have been made public through the <a href="#">Uganda TSDP AF – Lessons Learned and Agenda for Action Report</a>. The review of environmental and social safeguards performance made a number of recommendations to improve safeguards performance across the Uganda portfolio. The review noted the need to improve community consultation and GRMs in almost all projects. The review also resulted in project-specific action plans to address identified deficiencies across the portfolio. Since the review, both the Bank and the GoU have undertaken a number of measures to strengthen management of safeguards issues in the Uganda portfolio.</p> <p>In addition, the Bank's independent review of the Uganda portfolio assesses the risks of sexual abuse of minors and child labor under other projects. While the review found a number of factors specific to Uganda that heightened the risks and recommended a number of systemic improvements, no additional incidents of child abuse were found. The review recommended improvements in project design, implementation and staffing in the Uganda portfolio to take account of child protection risks.</p>
<b>12. Procurement and contract management</b>	
<p>Management recognizes that environmental and social provisions in contracts for contractors as well as supervising engineers need to be strengthened when civil works are carried out in, or near, vulnerable</p>	<p><b>Enhanced SBDs and SPDs</b></p> <p>All Standard Bidding Documents (SBDs) and Standard Procurement Documents (SPDs) have been revised to reflect lessons learned from the Uganda TSDP and are available for use. SBDs are used for projects with a Project Concept Note (PCN) prior to July 1, 2016, and SPDs for projects with a PCN after this date (i.e., the date of</p>

Proposed Actions	Status Update as of March 2017									
<p>communities and in other high-risk situations. A series of measures to be piloted include the following:</p> <p>As part of the bidding process for civil works:</p> <ul style="list-style-type: none"> <li>• Applicants/Bidders would be required to declare any civil works contracts that have been suspended or terminated by the Employer for reasons related to environmental or social safeguards (including health and safety issues) compliance in the past five years. This information would be used to inform additional due diligence that may be required prior to contract signing.</li> <li>• Specifications in the bidding documents will be strengthened to set out clear expectations with respect to environmental or social safeguards.</li> <li>• Bidders would be required to submit a plan for addressing environmental and social risks as part of the bidding process as well as a code of conduct for their workers based on a template to be provided by the World Bank.</li> </ul> <p>As part of contracts for civil works:</p> <ul style="list-style-type: none"> <li>• Contractors would be required to post an environmental and social performance bond that the contracting entity could cash should a contractor fail to remedy cases of environmental and social non-compliance. The bond should be for a reasonable amount which, in combination with the current performance bond, would normally not exceed 10 percent of the contract amount. The bond would be cashable based on failure to comply with the Engineer's Notice to Correct the said defects.</li> <li>• A provisional sum may be included in civil works contracts to be used as agreed between the contracting entity and the contractor in cases where</li> </ul>	<p>effectiveness of the Procurement Framework). Revised documents include:</p> <p><b>Standard Procurement Document (SPD) Works</b></p> <ol style="list-style-type: none"> <li>1. Standard Prequalification Document (SPQD) Works</li> <li>2. Request for Bid (RFB) Works (after PQ)</li> <li>3. RFB Works (without PQ)</li> <li>4. RFB Small Works (one envelope)</li> <li>5. RFB Small Works (two envelope)</li> <li>6. RFB Roads (performance-based)</li> </ol> <p><b>SBD Works</b></p> <ol style="list-style-type: none"> <li>7. PQ Works</li> <li>8. SBD Small Works</li> <li>9. SBD Works</li> <li>10. SBD Roads (performance-based)</li> </ol> <p><b>Consulting Services</b></p> <ol style="list-style-type: none"> <li>11. 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RFP Consulting Services 2016 (for supervising engineer)</li> </ol> <p><b>Summary of key enhancements</b></p> <table border="1"> <thead> <tr> <th data-bbox="567 1501 621 1554">#</th><th data-bbox="621 1501 915 1554">Subject</th><th data-bbox="915 1501 1449 1554">Enhancement/s</th></tr> </thead> <tbody> <tr> <td data-bbox="567 1554 621 1776">1</td><td data-bbox="621 1554 915 1776"><b>Declaration of contract suspension or termination</b></td><td data-bbox="915 1554 1449 1776"> <ul style="list-style-type: none"> <li>• Applicants/Bidders/Proposers are now required to make a declaration listing any civil works contracts that have been suspended or terminated by an employer and/or performance security called by an employer, for ESHS reason/s. 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Proposed Actions		Status Update as of March 2017	
<p>contractors have fully met all environmental and social obligations under the contract and propose to further enhance environmental and social outcomes. The parties' agreement on the use of the provisional sum would be subject to the Bank's No Objection.</p> <ul style="list-style-type: none"> <li>Civil works contractors and supervising engineers would be required to include dedicated staff with appropriate qualifications and experience to manage specific social and environmental impacts.</li> </ul> <p>As part of contracts for supervising engineers:</p> <ul style="list-style-type: none"> <li>Clients would be required to share all progress and other technical reports received by the supervising engineers with the World Bank.</li> </ul>			requirements.
