VULNERABLE & MARGINALISED GROUPS’ FRAMEWORK
FOR THE
UGANDA SECONDARY EDUCATION EXPANSION PROJECT

Updated 15th April 2020

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**LIST OF EXPERTS**

The Vulnerable and Marginalized Groups Framework (VMGF) for Uganda Secondary Education Expansion Project (USEEP) report was prepared by the following staff from MoES with the support of a Social Development Specialist Consultant.

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<tr>
<td>ACHPR</td>
<td>African Commission on Human and Peoples Rights</td>
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<td>AICM</td>
<td>African International Christian Ministries</td>
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<td>BDP</td>
<td>Batwa Development Programme</td>
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<td>BMCT</td>
<td>Bwindi Mgahinga Conservation Trust</td>
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<td>BoG</td>
<td>Board of Governors</td>
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<td>CBO</td>
<td>Community Based Organisation</td>
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<td>DCDO</td>
<td>District Community Development Officer</td>
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<td>DIS</td>
<td>District Inspector of Schools</td>
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<tr>
<td>CMU</td>
<td>Construction Management Unit</td>
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<td>CSO</td>
<td>Civil Society Organizations</td>
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<tr>
<td>CWSN</td>
<td>Children with Special Needs</td>
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<td>EMIS</td>
<td>Education Management Information System</td>
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<td>ESMF</td>
<td>Environment and Social Management Framework</td>
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<td>ESSS</td>
<td>Environmental and Social Safeguards Specialist</td>
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<td>FGM</td>
<td>Female Genital Mutilation</td>
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<td>FPIC</td>
<td>Free, Prior Informed Consent</td>
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<td>GO</td>
<td>Grievance Officer</td>
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<td>GoU</td>
<td>Government of Uganda</td>
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<td>GPE</td>
<td>Global Partnership for Education</td>
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<td>GRC</td>
<td>Grievance Redress Committee</td>
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<td>GRM</td>
<td>Grievance Redress Mechanism</td>
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<td>IDA</td>
<td>International Development Association</td>
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<td>VMGP</td>
<td>Indigenous Peoples Plan</td>
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<td>VMGF</td>
<td>Indigenous Peoples Planning Framework</td>
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<td>VMGs</td>
<td>Indigenous Peoples</td>
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<td>IWGIA</td>
<td>International Work Group for Indigenous Affairs</td>
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<td>IWGVMG</td>
<td>International Work Group on Indigenous Peoples</td>
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<tr>
<td>KADDNET</td>
<td>Kasese District Development Network</td>
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<td>KOPEIN</td>
<td>Kotido Peace Initiative</td>
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<td>LG</td>
<td>Local Government</td>
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<td>MCC</td>
<td>Mennonite Central Committee</td>
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<td>MIS</td>
<td>Management Information Systems</td>
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<td>MOES</td>
<td>Ministry of Education and Sports</td>
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<td>NGO</td>
<td>Non-Government Organisation</td>
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<td>OP</td>
<td>Operational Policy of the World Bank</td>
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<td>PCU</td>
<td>Project Coordination Unit</td>
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<td>PTA</td>
<td>Parents Teachers Associations</td>
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<td>PPP</td>
<td>Private Public Partnership</td>
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<td>RPF</td>
<td>Resettlement Policy Framework</td>
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<td>SA</td>
<td>Social Assessment</td>
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<tr>
<td>UN</td>
<td>United Nations</td>
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<tr>
<td>UPE</td>
<td>Universal Primary Education</td>
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<td>UPPET</td>
<td>Uganda Post-Primary Education and Training</td>
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<tr>
<td>USDP</td>
<td>Uganda Skills Development Project</td>
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<td>USE</td>
<td>Universal Secondary Education</td>
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<td>UTSEP</td>
<td>Uganda Teacher and School Effectiveness Project</td>
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<td>UOBDBU</td>
<td>United Organization for Batwa Development in Uganda</td>
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<td>VMGs</td>
<td>Vulnerable and Marginalised Groups</td>
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<td>WB</td>
<td>World Bank</td>
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1. INTRODUCTION

1.1. Background
The Government of Uganda is focused on improving learning levels and completion rate at the primary education level, through a variety of measures. This includes a US$100 million grant from the Global Partnership for Education (GPE) to strengthen the effectiveness of teachers and schools in the delivery of primary education in Uganda. This will potentially increase the number of children who will try to access lower secondary education, while also reduce the outflow of students into the labor market with minimum skills. The education system will therefore have to double its current intake capacity to achieve Universal access to primary, secondary and Post Primary Education.

The introduction of Universal Secondary Education (USE) under the Uganda Post-Primary and Education Training (UPPET) in 2007 increased secondary school enrolment at an annual rate of 6%, growing from a total of 954,000 in 2007 to over 1.36 million in 2013 (USEEP Concept Paper). However, this increase in enrolment is not distributed evenly across different regions, location, gender and socio-economic groups. The disparities in access and completion of secondary education call for an intervention to ensure equitable access to quality lower secondary education for all. Therefore, the Government of Uganda (GoU) through the Ministry of Education and Sports (MoES) is in the process of securing finances from the World Bank to support a proposed project entitled Uganda Secondary Education Expansion Project (USEEP).

1.1. Proposed Development Objective
The project development objective is to enhance access to lower secondary education by focusing on underserved populations in targeted areas. Underserved populations include communities hosting refugees, refugees, girls and people in the targeted areas with limited access to public lower secondary schools.
1.2 THE PROPOSED PROJECT COMPONENTS

Component 1: Expansion of Lower Secondary Education

This component will focus on building more schools and expanding existing schools, and by providing learning environments that are safe, non-violent, and supportive of girls’ education. Lower secondary school construction financed under this component is complemented with a support package to ensure that each new school is fully ready to offer quality education to students. All new schools will include new cost efficient and quality infrastructure design, learning materials on a 1:1 ratio for students, school management and multi-pronged teacher training (curriculum, girls’ education, special needs, violence awareness, ICT assisted teaching) and communities of practice for further professional development.

Existing overcrowded public schools in the Refugee Hosting Areas (RHAs) will receive a standard package of additional infrastructure. Financial support provided to such schools through the scholarships program (sub-component 2.2.) shall be used to procure required learning materials and other resources as required by each benefiting school. In cases, where additional teachers will be required for such schools, the GoU will be responsible for recruiting, training, and paying salaries. Demand for additional teachers will be established during detailed sites appraisal as part of the ESMPs preparation.

Subcomponent 1.1: Construction of New Lower Secondary Schools and Facilities

This subcomponent will finance the construction of about 116 new lower secondary schools across the country and improving infrastructure in about 61 existing schools in the RHAs. In total, over 70,300 new spaces will be established. Out of 116 schools, approximately 32 new schools will be located in refugee and hosting communities and 84 will be in other targeted sub-counties of districts meeting the selection criteria. The new schools will be built as large (double stream, eight classrooms) schools creating a total of 55,680 additional spaces for enrolment. The component will also finance school furniture, science laboratory kits, ICT laboratory computers, student textbooks and teacher guides for all new schools. Overcrowded public schools in the RHAs will receive a standard package of additional infrastructure: four classrooms, science lab and latrines. The component will also finance school furniture and science laboratory kits for new classrooms and labs. Thus, 14,640 additional space.

Subcomponent 1.2: Ensuring Safe and Protected Children

This subcomponent will complement the construction of new school facilities by ensuring safe and protected children with a particular emphasis on girls, based on the policy and legal framework of Uganda. The subcomponent will support a multi-pronged approach through: (i) training of the new schools’ headteachers, and their deputies and teams of teachers in establishing and maintaining safe school environments; (ii) implementation of social and emotional learning modules; (iii) implementation of violence against children codes of conduct for communities’ leaders, school-founding bodies and Boards of Governors, teachers, and works contractors; (iv) sensitization of the local communities (violence reduction, back to school and importance of girls’ education); and (v) equipping students with important life skills, including independent and
proactive participation in income generating activities. All existing schools in the RHAs (about 210) and all new schools constructed under the project inside and outside RHA (116) will benefit from the sub-component.

A set of targeted community and school level activities will comprise the “Safe School Program” and promote school, community, and parental awareness to prevent cases of violence in schools, encourage parents to educate their girls, prevent early pregnancies, provide support to at-risk children, mobilise child mothers to complete their education, and help girls and boys to develop crucial life skills.

Within the target districts special attention will be provided to the areas where the pregnancy and dropout rates for girls is high. Social and emotional learning (SEL) modules under the program will help students, especially in the RHA to cope with psycho-social challenges related to violence in schools and local communities by fostering their resilience, empathy, and engagement.

Much of this component’s activities are modelled after and will build on ongoing and past efforts made by the Uganda-based Non-Governmental Organizations (NGOs). To ensure sustainability, staff from the MoES’s Secondary Education Department and the Local Government will go through capacity building so that they will be better equipped to support schools in implementing and sustaining the component activities.

**Component 2: Hosting Community and Refugee Education Support**

Component 2 will focus on both new and existing lower secondary schools in refugee hosting sub-counties within the 12 targeted districts. All activities under this component are financed through grants received through the IDA 18 sub-window for refugees and host communities. The target population is refugee and host community school-aged children eligible for lower secondary education (ages 13-18) who have already completed primary schools. The component will support the development and execution of the following programs: (i) Accelerated Education Program (AEP) and (ii) School scholarships. Note that social and emotional learning programs (SEL) which are crucial for addressing specific challenges faced by refugees will be funded in subcomponent 1.2 together with Safe schools packages. The component will also provide support in obtaining equivalent certifications in Uganda that allows children who have finished primary school abroad to attend secondary school in Uganda.

**Subcomponent 2.1: The Accelerated Education Program**

The Accelerated Education Program (AEP) will provide students who have missed the opportunity to enrol in lower secondary school at the appropriate age or who dropped out of school for various reasons (displacement, pregnancy, etc.) with a fast track learning opportunity. Given the paucity of experience and track records of administering AEP at the secondary school level, this program will start with small scale pilots in five existing schools building on some of the most promising early AEP initiatives by leading NGOs. This will be followed by additional AEPs in seven new schools, resulting in 12 pilot AEP across the whole refugee hosting regions.

