



**BOTSWANA EMERGENCY WATER SECURITY AND EFFICIENCY
(BEWSEP)**

LETLHAKANE WASTEWATER TREATMENT PONDS SUB-PROJECT

**VULNERABLE COMMUNITY PLAN (VCP) FOR BUUHE WARD AT
LETLHAKANE**

S E P T E M B E R 2 0 2 2

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LIST OF ABBREVIATIONS

ACHPR	African Commission on Human and Peoples Rights
ARV	Anti-Retroviral
BEWSEP	Botswana Emergency Water Security and Efficiency Project
BOS	Botswana Bureau of Standards
BPC	Botswana Power Corporation
CBO	Community Based Organization
CSO	Civil Society Organization
DEA	Department of Environmental Affairs
DNMM	Department of National Museum and Monuments
DWMPC	Department of Waste Management and Pollution Control
DWNP	Department of Wildlife and National Parks
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GBV	Gender-Based Violence
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
ISO	International Standard Organization
ISPAAD	Integrated Support Programme for Arable Agriculture Development
LIMID	Livestock Management and Infrastructure Development
MFEP	Ministry of Finance and Economic Development
MLMWS	Ministry of Land Management, Water and Sanitation
NSP	National Settlement Policy
PDL	Poverty Datum Line
PMTCT	Prevention of Mother to Child Treatment
RADP	Remote Area Development Programme
S&CD	Social and Community Development
SDGs	Sustainable Development Goals
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SPSS	Statistical Package for Social Sciences
STI/STD	Sexual Transmitted Infections/Diseases
VAC	Violence Against Children
VDC	Settlement Development Committee
VCP	Vulnerable Community Plan
VC (VCs)	Vulnerable Community (Vulnerable Communities)
WUC	Water Utilities Corporation
TB	Tuberculosis
TOR	Terms of Reference
UN	United Nations
UNDRIP	UN Declaration on the Rights of Indigenous Peoples

G L O S S A R Y

Affected Persons: All persons who, as result of work carried out or to be carried out under the Project, would incur involuntary loss, temporarily or permanently, of land, shelter, productive assets, or access to productive assets, or of income or means of livelihood and, as consequence, would have their living standards or production levels adversely affected.

Badimo: People who believe in ancestral gods and spirits. It is synonymous to African Traditional Religion.

Basarwa: A general name given to a family of click dialects spoken by a segment of the Tswana Society of the Hunting and gathering origin, who used to live a nomadic life. It comprises around 8 dialects in Botswana. These have been relocated and resettled to integrate them in the larger Tswana Society.

Compensation: Payment in cash or in kind for an assets or resource that is acquired or Affected by a project at the time the asset needs to be replaced.

COVID-19: In late December 2019, investigation of a cluster of pneumonia cases of unknown origin in Wuhan, China resulted in identification of a novel coronavirus. The virus is distinct from both severe acute respiratory syndrome coronavirus (SARS-CoV) and Middle East respiratory syndrome coronavirus (MERS-CoV), although closely related. Epidemiologic evidence suggests that the virus is more contagious than its predecessors. Severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2 or COVID-19) is a newly identified pathogen and it is assumed there is no existing human immunity to the virus. Everyone is assumed to be susceptible, although there may be risk factors that increase an individual's illness severity. While some people who contract COVID-19 are asymptomatic, in other cases, the illness can lead to death. Some clinical criteria include chills, rigors, myalgia, headache, sore throat, new olfactory and taste disorder(s), cough, shortness of breath, or difficulty breathing, clinical or radiographic evidence of pneumonia, and acute respiratory distress syndrome (ARDS).

DiKgosi: Plural for Kgosi or Traditional leader or Chief of a ward/village.

Gender-based Violence: An umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering; threats of such acts; coercion; and other deprivations of liberty. These acts can occur in public or in private. GBV is both a result of gender inequality and is a manifestation of unequal power relations between men and women.

Grievance Procedures (including Grievance Mechanism or GM): The processes established under law, local regulations, or administrative decision to enable project-affected people, property owners and other displaced persons to redress issues related to acquisition, compensation, or other aspects of resettlement or pertaining to social and environmental concerns and issues related to the implementation (and all phases) of the project. In Bank funded projects, such procedures are implemented at project-level to address project-level

concerns and issues, and improve sustainability and community engagement in the project, but does not preclude the use of other administrative processes.

Kgosi: Traditional leader or chief of a ward/village.

Kgotla Meeting: A public meeting held at the Kgotla, in the presence of a Kgosi or his representative. All individuals are encouraged to speak freely and openly. It upholds the idea of equality.