	3	<b>Workers' ESHS Code of Conduct</b>	<ul style="list-style-type: none"> <li>Bidders/Proposers are now required to submit, as part of their Bid/Proposal, an ESHS Code of Conduct that will apply to their employees and sub-contractors, and details of how it will be enforced.</li> <li>The suitability of the Code of Conduct can be assessed and discussed as part of the Bid/Proposal evaluation and negotiations.</li> <li>The successful Bidder/Proposer is required to implement the agreed Code of Conduct upon contract award.</li> </ul>
	4	<b>Contractor's ESHS Management Strategy and Implementation Plans</b>	<ul style="list-style-type: none"> <li>Bidders/Proposers are now required to submit, as part of their Bid/Proposal, ESHS Management Strategies and Implementation Plans required to manage the key ESHS risks of the project.</li> <li>The suitability of these strategies and plans can be assessed as part of the Bid/Proposal evaluation, and discussed during pre-contract discussions, as appropriate.</li> <li>These strategies and plans will become part of the Contractor's Environmental and Social Management Plan (C-ESMP).</li> <li>Particular Conditions of Contract now include provisions relating to C-ESMP, e.g.: <ul style="list-style-type: none"> <li>a requirement that the Contractor shall not commence any Works unless the Engineer is satisfied that appropriate measures are in place to address ESHS risks and impacts;</li> <li>at a minimum, the Contractor shall apply the plans and ESHS Code of Conduct, submitted as part of the Bid/Proposal, from contract award onwards.</li> </ul> </li> </ul>
	5	<b>ESHS Performance Security</b>	<ul style="list-style-type: none"> <li>The successful Bidder/Proposer is now required to provide, in addition to the standard Performance Security, an ESHS Performance Security (the sum of the two "demand" bank guarantees, normally not to exceed 10 percent of the contract price).</li> <li>The ESHS performance security is in the form of a "demand" bank guarantee."</li> <li>The application of this provision is at the Borrower's discretion. It is recommended for contracts where there is significant ESHS risks as advised by Social/Environmental specialist/s.</li> </ul>
	6	<b>ESHS Provisional Sum</b>	<ul style="list-style-type: none"> <li>An additional provisional sum, specifically for ESHS outcomes, may be included in the Request for Bids/Proposals documents, and eventual contract. Normally, the payment for the delivery of ESHS requirements shall be a subsidiary obligation of the Contractor covered under the prices quoted for other Bill of Quantity/price</li> </ul>

Proposed Actions	Status Update as of March 2017		
			items.
