

Update Meeting on Mitigation Measures to address risks of the Anti-Homosexuality Act in World Bank Group-financed Projects

Golden Tulip Hotel, Kampala March 28, 2025

1.0 Introduction

The World Bank organized a third consultative meeting with local civil society organizations and representatives of Sexual Orientation and Gender Identity (SOGI) on March 28, 2025¹ to share an update on the mitigation measures to address the risks of the Anti-Homosexuality Act in World Bank Group financed projects, since the last meeting held on January 28, 2025. This meeting also discussed preliminary findings of the feedback mechanisms to monitor the implementation of mitigation measures. In attendance were nearly 56 CSOs representing sexual and gender minorities, World Bank team and SREO. Below is a record of proceedings and a summary of key issues discussed during the meeting

2.0 Opening Session

Ms. Mukami Kariuki, Uganda Country Manager, joined remotely and welcomed the CSOs to the meeting recognizing their continuous engagement with the World Bank over the past two years. The Country Manager noted that the purpose of the meeting was to receive feedback from the CSOs on some of the potential constraints identified since the implementation of the Enhanced Implementation Support and Monitoring (EISM) across the country portfolio. Mr. Rogers Ayiko, on behalf of the country team, gave the welcome remarks at the meeting.

3.0 What has been delivered up to March 2025

Mr Peter Leonard, World Bank Regional Consultant, and Mr. Richard Ssebaggala, SREO Stakeholders Coordinator shared an update of the implementation of mitigation measures over the last three months.

The main mitigation measures include: (i) **Instructions to all front-line service providers in Bank-financed operations** (project staff, contractors, sub-contractors) to ensure inclusion of and non-discrimination of SOGIs (through government circulars, contract clauses, codes of conduct signed by workers); (ii) **Raising awareness of the above requirement to ensure inclusion and non-discrimination** among potential beneficiaries, local communities, authorities, and local CSOs; (iii) **Establishing safe and confidential enhanced Grievance Redress Mechanisms** to report potential instance of exclusion or discrimination (Hotline, WB Grievance Redress Services); (iv) **Establishing a protocol involving the Government of Uganda (GoU) and World Bank (WB) representatives for promptly addressing potential cases** of exclusion or discrimination and (v) **Establishing an overall monitoring and evaluation approach** to help ensure the system to implement mitigation measures is functioning smoothly.

¹ The second broad consultative meeting was held in November 7th, 2024, which provided an update on the rolling out of mitigation measures related to the Anti-Homosexuality Act 2023.

- i. The rolling out of mitigation measures has included 8 out of 11 ongoing projects, as follows:
 - 1) Uganda Roads and Bridges in the Refugee Hosting Districts/Koboko-Yumbe-Moyo Road Corridor Project
 - 2) Uganda Secondary Education Expansion Project
 - 3) Irrigation for Climate Resilience Project
 - 4) Uganda Intergovernmental Fiscal Transfers Program
 - 5) Integrated Water Management and Development Project
 - 6) Generating Growth Opportunities and Productivity for Women Enterprises
 - 7) Greater Kampala Metropolitan Area Urban Development Program
 - 8) Uganda Investing in Forests and Protected Areas for Climate-Smart Development Project
- ii. Training, outreach and sensitization were given to up to 3,284 participants, including contractors/subcontractors, workers, Project Implementation Units (PIUs) staff, Service providers/CSOs, consultancy firms, Grievance Redress Committees, District officials and other stakeholders. Approximately 2,000 contractors' workers have also signed IND revised codes of conduct.
- iii. A monitoring team of 13 individual Ugandan CSOs and members of the SOGI Community have been hired and trained to be community monitors of the mitigation measures.
- iv. UGANET was contracted by SREO to operate the hotline to handle grievances on exclusion and discrimination. The hotline became operational in January 2025.
- v. A mapping of 124 CSOs working with the SOGI community across the country has been conducted to support referral of cases not related to World-Bank group operations.
- vi. An online survey on attitudes towards discrimination was rolled out to PIU staff in January 2025 and preliminary findings were included in monitoring reports on the implementation of mitigation measures.

4.0 Summary of Key Issues Discussed:

- i. CSOs requested participation of SREO' core team to share results of the EISM, including the Monitoring and Evaluation System of the mitigation measures. It was recommended that SREO representatives and World Bank teams present updates in the future.
- ii. CSOs also requested participation from GOU in the discussions regarding implementation of EISM.
- iii. CSOs expressed concerns about the national vendor hired by SREO to operate the hotline since UGANET is not an organization representing the local SOGI CSOs. It was proposed to have another organization to work with UGANET. WB clarified that several organizations from the SOGI Community were invited to participate in the selection

process. However, only UGANET expressed interest and engaged with SREO in formulating a technical and financial proposal. Nonetheless, there is room to consider other service providers in future activities.

- iv. Participants also questioned the content of the training on Inclusion and Non-Discrimination. The WB invited members of the SOGI CSOs to attend some training sessions as observers.
- v. Key informant Interviews had been conducted by members of the SOGI community in Kampala and Northern Uganda, mobilized by SREO. Initial findings and feedback from the interviews include: i) inadequacy of outreach efforts (mainly through emails); ii) trust in ESIM was low to moderate; iii) fear or retaliation discourages individuals from using project level GRMs; iv) implementation of WB inclusion and non-discrimination policies is insufficient; v) Outreach efforts have been limited to CSOs/NGOs, and small community-based organizations face barriers to participation.

The main recommendations received to address EISM implementation challenges involve: (i) increasing awareness and communication through diverse media platforms; (ii) Strengthening policy implementation and accountability; (iii) Improving effectiveness of Grievance Redress Mechanisms and (iv) continuing dialogue with affected communities and individuals to reinforce trust and participation, involving community-based organizations.

