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# FROM CRISIS TO OPPORTUNITY

## Addressing Risks of Gender-Based Violence Across the Uganda Portfolio

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# Abbreviations and Acronyms

ARSDP	Albertine Region Sustainable Development Project
BRAC	Bangladesh Rural Advancement Committee
ECPR	Emergency Child Protection Response
ESDP	Electricity Sector Development Project
GBV	gender-based violence
MAP	Management Action Plan
MEMD	Ministry of Energy and Mineral Development
MGLSD	Ministry of Gender, Labour and Social Development
NERAMP	North-Eastern Road Corridor Asset Management Project
SCOPE	Supporting Children's Opportunities through Protection and Empowerment
SEA	sexual exploitation and abuse
TSDP	Transport Sector Development Project
UNRA	Uganda National Roads Authority
UTSEP	Uganda Teacher and School Effectiveness Project
VAC	violence against children



## 1. Objective

This note summarizes the experiences of multiple project teams addressing sexual exploitation and abuse (SEA), following recommendations outlined in the Inspection Panel’s Management Action Plan (MAP) for the Uganda Transport Sector Development Project (TSDP). Processes are detailed for interventions that ensued from the MAP; SEA-related incidents reported to the World Bank over the past two years are documented; and examples of challenges and successes are depicted. Task teams seeking to operationalize the Global Gender-Based Violence (GBV) Task Force’s recently published guidelines may find this summary particularly useful.

## 2. Background

The Transport Sector Development Project (TSDP),<sup>1</sup> implemented by Uganda National Roads Authority (UNRA) included upgrades and rehabilitation of three national roads in Western and Northern Uganda: Vurra-Oraba and Gulu-Attiak (160 kilometers) and Fort Portal-Kamwenge (66 kilometers).

The World Bank Inspection Panel received a request to investigate serious allegations involving the project on September 11, 2015,<sup>2</sup> that included workers having sexual relations with minor girls—sometimes resulting in pregnancies, an increased presence of sex workers in the community, the spread of HIV/AIDS, sexual harassment of female employees, child labor, an increase in

1. Environmental assessment Category B, approved December 10, 2009; effective July 15, 2010, with a US\$190 million credit and additional financing of US\$75 million.

2. A previous request, received December 19, 2014, was not registered in order to give management an opportunity to address the concerns.

Girls attending a session at an Adolescent Club along the Kabwoya-Kyenjojo Road



school dropout rates, inadequate resettlement practices, fear of retaliation, lack of community participation, poor labor practices, and a lack of safety on the Fort Portal-Kamwenge road. TSDP was canceled on December 22, 2015; all projects in the transport sector in Uganda were suspended; and a subsequent freeze was placed on the Uganda project pipeline.

The inspection request was approved, and the World Bank's Board of Directors approved the resulting Management Action Plan (MAP) to address the issues. The substantial completion of the action plan was a precondition for lifting the suspensions, which occurred on June 6, 2017, through a formal communication to the government of Uganda.

