

NYAMAGASANI 1&2 GBVH ACTION PLAN 2025/2026 (updated December 2025)

| Strategic Result | Activities | Status & Time frame | Responsible |
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| Result 1 | Achieve timely GBVH case closure, prevention and response mechanism implemented in Kyarumba and Kyondo Sub Counties | | |
| 1.1 | GBVH Case Management Strengthened in Kyarumba and Kyondo Sub-counties | | |
| a) | Engage a specialized Gender-Based Violence and Harassment (GBVH) expert entity, in collaboration with Kasese District, to manage 41 GBVH cases. | Completed Oct-Dec 2024 | Project Companies and VS Hydro |
| b) | Development of TOR for GBVH Actor. | Completed Oct-Dec 2024 | Project Companies and VS Hydro |
| c) | Recruitment of GBVH Actor through a competitive procedure. | Completed Oct-Dec 2024 | Project Companies and VS Hydro |
| d) | Recruitment of Gender Officer by the Project Companies to give technical support to the implementation of the GBVH Action Plan. | Completed Nov-Dec 2024 | Project Companies |
| 1.2 | Improve access to GBV services for survivors in Kyarumba and Kyondo | | |
| a) | Strengthen GBV community Referral Pathways i.e., Enhance clear, efficient referral systems between healthcare providers, legal services, community-based case managers, and psychosocial support organizations to ensure timely and effective access to GBV services for survivors. | Completed Jan 2025-Mar 2025 | GBV Actor (UGANET) |
| b) | Support identified GBVH actors to provide GBVH response services targeting GBVH cases (Materials, Supplies and Trainings). | Completed Apr 2025-Jul 2025 | GBV Actor (UGANET) |
| c) | Hold 2-3 workshops and or seminars for GBVH relevant Service Providers (healthcare workers, Sub-County and district duty bearers, counselors, and social workers in GBV Case management and other relevant topics needed to support GBV survivors effectively. | Completed Workshop 1: Apr 2025 Workshop 2: Aug 2025 Planned Workshop 3: Apr 2026 | GBV Actor (UGANET) |
| d) | Conduct quarterly targeted awareness campaigns to raise awareness about GBV services available to survivors, focusing on breaking the stigma around seeking help and educating communities on where and how to access these services within the project area of influence. | Ongoing Apr 2025-Dec 2026 | GBV Actor (UGANET) |
| 1.3 | Provide targeted support and services to 41 GBVH survivors | | |
| a) | Establish dedicated Counseling and Psychological Support Services to mental health and psychosocial support to the GBVH 41 survivors. | Ongoing Jan 2025-Dec 2026 | GBV Actor (UGANET) |
| b) | Set up and Implement a GBVH survivors support fund to ensure access to services they need (health facilities, Police, Justice, | Ongoing Jan 2025-Dec 2026 | GBV Actor (UGANET) |

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| c) | Implement Economic Empowerment Programs and Provide vocational training, financial assistance, Income generating activities, financial & entrepreneurial skills, and job placement services to help survivors rebuild their lives and achieve financial independence, as per individual recommendations. | Ongoing Apr 2025-Dec 2026 | GBV Actor (UGANET) |
| c) | Provide access to specialized support services for survivors, such as counseling, legal assistance, and medical care. Ensure that these services are accessible, confidential, and tailored to the needs of the survivors. | Ongoing Apr 2025-Dec 2026 | GBV Actor (UGANET) |
| d) | Establish/strengthen mediation structures in mediation for GBVH case management approach for cases related to child neglect especially. | Ongoing Jan 2025-Aug 2026 | GBV Actor (UGANET) |
| 1.4 Effective management of the Subject of Complaint (SOC) with adherence to protocols, ensuring fairness, transparency, and timely resolution | | | |
| a) | Refer all GBVH cases related to UPDF, G4S, and other related actors for further case management to the senior management of UPDF and G4S. | Completed Jan 2025- Apr 2025 | GBV Actor (UGANET) |
| b) | Inform SOCs within the company's reach of the investigation findings, and where possible initiate fair hearing processes from the implied SOCs (if requested by the survivors). | Closed Apr 2025-Aug 2025 | GBV Actor (UGANET) |
| c) | For SOCs who are no longer employees of the companies. <ol style="list-style-type: none"> 1. Blacklist the SOC from future employment within the company 2. Deny recommendation or certificate of good conduct if SOC has been traced and not willing to address the issue at hand | Closed Apr 2025-Dec 2026 | Project Companies and VS Hydro |
| 1.5 Increased GBVH Prevention actions implemented or Increased Intolerance to GBHV within Kyarumba and Kyondo Sub counties | | | |
| a) | Train community-based structures on GBVH (CBOs, faith institutions, cultural and community leaders) annually. | Completed Apr 2025-Jun 2025 | GBV Actor (UGANET) |
| b) | Participate in Community Education and Awareness Campaigns and community-based campaigns to educate the community on the forms, consequences, and prevention of GBVH, emphasizing the importance of gender equality and respect. | Ongoing Apr 2025-Dec 2026 | GBV Actor (UGANET) |
| c) | Train and empower community leaders in the sub-county, including religious and cultural leaders, to become advocates for GBVH prevention, promoting zero tolerance and creating a supportive environment for victims to come forward. | Completed Apr 2025-Jun 2025 | GBV Actor (UGANET) |
| d) | Create safe spaces and establish support groups within communities where individuals can discuss GBVH issues openly, receive support, and access resources, fostering a culture of mutual respect and safety. | Planned Jan 2026-Dec 2026 | GBV Actor (UGANET) |
| e) | Support integrating GBVH awareness and prevention into school curriculums, promoting respectful relationships, and equipping young people with the knowledge and skills to prevent and respond to GBVH. | Planned Jul 2026-Dec 2026 | GBV Actor (UGANET) |
| f) | Support GBVH exchange visits among actors. | Planned Jul 2026-Dec 2026 | GBV Actor (UGANET) |