**Subcomponent 2.2: The Scholarship Program**
The school scholarship program transfers funds to Local Governments (LGs) as Accounting Offices for further administration to the lower secondary schools in refugee and hosting communities as a means to offset the economic shock refugee families are experiencing. The school scholarships will assist in reducing school charges that are passed on to parents, especially to refugee families. School charges in Uganda represent a considerable share of the average household income. The proportion of school charges of household income is likely to be higher for refugee and host community. This program is designed to increase the likelihood of households (both hosts and refugees) with eligible secondary school aged children to enroll and retain their children in school. The amount generated by scholarships at each school (both new and existing) will depend on the number of refugee students enrolled each year. The scholarships will be managed on the school level in the same way and under the same guidelines as the capitation grants for Ugandan students.

The school scholarship program relies on Project grant funds to provide support for refugees that are equivalent to the capitation grants that the MoES already provides for Ugandan students. Given the Government, as part of the Refugee Response Plans, has pledged extending capitation grants to refugees during the next few years, this project considered that it would be the MoES’s responsibility to finance capitation grants as part of their regular budget by the end on the project life.

**Subcomponent 2.3: Certification of Prior Education**

The sub-component will provide funding to (a) mainstream support for refugees in obtaining papers required to start / continue secondary education (e.g. translation, validation and equating of relevant certificates) through MoES/ Uganda National Examinations Board (UNEB), and (b) identify those who need support for certification and cover the costs for obtaining relevant certifications for refugees.

**Component 3: Improving Teachers Support and Policy Development Nationally**

This component will scale up existing elements of the teacher support system and build capacity of the school principals as primary pedagogical supporters for teachers. The component will also aim to prepare for future development of quality lower secondary education through analytical and capacity building work.

**Subcomponent 3.1: Support to Teachers**

The sub-component will support establishing a **Continuous Professional Development (CPD) system** nationwide. The system will be based on about 100 lower secondary school clusters that will help organize and support teacher training country wide. Each cluster will be built around a cluster center – existing well performing schools with capable teachers. The cluster centers will deliver in person and distance-based teacher coaching. The centers will facilitate Communities of Practice (CoPs) for subject teacher. The CoPs will serve as peer-to-peer teacher support mechanism. Digital platforms will be utilized to operate CoPs and deliver teacher support by distance.

The CPD support will focus on providing ongoing support to teachers implementing the new
The GoU will cover the basic costs of introducing the new curriculum: initial and follow-up teacher training, printing and delivering textbooks and teacher guides with scripted lessons, learning materials, and ongoing training/support costs, etc.

The subcomponent will finance the establishment of the cluster centers in existing schools (using existing facilities, no construction is expected) that are geographically accessible by their network of schools and have a track record of good performance delivering learning outcomes at an appropriate level (e.g. above national average). A selected teacher will be the coordinator at the cluster center and will be responsible for coordinating the trainings for their respective network of about 40 schools. Coaching will be led by the head teacher at each school and by visiting coaches (inspectors, regional trainers). The subcomponent will train center leaders. Digital platforms and resources will be utilized to allow teachers to grow CoPs, to receive remote support and feedback from regional and national trainers and coaching on how to improve teaching and learning. They will also be able to share their own experiences directly with each other.

**Head teachers and deputy head teachers** from all public schools as well as head teachers from poorly performing private schools (the worse performing half of the private schools) will be trained in (i) school management and (ii) pedagogical leadership. School performance will be measured by the tool which is currently under preparation with support from UgIFT project. The tool will be applied to select beneficiary private schools. The training provided under the project will improve school management practices, results orientation, service delivery and raise quality of teaching though providing teachers with ongoing pedagogical support from the principals.

**The project will implement a special program for training science teachers as ICT Champions to promote technology assisted teaching of science subjects and develop modern digital skills** (as required by the new curriculum) among lower secondary school students. One teacher from each public school and teacher from poorly performing private schools (bottom half of worse performing schools) will be trained. The ICT assisted teaching starts with identifying an ICT champion (supporter and early adopter) in a school. The champion will promote the use of ICT for better teaching and learning in the whole school starting with his/her subject. After training in ICT enhanced pedagogy, the champion will receive a laptop and projector (to be owned by the school). It will be preloaded with ICT resources for all the subjects. The program will be available to all public schools in the country (more than 1,200 schools), and new schools to be built under subcomponent 1.1, some with ICT capacity and some without any previous exposure to ICT assisted teaching in order to avoid widening the technology gap. This will enhance professional sharing and learning across teachers in all lower secondary schools in their respective clusters. In total, about 6,600 teachers and administrators will benefit from the training/capacity development program.

**Subcomponent 3.2: Support for Development of Key Secondary Education Improvement Policies**

This sub-component will prepare for the key measures/reforms required to further improve the quality of teaching and learning in lower secondary schools in accordance with the new education sector strategy (forthcoming around June 2020). It will include technical assistance to support policy research, preparation of policy papers and implementation plans, and capacity building for policy-makers. The sub-component will, inter alia, focus on the following areas: (i) assessing
existing experience and adopting a sustainable school construction strategy; (ii) teacher recruitment, deployment, retention, reward and motivation to address the teacher gap, teacher attrition, and the increase in enrolment due to demographic stress; (iii) improvement of provision of teaching and learning materials; (iv) quality assurance and assessment; and (v) enhanced private sector service delivery. In addition to developing new strategies/policies, the component will help to introduce measures required to operationalize existing policies, for instance VAC and GBV related.

Component 4: Project Management, Monitoring and Evaluation

This component will provide support to the project implementation, supervision, monitoring and evaluation, and verification costs. It will finance project staff (including staff needed to supervise school construction, including clerks of works), office rent, furniture, equipment, transportation, data collection and analysis, including gender specific aspects of the project, and capacity building. Third party assessments will be done to verify the achievement of the DLIs, other project results and satisfactory completion of large procurements.

1.3 Project Description

The USEEP project that is nationwide will also be implemented in the Districts of Bundibugyo, Kabale, Kasese, Moroto, Kaabong, and Kween that are inhabited by groups of people identified as traditional hunter/gatherer Batwa communities, also known as Twa, in South Western Uganda, the Karamojong communities the (Tepeth), and the IK live in Kaabong and Moroto respectively and Benet communities in Kween District. These people have historically suffered, and continue to suffer, disempowerment and discrimination on economic, social and cultural grounds. Their livelihood is threatened mainly by the dwindling access they have to land and natural resources on which they depended on either as pastoralists or as hunt-gatherers. Project implementation in these areas triggers The World Bank’s OP.4.10 policy for the identification of indigenous peoples.

In as much as the Bank policy OP 4.10 identifies these groups as indigenous, the Uganda Constitution refers to them as vulnerable and marginalized therefore this report will adopt to use the term “Vulnerable and Marginalized Groups” in place of “Indigenous Peoples.”

World Bank’s OP. 4.10 recognizes that “the distinct identities and cultures of VMGs remained inextricably linked to the lands they inhabited and the natural resources they depended upon to survive”. The policy requires that: (i) screening, (ii) social assessment, consultations with communities involved, (iii) preparation of or Vulnerable and Marginalized Groups Framework (VMGF) and, (iv) disclosure be carried out before the project is implemented. It also requires the borrower to seek broad community support of VMGs through a process of free, prior and informed consent before deciding to develop any project that targets or affects VMGs.
To ascertain the existence of VMGs in the project areas, MoES has undertaken a separate Social Assessment in the districts of Kasese, Kween, Kaabong and Moroto and the findings and recommendations are herein attached in the Social Assessment Report. (Volume 2).

1.4 Rationale for the VMGF
The VMGF is prepared to ensure that the development process fully respects the dignity, human rights, economies and the culture of VMGs and that the project has a broad community support from the affected VMGs.

1.4.1 Purpose and Objectives of the VMGF
The World Bank’s OP 4.10 on VMGs aims to avoid adverse impacts on VMGs and to provide them with culturally appropriate benefits. Therefore, this VMGF is prepared to ensure that the World Bank’s OP 4.10 on VMGs is applied to USEEP subprojects. It aims to develop measures to:

(i) Avoid potentially adverse impacts on VMGs;
(ii) Where avoidance is not feasible, minimize, mitigate and compensate such effects;
(iii) Ensure that VMGs receive social and economic benefits that are culturally appropriate as well as gender sensitive; and
(iv) Guarantee the full participation of VMGs in the entire USEEP project cycle;

1.5 Methodology

1.5.1 Desk Review
The preparation of this VMGF largely constituted reviewing the Social Assessment (SA) and Resettlement Policy Framework (RPF) reports for USEEP as well as relevant legal and policy documents. Records of laws, policies, plans and reports were reviewed to provide the national and international legal, policy and institutional framework. An examination of the World Bank’s OP 4.10 on IPs was undertaken to understand the requirements and scope of an VMGF. Additionally, reports documenting the challenges as well as struggles of VMGs for their rights in Uganda including the SA report for GPE/USTEP were examined.

1.5.2 Stakeholder Consultations
Key stakeholder consultations were conducted in selected districts known to host VMGs or VMGs such as Kasese, Moroto, Kaabong and Kween. Those consulted included: LG District officials; Civil Society Organisations (CSOs); and the local communities (VMGs).
2. AN UNDERSTANDING OF INDIGENOUS PEOPLES IN UGANDA

2.1. Definition of Key Concepts

2.1.1. Indigenous Peoples

Literature indicates a lack of a universally accepted definition of “Indigenous Peoples”. Indigenous Peoples may be referred to in different countries by such terms as “Indigenous ethnic minorities,” “aboriginals,” “hill tribes,” “minority nationalities,” “scheduled tribes,” “first nations,” or “tribal groups.” In Uganda, the term “ethnic minorities” is used to refer to VMGs. For purposes of this framework, the World Bank’s criterion for identifying VMGs will be used to distinguish them from the 65 ethnic groups in Uganda: that is, those people who have historically suffered, and continue to suffer disempowerment and discrimination on economic, social and cultural grounds. The term “Indigenous Peoples” is used in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees:

- Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- Customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture; or
- A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

It is noted that, although the Ugandan Constitution does not expressly recognize indigenous peoples it makes provision for addressing some of the negative effects arising from ethnic imbalances. The Constitution, in the section on National Objectives and Directive Principles of State Policy, provides that every effort shall be made to integrate all peoples while at the same time recognizing the existence of, amongst others, their ethnic, religious and cultural diversity. In this regard, the Constitution requires that everything necessary be done to promote a culture of cooperation, understanding, appreciation, tolerance and respect for each other’s customs, traditions and beliefs.