### 3. Identified Issues and Actions Taken

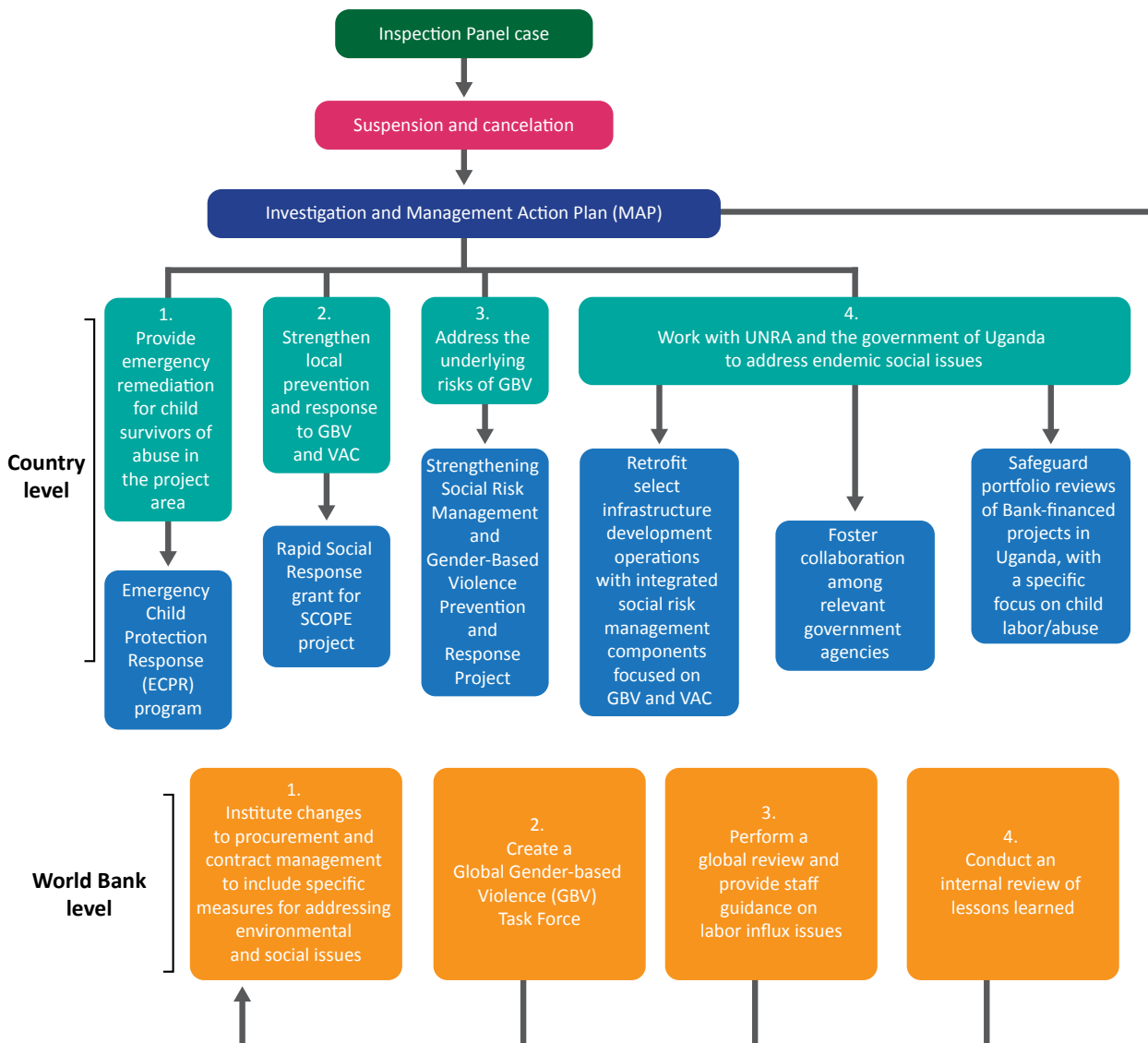
The Inspection Panel's investigation of the Transport Sector Development Project (TSDP) and the resultant Management Action Plan (MAP) led to a two-track, World Bank-led process at the institutional and county levels (figure 3.1). Country-level actions, described in more detail below, aimed to: (1) provide emergency remediation

for child survivors of abuse in the project area, (2) strengthen local prevention and response to gender-based violence (GBV) and violence against children (VAC), (3) address the underlying risks of GBV at the country level, and (4) work with the Uganda National Roads Authority (UNRA) and the government of Uganda to address endemic social issues. Institutional-level steps include: (1) instituting changes to procurement and contract management to include specific measures for addressing environmental and social issues, (2) creating a Global Gender-Based Violence (GBV) Task Force, (3) performing a global review and providing staff guidance on labor influx issues, and (4) conducting an internal review of lessons learned. A further review of institutional steps is outside the scope of this note, but an overview of county-level interventions follows.

#### 3.1. Provide emergency remediation for child survivors of abuse in the project area

In response to identified project failures, the primary tool for providing an emergency response to child survivors of abuse was the World Bank-financed Emergency Child Protection Response (ECPR) program, implemented by Bangladesh Rural Advancement Committee (BRAC), an international nongovernmental organization (NGO) with a presence in Uganda. The effort reached 1,061 girls in the project area through 35 Empowerment and Livelihoods for Adolescents clubs, which provided life skills, training, psychosocial, and medical support through village health teams and referrals to existing government health services. In addition, 37 girls completed vocational training for a range of income-generating activities and received start-up kits for their enterprises. ECPR program activities concluded in July 2017.

**Figure 3.1. Uganda Inspection Panel Case and Resulting Actions**



GBV = gender-based violence; VAC = violence against children.