1.1 The Next Steps

- i. The rolling out of mitigation measures in all existing World Bank projects will be completed by the end of April 2025.
- ii. Monitoring and evaluation of the mitigation measures will continue and more members of the CSOs are welcome to participate as community monitors. Some members will also be invited to attend training activities and provide feedback to the SREO team on the content and methodological approaches.
- iii. The World Bank management assessed the efficacy of systems in place and agreed to resume lending in Uganda gradually with the Northern Uganda Social Action Fund (NUSAF4) to be submitted to the Board in April 2025.
- iv. SREO core team and GOU officials will be invited to attend the next update on the implementation of EISM.

Annex: CSOs comments and World Bank responses

No.	Emerging Issue/Question/ Concern Raised	Response and Actions Proposed
a)	CSOs request participation of SREO's core team to share results of the monitoring and evaluation process to avoid bias. They also recommended that SREO and the World Bank team lead the updates in the future.	SREO core team will be invited at the next meeting to present updates with WB.
b)	CSOs request participation from the Government of Uganda (GOU) in the discussions regarding implementation of mitigation measures.	The relevant GOU officials will be invited to future meetings.
c)	Has the World Bank resumed all lending following the November 2024 assessment mission? This will affect the advocacy agenda to repeal the AHA.	The World Bank management team assessed the efficacy of systems in place in two initial projects and agreed in resuming lending gradually. The Northern Uganda Social Action Fund (NUSAF4) will be the first project to be submitted on April 2025
d)	The CSOs were not consulted on the choice of hotline provider. The sentiment was that UGANET does not represent or understand the SOGI community in Uganda. There was a request that another organization partners with UGANET. Another concern was why UGANET didn't attend the meeting to present the results of the hotline directly.	Several SOGI partners were contacted by SREO to express their interest in supporting the mitigation measures. One SOGI CSO declined in writing. A few other SOGI CSOs didn't respond to requests for participation. <u>Actions:</u> Consideration will be given to asking SOGI CSOs to witness the selection criteria of service providers to build trust and affirm transparency in future. UGANET will be invited to attend the next update meeting.
e)	CSOs request information on the content of the training on inclusion and non-discrimination.	SOGI CSO individuals will be invited as non-contract observers to some of the remaining training courses in April.
f)	The need to improve communications between SOGI CSOs and the WB – considering the list of participants had expanded to cover more community-based organizations and representation of all regions.	The World Bank will continue disseminating content on the mitigation measures with participants on a regular basis. Other SOGI and SOGI-friendly organizations were encouraged to contribute ideas and comments on how the process can be improved using their platforms.
g)	How can the SOGI CSOs challenge the AHA? And who is benefiting from the meetings	The World Bank has no direct control or influence over AHA. That is why mitigation

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	between WB and the CSOs?	measures were put in place to ensure non-discrimination in World Bank-financed projects whether the AHA is repealed or not.
h)	Are there any successes registered because of the inclusion and non-discrimination trainings?	This work has never been done anywhere else, and it is thus still experimental. However, there's evidence of signed codes of conduct by workers after training is delivered. The CoCs include commitment to observe and respect inclusion and non-discrimination during the implementation of projects.
i)	The CSOs and their members are struggling to access funds from the World Bank-financed GROW Project. How might the World Bank support on this?	<p>The World Bank was rolling out mitigation measures in all projects, GROW inclusive. There's hope that these will ensure inclusion. However, The Bank remains open to receiving feedback on how to improve the processes.</p> <p>The Bank may consider inviting the relevant stakeholders and PIUs during the next meetings to share feedback and respond to the CSOs' queries since it does not directly implement projects.</p>
j)	How far are the SOGI communities leading the monitoring? It seemed like some of the monitors were not from the SOGI CSOs.	SREO is working with SOGI CSO individuals on the monitoring and evaluation process. There will be more opportunities to understand and learn about how these measures were implemented using contracted and non-contract SOGI individuals.
k)	Is there a tool for monitoring the mitigation measures? And does the tool have aspects of inclusion of the CSOs?	Yes, there are Monitoring and Evaluation tools and the SOGI monitors got training on it. They are already in the field using the tool.
l)	The mitigation measures were piloted on two projects. What were the criteria of selecting these projects? And are the other projects being monitored? Also, is there any feedback from these projects on how the mitigation measures are working?	<p>The Bank shared feedback on the Roads and Bridges and Uganda Secondary Education Expansion projects, where sensitization was done in the previous meeting. It should be clarified that the mitigation measures are being implemented only on World Bank-financed projects. Therefore, the stakeholders being engaged are the ones working on these projects.</p> <p>The Bank is extending the mitigation measures to more projects. All the sensitization on the</p>

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		existing eleven (11) projects will be finalized by the end of April 2025. The Bank will provide CSOs with feedback from the training engagements conducted, engagements with the Government, and UGANET.
m)	If possible, the World Bank should build the capacity of SOGI CSOs so that they meet the desired Bank standards to ably represent themselves.	Capacity building of the SOGI CSOs was not part of the mitigation measures. The mitigation measures were targeted specifically at PIUs, district local government officials, grievance redress committees, contractors and workers. However, capacity building initiatives could be considered for future engagements.
n)	How can the CSOs also come up with projects to be funded by the World Bank?	The World Bank provides financing services to governments, not organizations or individuals.
o)	Is there a whistleblower policy to protect the people complaining on the hotline?	Yes, there's an explicit whistleblower protection policy embedded in the revised codes of conduct.