2.1.2. Ethnic Minority Groups

It is possible to argue endlessly about the meaning of the term ‘minority’ in the Ugandan context (and sub-Saharan Africa) and whether a particular group of individuals form a separate minority (MRG, 2001). Similarly, no definition of the term ‘minority’ has proved universally acceptable. However, the UN Human Rights Committee came up with a working definition as: “any disempowered group, regardless of its numerical size could be considered a minority” (Ibid).
2.1.3. **Marginalised Groups**
The term “Marginalization” generally describes the overt actions or tendencies of human societies whereby those persons perceived as being without desirability or function are removed or excluded (i.e., are “marginalized”) from the prevalent systems of protection and integration, so limiting their opportunities and means for survival.

2.1.4. **Vulnerable Groups**
Vulnerability refers to the conditions determined by physical, social, economic and environmental factors or processes, which increase the susceptibility of a community to the impact of hazards. A vulnerable group is therefore a population with specific characteristics that put it at a higher risk of falling into poverty than others living in project areas. Vulnerable groups thus include the elderly, disabled people, HIV/AIDS infected and affected individuals and households, women, and orphans and vulnerable children (girl child, street children, children from extremely poor households, HIV/AIDS infected and affected children, children with disabilities, children living with elderly or disabled parents, and children in paid employment). This definition also includes the three groups described above. On average, the Karamoja sub region is recognized as vulnerable, marginalized and poor. Therefore, there are very little differences between the persons identified as vulnerable/marginalized and the entire population of the region.

2.2. **Recognising VMGs in Uganda**
Uganda does not have an official definition of VMGs neither does it have a criterion for their identification. According to Uganda’s 1995 Constitution, there are 65 ethnic groups referred to as its indigenous communities as from the date of 1st February 1926. Ethnic diversity plays a major role in shaping the behaviours and ways of life of people as their cultural and social life differ from one ethnic group to another. The term ‘indigenous’ as referred to in the Constitution is used to describe the different ethnic groups that have historically resided within Uganda’s borders. This understanding differs markedly from the manner in which the term is used by international and regional organizations and by experts on VMGs’ issues. Uganda uses ethnic minorities, to the exclusion of other factors, as the only method of identifying VMGs.

The African Commission on the 3rd periodic report (concluding observations) on the Republic of Uganda, observed that one of the factors restricting the enjoyment of the rights enshrined in the African Charter on Human and Peoples’ Rights (ACHPR, 2009) is the apparent lack of political will to take measures to realize the rights of VMGs especially the Batwa as guaranteed under the Charter. The commission recommended that Uganda adopts measures to ensure the effective protection of the rights of VMGs especially of the Batwa people as guaranteed under the Charter by establishing laws that protect land rights and natural resources of VMGs (ibid). These groups are not recognized as VMGs by the GoU which prefers to call them vulnerable and Marginalized groups or Ethnic Minorities.

2.3. **The Vulnerable and Marginalized Groups of Uganda**
A number of ethnic minority groups in Uganda have been identified according to the World Bank’s OP 4.10 on the identification of VMGs. They include traditional hunters and gathers’ communities of:

- *Batwa*, also known as *Twa or Pigmies* who live primarily in south-western Uganda;
• *Ik* who live on the edge of the Karamoja - Turkana region along the Uganda - Kenya border in Kaabong district, Karamoja;

• *Benet*, also known as *Ndorobos*, are 20,000 in number and live in Kween district on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, and

• *Tepeth* also referred to as the *Soo*. They live in Mount Moroto and neighbor the Turkana and the Pokot of Kenya. They are also said to have been the original people of Moroto but due to ethnic wars with the Karimojong they were driven up the top of mount Moroto.

*A full write up about the above Vulnerable and Marginalized Groups is detailed in the Social Assessment Report Volume 2.*

The VMGs of Uganda are commonly characterised by:

• Historical and continued suffering, disempowerment and discrimination on economic, social, cultural and political grounds;

• Reliance on their land and environment to sustain themselves both physically (in terms of food, fuel and habitat) and culturally;

• Threatened livelihoods mainly due to dwindling access to land and natural resources on which they depend as hunters and gatherers;

• Their economic systems exist separately from that of the mainstream or dominant community, and tend to have minimal interaction (if any) with the socio-economic and legal systems of national governments;

• Much lower health and education indicators than those of the dominant community, often due to difficult access. This means that they are particularly vulnerable to changes in their socio-economic and physical environments; and

• Social exclusion, deprivation from mainstream government services, lack of participation in development processes that affect them, and in most cases uncertainty of land and natural resource tenure.

2.3.1.1. **Key Issues and Challenges of the Batwa**

• Landlessness - although the Batwa had no concept of land ownership before 1992, they were comfortable in the forest which was ‘owned’ by none except themselves. The forest provided them with all their basic living requirements without any threats. They are now impoverished in a state of landlessness and lack of resources;

• Loss of a culture/identity - transition from forest life to the ‘outside, open and dry life’ is one of their biggest challenges. The culture outside the forest is alien, demanding and does not enable *Batwa* carry out activities previously undertaken in the forests. This has affected teaching and learning of indigenous knowledge to the young generation and thus a steady loss of their culture;

• The threat of extinction - some *Batwa* in the sub region are faced with the threat of extinction due to stigmatization and ‘integration’. The VMGs remain ‘silent’ and ‘hidden’ in the dominant community because they are ashamed of revealing their identity;

• High non-school attendance, school dropouts and low completion rates at both primary and secondary levels. There are very few *Batwa* children in secondary schools;
• Joblessness - without land and any form of wealth/property, the Batwa sell their labour to earn a living. Idleness attracts vices like alcoholism and ‘prostitution’ making them susceptible to diseases particularly HIV/AIDS;
• Poor hygiene and eating habits – this does not only affect their health status but also affects their children’s school attendance as they skip school because they are hungry or/and are dirty in which case they are teased at school; and

2.3.1.2. **Key Issues and Challenges of the IkVMGs**

Based on consultations as well as literature sources, below is a summary of the key issues and challenges currently faced by the Ik:

• Non-school attendance, high school dropouts and low school completion rates due to absolute poverty, marginalization and lack of resources/wealth. There is need for affirmative action for the Ik community to strengthen their participation in secondary education (USEEP);
• Geographical isolation, frequent famine due to drought, and the aid that is sent usually does not reach them and is directed more to groups residing in the lowlands;
• Frequent pressures to relocate their communities to the lowlands where government services can be easily provided or are readily available, but prefer to keep in their territories, and thus are in constant fear of the inevitable, eviction from their homeland;
• As traditional hunters/gatherers, the Ik have witnessed the depletion of wild game in their areas due to cutting down of trees and the widespread use of illegal guns;
• Timu forest which is a center for their rituals and traditions is slowly becoming depleted causing gathering methods to be more difficult and greatly affecting the performance of their rituals and traditions. The Dodoth and Turkana graze in Ik lands during which they cut down trees for fencing their homestead and kraal;
• While they do speak their own native language, many Ik have ventured outside of their culture and learned the language of surrounding tribes in order to herd cattle for these groups as a source of employment;
• Their strong culture, attachment to their land/habitats, and social cohesion makes it either difficult or easy to mobilize them or change the Ik.

2.4. **Key Concerns and Issues Common to VMGs in Uganda**

The non-recognition and identification of VMGs by the GoU is a major cause of their neglect and violation of their rights. According to IWGIA, dispossession of traditional lands and territories is one of the major problems of VMGs in Africa. Dominating development paradigms in Africa perceive VMGs’ modes of production (pastoralist, hunting, and gathering), as primitive, non-productive and unaligned with today’s modernization aspirations of African States. Therefore, many development policies are either directly or indirectly unfavourable to VMGs’ modes of production. In addition, IWGIA notes that only a few African States recognize and protect the basic collective rights of VMGs in their constitutions or national legislation. Indigenous Peoples suffer from weak political representation, discrimination, and stereotyping from the mainstream society. Some of the major challenges and concerns faced by indigenous groups in Uganda are:

• Uganda's constitution has no express protection for VMGs, though it does provide for affirmative action in favor of marginalized groups (IWGIA, Update 2011);
• The Land Act of 1998 and the National Environment Statute of 1995 protect customary interests in land and traditional uses of forests. However, these laws also authorize the government to exclude human activities in any forest area by declaring it a protected forest, thus nullifying the customary land rights of VMGs. Nevertheless, the National Land Policy 2013 seeks to address the issue of dispossession of VMGs’ ancestral lands as will be seen in the next section;

• Political participation of VMGs remains limited and their socio-economic rights are ignored by the State and society; and

• Eviction from their homelands has limited Uganda's VMGs' access to natural forest food, herbal medicine, and shelter leaving some of them plagued by starvation and sickness;

• Frequent attacks from hostile ethnic groups especially the Tepeth in Moroto are attacked by the Pokot and Turkana from the Kenya. The Ik are attacked by other Karamojong ethnic groups.

• Eviction from homelands (Natural Forests) has limited the vulnerable/marginalized Peoples' access to food, medicine, and shelter. As a result, some of them are plagued by starvation, sickness and exposure. For instance, the Batwa in Bundibugyo District numbering less than 200 are on the verge of total extinction due the HIV/AIDS, which they have acquired due to the integration with other communities who believe that one can get cured of the infection after sleeping with a Mutwa woman.

The International Work Group for Indigenous Affairs (IWGIA) and the Working Group on Indigenous Issues of the Commission have argued that: the issue of VMGs revolves around the assertion that certain marginalized groups are discriminated against in particular ways because of their particular culture, mode of production and subordinate position within the State and that State legal and policy frameworks have been impotent at addressing these challenges. This is a form of discrimination which other groups within the State do not suffer from. It is legitimate for the marginalized groups to call for the protection of their rights in order to alleviate this particular form of discrimination.
3. POTENTIAL IMPACTS OF USEEP PROJECT ON AFFECTED VMGs

3.1. Key Issues
It is evident from the consultations that the collective relationship that VMGs have with their lands, territories and resources is both multi-faceted and profound. It has dimensions which are material, social, cultural, economic, political, psychological and spiritual in nature. This relationship is intergenerational and critical to the identity, economic sustainability and survival of the VMGs as distinct cultural communities with their own world view and spirituality. Denial or restriction of access to their lands, territories and resources can threaten their physical and cultural survival as well as social organisation. Therefore, a number of risks relevant for the subprojects of USEEP are worth noting:

- Indigenous Peoples’ rights - Particular rights of VMGs are recognized in international agreements and for World Bank-supported projects by the Bank’s own policy. Such rights especially access to their land are also recognized in the National Land Policy, 2013. The implementation process of the USEEP subprojects will have to identify and recognize these rights to ensure that activities do not infringe on such rights.