### 3.2. Strengthen local prevention and response to GBV and VAC

To bolster local prevention efforts, and for reasons of sustainability and continuity, the World Bank, on behalf of the government of Uganda, secured a grant of US\$673,000 from the multidonor Rapid Social Response program for the Supporting

Children’s Opportunities through Protection and Empowerment (SCOPE) project. SCOPE, which became effective on January 25, 2017, is being implemented by the Ministry of Gender, Labour and Social Development (MGLSD); it concludes in January 2019. The overall goal of the project is to enhance the provision of prevention and response services for child survivors of sexual violence in

### **Box 3.1. Activities Carried Out Under Supporting Children's Opportunities through Protection and Empowerment (SCOPE) Project**

- Over 60 justice, law, and order sector and community-based service staff received sexual abuse case management and referral training, which included trauma-informed and survivor-focused approaches.
- Mobile courts piloted in Kamwenge expedited aggravated defilement cases, resulting in 9 perpetrators who had been provided state brief counsel pleading guilty on the first day.
- Forty-four health workers received training in line with World Health Organization guidelines on case management and trauma-informed care for survivors of sexual violence.
- Two health facilities were provided support to offer safe spaces that allow survivors to access safe and nonstigmatizing services.
- Twenty-four community facilitators were trained in providing psychosocial support to survivors.
- Thirty-five adolescent clubs along the Fort Portal–Kamwenge road provide life skills training and livelihood support to over 1,050 adolescents at risk of sexual violence.
- Thirty-three “male champions” were selected and trained to support community mobilization efforts and to promote the active engagement of men and boys in violence prevention efforts.

Kamwenge and Kabarole districts with a focus on: (1) improving access of child survivors to an essential package of services, including emergency health care, psychosocial support, and legal counseling; (2) preventing VAC and GBV through community-level interventions that support the socioeconomic empowerment of adolescent girls at risk of sexual violence and reducing the acceptance of social norms and behaviors that generate and perpetuate GBV and VAC; and (3) strengthening the capacity of MGLSD and district authorities to coordinate, monitor, and ensure the quality of services for GBV survivors.

Among the implementing NGOs engaged through a competitive process are World Vision and BRAC, both hired August 24, 2017, as well as the International Justice Mission/Joy for Children, hired September 4, 2017. In addition, MGLSD and

district authorities signed memoranda of understanding regarding implementation arrangements in August 2017.

There was a concerted effort to strengthen prevention and response to incidents of sexual violence by the justice, law, and order and health sectors under the Rapid Social Response grant. The project improved district-level multisectoral coordination with the establishment of District Action Centers and achieved notable success fostering coordination between the police and center staff through joint trainings; joint case work; and organization and regularization of case management meetings at the action centers by, for example, bringing stakeholders together to discuss and develop action plans, including assigned responsibilities—this has been particularly useful in establishing a pattern of follow-up and coordination of cases.



### Box 3.2. SCOPE-supported Empowerment and Livelihoods for Adolescents Model

SCOPE has supported evidence-based approaches to prevent violence against girls, such as the Empowerment and Livelihoods for Adolescents (ELA) model, developed by the Bangladesh Rural Advancement Committee (BRAC). However, the approach should be contextualized to address dynamics specific to gender-based violence, including sexual exploitation and abuse associated with labor influxes into communities due to large infrastructure projects. To foster sustainability, the SCOPE team linked project activities to other programs, such as the Youth Livelihood Program and the Uganda Women Entrepreneur-

ship Program. The potential for scaling this approach in other sectors is substantial, warranting further analysis.



Young women operating a tailoring shop using skills they acquired through the SCOPE project

SCOPE has also established mechanisms of national-level coordination to integrate mitigation of risks of GBV and VAC in all projects, including knowledge exchange activities with UNRA, the Ministry of Energy and Mineral Development, and the Ministry of Education and Sports.

The implementation of the SCOPE project is generating lessons and documenting practices on GBV and VAC prevention and response relating to infrastructure projects in contexts with poor institutional capacity. A comprehensive approach is crucial to ensuring that national and local systems can effectively address the potential increase of reported cases resulting from community mobilization activities.

The project team determined that it was essential and feasible to build case management and referral system capacity through technical skills training. Ongoing mentoring facilitated by specialized actors—NGOs, police, and judiciary sector staff—and follow-up efforts to reinforce the skills learned during the case management trainings are

needed, especially regarding sensitive issues such as sexual violence against children. Joint trainings of health workers, police, and social workers have created a platform for practical discussions around how to work together better.