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| g) | Conduct annual audits and review GBVH case management practices to ensure they are effective and adhere to best practices. Use feedback from survivors and stakeholders to continuously improve the mechanism and address any gaps or issues. | Completed Jul 2025-Sep 2025 | Gender Consultant |
| h) | Train Frontier staff on GBVH and Frontier GRM annually. | Completed Year one Apr-Jun 2025 Planned Year two Apr-Jun 2026 | Gender Consultant |
| Result 2 | Gender and GBVH considerations are integrated into company policies, strategic plans, operational guidelines, and actions, ensuring a comprehensive approach to addressing and preventing GBVH throughout all organizational levels | | |
| 2.1 | Support the mainstreaming of gender and GBVH in Frontier policies, strategic plans, other operations guidelines, and actions as identified in the GBVH capacity assessment | | |
| a) | Review and update policies guidelines to address gender and GBVH concerns. As identified in the GBVH capacity assessment. | Completed Mar 2022-Aug 2024 | Frontier Energy |
| b) | Develop and operationalize guidelines and tools for mainstreaming gender and GBVH in policies and guidelines | Completed Aug -Dec 2024 | Frontier Energy |
| c) | Ensure adverts have a clause on GBVH Zero Tolerance. | Continuous | Frontier Energy |
| d) | Ensure reference checking on issues of staff conduct about GBVH where possible. | Continuous | Frontier Energy |
| e) | Ensure orientation and induction of all Staff on GBVH and attain their commitment to Zero Tolerance. | Continuous | Frontier Energy |
| 2.2 | Partnership Management and GBVH Compliance | | |
| a) | Clarify and communicate GBVH expectations to contractors and related actors regarding prevention and management. | Continuous | Frontier Energy |
| b) | Train and support contracted entities on GBVH, emphasizing their obligations. | Completed Year one 2025 Planned Year two 2026 | Frontier Energy |
| c) | Conduct regular monitoring of the implementation of GBVH measures. | Continuous | Frontier Energy |
| d) | Use GBVH compliance as a criterion for selecting contract services. | Continuous | Frontier Energy |
| Result 3 | Enhanced internal capacity, with established protocols and trained personnel, for efficient and effective management of GBVH cases | | |
| 3.1 | Establish and ensure internal capacity to manage GBVH cases | | |
| a) | Implement secure Confidential Reporting Channels that allow survivors and witnesses to report GBVH cases without fear of retaliation or breach of privacy. This can include anonymous hotlines, secure online forms, or designated reporting officers. | Completed Aug -Sep 2024 | Project Companies/ Frontier Energy |
| b) | Train personnel on GBV/SEAH and reporting mechanisms | Continuous | Project Companies/ Frontier Energy |

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| c) | Create and enforce comprehensive protocols for managing SEAH cases, including procedures for investigation, documentation, and support. Regularly train staff and management in these protocols to ensure consistency and awareness. | Completed Jan 2025-May 2025 | Project Companies/ Frontier Energy |
| f) | Ensure, to coordinate and collaborate with sister companies for learning and strengthening prevention of GBVH | Continuous | Project Companies/ Frontier Energy |