- Loss of culture and social cohesion - Given VMGs’ distinct cultures and identities and their frequent marginalization from the surrounding society, USEEP interventions may run the risk of imposing changes to or disruption of their culture and social organization, whether inadvertently or not. While these indigenous communities may welcome and seek change, they can be vulnerable when such change is imposed from external forces and when such change is rushed. Moreover, since many indigenous communities’ culture and social organization are intertwined with their land and natural resource use practices, changes to these practices may result in undesired changes in the culture and social organization which may lead to social disruption and conflicts within and between communities and other stakeholders.

3.2. Potential Positive Impacts

Table 1: Potential Positive Impacts

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<thead>
<tr>
<th>Project Components and Subprojects</th>
<th>Potential Positive Impacts on VMGs</th>
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<tbody>
<tr>
<td><strong>Component 1: Equitable expansion of secondary education</strong></td>
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<tr>
<td>It is noted that to significantly increase access to lower secondary education by VMGs, the project should grant full scholarships to VMGs in the same manner agencies like KOPEIN/MCC and BDP are doing. These agencies are faced with inadequate resources to meet the increasing demand by VMGs. KOPEIN has enabled all qualifying Ik pupils to access any of the 3 secondary schools in Kaabong district. Likewise, BDP has facilitated a number of Batwa children to access secondary education. In addition some VMGs’ communities like the Tepeth in Moroto do not have any secondary school in their community or proximity.</td>
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<tr>
<th>Sub-component 1.1 Construction of new schools</th>
<th>Establishment of desired new secondary schools and an improvement of a learning environment in existing ones may potentially have the following positive impacts on VMGs:</th>
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<tr>
<td>Improving access by expanding the network of secondary schools in underserved areas</td>
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<tr>
<td>• Increased access to quality secondary school education due to proximity of the schools.</td>
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<tr>
<td>• Enhanced abilities of parents to monitor, counsel and encourage their children to stay in school since they will</td>
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be studying within their community and hence a reduction in the dropout rate and increase in completion rates.

- Improved primary school completion rates as pupils will be encouraged by the presence and proximity of secondary schools in their community.
- Improved VMGs’ attitude towards education, hence making it a priority for many. Parents’ negative attitudes towards education may gradually change when they benefit from the good results of education.
- Related to the above, more learners will enrol and complete secondary school which will improve the literacy and numeracy levels of VMGs.
- More VMGs will be encouraged to support their children complete lower secondary education given the practicability of what is taught in the schools
- Secondary education empowers for better decision making at village level especially if many girls complete lower secondary education, it is one way of empowering them against gender-based violence.
- A reduction of beggars among the VMGs since people with secondary school education will find better coping mechanisms than begging.
- Enlighten VMGs still practicing FGM (Tepeth & Benet) to abandon the practice.

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<tr>
<th>Sub-component 1.3: Supporting girls’ education</th>
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<tr>
<td><strong>Note:</strong> Most VMGs recommended that the best way of keeping at school is by building only Girls Boarding Secondary schools in their areas.</td>
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<tr>
<th>Component 3 Improving Teachers Support and Policy Development Nationally</th>
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<tr>
<td>The objective of this component is to support improvements in teaching and learning across the country by scaling up existing elements of the teacher support system. The component will also aim to prepare for future development of quality lower secondary education through analytical and capacity building work.</td>
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<tr>
<td>Building of Girls’ only boarding schools will increase the number of girls from VMG communities that complete school without much interruption from the boys/men they meet while on the way to school</td>
</tr>
<tr>
<td>The girls only boarding schools will keep the girls in school hence preventing them from targeted for FGM among those VMGs still practicing it like the Tepeth and Benet.</td>
</tr>
<tr>
<td>Increased participation of girls from VMGs’ communities in secondary education through increased enrolment, retention and completion rates</td>
</tr>
<tr>
<td>This will go a long way in improving the quality of education in the project areas given the fact most schools lack teachers with the requisite skills</td>
</tr>
<tr>
<td>They will be able to apply the skills in their community serving the community as well as earning a livelihood.</td>
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<tr>
<td>VMGs’ would for the first time pursue science subjects in particular and the use of ICT as a pedagogical tool, they will understand the concepts and perhaps study up to university level. This is hoped to improve their living standards since their children will be employable and able to support their families.</td>
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<tr>
<td>Improved school management, leadership and accountability, would offer an opportunity to VMGs to manage a secondary school establishment which would boost their image.</td>
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### Component 4: Project management, monitoring and evaluation.

This component will finance:
- PCU staffing, office rent, audit, project baseline studies, monitoring and evaluation, capacity building activities.

- Proper management of the proposed USEEP project will imply that VMGs will actively participate and have a fair share of the project benefits in way of increased number of their children who successfully complete lower secondary education.

- The teachers and school management bodies such as SMCs, BoGs and PTA will benefit capacity building activities. VMGs parents will be encouraged to be part of the schools management bodies.

### 3.3. Potential Negative Impacts

The USEEP subprojects are likely to have two categories of adverse impacts on VMGs:

- **Permanent effects** - Permanent effects will result into an infinite loss of use of property, vegetation, or land by the affected person as a result of subproject activities. This is likely to occur where permanent installations such as school buildings/infrastructure are established. Such effects may affect:

  - VMGs whose land is found suitable for the infrastructure and this can translate into either loss of land or crop cover or both. The main activity for land use among the Ik and Benet is subsistence farming dominated by cultivation of crops, bee keeping, hunting wild animals and gathering fruits and vegetables. The mitigation is for MoES to establish new schools in sub counties that have their own land free from encumbrances in order to avoid the need for land acquisition and displacement of VMGs. Where land acquisition is inevitable, the provisions in the RPF prepared for the USEEP project will be followed.

  - Resettlement can also lead to the loss of access to communal resources:
    - Loss of land for grazing;
    - Loss of access to water;
    - Loss of forest affecting forest based activities
    - Loss of medicinal plants; and
    - Loss of trees for charcoal production and firewood.

  To address the above effects, the USEEP subprojects will avoid any permanent displacement, resettlement of VMGs as a result of the project through establishing new schools only where sub counties have their own land free from any encumbrances and in existing schools with enough land accompanied by proper documentation.

  - VMGs’ health status as they may be exposed to new interactions with people to be engaged in the civil works which may lead to an increased spread of infectious diseases like STIs and HIV/AIDS. Continuous sensitization about HIV/AIDS prior to project implementation and after should be carried out to prevent against VMGs and vulnerable groups from contracting/spreading HIV/AIDS.

  - VMGs’ communities’ children may be abused in ways such as underage employment in civil works, sexual harassment of girls in the community, and in the schools as a result of an influx of workers for construction activities. In addition, influx of labour can introduce social ills like alcoholism and drug abuse. MoES in collaboration with the district LGs
(DCDO) should ensure that existing child protection mechanisms (policies and laws on children’s rights, labor etc.) are adhered to.

The above impacts can result in further indirect impacts, including causing VMGs to be more vulnerable as these can increase their poverty levels. The social impacts other than those related to social safeguards should be mitigated in line with the Environmental and Social Management Framework (ESMF) prepared for the USEEP project.

**Temporal impacts** - Temporal impacts will result into an interruption in the current use of property or land by the affected communities or individuals as a result of subproject activities. This is likely to occur during expansion of existing infrastructure especially classrooms, dormitories, laboratories etc. It is likely to affect:

- Students including VMGs that currently utilize the classrooms that may have to be demolished to pave way for new ones and will therefore, have to find temporary shelters to serve as classrooms;

The mitigation measure to the above temporary impact is for MoES to encourage schools to provide alternative structures for use by students.

### 3.4. USEEP Intervention Risks’ Analysis

Some of the social risks of USEEP interventions include, but are not limited to:

- **a)** Karamoja is a generally marginalized sub region with a very low human development index due to high levels of poverty. However, poverty is higher among the Ik and Benet VMGs than the major groups (e.g. Dodoth, Matheniko and Karimojong). The dire lack of any form of wealth (property/assets, cattle) implies that whatever VMGs produce/gather is from hand to mouth with no saving for education. Therefore, it would be risky for USEEP to implement its activities in VMG areas without careful consideration of their ability to make a meaningful contribution towards USE in their community. Findings indicate that government’s full support and exemption from paying any dues in school is needed. Therefore, USEEP should consider affirmative action for VMGs and VMGs to include payment of all school dues if they are to benefit.

- **b)** Establishment of new schools in the areas of VMGs particularly in the Ikand Tepeth communities which is bordered by 2 countries (Kenya and South Sudan) may attract international students and students from the surrounding dominant ethnic groups. While this may increase interaction and foster cooperation between the different communities, it may increase the spread of diseases such as HIV/AIDS. Consultations revealed that the Ikand Tepeth were not aware whether HIV/AIDS existed in their community. This is an issue of major concern.

- **c)** Apart from meeting a basic human need, new schools could have a direct impact on various human development indicators among the VMGs but may run the risk of high consumption of fuel resources (firewood, charcoal) which might deplete the nearby forests if not well managed. This will in turn disrupt the VMGs’ way of life that heavily depends on natural resources.
Best practices emphasize that projects should be demand driven and encourage grassroots participation to ensure community ownership especially for the established infrastructure as a lack of it can result in ‘white elephants’. Infrastructure investments completed without meaningful local community input face a risk of poor use and maintenance. Some of the previous efforts to upgrade school infrastructure have faced challenges of sustainability since projects were implemented in a top-down manner.