The training of health workers on case management and the improvement of facilities to provide safe spaces for child survivors of sexual violence has expedited medical-legal processes, such as for sexual assault forensic examinations. Future interventions might integrate aspects of psychosocial support in the training of community-level actors to ensure that survivors receive appropriate services.

Multisectoral coordination stands out among the project's successes. Cases were more efficiently handled, with survivors receiving better services. However, systemic reforms are crucial to ensuring the standardization of the District Action Centers across districts, including adequate staffing and equipment.



### 3.3. Address the underlying risks of GBV at national level

The Strengthening Social Risk Management and Gender-Based Violence Prevention and Response Project (P160447) was aimed at systematically addressing the underlying drivers of GBV and complementing existing project-specific risk-mitigation measures. In October 2016, the government of Uganda requested that the International Development Association (IDA) provide support of US\$40 million for the operation, which was approved on June 20, 2017. The project is expected to support the implementation of the National Policy on the Elimination of Gender Based Violence at the national level and in 13 selected districts, including Kamwenge and Kabarole. The project development objectives are to: (1) increase

participation in GBV prevention programs, and (2) foster utilization of multisectoral response services for survivors of GBV in targeted districts. As of November 2018, the Ugandan parliament was discussing the project; the outcome of this review is expected by the end of December 2018.

### 3.4. Work with UNRA and the government of Uganda to address endemic social issues

The World Bank's efforts to address pervasive social concerns in cooperation with UNRA and the government of Uganda fall under three main categories at different implementation stages: (1) retrofit select infrastructure development operations with integrated social risk management components focused on GBV and VAC;

(2) foster collaboration among relevant government agencies; and (3) safeguard portfolio reviews of Bank-financed projects in Uganda, with a specific focus on child labor and abuse. Each category is explored in more detail below.

### **Retrofit selected infrastructure development operations with integrated social risk management components focused on GBV and VAC**

Since the receipt of the request for inspection, four existing IDA-supported operations in Uganda related to education, energy, and transport have been retrofitted through restructuring to include integrated social risk management components with a focus on GBV and VAC. Each is described below.

#### **NORTH-EASTERN ROAD CORRIDOR ASSET MANAGEMENT PROJECT**

The North-Eastern Road Corridor Asset Management Project (NERAMP), which is in the early stages of implementation (civil works contracts are signed but work has yet to commence) and which will include the rehabilitation of 340 kilometers of a national road, was retrofitted with a set of activities to address GBV and child protection as well as occupational health and safety.

In terms of GBV and the protection of children, the implementing agency, UNRA, has hired—AIDS Information Center and Joy for Children as service providers to: (1) enhance mechanisms to prevent and respond to GBV and VAC resulting from project-related labor influxes, (2) support community-based prevention of GBV and VAC in the project area, including supporting at-risk groups; and (3) monitor implementation of various measures to address GBV- and VAC-related risks associated with the road projects. The team conducted preparatory work to ensure the signing of these contracts and that the service providers' personnel

were on the ground prior to the deployment of the contractor's workers. In anticipation of the work projects, UNRA established 101 grievance management committees along the road.

To address issues around occupational health and safety, in April 2016, UNRA developed and adopted an environment and social safeguard policy, which:

“sets out the specific commitments that the Authority makes regarding the Environment and Social sustainability of its activities and projects. It is a requirement that employees, contractors, consultants, and sub-contractors who are involved in the planning and implementation of UNRA's activities will comply with the Policy while undertaking their work.”

In addition to the measures listed in box 3.1, UNRA has established safeguards in the form of an internal reporting mechanism that requires the consultant to provide immediate notification of any incident occurring during project implementation fitting the descriptions in box 3.3. The client must receive full details of these incidents within the timeframe stipulated in the contract.

#### **ELECTRICITY SECTOR DEVELOPMENT PROJECT**

The Electricity Sector Development Project, which involves the construction of a transmission line and associated facilities in southwest Uganda, was retrofitted to include a US\$1.5 million component focused on GBV and VAC prevention in the energy sector. Activities supported by this component include: (1) enhance mechanisms to prevent and respond to GBV and VAC resulting from the project, such as codes of conduct and social risk identification tools; (2) support community-based GBV and VAC prevention in the project area; (3) develop the capacity of ministries, departments, and agencies to adequately monitor aspects of projects relating to GBV and VAC; and (4) strengthen coordination

