

Update on the Rwenzori Hydro and Nyamagasani 2 HPP Gender Based Violence and Harassment (GBVH) / Sexual Exploitation, Abuse, and Harassment (SEAH) Case

December 2025

This note provides an update on implementation of the Nyamagasani 1 & 2 GBVH/SEAH response programme since January 2025.

Background

Following allegations of GBVH and SEAH concerning contractor and sub-contractor employees engaged during the 2017-2021 construction period of the Rwenzori and Nyamagasani 2 HPP projects (hereafter referred to as the Project Companies), the Project Companies together with the EPC Contractor engaged independent GBVH experts to investigate the cases in 2024. The investigation validated 41 cases in which some level of GBVH/SEAH or child neglect likely occurred and made recommendation that are currently being implemented. These included strengthening internal GBVH policies to prevent future occurrences, establishing and enhancing internal reporting mechanisms, hiring a Gender Officer to oversee action plan implementation and respond to GBVH issues, contracting a Gender Consultant to provide technical guidance, and partnering with a community-based organization to implement a 2-3 year prevention and response program for the 41 affected women and the communities of Kyondo and Kyarumba beginning in 2025.

Current Status

A partnership was established between the Project Companies, the EPC Contractor, and UGANET - the Uganda Network on Law, Ethics and HIV/AIDS. UGANET is a national non-governmental organization with a strong mandate in advocating for strengthened policies, legal frameworks, and ethical responses to health, gender, and HIV/AIDS issues in Uganda. With over 20 years of experience, UGANET has a proven track record in GBVH prevention and response, as well as socio-economic empowerment of women and girls in rural settings. The partnership aims to strengthen prevention and response to Gender-Based Violence in Kyondo and Kyarumba Sub-counties in Kasese District, covering the Nyamagasani 1 and 2 project areas.

Implementation began in January 2025, focusing on responding to and managing the 41 confirmed cases adopting a survivor-centered approach and the SASA! methodology, which focuses on unequal power relations and social norms as root causes of violence against women and girls.

Since January 2025, GBVH awareness creation for staff and contractors has been conducted across projects in the Frontier Energy portfolio. Staff now understand GBVH implications and recognize their roles in prevention.

Management policies have also been strengthened to safeguard staff and contractors against GBVH, foster a safe working environment, and promote healthy relationships within staff teams and neighboring communities.

To strengthen reporting, multiple mechanisms have been established or enhanced, including suggestion boxes and the selection and training of GBVH focal point persons per Project Company.

These focal persons now understand their roles and responsibilities in supporting rapid GBVH response and case management.

Partner Implementation Progress

UGANET commenced inception meetings with Kasese District authorities, community leaders, and families within the operational areas of Kyondo and Kyarumba. These engagements aimed at securing community buy-in and managing expectations regarding the project's scope and mandate.

UGANET then carried out needs assessments, traced and documented all 41 cases, and developed individualized case management plans for each survivor. Survivors have since received a combination of:

- Legal support
- Medical assistance
- Mediation
- Psychosocial counseling
- Education support (school fees and scholastic materials)
- Livelihood interventions, including economic empowerment training and start-up capital for 30 beneficiaries

Ten project beneficiaries were enrolled in the skilling program and will receive start-up kits-such as sewing machines and salon equipment-in early 2026. These trainings are conducted through community training centers, and participants will be assessed by the Uganda Vocational and Technical Assessment Board (UVTAB) in preparation for future job-market opportunities. UVTAB certifies competencies acquired through formal and informal vocational training.

Thirty survivors and caregivers (16 survivors and 14 caregivers) are receiving economic empowerment support. Seed capital has been provided to help them grow income-generating activities ranging from agriculture to general merchandise and produce trading. This support aims to enhance their ability to sustain themselves and their children.

Community-Based Prevention Activities

In addition to case management, UGANET is leading community-based prevention efforts using the SASA! methodology, which focuses on transforming power dynamics and social norms to create a community-wide shift regarding GBVH.

40 community activists have been trained and supported to conduct:

- Household visits
- Community dialogues
- Public sensitization sessions, including in schools attended by project beneficiaries

These efforts have reached hundreds of households and thousands of community members, engaging a wide network of stakeholders across both sub-counties. Despite broad outreach,

UGANET emphasizes that meaningful behavior change requires time, commitment, and continued investment long after the project period.

UGANET and the Project Companies have also conducted two staff awareness training sessions on GBV and human rights for Nyamagasani II and Rwenzori HPP staff. Topics covered included:

- Protection from Sexual Exploitation, Abuse, and Harassment
- Forms of GBVH
- Gender sensitivity
- Ethical workplace conduct
- Power dynamics in violence

Across the district, quarterly stakeholder meetings continue with police officers, health workers, community development officers, and local leaders to strengthen case management capacity, referrals, and accountability mechanisms.

Legal and Accountability Progress

During the year, UGANET facilitated the reporting of seven cases involving child neglect and defilement to local authorities based on survivor preferences. One arrest has been made, and the remaining cases are still under investigation by the Uganda Police Force at the Bwera regional station. This has strengthened accountability and increased community confidence in reporting child-related abuse. Community leaders have become more vigilant and actively sensitize residents on available reporting structures.

Monitoring and Lessons Learned

GBVH project monitoring was conducted by the Gender Consultant in September 2025 to track progress and assess alignment with project objectives. Findings indicate strong progress, reflected in survivors' improved well-being, optimism, and recovery. Some survivors have reconnected with the fathers of their children, providing additional emotional support.

Survivors have transitioned from being community outcasts to being admired for their resilience. Areas of improvement include ensuring that interventions are tailored to individual needs rather than applying a uniform approach, recognizing that survivors face different levels of vulnerability and priorities.

Outstanding Issues

Project implementation will continue throughout 2026. Beneficiaries will continue to receive monitoring and support to ensure meaningful change and sustainability.

- Of the five alleged survivors who could not initially be traced, three have now been located. Two remain untraced, however, the caregivers are participating in economic empowerment activities while tracing efforts continue.

- One survivor passed away earlier this year due to maternal complications, reflecting the heightened risks faced by young women in vulnerable environments. Her caregiver is participating in economic empowerment to support the orphaned child.

Summary

Frontier Energy deeply regrets that its projects did not meet the company's environmental and social standards in this case. Frontier is committed to remedying harm where possible and to preventing similar cases in the future, in close collaboration with affected women, their families, community leaders and authorities.

The Project Companies and UGANET remain committed to advancing GBVH prevention and response efforts and they will continue providing:

- Legal aid services
- Psychosocial care
- Economic empowerment support
- Community sensitization
- Institutional training

Additional activities such as community barazas, referrals to shelter homes, and collaboration with other human rights actors in Kasese District will also continue.