### 3.5. Mitigation Measures

To avoid or minimize adverse impacts and, at the same time, ensure benefits for the VMGs and VMGs, the MoES may apply the following basic principles in the selection and design of particular subproject activity:

- Ensure that VMGs communities in general and their organizations/local leaders are not excluded by any means in activities of selection, design, and implementation processes;
- Provide full scholarships to all VMGs’ learners and support interventions that will break the barriers to their retention and completion of school;
- To ensure that VMG girls stay at school MoES should consider building only girls boarding schools in the VMG districts;
- MoES should ensure that VMGs in the project areas get a fair share of the USEEP project in their ancestral lands so that children of the major tribes are encouraged to attend school within VMGs community to encourage interactions with the wider community. Thus, MoES has to be mindful of the potential harm caused by gaps in service provision;
- MoES should carry out specific assessments of the impact of proposed subprojects on the economic and social development of VMGs as an integral part of the project cycle, through a transparent process with free and informed participation of the affected communities. MoES has to ensure that the USEEP interventions do not unnecessarily and unintentionally exacerbate factors outside the scope of planned impacts;
- Together with VMGs and vulnerable groups, MoES should carefully screen the activities of all subprojects for a preliminary understanding of the nature and magnitude of potential impacts, and explore alternatives to avoid or minimize any adverse impacts;
- Where alternatives are not feasible and adverse impacts on VMGs are unavoidable, MoES, together with VMGs and others knowledgeable of VMG culture and concerns should immediately make an assessment of the key impact issues; and
- MoES should undertake the necessary tasks in order to adopt appropriate mitigation measures. The most important in this respect is intensive consultation with the VMGs communities, community elders/leaders, CSOs/NGOs and others who have experience in working with VMGs.

### 3.6. Strategies for VMGs Participation

VMGs are usually excluded from accessing basic services because they are not sufficiently positioned to tap vital development opportunities. Below are the strategies to ensure their inclusion and participation in USEEP.

### 3.6.1. Guidelines for Inclusion

Guidelines for including VMGs include:
• Identify subgroups (VMGs) among the poor, especially those at risk of exclusion;
• Structure project rules and procedures to promote their participation;
• Determine participatory techniques that can help facilitate their involvement (where existing systems of social organization are highly inequitable, new groups may need to be created to enable excluded groups to participate);
• Ensure that intermediaries (CSOs/NGOs/CBOs, etc.) working with communities have expertise in working with these groups and using participatory techniques;
• Investigate how secondary schools can be made more responsive and inclusive of these groups e.g. inclusion of VMGs/VMGs on school management bodies (BoG/SMC/PTA);
• Include specific indicators related to these groups in monitoring and evaluation systems, and involve all stakeholders in monitoring and evaluation.

3.6.2. Consultation and Mobilization
USEEP subprojects must be designed in such a way that all segments of the community have a voice in decision-making and management. In order to enhance the positive benefits of the project, there should be adequate consultation and participation of VMGs during project design and implementation to ensure that the project adequately deals with the needs, priorities and preferences of the VMGs. Emphasis should also be put on mobilizing communities to manage and sustain the project infrastructure and services so as to encourage ownership of these investments. Focus should also be put on providing access to information that will enable all community members not only to know their rights, demand for services and hold leaders accountable but also fulfill their duties and responsibilities as project stakeholders. The project will involve the training of School management teams that should work together with the respective District Community Development Officers (CDOs) and the CSOs/NGOs to mobilize VMGs and VMGs to participate in the USEEP.

3.6.3. Working with stakeholders
The degree to which MoES will be able to collaborate, share information, and synthesize efforts will determine, to some extent, the success of USEEP interventions in the proposed project areas. Engaging stakeholders will help MoES to:

• Identify and prioritize community development needs and opportunities for integration in design of USEEP subprojects;
• Identify potential positive or negative impacts that USEEP may further leverage or help to mitigate;
• Encourage community member involvement in project design, implementation, and monitoring;
• Identify and evaluate potential partners to implement the project; and
• Monitor project impacts and ensure that the project meets community expectations

Experience of already existing NGOs and other agencies in the project areas will be invaluable to MoES. The presence of NGOs like KOPEIN, BDP, and KADNET has helped in the promotion of VMGs education through scholarships and addressing some of the underlying barriers to education. Therefore, MoES should consider tapping experiences from these CSO/NGOs during project implementation. The direct key stakeholders relevant to securing FPIC will be the districts of Kasese, Moroto, Kaabong and Kween. And these include LG District officials; Civil Society
4. GUIDELINES ON PREPARATION OF THE VULNERABLE AND MARGINALIZED GROUP FRAMEWORK

OP 4.10 requires that a process of free, prior, and informed consultation, with the affected vulnerable and marginalized communities, of the potential adverse and positive effects of the Project be designed and used in consultation. It is likely that some of the proposed investments will result in significant adverse impacts for vulnerable and marginalized communities and as such the VMGs should be informed and consulted prior to Project implementation. The Vulnerable and Marginalized Groups Framework (VMGF) sets out:

- The potential positive and adverse effects of USEEP subprojects on VMGs;
- A plan for carrying out the social assessment for USEEP subprojects;
- A framework for ensuring free, prior, and informed consent with the affected VMGs’ communities at each stage of project preparation and implementation;
- Institutional arrangements including capacity building where necessary for screening project-supported activities, evaluating their effects on vulnerable and marginalized groups, preparing VMGF, and addressing any grievances;
- Monitoring and reporting arrangements, including mechanisms and benchmarks appropriate to the project; and
- Disclosure arrangements to the VMGs to be prepared under the VMGF.

4.1. Plan for Social Assessment

The social assessment is a variant of what is generally known as a Social Impact assessment (SIA) and will be done during the VMG subproject preparation. It will gather relevant information on demographic data: social, cultural and economic situation; and impacts. This information will be gathered through separate group meetings within the vulnerable and marginalized communities, including leaders, NGOs, CBOs, and affected persons. Discussions will focus on potential positive and negative impacts of the subprojects; measures to enhancing positive impacts and strategies/options to minimize and/or mitigate negative impacts.

The social assessment includes the following elements, as needed:

a) A review, on a scale appropriate to the project, and institutional framework applicable to vulnerable and marginalized groups.

b) Gathering of baseline information on the demographics, social, cultural and political characteristics of the affected vulnerable and marginalized groups’ communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.

c) Taking the review and baseline information into account, the identification of key subproject stakeholders and the elaboration of a culturally appropriate process for consulting with VMGs at each stage of subproject preparation and implementation.

d) An assessment, based on free, prior, and informed consent, with the affected VMGs communities, of the potential adverse and positive effects of the relative vulnerability of,
risks to land and natural resources as well as their lack of access to opportunities relative to their social groups in the communities, regions, or national societies in which they live.

e) The identification and evaluation, based on free, prior, and informed consent with the VMGs communities, of measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that VNGs receive culturally appropriate benefits under the subproject.

4.2. Institutional and Implementation Arrangements

The project financial and other resources will be managed through the existing financial management arrangements in MoES as established under the Directorate of Finance and Administration. During project execution the MoES shall coordinate project implementation and manage: (a) project monitoring, reporting and evaluation; (b) contractual relationships with IDA and other co-financiers; (c) procurement and (d) financial management and record keeping, accounts and disbursements.

This section will focus on the institutional as well as implementation arrangements specific to this VMGF including an assessment of capacities for effective VMGF/VMGP implementation.

4.2.1. Roles and Responsibilities of Implementation Stakeholders

MoES: The ministry will take the overall responsibility of implementing USEEP including in ensuring the effective execution of the VMGF. Coordination of all social issues including on VMGs under the project will lie with the Commissioner, Education Planning Department (EPD) supported by the Project Coordination Unit (PCU) which will be headed by a Project Coordinator (PC). This will be done in manner similar to how it is done for other projects under the ministry. The Environment and Social Safeguard Specialist (ESSS) and the Social Development Specialist in the ministry/PCU will oversee the preparation and implementation of the VMGP. Other roles of the ministry will include:

- Prepare the VMGF for the Project and ensure that measures to address adverse impacts where they cannot be avoided are spelled out;
- Consult on the VMGP with stakeholders, with special attention paid to including affected VMGs (and other VMGs) and relevant government agencies to ensure that VMGs fully benefit in culturally appropriate ways;
- Ensure that the VMGF/ have adequate resources to enable effective implementation;
- Provide technical assistance and facilitation to LGs/Schools to implement the VMGP;
- Implement monitoring and reporting activities of the Plan, including arranging and paying for any independent monitoring that might be deemed necessary;
- Notify the World Bank of any substantial change in the course of the Plan implementation;
- Build capacity of the relevant LG staff and VMGs and other vulnerable groups; and
- Report both to affected VMGs/VMGs and WB on project progress and any unexpected and unintended events affecting VMGs and vulnerable groups.

District Local Governments (LGs): Beneficiary LGs will support the MoES in collaboration with the MoLHUD to identify land for the establishment of new schools. Districts especially the District Education Department (District Education Officer (DEO) and District Inspector of Schools (DIS)) will also support in selecting existing schools for learning environment improvement. The LGs
should devise measures during identification, to ensure that sub-counties inhabited by VMGs’ communities and/or schools serving VMGs and other ethnic minorities are selected to benefit from the project. This will to a greater extent serve the interests of the 1995 Ugandan Constitution and other relevant legal and policy frameworks. During USEEP implementation, the District Community Development Officers (DCDO) with guidance from the ESSS at MoES will:

- Undertake social screening of subprojects to confirm the presence of and enhance the participation of VMG communities as well as other VMGs in the district;
- Implement the VMGP in their respective districts;
- Mobilize the relevant VMGs’ communities and create awareness about the project;
- Monitor mitigation measures intended to enhance the participation of VMGs’ communities and vulnerable groups in the USEEP; and
- Monitor the implementation of the VMGP on the ground and produce progress reports.

**Schools/Communities:** Beneficiary schools/communities will be the actual implementers of the proposed project, particularly the subprojects involving civil works. Among their roles will be:

- Attend and make contributions during stakeholder meetings;
- Participate in project implementation on the ground;
- Participate in the monitoring of VMGP implementation; and
- Safeguard and maintain project infrastructure as applicable.

**Local/Community Organisations:** If deemed necessary, active local organisations such as KOPEIN and BDP operating in the affected VMGs communities may be called upon to support the DCDO in not only mobilising VMGs and other VMGs to actively participate and benefit from the project but also in sharing their experiences and knowledge of working with VMGs.