### Box 3.3. Social Safeguards Requirements

The Uganda National Roads Authority (UNRA) established the following social safeguards requirements for contractors, consultants, and subcontractors:

- Provide and maintain a healthy and safe work environment and safe systems of work;
- Protect the health and safety of local communities and users, especially for those who are disabled, elderly, or otherwise vulnerable;
- Ensure that the terms of employment and working conditions of all engaged workers meet national labor laws and International Labour Organization's Core Labour Standards;
- Be intolerant of and enforce disciplinary measures for illegal activities;
- Be intolerant of and enforce disciplinary measures for gender-based violence; child abuse; child defilement; inhuman and degrading treatment; and all forms of sexual abuse, including but not limited to sexual harassment;
- Incorporate a gender perspective and provide an enabling environment where women and men have an equal opportunity to participate in and benefit from planning and development of the works;
- Work cooperatively, including with road users, relevant authorities, contractors, and local communities;
- Engage with and listen to affected persons and organizations; and be responsive to their concerns, with special regard for vulnerable, disabled, and elderly people;
- Provide an environment that fosters the exchange of information, views, and ideas that is free from any fear of retaliation;
- Minimize the risk of HIV transmission and mitigate the effects of HIV/AIDS associated with the execution of the works; and
- Use willing-lessor, willing-lessee agreements to access land not acquired by UNRA, and reinstate this land to the preuse situation or the situation agreed with the lessor before handing it back.

with national and district authorities to monitor implementation of mitigation measures. World Vision, which the Ministry of Energy and Mineral Development hired to support the implementation of this component, has conducted a rapid assessment at project sites, including identifying risk factors as well as service providers to prevent and respond to GBV and VAC. The Ministry of Energy and Mineral Development (MEMD) has drafted standardized codes of conduct emphasizing sexual exploitation and abuse (SEA) and sexual harassment, and it is hiring a specialist to oversee activities on

GBV mitigation and gender inclusion more broadly. MGLSD and MEMD have signed a memorandum of understanding. The World Bank and MEMD are exploring possibilities around continuing GBV prevention and mitigation activities through the Grid Expansion and Reinforcement Project.

#### UGANDA TEACHER AND SCHOOL EFFECTIVENESS PROJECT

The Uganda Teacher and School Effectiveness Project now includes enhanced mechanisms to mitigate VAC-related risks associated with the

### Box 3.4. Reporting Requirements for Supervising Consultants

The Uganda National Roads Authority (UNRA) has instituted the following reporting requirements for all supervising consultants:

- Confirmed or likely violation of any law or international agreement;
- Any fatality or serious (lost time) injury;
- Significant adverse effects or damage to private property (e.g., vehicle accident);
- Any allegation of sexual harassment or sexual misbehavior, child abuse, defilement, or other violations involving children;
- Prompt informing and sharing with the client of any immediate notification related to environmental social health and safety provided by the contractor; and
- Timely sharing of the contractor's environmental, social, health, and safety metrics with the client, as required.



Toolbox meeting at the ARSDP contractor's camp in Mabale

project and to prevent violence in schools through child participation and empowerment, including the following activities: (1) enhance mechanisms to mitigate project-related risks of VAC, such as codes of conduct and grievance-redress mechanisms for documenting reported instances of VAC, and refer survivors to existing community or government service providers or supporting district officials, such as district environment officers and district community development officers, to monitor and supervise safeguards using environment

and social management plans as a guide; (2) promote positive and progressive attitudes and behaviors around the protection of children from violence in schools, including implementing the guidelines on VAC-related reporting, tracking, referral, and response to cases of VAC; and (3) prevent school violence with activities that involve the participation and empowerment of children, such as the creation of student-led clubs. The project covers 34 districts; and the Ministry of Education and Science has contracted World Vision and Plan International to support the implementation of the component and is in the process of hiring RTI International. The ministry has also conducted induction workshops with implementing partners to ensure consistency and alignment of the national guidelines proposals regarding approaches to preventing VAC in schools.

#### ALBERTINE REGION SUSTAINABLE DEVELOPMENT PROJECT

The Albertine Region Sustainable Development Project (ARSDP) seeks to enhance mechanisms for mitigating project-related risks of GBV and VAC, to implement community-based GBV and VAC prevention programs, and to strengthen

coordination among national and district authorities of monitoring implementation measures.