Kgotla (Customary Court): A traditional place for community meetings and disputes hearings. The meetings and hearings are led by Kgosi and is a place where everybody is allowed to voice out his/her opinions and concerns.

Land Acquisition: The process of acquiring land under the legally mandated procedures of eminent domain.

Land Expropriation: The process whereby a person is compelled by a public agency to alienate all or part of the land s/he owns or possesses, to the ownership and possession of that agency, for a public purpose, in return with compensation at replacement value.

Monitoring: The process of repeated observations and measurements of environmental and social quality parameters to assess and enable changes over a period of time.

Population Census: A complete and accurate count of the population that will be affected by land acquisition and related impacts. When properly conducted, the population census provides the basic information necessary for determining eligibility for compensation.

Primary Stakeholders: Are those most directly affected in resettlement situations, the population that loses property or income because of the project and host communities. Other people who have an interest in the project such as the project authority itself, the beneficiaries of the project (e.g., urban consumers for a hydro-power project), and interested NGOs are termed secondary stakeholders.

Project - Affected Household: All members of a household, whether related or not, operating as a single economic unit, who are affected by a project

Project Affected Persons/Family: Any person or persons/family who, for reasons of the involuntary taking or voluntary contribution of their land and other assets under the project, suffer direct economic and or social adverse impacts, regardless of whether the said project affected persons physically relocate. These people may have their: i) standard of living adversely affected, whether or not the project affected person must move to another location; ii) right, title, interest in any house, land (including premises, agricultural and grazing land) or any other fixed or movable asset acquired or possessed, temporarily or permanently, adversely affected; iii) access to productive assets adversely affected, temporarily or permanently; or iv) business, occupation, work or place of residence or habitat adversely affected.

Remote Area Dwellers/Communities: People who live outside established villages and settlements which are located 15km from major villages or urban settlements and do not have access to basic social amenities and are generally socially and economically marginalized. People residing in the remote areas are mostly the poorest of the society. Basarwa make a high percentage of this population, 72% according to Hitchcock (1992).

Remote Area Settlements: Settlements which are a minimum of 15km away from major settlements or urban settlements.

Sesarwa: Vernacular language spoken by the Basarwa or Sans in Botswana. It comprises of other dialects being Naro, Sekaukau, Qgoo Dxana and Deui.

Setswana: Official language of Botswana in addition to English

Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. In World Bank financed operations, sexual exploitation occurs when access to or benefit from a World bank financed good or services is used to extract sexual gain.

Sexual Harassment: Any unwelcome sexual advances, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Sexual Harassment (SH) versus Sexual Exploitation and Abuse (SEA): Sexual Exploitation and Abuse occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures to report each.

Social Impact: An effect (both positive and negative) on a social issue resulting from development projects.

Socio-Economic Survey (SES): A complete and accurate survey of the project-affected population. The survey focuses on income-earning activities and other socioeconomic indicators.

Social Impacts and Risks: These include (i) threats to human security through the escalation of personal, communal or interstate conflict, crime or violence; (ii) risks that project impacts

fall disproportionately on individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable; (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged or vulnerable; (iv) negative economic and social impacts relating to the involuntary taking of land or restrictions on land use; (v) risks or impacts associated with land and natural resource tenure and use, including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vi) impacts on the health, safety and well-being of workers and project-affected communities.

Stakeholders: A broad term that covers all parties affected by or interested in a project or a specific issue, in other words, all parties who have a stake in a particular issue or initiative.

Tandabala: The common name used to refer to monthly old age pension paid to all sixty-five (65) years and over elderly. Literally translated, it means "receive while seated".

Violence Against Children (VAC): Physical, sexual, neglect or negligent treatment of children under the age of 18. Violence against children can manifest itself almost anywhere in the home, within the community and at the workplace.

Vulnerable Communities: A term that refers to Basarwa communities in the Botswana Emergency Water Security and Efficiency Project. They are social groups with identities that are often distinct from dominant groups in their national societies, are frequently among the most marginalized and vulnerable segments of the population. As a result, their economic, social, and legal status often limits their capacity to defend their interests in and rights to lands, territories, and other productive resources, and/or restricts their ability to participate in and benefit from development. In line with the World Bank's Indigenous Peoples Policy (OP4.10), vulnerable communities refers to a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees: (a) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (b) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; (c) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and (d) an indigenous language, often different from the official language of the country or region.

Vulnerable Groups or Individuals: Those who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, religious affiliation, social status or other characteristics may be more adversely affected by project impacts. This is distinguished from vulnerable communities which refers to those groups which meet the criteria under OP4.10.