### 4.3. A Situational Analysis and Enhancement of Capacities for VMGP Implementers

The MoES has relatively adequate institutional capacity to implement this VMGF. The MoES has in the past implemented World Bank supported projects (e.g. UPPET). It is currently implementing two World Bank financed projects, USTEP and USDP, both of which involve implementing social safeguards measures. Therefore, the ministry has accumulated considerable capacities in management of vulnerable and marginalized groups. Nonetheless the capacity of the MoES to plan and implement the measures outlined in this VMGF requires continuous strengthening for a robust vulnerable and marginalized people management. The MoES has recruited an Environment and Social Safeguards Specialist (ESSS) under the UTSEP/Global Partnership for Education (GPE) project who is expected to liaise and guide the Social Development Specialist who should be recruited to manage social safeguards and issues for the USEEP. It is expected that, to strengthen the ministry’s capacity, the ESSS under UTSEP and the proposed Social Development Specialist (SDS) under USEEP in MoES will be instrumental in its capacity enhancement. This should be augmented by undertaking relevant training in implementation of the Indigenous Peoples Plan and orientation training on the new World Bank Environment and Social Framework for further capacity building.

The relevant officers in the LGs and target Schools to be trained will include DCDO, CDOs, BoG/SMC members, and head teachers. They should be trained on social safeguards including all
social issues in addition to being facilitated accordingly by MoES to help implement and monitor the VMGPs on the ground. Specific areas of training will include screening, development of district specific VMGPs, managing social issues, and monitoring and reporting. The SDS will be the responsible focal person for all social matters including safeguards related to the USEEP project. The SDS in close collaboration with the respective districts (DCDO) will:

a. Identify VMG communities within the project areas;
b. Identify and explain the rights of VMGs as enshrined in Uganda’s legal framework;
c. Design appropriate tools to undertake free, prior and informed consultations with the VMGs;
d. Disseminate the draft VMGP to the VMGs for their consent and input;
e. Conduct and participate in training matters related to the identification, communication and provision of services to VMGs;
f. Ensure that appropriate channels are used to communicate with VMG communities; and
g. Train safeguards personnel at the district levels on project implementation and monitoring.

At school/community level, USEEP project intends to improve school management and accountability through support to school management teams (BoG, SMC and PTA). Training of these teams will ensure the proper management of new and expanded schools and enhance VMGs’ operation and maintenance capacities. The BoG/SMC/PTA should in turn sensitize VMGs’ communities on the important role they should play in maintaining USEEP school infrastructure.
5. VULNERABLE AND MARGINALIZED GROUPS PLAN/VMGP

Based on the social assessment, the subproject will develop appropriate mitigation measures and livelihood enhancement activities for vulnerable and marginalized groups. A VMGP addresses the (i) aspirations, needs, and preferred options of the affected VMGs, (ii) local social organization, cultural beliefs, ancestral territory, and resource use patterns among the affected VMGs; (iii) potential positive and negative impacts on VMGs; (iv) measures to avoid, mitigate, or compensate for adverse project effects; (v) measures to ensure project benefits will accrue to VMGs; (vi) measures to strengthen the capacity of local authority and relevant government departments to address VMGs issues; (vii) the possibility of involving local organizations and non-governmental organizations with expertise in VMGs issues; (viii) budget allocations; and (ix) monitoring. MoES, the implementing agency will submit the VMGP to the Bank for review and approval prior to commencement of project works.

The Vulnerable and Marginalized Groups Plan is prepared in a flexible and pragmatic manner, and its level of detail varies depending on specific project and nature of effects to be addressed. The VMGP includes the following elements, as needed:

a) A summary of the social assessment
b) A summary of results of the free, prior, and informed consent with the affected VMGs communities that was carried out during subprojects preparation and that led to broad community support for the subprojects.
c) A framework for ensuring free, prior, and informed consent with affected VMGs communities during project implementation.
d) An action plan of measures to ensure that VMGs receive social and economic benefits that are culturally appropriate, including, if necessary to enhance the capacity of the subproject implementing agency.
e) When potential adverse effects on VMGs are identified, an appropriate action plan which includes measures to avoid, minimize, mitigate, or compensate for these adverse effects.
f) The cost estimates and financing plan for VMGP.
g) Accessible procedures appropriate to the subprojects to address grievances by the affected VMGs’ communities arising from subproject implementation. When designing the grievance procedures, the borrower (GoU) through MoES will take into account the availability of judicial recourse and customary dispute settlement mechanisms among the VMGs.
h) Mechanisms and benchmarks appropriate to the subproject for monitoring and evaluating, and reporting on the implementation of the VMGs. The monitoring and evaluating mechanisms should include arrangements for the free, prior, and informed consultation with the affected VMGs.

5.1. Framework for free, prior, and informed consent

Obtaining FPIC implies a process of good faith engagement whereby the parties establish a dialogue allowing them to find appropriate solutions in an atmosphere of mutual respect with full and equitable participation. The outcome of the social assessment and measures for VMGs and VMGs will be presented in community meetings. The Ministry’s Social Development Specialist will coordinate with the District Community Development Officer (DCDO) in the of process of free, prior and informed consultation with the affected VMGs’ communities during project preparation to inform them about the project, to fully identify their views, to obtain their broad
community support to the project, and to develop project design and safeguard instruments. In most cases, this process is best done as part of the SA although consultations are likely to continue after its completion. Given the social setup of the identified VMGs and VMGs, consultation will definitely require time and an effective system of communication amongst interested parties to ensure that it adequately deals with their needs, priorities, and preferences. Accordingly, the project plans, including VMGP, will be prepared in consultation with VMGs. The VMGs will be provided with relevant project information in language(s) and manner suitable to them. VMGs should be able to:

- Participate either directly or through their own freely chosen representatives and/or customary or other institutions; and
- Specify which of these is entitled to express consent (or lack of) on their behalf.

Free, prior and informed consultation (FPIC), in relation to activities taking place on VMGs lands, refers to a process whereby affected vulnerable and marginalized communities, freely have the choice, based on sufficient information concerning the benefits and disadvantages of the Project, of whether and how these activities occur, according to their systems of customary decision making. A free, prior and informed consent means:

Table 2: Free, Prior and Informed Consent

<table>
<thead>
<tr>
<th>Free</th>
<th>Prior</th>
<th>Informed</th>
<th>Consent</th>
</tr>
</thead>
<tbody>
<tr>
<td>No manipulation.</td>
<td>None of the following should be undertaken before consent has been obtained:</td>
<td>Information to be provided should:</td>
<td>Form may vary for different communities: so may be oral or written but will always involve consultation and participation.</td>
</tr>
<tr>
<td></td>
<td>• authorization or</td>
<td>• be accurate</td>
<td>The process should be participatory.</td>
</tr>
<tr>
<td></td>
<td>• commencement of activities</td>
<td>• be in an appropriate language</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• land acquisition</td>
<td>• include information, when available, on social, economic, environmental and cultural impacts and reasons for proposed activities, duration, affected locality, proposed benefits sharing and legal arrangements and people likely to be involved</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Finalization of development plans.</td>
<td>• be in a form that is understandable and that takes into account traditions of the community</td>
<td></td>
</tr>
<tr>
<td>No coercion.</td>
<td>Specific time requirements of the consultation/consensus process.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No incentives.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No intimidation.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The consultations and participation of VMGs will be ensured in the formulation of the VMGP/subproject to ensure that it adequately deals with needs, priorities, and preferences. VMGs will be provided with relevant project information in languages and manner suitable to them. Separate focus group discussions will be carried out to assess the subproject impacts and benefits to these groups. The outcome of social assessment and VMGP will be presented in community workshops/meetings.

The lead Agency, MoES will make available the following documents to the project affected VMGs and disclose to the public:

(i) A draft Vulnerable and Marginalized Groups Plan before project appraisal;
(ii) A final Vulnerable and Marginalized Groups Plan after completion of such VMGP and
(iii) The revised Vulnerable and Marginalized Groups Plan, following the detailed design or change in scope in the subproject.
Note: Details of stakeholder consultations carried during the preparation of this VMGF are documented in the Social Assessment Report as volume 2 of this report.
6. GRIEVANCE MECHANISM

According to Article 40 of the UN Declaration on the Rights of VMGs states that, “Indigenous peoples have the right to access to and prompt decision through just and fair procedures for the resolution of conflicts and disputes with States or other parties, as well as to effective remedies for all infringements of their individual and collective rights. Such a decision shall give due consideration to the customs, traditions, rules and legal systems of the indigenous peoples concerned and international human rights.”

Vulnerable Marginalized Groups may encounter a grievance or a complaint against the project, its staff or contractors during project implementation. To address or resolve the grievance, a mechanism describing procedures, roles and responsibilities in grievance management process is given below. To be effective, the mechanism shall utilize existing local administrative and community structures. All grievances concerning non-fulfillment of contracts, levels of compensation, exclusion from subproject benefits, or seizure of assets without compensation shall be addressed to the Local council 1 Chairperson.

MoES’s Social Development Specialist shall work with community leaders in the project area to set up an LC1 Grievance Committee to be the first point where grievances are addressed. All attempts shall be made to settle grievances amicably before resorting to courts of law.

Entities seeking redress and wishing to record grievances will do so by notifying their Local Leader (LC 1 Chairperson) who will chair a Local Grievance Committee at LC 1 level set up with guidance of MoES’s Social Development Specialist. The Local Leader will inform and consult with the District Administration to determine validity of claims. If valid, the Local Leader will convene a meeting of the LC1 Grievance Committee to resolve the grievance and notify the complainant of the outcome. If the complainant’s claim is rejected, the matter shall be brought before the District government authority for settlement.

Any objections or grievances related to exclusion/marginalization shall be made in writing, in the language that the VMGs understands and are familiar with, to the Local Leader. Copies of the complaint shall be sent to MoES, within 20 days after the public notice. Channeling complaints through the Local Council Grievance Committee is aimed at addressing the problem of distance and cost the VMGs may have to face.

The Local Leaders (trained by MoES’s Social Development Specialist) shall maintain records of grievances and complaints, including minutes of discussions, recommendations and resolutions made. The procedure for handling grievances should be as follows:

a) The affected person should file his/her grievance in writing, to the Local Leader. The grievance note should be signed and dated by the aggrieved person. Where the affected person is unable to write, s/he should obtain assistance to write the note and emboss the letter with his/her thumbprint.