Despite the implementation of these initial measures, which were a precondition to the lifting of the suspension, the World Bank was notified—after a significant delay—of five alleged SEA-related cases that directly involved project workers. (The cases reportedly occurred in March 2017 but were only reported to the Bank in early July 2017.) Consequently, the World Bank organized a high-level mission to the project site, July 19–21, 2017, to investigate the root causes of the incidents and the reason for the reporting delay. Participants included the task team, director of strategy and operations, director of social development, communications manager, and transport practice manager. Table 3.1 outlines the main issues identified during the missions, and specific actions that the client or World Bank has either taken or that is recommended to address the issues.

### **Foster collaboration among relevant government agencies**

Efforts among parties resulted in memoranda of understanding between MGLSD and UNRA, the Ministry of Education, and the Ministry of Energy and Mineral Development.

In January 2018, UNRA signed a five-year memorandum of understanding with MGLSD that identifies and stipulates the roles and responsibilities of the parties as they relate to each other and sets out the areas of cooperation to address the negative impact of works and labor influxes in road construction projects. Its main objectives are to: (1) foster collaboration in operating a safe, efficient, and well-developed network of national roads; (2) create a framework to enable the promotion of decent employment, labor productivity, and protection of vulnerable and marginalized groups in communities where road construction projects are ongoing; (3) establish a mechanism

to prevent and mitigate the negative impacts of roadwork on communities; and (4) promote community mobilization for ownership and support of road construction projects.

Areas for collaboration under this memorandum of understanding include: (1) prevent and mitigate negative impacts of roadwork on communities; (2) promote labor productivity and decent work in road construction projects; (3) promote occupational safety and health in road construction projects; and (4) promote community mobilization to enhance ownership and support of road construction projects. Table 3.2 outlines the specific obligations of each party.

### **Safeguard portfolio reviews of Bank-financed projects in Uganda, with a specific focus on child labor and abuse**

The World Bank completed a general performance review of the environmental and social safeguards for all IDA-supported projects in the Uganda portfolio, complemented by a review specifically focused on the risks of sexual abuse involving minors and child labor. Recommendations from both are included in Uganda TSDP AF—Lessons Learned and Agenda for Action Report, released April 28, 2017.<sup>3</sup>

The environmental and social safeguard performance review recommended improvements across the Uganda portfolio, noting the need to improve community consultation and grievance-redress mechanisms in almost all projects and offering project-specific action plans to address identified deficiencies. Since the review, both the World Bank and the government of Uganda have implemented measures to strengthen the management of safeguard-related issues in the country.

3. Available at <http://documents.worldbank.org/curated/en/256791492009515078/Uganda-TSDP-1st-Progress-Report-REV-for-SVPOP-April-4-final-fdg-CLEARED-04062017.docx>.