Vulnerable Communities Plan: A plan that outlines culturally appropriate impact prevention for a project and where impacts on vulnerable communities are unavoidable, mitigation measures as well as identity opportunities to maximize sustainable benefits to the indigenous community beyond the life of the project.

EXECUTIVE SUMMARY

A. BACKGROUND

The Government of Botswana through Water Utilities Corporation (WUC) is undertaking the Botswana Emergency Water Security and Efficiency Project (BEWSEP) with funding from the World Bank. The Letlhakane Wastewater Treatment Plant Project is a sub-project under this BEWSEP. The Wastewater Collection and Treatment Project will take an active part within a collection of measures to improve the current water balance. The project will support strategic investments in the refurbishment /rehabilitation of wastewater collection and treatment facilities to protect surface and groundwater sources.

Water Supply: The current water production with a pumping time of about 18 h/d covers water demand only until 2023. If the population of Letlhakane is to be growing further, all households in the town are to be connected to the central supply system. It must also be considered that the proper functioning of the water supply system has important consequences for the selection of future wastewater system and its design.

Wastewater Management: The existing sanitation system in Letlhakane is mainly based on the use of septic tanks and pit latrines. Most households (60%) use flush toilets to be connected with septic. Septic tanks are emptied by vacuum trucks in regular intervals. The septic tank sludge is discharged into existing wastewater ponds in the village. This practice causes unpleasant odours around the pond sites. Existing off-site sanitation facilities comprise central sewer systems at Letlhakane Senior Secondary School, Letlhakane Primary Hospital, the State Prison, and Government offices. The collected wastewater is being discharged to the existing pond system (the prison is served by their own pond system). As the current wastewater management facility is limited to servicing only some Government institutions (Letlhakane Senior Secondary School, Letlhakane Primary Hospital and Government offices), the bulk of the wastewater is transported to the nearest facility which is in Serowe, about 200 km away.

The proposed Letlhakane Wastewater Treatment facility will have the capacity to handle all the wastewater from the entire Letlhakane village. This will prevent environmental contamination caused by the current wastewater treatment facility which has limited capacity and often discharges inadequately treated wastewater into the Letlhakane River. The new wastewater pipeline to the propose WWTP will connect to the existing sewer pipeline at the existing wastewater treatment ponds from manhole MH1550.

A Vulnerable Community Plan has been prepared specifically for Buuhe ward within Letlhakane village, which is inhabited by the Basarwa (historically known as San), and this therefore marks their presence in Letlhakane village. Even though there are Basarwa found in some parts of the village, mostly are concentrated in Buuhe Ward hence the “Vulnerable Community Plan” being prepared specifically for Buuhe Ward, and the plan will not extend to Basarwa living elsewhere in the village. The Buuhe community will be part of the beneficiaries of this wastewater treatment facility once connection has been made to households. The wastewater treatment facility is far from the Buuhe community and currently no pipeline would pass through this community. The social assessment undertaken for the sub-project as per the World Bank’s Indigenous Peoples Policy (OP4.10) determined that they meet the criteria of ‘Indigenous people’ (Vulnerable Community in the context of Botswana).

Project Description: The main components of the works to be undertaken within are as follows:

- Design and construction of a sewer network for selected institutions within the Letlhakane village
- Construction of sewer manholes and lift stations
- Construction of a WWTP.
- Operation of the constructed sewer network and the WWTP with ancillary infrastructure.

Project Beneficiaries

The project is estimated to benefit 177,000 people which include the vulnerable communities of Buuhe ward in Letlhakane.

Project Location

Letlhakane is a village situated in Boteti Sub-district in the Central District of Botswana. It is located 25 km southeast of the mining town of Orapa and 180 km northwest of Serowe, which is the district headquarters of the Central District. The village is found 230km west of Francistown, which is the second capital city of Botswana. **Map 1** shows the location of Letlhakane village, the location of the existing wastewater sewage ponds, the location of the wastewater pipeline, and the location of new WWTP.

B. METHODOLOGY

The preparation of this VCP included a mixed method approach where qualitative and quantitative study approaches were used including; focused group meeting consultations with the community of Buuhe, one on one discussions with community leaders, and the Social and Community Development (S&CD) officers of Letlhakane Sub-District Council, review of anthropological and other relevant literature.