A sample grievance form is provided in Appendix 4.

b) The Local Leader should respond within 14 days during which any meetings and discussions...
to be held with the aggrieved person should be conducted. If the grievance relates to valuation of assets, a valuer may need to revalue the assets. In this case, the aggrieved person must be notified by the Local Leader that his/her complaint is being considered.

c) If the aggrieved person does not receive a response or is not satisfied with the outcome within the agreed time (s)he can lodge his grievance to the Local Administration (District).

d) The Local Administration will then attempt to resolve the problem (through dialogue and negotiation) within 14 days of the complaint being lodged. If no agreement is reached at this stage, then the complaint is taken to MoES’s Grievance Committee comprising the following entities:

   i) A Grievance Officer (MoES Staff)
   ii) A Local Council 1(LC1) Chairperson
   iii) District Representative (e.g. CDO or Member of District Land Board)
   iv) A community representative in project area (e.g. religious leader)
   v) Head Teacher and a Member of the School Management Committee

Note that persons in ii)-iv) will be location specific. If the complainant is still dissatisfied with the handling of his complaint, then he/she can take up the complaint through the court system. A flow process of grievance mechanism is illustrated in figure below.
Figure 1: Illustration of the grievance process
7. MONITORING AND EVALUATION

7.1. Overview
The PCU at MoES in collaboration with the Monitoring and Evaluation (M&E) department of the ministry will establish a simple monitoring system for the implementation of the VMGF. The M&E system will facilitate the collection and analysis of the required data during project implementation. Actual project achievements will be compared against planned activity targets, subprojects outputs and outcomes. The system will aim at improving efficiency and effectiveness of project implementation. The information to be collected and analysed will be based on set targets and planned activities under the project. This process should be part of the on-going M&E activities in the ministry.

Baseline data collection on the socio-economic status and cultural practices of VMGs will be carried out during subproject feasibility study/design. These will be the basis for establishing baseline data to monitor the project impacts on VMGs. The respective VMGPs will also specify systems of data collection and monitoring of the anticipated changes and will include Terms of Reference (ToR) for the monitoring agency/consultant. The Ministry’s PCU will submit monitoring reports to the World Bank for its review. Key indicators for both benefits and VMGs’ participation will include:

- Number of consultations with VMGs at all stages of USEEP implementation;
- Number of schools established in VMGs’ communities;
- Number of existing schools expanded in VMGs’ communities;
- Number of VMGs’ households with children in project target schools;
- Number of VMGs’ children in project schools; and
- Mobilization of VMGs to manage the established infrastructure.

Indicators for negative impacts on VMGs will include:
- Number of VMGs’ households and individuals physically or economically displaced by the project;

Monitoring indicators for VMGs will include gender and vulnerability specific indicators, and monitoring reports will present data disaggregated by gender and vulnerability. To effectively monitor project impacts on VMGs, the baseline data for the project will include data on representative VMGs’ households. The socioeconomic baseline indicators will be used for measuring the outcomes and impacts on vulnerable communities. The M&E mechanisms adopted for the project will ensure that in addition to process and outcome indicators, appropriate impact indicators are defined related specifically to impacts on vulnerable groups and their livelihoods. These will include: how many vulnerable people participated actively and benefitted from project activities and documentation of their opinions on project impacts and if any of their specific concerns were addressed during implementation. In measuring the extent and quality of participation, it will be important to understand and capture how gender differences will affect the participation of girls and women in USEEP activities. Gender analysis will therefore be an integral part of monitoring and evaluation of USEEP activities.
The monitoring and evaluation mechanisms adopted for the project will ensure that in addition to process and outcome indicators, appropriate impact indicators are defined specifically to impacts on vulnerable groups and their livelihoods. It is recommended that an impact evaluation be undertaken about 6 months before project completion to assess the changes in the overall living standards compared to the former living status or standards of living for these groups.
8. **BUDGET**

The cost for implementation of the individual VMGPs or VMGPs will be incorporated in the project cost and the administrative costs for survey, social assessment, and preparation of VMGs will be financed under Project. Additional costs to specifically cater for VMGs include; hire of a social scientist or VMGs Consultant to screen VMGs and prepare the VMGF, implementation of FPIC including mobilization, translation of reports, and special focus meetings and capacity building for project staff dealing with social issues including staff at district level. Since there are only three regions (Southwestern, Northeastern and Eastern) in Uganda known for hosting vulnerable and marginalized groups, the budget for implementation of the VMGPs or VMGPs can be estimated to be not more than 3% (USD: 4,500,000 Million) of the total project cost (USD: 150 Million).

**Table 3: Vulnerable and Marginalized Groups Framework Implementation Budget**

<table>
<thead>
<tr>
<th>No.</th>
<th>Component</th>
<th>Estimated Cost ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Hire of a Social Development/VMG Consultant to screen VMGs and prepare the VMGP</td>
<td>750,000</td>
</tr>
<tr>
<td>2</td>
<td>Implementation of FPIC including mobilization, translation of reports, and special focus meetings</td>
<td>1,770,000</td>
</tr>
<tr>
<td>3</td>
<td>Recruitment and salary of in-house Social Development Specialist/Safeguards Officer as part of the PCU at MoES. (Annual salary of $ 96,000) X 5 years</td>
<td>480,000</td>
</tr>
<tr>
<td>4</td>
<td>Monitoring of project impact on VMGs including facilitation (Motor cycles, fuel, bicycles)</td>
<td>1,500,000</td>
</tr>
<tr>
<td></td>
<td>TOTAL</td>
<td>4,500,000</td>
</tr>
</tbody>
</table>
9. DISCLOSURE ARRANGEMENTS FOR VMGPS TO BE PREPARED UNDER THE VMGF

The final draft of this VMGF will be submitted by the MoES to the World Bank for review and clearance. Once cleared, it will be disclosed in-country, in the appropriate form, manner and official language (English) in the daily newspapers. Later on, the information from the documents specified above (particularly the VMGP/subprojects) will be made available to affected persons summarized in form of brochure or leaflets translated in the appropriate language. After submitting the VMGPs to the Bank for review and clearance, MoES shall post the above documents on its website https://www.moes.go.ug/ and on the Bank’s Infoshop. During implementation, MoES will prepare social monitoring reports including safeguard issues, make them available to affected VMGs, post them on its website, and submit to the Bank for review.
References


APPENDICES

Appendix 1: Indigenous Peoples (VMGs) Screening and Impact Categorisation

a) Identification of VMGs in the subproject area

<table>
<thead>
<tr>
<th>Name of District:</th>
<th>Subproject title:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Impact on VMGs</th>
<th>Not known</th>
<th>Yes</th>
<th>No</th>
<th>Remarks or identified problems, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Are there VMGs in the subproject locations?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Do they maintain distinctive customs or economic activities that may make them vulnerable to hardship?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Are there any of the following vulnerable groups in the project area? OVCs, child mothers, widows, PWDs, elderly</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>4 Will the subproject restrict their economic and social activity and make them particularly vulnerable in the context of the project?</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>5 Will the subproject change their socioeconomic and cultural integrity?</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>6 Will the subproject disrupt their community life?</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 Will the subproject positively affect their health, education, livelihood or social security status?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8 Will the subproject increase conflict between VMGs and other communities?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9 Will the project alter or undermine the recognition of their knowledge, preclude customary behaviours or undermine customary institutions?</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>10 In case of no disruption of indigenous community life as a whole, will there be loss of housing, strip of land, crops, trees and other fixed assets owned or controlled by individual indigenous households?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
b) Potential impacts of the Project on VMGs

<table>
<thead>
<tr>
<th></th>
<th>Project activity and output</th>
<th>Potential positive impacts</th>
<th>Potential negative impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>3</td>
<td></td>
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<td>...</td>
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</tr>
</tbody>
</table>


c) Categorisation of Subprojects

The responses to the issues outlined in (a) and (b) above will form the basis for determining whether a subproject is in category A, B or C as indicated in the table below. Tick only the appropriate one.

<table>
<thead>
<tr>
<th>Tick</th>
<th>Category</th>
<th>Decision or Action Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>All subprojects categorized under A will require to prepare an VMGP</td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>Subprojects under here will require a specific action favourable to VMGs and addressed through a specific provision in related plans e.g. Resettlement Plan or a general Social Action Plan</td>
<td></td>
</tr>
<tr>
<td>C</td>
<td>Subprojects categorized as C require no VMGP or a specific action to be taken</td>
<td></td>
</tr>
</tbody>
</table>

Assessed by: …………………………………………………………………………………

   Environmental and Social Safeguards Officer/Consultant

Date: ……………………

Reviewed by: …………………………………………………………………………………

   Project Coordinator

Date: ……………………

Approved by: …………………………………………………………………………………

   Head of Department, MoES

Date: ……………………
Appendix 2: A Standard Outline for an VMGP

The size and level of detail of an VMGP varies depending on the specific subproject and nature of impacts to be addressed. A typical VMGP includes the elements below:

(i) A summary of the legal and institutional framework of Uganda applicable to VMGs and a brief description of the demographic, social, cultural, and political characteristics of the affected VMGs’ communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.

(ii) A summary of the social assessment.

(iii) A summary of results of the free, prior, and informed consultation with the affected VMGs’ communities that was carried out during project preparation and whether it led to community support or rejection of the project;

(iv) A Framework for ensuring free, prior, and informed consultation with the affected VMGs’ communities during project implementation;

(v) Formal agreements reached during the free, prior, and informed consultation during project preparation.

(vi) A Grievance mechanism taking into account local dispute resolution practices.

(vii) An action plan of measures to ensure that the VMGs receive social and economic benefits that are culturally appropriate, including, if necessary, measures to enhance the capacity of MoES;

(viii) When potential adverse effects on Indigenous Peoples are identified, appropriate action plans with measures to avoid, minimize, mitigate, or compensate for these adverse effects;

(ix) Special measures for the recognition and support of customary rights to land and natural resources may be necessary.

(x) Special measures concerning women and marginalized generational groups may be necessary to ensure inclusive development activities.