**Table 3.1. Issues Identified by the High-Level Missions and Recommended or Taken Actions**

Key Issue	Recommendation/Action Taken
<b>A. Reporting</b>	
1. Lack of a protocol to ensure timely reporting of incidents within UNRA and to the Bank.	A protocol for timely reporting of incidents from the project site to UNRA's environmental and social safeguards department to UNRA's executive director and from UNRA's executive director to the World Bank was drafted by the agency and is now in use.
2. Noted failures in prompt reporting of alleged incidents of sexual exploitation and abuse to UNRA and the World Bank.	An investigation was conducted into reporting failures of sexual exploitation and abuse allegations, including a thorough review of all involved parties; mitigation measures described in this table were subsequently put in place.
3. Significant breach in timely reporting and poor exercise of judgment.	A request was made for UNRA to review its contract with the supervising consultant and to take appropriate action; as a result, the resident engineer was replaced.
<b>B. Protocols and procedures</b>	
1. Information gathered during missions indicate that survivors are receiving services, but inconsistent provision and timeliness of support was observed.	A protocol was put in place, with support from the World Bank, to ensure that, upon identification, all survivors are provided prompt and comprehensive support and services by the NGOs. A comprehensive mapping of survivors of child abuse and gender-based violence guided the process for remedial service providers, including health, psychosocial, legal, and police investigation.
<b>C. Hiring qualified agencies to address social risks</b>	
1. Inadequate delivery of preventive measures, such as outreach, awareness raising, and sensitization around child sexual abuse; inadequate remedial response of identified cases in the project area.	UNRA procured an NGO (BRAC) as service provider to carry out activities relating to gender-based violence and sexual exploitation and abuse.
<b>D. Awareness raising</b>	
1. The mission noted minimal use of information, education, and communication materials addressing child protection on the project road.	A set of posters, pamphlets, and billboards were distributed and displayed along the road to complement the ongoing radio talk-shows and other outreach measures that were already being implemented, such as public meetings with targeted groups.
2. Observed gaps in outreach to child survivors and population at risk of gender-based violence.	Grievance-redress committees located along the road received training to improve outreach to child victims of abuse and populations at risk of gender-based violence.
3. Observed bias in cases involving drivers from both the contractor and supervision engineer.	UNRA and the nominated NGO carried out and continues carrying out targeted child abuse prevention interventions that include sensitization of drivers and establishment of fleet control measures.
4. The mission noted that the existing worker's code of conduct needed to be translated into all relevant local languages and mainstreamed into worker and host communities.	The translations were completed and additional workshops were held to explain the code of conduct to workers, including clearly communicated consequences of violations. It was also shared with the community to make them aware of expectations from workers and the consequences of violations.
5. There was one reported case of workers residing next to a school (Uganda Rural Development and Training Programme) and harassing girls.	The contractor received instructions to construct fences around all schools to manage access and prepared a list of "off-limits" sites for setting up residences.
6. There were no deterrence measures in place to send a clear signal to all that committing such offenses is unacceptable and that culprits would be pursued and justice sought.	The service provider conducted awareness activities that clearly explained the consequences of committing SEA or VAC offenses; and material support from UNRA strengthened the police's role in addressing cases in the project area.
<b>E. Capacity and resources</b>	
1. The local-level institutional structure of the MGLSD was severely under-resourced, especially given the important role that it plays alongside UNRA to address social issues.	MGLSD and UNRA signed a memorandum of understanding to ensure that ministry staff at the respective districts in the project areas are equipped and facilitated to effectively handle developing cases.
2. The capacity of UNRA's environmental and social department to respond to social risks of gender-based violence and sexual abuse associated with their projects was deemed questionable.	A review of the capacity, accountability, track record, and performance of the environmental and social department, especially with respect to identifying reporting, was carried out, and UNRA now has a dedicated sociologist and a social development specialist for both ongoing projects (ARSDP and NERAMP); the department also now has clear policies and procedures for risk management.

ARSDP = Albertine Region Sustainable Development Project; BRAC = Bangladesh Rural Advancement Committee; MGLSD = Ministry of Gender, Labour and Social Development; NERAMP = North-Eastern Road Corridor Asset Management Project; NGO = nongovernmental organization; SEA = sexual exploitation and abuse; UNRA = Uganda National Roads Authority; VAC = violence against children.

The Bank's independent review of the Uganda portfolio assessed the risk of sexual abuse of minors and child labor under other projects as well. It found several factors specific to Uganda that heightened risk and recommended systemic improvements, particularly in project design, implementation, and staffing.

## 4. Challenges and Lessons Learned

The Uganda social development team encountered several challenges while implementing actions recommended by the Management Action Plan (MAP). Other teams working to address issues relating to sexual exploitation and abuse (SEA) in infrastructure operations might find the following summary of lessons learned useful.

### 4.1. Client buy-in

It was at first challenging to get the client and line ministries, particularly Uganda National Roads Authority (UNRA), to recognize SEA as a tangible social risk in road construction projects. This is attributable to a range of drivers, including social norms in project areas and the overall socioeconomic context in the country. The Bank faced initial resistance from the agency during the Inspection Panel case, and management had to hold several high-level meetings with UNRA before it adjusted its corporate stance on the issue. Since the issuance of the MAP and its gradual implementation, UNRA has made considerable improvements to address social risks, particularly SEA-related issues in Bank-financed projects, and specifically for the Albertine Region Sustainable Development Project (ARSDP). Buy-in by UNRA management was crucial, as was a commitment

to effectively address gender-based violence (GBV) and strengthen its overall risk management system, including land acquisition, human resources, environmental management, grievance-redress mechanisms, and stakeholder engagement. The Ministry of Gender, Labour and Social Development (MGLSD), which holds the mandate for the management of social risks in large-scale projects, had only been marginally involved in the national-level discussion around the issue over the past year, mainly due to limited human and financial resources. However, its involvement in the process was equally critical to the gains made.