	7	<b>Key ESHS Personnel</b>	<ul style="list-style-type: none"> <li>Bidders/Proposers are now required to demonstrate that they have suitably qualified ESHS specialists among their Key Personnel.</li> <li>Key Personnel must be named in the Bid/Proposal, and in the contract.</li> <li>The quality of the proposed Key Personnel (including ESHS specialists) will be assessed during the evaluation of Bids/Proposals.</li> <li>The Contractor shall require the Employer's consent to substitute or replace any Key Personnel.</li> <li>The Engineer may require the removal of Personnel if they undertake behavior which breaches the ESHS Code of Conduct, e.g. spreading communicable diseases, sexual harassment, GBV, illicit activity, or crime.</li> </ul>
	8	<b>ESHS Reporting</b>	<ul style="list-style-type: none"> <li>Contracts now contain specific ESHS reporting requirements. These relate to: <ul style="list-style-type: none"> <li>- ESHS incidents requiring immediate notification</li> <li>- ESHS metrics in regular progress reports.</li> </ul> </li> </ul>
	9	<b>ESHS considerations during contract variation</b>	<ul style="list-style-type: none"> <li>As part of variation procedures, the Contractor shall provide relevant ESHS information to enable the Engineer to evaluate the ESHS risks and impacts.</li> </ul>
	10	<b>Ability to withhold interim payment</b>	<ul style="list-style-type: none"> <li>Contracts now contain provisions allowing interim payments to be withheld where there is a failure to perform an ESHS obligation.</li> </ul>
	11	<b>ESHS considerations included in civil works Consulting Services</b>	<ul style="list-style-type: none"> <li>The standard Request for Proposals for consulting services now include ESHS considerations to apply to the supervision of civil works.</li> </ul>

### 13. Global review and staff guidance on labor influx issues

A draft guidance note for staff has been prepared by a working group and internal review was completed on October 4, 2016. Consultation with external public and private sector stakeholders will be completed by November 15, 2016. The guidance note will be issued and staff training will be initiated by December 1, 2016. Based on the above guidance, a portfolio-wide review of projects across the Bank will be conducted to ensure that pertinent issues are being appropriately addressed where they arise. All Task Team leaders will be required to review civil works	<p>A guidance note for staff "Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labor Influx" was issued by December 1, 2016, and disseminated to all Bank operational staff. Based on the above guidance, a portfolio-wide review of projects across the Bank is being carried out to ensure that pertinent issues are being appropriately addressed where they arise. The review is expected to be completed in April 2017. To complement the Guidance Note, a resource web site was established for staff to access key documents, such as codes of practice for preparing Traffic Management plans, and examples of key documents.</p> <p>In the case of new projects, all new projects with a Project Concept Note (PCN) date after July 1, 2016 fall under the new procurement framework and as such will use the SPDs for International Competitive Bidding, which reflect the lessons learned from the TSDP and include enhanced ESHS provisions, such as the provision that requires Bidders/Proposers to submit, as part of their Bid/Proposal, an ESHS Code of Conduct that will apply to their employees and sub-contractors, and details of how it will be enforced. For projects outside of the new Procurement Framework (PCN dates before July 1, 2016) the revised SBDs, that now include the same enhanced ESHS</p>
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<b>Proposed Actions</b>	<b>Status Update as of March 2017</b>
<p>contracts that they manage with a view to (i) the size and characteristics of any labor influx; (ii) the existence and implementation of any mitigation measures in the environmental and social management plan; and (iii) whether problems identified in the environmental and social management plan or similar to those arising under the TSDP have arisen, or are likely to do so. Where needed, project-specific action plans responding to the findings of this review will be prepared and implemented.</p>	<p>provisions, can be applied without requiring amendments to the legal agreements.</p> <p>In the case of the transport sector in particular, for instance, as of end of March 2017, of all the relevant Investment Project Financing loans approved by the Board after the approval of the MAP in November 2016, only one fell under the new procurement framework. However, in 30 percent of the remaining cases that had PCNs before July 1, 2016, teams had the chance to proactively revisit the project documents before Board approval to include specific provisions reflecting the above enhanced requirements. Those that did not, will have the opportunity to use the revised SBD as mentioned above. Finally, an approach for implementing effective “Codes of Conduct” by companies to address GBV and VAC has been developed and is being pilot tested in three ongoing contracts in a Pacific Islands transport project. Lesson from those pilots could inform and strengthen the approach more broadly in the sector. Additional guidance has been prepared to improve occupational health and safety measures and will be tested in the second quarter of 2017.</p>
<b>14. Global Gender-Based Violence Task Force</b>	
<p>The World Bank Group President has formed a Global Gender-Based Violence Task Force to strengthen the institution’s response to instances of gender-based violence encountered as part of its operations. The Task Force will include a range of members from academia, NGOs, foundations, UNICEF, and government. The Task Force is expected to deliver its report within nine months, and the Bank will follow up on its recommendations.</p>	<p>A Global Gender-Based Violence Task Force has been formed to strengthen the institution’s response to instances of GBV encountered as part of its operations. The Task Force includes a range of members from academia, NGOs, foundations, UNICEF, and government. The Task Force is on track to deliver its report in June 2017, and the Bank will follow up on its recommendations.</p>
<b>15. Internal review of lessons learned</b>	
<p>Management has commissioned an internal report on the lessons that can be learned from the Uganda Transport Sector Development Additional Financing and their implications for future Bank-supported projects in similar situations. The report will be made public by the end of October 2016.</p>	<p>A report on “Lessons Learned and Agenda for Action” from the Uganda TSDP – Additional Financing and the implications of those lessons for future Bank-supported projects in similar situations, has been prepared and discussed with the Board, disseminated to all staff, and also made publicly available.</p>