(xi) Capacity building activities for the indigenous communities to enhance their participation in project activities

(xii) The cost estimates and financing plan for the VMGP;

(xiii) Procedures appropriate to the project to address grievances by the affected VMGs’ communities arising from project implementation. When designing the grievance procedures, the consultant/MoES will take into account the availability of judicial recourse and customary dispute settlement mechanisms among the VMGs;

(xiv) Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the VMGP. The monitoring and evaluation mechanisms should include arrangements for the free, prior, and informed consultation with the affected Indigenous Peoples’ communities.
Appendix 3: Content of a Subproject’s Social Assessment

The extent and depth of analysis required for the social assessment are proportional to the nature and scale of the proposed project’s potential effects on the VMGs. The social assessment may include but not limited to the following elements, as required:

(a) A review, on a scale appropriate to the project, of the legal, policy and institutional framework applicable to VMGs.

(b) Gathering of baseline information on the demographic, social, cultural, and political characteristics of the affected VMGs’ communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.

(c) Taking the review and baseline information into account, the identification of key project stakeholders and the elaboration of a culturally appropriate process for consulting with the VMGs at each stage of project preparation and implementation.

(d) An assessment, based on FPIC, with the affected VMGs’ communities, of the potential adverse and positive effects of the project. Critical to the determination of potential adverse impacts is an analysis of the relative vulnerability of, and risks to, the affected VMGs’ communities given their distinct circumstances and close ties to land and natural resources, as well as their lack of access to opportunities relative to other social groups in the communities, regions, or national societies in which they live.

(e) The identification and evaluation, based on FPIC with the affected VMGs’ communities, of measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that the VMGs receive culturally appropriate benefits under the project.
## Appendix 4: Grievance Log and Resolution Form

**Name (Filer of Complaint):** .................................................................

**ID Number** (PAPs ID number): ............................................................

**Contact Information** (house number/ mobile phone): ..........................

**Nature of Grievance or Complaint:** ....................................................

**Date Individuals Contacted**

**Summary of Discussion:** .................................................................

**Signature** ................................................................. **Date:** .................................................................

**Signed (Filer of Complaint):** ............................................................

**Name of Person Filing Complaint (if different from Filer):** ...................

**Position or Relationship to Filer:** ....................................................

**Review/Resolution**

**Date of Conciliation Session:** ............................................................

**Was Filer Present?** Yes/No

**Was field verification of complaint conducted?** Yes/No

**Findings of field investigation:** ..........................................................

**Summary of Conciliation Session**

**Discussion**

**Issues:** .................................................................

**Was agreement reached on the issues?** Yes/No

**If agreement was reached, detail the agreement below**

**Signed (Conciliator):** ................................................................. **Signed (Filer):** .................................................................

**Signed:** ................................................................. **(Independent Observer)**

**Date:** .................................................................
Appendix 5: Summary of Stakeholder Views

<table>
<thead>
<tr>
<th>Issues Raised</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Community Support:</strong></td>
</tr>
<tr>
<td>All communities consulted showed overwhelming support the USEEP as there is a significant participation of parents and the community at large. Generally, community participation and parental involvement in secondary education was reported to be good in all the districts with some secondary schools being initiated by communities. They all echoed the availability of land for construction of new schools. As some of them said: “Education of our children is very important and we are happy and appreciate government for the development of our school within Ik community this will improve access to lower secondary education. We want their children to learn in a good environment and complete O’ level.” Ik Community Kamion S/C Kaabong.</td>
</tr>
<tr>
<td>We the people of Kitawoi love development but we have only one secondary school it has about 10 acres of land with 460 students. So with new schools they will shall have more than 1,000 students enroll into secondary education. We have land, building materials and safe place to keep the materials during construction. Therefore, the issue of lack of land should not be mentioned here.” Chairman L/C III, Kitawoi Village Benet S/C Kween.</td>
</tr>
<tr>
<td><strong>Inadequate Secondary Schools</strong></td>
</tr>
<tr>
<td>All districts where IPs/VMGs are found do not have enough secondary schools particularly in the Sub-counties where IPs/VMGs reside. This has greatly contributed to the many impacts related to high illiteracy rates, high school dropout, low girl child retention of completion rates and generally the low development in these areas. The sub-counties had just one secondary school with Kamion and Tapac where the Ik and Teppeth respectively having none. “I am very happy with the project of building secondary schools in the district it will help us to educate our children. We want our children to reach higher levels in education. Education in Karamoja was brought by missionaries where I benefited as a blind boy. As for the land it ours so it will not be a big problem. We don’t mind a mixed boarding school but prefer single sex schools in the region.” Councillor for PWD Tapac Sub-county Moroto.</td>
</tr>
<tr>
<td>However, they prefer boarding schools as they believed to be the ones help keep especially girls at school.</td>
</tr>
<tr>
<td><strong>Teachers Issues</strong></td>
</tr>
<tr>
<td>Teachers Issues were reported to be enormous including; unavailability, poor pay, lack of accommodation, travelling of long distances, lack of teaching and instruction materials, living in difficult to live and stay areas given their remoteness, lack of motivation, poor performance by students and minimal parental support. The situation is worse with science teachers.</td>
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<tr>
<td><strong>Quality of Education</strong></td>
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<td>The quality of education in the IP/VMGs districts is very poor due to; Inadequate Secondary schools, limited facilities like laboratories, Computer laboratories, classrooms, desks and Libraries; Lack of adequate scholastic materials and equipment, Constant poor performance; Inadequate basic tools for teaching like even chalk and textbooks. These have contributed to the teachers’ ineffectiveness in classrooms. “The issue of limited facilities at schools like books, laboratories, desks, has caused our children not catch up with the rest of the country academically. The government should look into the issue of computers and modern laboratories for them to catch up.” Community member KitawoiKween.</td>
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<td><strong>Poor road Network</strong></td>
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<td>These districts are characterised with very bad terrain and poor road network, accessibility is a problems and this has not only affected secondary education but also access to markets and other social services. Parents cannot afford to pay the little contribution of fees required from them due to low prices of their produce due to poor roads to the markets. Teachers and students are forced to walk very long distances daily to access schools. This has exacerbated the school drop as most students opt out to go do business for boys and the girls marry off early. This a forgotten place due to the poor road network. This has rendered schools being far, as such children don’t go to schools leading high girls drop out of school and hence early marriages and boys get engaged in trade. We believe when services are near, it will be easy to maintain a girl child at school. Parent in Kitawoi Village Kween.</td>
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<td><strong>Security concerns</strong></td>
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<td>Given the fact that these IPs live in the margins of forests or protected areas, they are threatened with insecurity both from the wildlife and sometimes bad elements in society. “Wild animals in the Park are grounds for security concerns where some teachers fear for their lives. Sometimes the elephants block the road and the teachers cannot proceed to the school. Therefore, addressing the issue of teachers’ accommodation alone might not entirely solve the question of absenteeism in some schools unless security issues are also addressed. For instance, the school and staff quarters must be tightly fenced to keep off wild animals.”</td>
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<td><strong>Parents’ perception on education</strong></td>
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| The District Education Officer claimed that the dropout phenomenon was more prevalent among the people because the parents’ priority was not the education of their children according to the District Education Officer. The ability of the many uneducated people to pull down the few who try to go to school. The ability to change the minds of the population is very difficult. Over drinking, drug abuse in the community.
Causes of High school dropout

Lack of role Models: This is not helped by a lack of and utilisation of available role models; and few female teachers who would serve as role models. The boys can however persist with studies even when overdue although this affects their focus. Some of the boys even marry and still keep in school. The students also lack role models to motivate them to read hard to be like them. The few who continuous do not come back to encourage others therefore the rest do not the benefit of studying till university. Even those who excel in athletics should come and motivate others we have children with talents like athletics which need to be tapped.

Market days at the boarder: The schools near the border with DRC also suffer with 3 market days in a week which affect attendance and performance of all students. Every Tuesday and Friday is a big market at the customs and every Wednesday is a market day in the community. The schools are working together with the local leadership to devise strategies of curbing students from attending market days.

Ecological Conditions:

for instance, floods, landslides have significantly affected the local communities reducing their incomes and support to the education of their children.

Climate change: New weather patterns threaten to worsen food insecurity in Karamoja sub-region. This undermines agricultural production in the region. Climate change is causing every household to be vulnerable in the region which further forces parents to send their children to look for food instead of going to schools.

Child Labour

High labour demand from parents who are pastoralists in general, who prefer their children to stay home and look after their herds of cows and sheep. Mining of marble and limestone at Kosiroy for Tororo cement factory has attracted students to provide casual labour instead of going to school hence high school dropouts in Karamoja. Apart from labour requirements, parents are particularly reluctant to send girls away from homes where they are protected and controlled.

Child labour has been cited as a major factor influencing school dropout in the district. It is claimed that some students, especially those at the secondary level leave school to engage in farming activities so as to get quick money. Child labour is still a big issue among the Benet community, farming and looking for firewood and when they get money, the students leave school.

Domestic chores – this is a gender issue that affects girls mainly because of the different gender roles assigned to girls and boys. Whenever there is a domestic chore that requires the attention of a mother or other older female in a family and they are unable to, the girls fill the gap. Chores such as looking after younger children and caring for patients whenever the mother is away or going to the market, are covered by the girl.

Cultural practices

Cultural Beliefs: The Ik community also outlined the key reasons for their reluctance to send their daughters to school as: cultural beliefs that the girl child is meant to be at home to perform domestic chores; early marriages; the negative attitude of parents towards education thus neglect supporting their children/daughters; high illiteracy rates especially among the women who are not interested in educating their daughters since they are not educated themselves and; poverty which prevents them from providing basic school requirements.

FGM is another cultural practice still privately practiced among the Benet and Tepeth communities. This is a sign of initiation to maturity and after FGM girls fear to go back school due to the stigma associated with it. Its only education that can help in eradicating FGM.

Poverty

High poverty levels in the community caused by low market prices for their produce due to poor road network where the community depends on basically farming. Currently the price of maize is as low as 200/= per kilo, therefore how much maize will a parent sell to raise the required school fees?

Corruption in giving out bursaries:

I am Councilor for people with disability, with all the above hardships, the sub-county leaders do not look for those who are very needy, instead opportunities are given to those one who already have. This has made the community to have negative opinion to education, making children lose interest in studying and this has led to students repeating P.7.

Another issues is about the boys who mislead the girls who are bright and still want to study.