### 4.2. Use of existing structures for prevention and response

Task teams must facilitate synergies between the client, the contractor, the supervising consultant, and all relevant national and local stakeholders working on issues relating to SEA and violence against children (VAC). The positive gains made under SCOPE and ARSDP demonstrate how crucial this is. Under those projects, MGLSD, the justice, law, and order sector, and Ministry of Health personnel at both central and district levels, local child protection structures, and local and national nongovernmental organizations (NGOs) have been involved in SEA- and VAC-related prevention and response measures in project areas.

### 4.3. Limited expertise on GBV/VAC

Theoretically, MGLSD, through its network of local structures of probation officers, welfare officers, and community development officers, provides guidance on how to manage project-related GBV cases, but sufficient resources are not always available, mainly due to the ministry's limited financial and human resources. As a result, agencies such as UNRA have been unable to tap into



this network to design comprehensive systems for adequately addressing the issue at the local level. Task teams also faced limits in terms of resources offered by the World Bank that could provide guidance on effectively mitigating GBV-related risks, including SEA and VAC in its operations. Moreover, the operational capacity of local and international service providers and NGOs with the expertise to support the client was limited. For example, the Bangladesh Rural Advancement Committee (BRAC), which is currently contracted by UNRA, has significant capabilities regarding the prevention of violence against adolescent girls through economic empowerment and life skills development, but it does not have similar expertise on SEA-related issues. Likewise, UNRA’s environmental and social department lacks the expertise to address the issue as an institution. These competency gaps reveal how crucial it is for various stakeholders, including World Bank task teams to collaborate.

#### 4.4. Holistic approach

As the Supporting Children’s Opportunities through Protection and Empowerment (SCOPE) project demonstrates, interventions across the entire chain of actors is vital to addressing and responding to GBV and VAC. When necessary, the Bank’s convening powers can help create synergies among actors to foster a functional system for addressing GBV. For example, the justice, law, and order sector, which may not appear to be an obvious actor, is under-resourced in Uganda and is frequently unable to prosecute cases. District police lack basic training and equipment (e.g., transport and fuel) to follow up on cases of GBV. This is also true for health care facilities, which often lack trained personnel or kits to treat GBV survivors. It is therefore important to assess all relevant actors



Information, education, and communication materials used along the ARSDP road

in the project area when establishing a system and to also provide support equally across actors.

#### 4.5. Sequencing of activities

The ARSDP task team regularly faced lengthy administrative processes on the client side, particularly for the signing of contracts for service providers and NGOs, mainly attributable to a general reluctance of the government and its agencies to deal with NGOs but in some cases also due to limited capacity among organizations to satisfactorily follow bidding processes. It is imperative, therefore, that activities be initiated early in the process to allow for any necessary adjustments.

#### 4.6. Applying survivor-centric approach to reported cases

Among the challenges faced by the Uganda social team—and which, to some degree, it continues to encounter—is difficulty in ensuring that responses to allegations are survivor-centric. Ugandan law requires that all alleged cases of SEA be reported to the relevant authorities (e.g., police or district officers), including by third parties. This

has impacted survivors negatively due to the stigma associated with various investigative processes. In one instance, the principal of a vocational school along the ARSDP road alleged that four of her female students had been defiled by project workers and duly reported the cases to the Police in early 2017. Following multiple trips to the police station, medical examinations, and frequent visits from authorities, all charges against the alleged perpetrators were dropped due to the lack of cooperation among survivors. This incident demonstrates how critical it is for all stakeholders, including the police, medical professionals, relevant district authorities, and others, to be regularly sensitized on appropriate approaches while a response mechanism is established.

## 5. Conclusion

Following the Inspection Panel Case and the Management Action Plan (MAP), addressing gender-based violence (GBV) in Uganda, including sexual exploitation and abuse (SEA) and violence against children (VAC), has been a gradual and continuous process for both the World Bank and the government of Uganda. There was limited available expertise to guide task teams through the initial stages of the process but, eventually, inputs from specialists across the Bank's Gender Team and Global Practices and from outside the institution strengthened the approach. The involvement and commitment of management from both the Bank and the client has been crucial to effectively addressing the issue.

Task teams should therefore: (1) secure client buy-in in terms of the recognition of this particular risk, (2) identify and utilize existing country- and local-levels structures that address SEA and VAC, (3) make use of available Bank guidelines and experiences, (4) work with all actors involved in the national-level response, (5) ensure that all relevant administrative procedures are initiated early enough in the process to avoid any delays that could significantly impact the client's response, and (6) ensure that all relevant actors are regularly sensitized about the need to use a survivor-centric approach in response to cases.





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