The use of different methods ensured quality of the data collected as the methods complement each other. Each method filled in the gaps that the assessors may not have anticipated and picked, and this strengthened the preparation of the VCP. These methods included:

- Field Site Surveys.
- Preliminary Literature Review.
- Primary and Secondary Data Collection.
- Focus Group discussions

Information Dissemination including Disclosure and Community Consultations

Several consultative meetings with various community groups (youths, disability organisation, Buuhe Multi-Purpose Cooperative) and leaders (Kgosi, Advisory Council to Buuhe Kgosi, Letlhakane Umbrella VDC and Botswana Khwedom Association) have been held. In addition to the survey to obtain baseline data, a consultation with those who are likely to be affected by the sewage transmission pipeline has been undertaken. These were undertaken from February 14 to February 24, 2021. The outcome of the VCP will be discussed and disclosed to

them after the approval of the draft plan. This plan will be made available to the affected vulnerable communities at the Kgotla.

Consultation Strategy

The community agreed to a consultation strategy whereby the Project Team (Project Liaison Officer and WUC Safeguards Team) would meet with the community (and will request the attendance of as many Basarwa as possible) at least once a month for the entire project lifecycle to answer community questions as well as updates on the project, in addition to sensitization trainings (such as GM or GBV/SEA/SH/VAC or COVID-19) as agreed to in the project ESIA/ESMP.

C. CONSULTATIONS

In observing community protocol, permission was obtained from the Kgosi to engage with the community of Buuhe Ward. Objectives of Free, Prior and Informed Consultation with the Basarwa community were also referred to as per WB OP4.10. The main objectives of the consultation was to:

- Inform the affected vulnerable community (Basarwa) about the proposed project and obtain their opinions/views and support for the project.
- Assess in a participatory manner the possible project benefits and adverse impacts.
- Agree on measures to enhance culturally appropriate benefits or mitigate adverse impacts that will be incorporated into the project design.

Summary/Outcome of the Consultations

Challenges regarding livelihoods

- Government should be willing to allocate land for ploughing and do so through a special programme for people of Buuhe.
- Low economy activity - those considered well-off are those given about ten (10) goats by the Department of Community Development for asset building purposes.
- Currently they sustain themselves by working as cattle herders.
- Literacy is very low, influenced by low living standards of their parents.
- Local people will be side-lined because of low education.

Gender Roles and GBV

- Women gather *phane* (mophane worm) and grass by the road.
- Crafts - *Kika*, *mafetlho* and *dibaga* no longer last because the weather is not the same (climate change).
- Men dominate women in most decision making.
- Children get involved in love affairs at a young age at about 14 years.
- No legal marriages, long term cohabitation.
- High gender-based violence rate but not being reported.
- GBV (Gender-based violence) - GBV issues are handled by the Police, and there are many cases from Buuhe.

Water Supply and Electricity

- Water supplied by WUC, and people have to apply for connections, but due to poverty, people have not connected water in their homes and use standpipes in the ward to get water. There are seven (7) standpipes, of which three (3) are operational; and
- The community cannot afford the cost of electricity, so there is no electricity in the ward.

Land Ownership

- Have only residential plots
- Do not have ploughing fields because Land Board cannot allocate them fields near their ward, they have been told to submit applications for fields to be allocated fields in one of the villages outside Letlhakane and have not submitted because they want fields near their homes in Letlhakane.

Community Issues/Problems

- Unemployment
- Lack of household water connections
- Disruption of school activities due to water shortages
- Lack of water for livestock
- Disruption or failure of potential businesses due to water shortage

Consultations with the community affirmed several times that this project should leave a “positive legacy on the community”. The community felt that the following interventions would be important for community development in terms of additional project benefits:

- Job creation and youth employment.
- CSI project on the ploughing field; A permaculture garden (to improve livelihoods and access to nutritious food, skills and training and materials to be able to successfully achieve yields and to bring it to market).
- Health capacity and infrastructure development.
- Consultation throughout.
- Subcontract the local companies; and
- Use excess gravel to fill up gullies in the village.

D. LEGAL AND INSTITUTIONAL FRAMEWORK APPLICABLE TO VULNERABLE COMMUNITY

The following laws and policies are relevant for the preparation of the Vulnerable Community Plan. The full framework is provided in the main text.

- Constitution of Botswana (1966)
- Tribal Land Act (1968) and amended Act (1993)
- The Acquisition of Property Act (1971)
- Children’s Act (2009)
- Botswana Vision 2036

- Poverty Reduction Strategy (2003)
- Revised National Policy on Destitute Persons (2002)
- Affirmative Action Framework for Remote Area Communities (2009)
- Revised Guidelines for Implementation of Ipelegeng Programme (2012) - (Labour Based Public Works Programme)
- Remote Area Development Programme (RADP)
- Government Housing Programme (Destitute Housing Scheme)
- ILO Convention on Indigenous and Tribal Peoples
- The 2005 Report of the African Commission on Human and Peoples' Rights Working Group on Indigenous Populations
- UN Declaration on Rights of Indigenous Peoples (2007)
- African Union Agenda (2063)

OP4.10: The World Bank's Environmental and Social Safeguard Policies specifically the OP4.10 requires that an Indigenous Peoples Plan (Vulnerable Community Plan) be prepared to comply with the requirement of the Bank in terms of the social development of vulnerable community. The only conflict identified in the review of this legal framework here is in the use of the word "Indigenous". The Government of Botswana understands the term "indigenous" in a way which differs from the World Bank and the African Commission on Human and Peoples' Rights (ACHPR) Working Group on Indigenous Populations, and therefore would prefer not to use that term. However, to meet the Bank requirements under OP 4.10, the Bank has agreed that the term "vulnerable communities" can be used in its place for those communities who meet the criteria of OP 4.10.

E. SUMMARY OF SOCIAL ASSESSMENT IN OP4.10 CRITERIA

History of San (Basarwa) in Letlhakane

Buuhe is one of the fourteen (14) wards in Letlhakane. According to its Headman, Buuhe started as a cattle post around the 1960s and gained momentum in 1976 as people were attracted to the area by the availability of water from the Metsiaela Borehole. Most of its inhabitants are of Basarwa origin. Since the Basarwa prefer to live on their own, and amongst themselves, they kept moving away from the Letlhakane village expansion until 2006/07 when the Government decided that they should settle in Buuhe, then called Metsiaela. During this time Kgosi Keantshiwa Amotseng was their first Kgosi but not recognised by the Government (only recognised as an elder). For them to be recognised in 2006/07 the Letlhakane Land Board had issued eviction letters which were set aside by the then Minister of Local Government, Mrs Margaret Nasha. Kgosi Amotseng was officially recognised only to pass away in 2010. In 2011 Kgosi Alfred Petelelo succeeded him as the Kgosi and holds the tribal throne to date.

The Letlhakane Land Board is now allocating land in Buuhe and most of the plots are planned. Some Basarwa who were displaced by developments elsewhere were relocated to Buuhe. Some still prefer to live amongst their clan and have deserted their allocated plots to go and squat elsewhere. The Basarwa communities in Buuhe Ward were screened against the criteria of OP 4.10 and were found to meet the characteristics, in varying degrees, as a distinct social

and cultural group. Despite changes in their traditional livelihoods and cultural practices because of cumulative impacts of various policies on them.

Assessment of OP 4.10 Criteria of San (Basarwa) in Letlhakane

The following are characteristics in which the Basarwa as a distinct social and cultural group are identified with:

- Self-Identification
- Collective Attachment to Ancestral Lands or Geographically Distinct Habitats
- Distinct Customary Cultural, Economic, Social, or Political Institutions
- Distinct Language or Dialect

Social Assessment Findings

Some of the major findings of the socio-economic issues afflicting the community were found as follows:

- Alcoholism, prevalent in both youth and the elderly.
- Teenage pregnancies.
- Unemployment.
- Societal ills such as livestock theft and substance abuse.
- Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC).
- STDs and HIV/AIDS.
- Illiteracy as most do not value education.
- Dependency on social protection programmes from Council.
- Lack of assertiveness and cannot apply for land due low literacy levels and need to be assisted.
- Low literacy levels with no qualifications therefore cannot work in the mines.
- Have no watering points for their livestock.
- Need school of excellence for their various talents such as hunting and marathons.

F. ACTION PLAN FOR ENSURING SOCIO-ECONOMIC

It is important for this project that the vulnerable community (Basarwa) receive proper community and economic benefits that are socially acceptable for them. This will also create a sense of ownership for the project. A plan of action has been suggested to achieve that as well as a recommended institutional arrangement.

G. KEY IMPACTS ON VULNERABLE COMMUNITY

The key potential adverse impacts on VCs are as follows:

- Creation of employment
- Lack of household water connections
- Disruption of school activities due to water shortages
- Disruption or failure of potential businesses due to water shortage
- Enhanced socio-economic development (livelihoods)
- Possible increase in teenage/unplanned pregnancies

- Community being paid unfair wages, wages not paid timely, and mistreatment from Contractor and Sub-Contractor
- Potential gender discrimination

H. MITIGATION AND DEVELOPMENT MEASURES

Several mitigation measures have been proposed to manage the identified adverse social risks and impacts. These include employment and skills development to vulnerable community (including women and persons with disabilities), and engagement of CLOs, GM, and monitoring, during consultations. They also include specific provisions in procurement documents for Construction Contractor to develop a Hiring Plan that includes VCs, education and awareness programmes for both the community and labourers/contractors (on issues related to HIV/AIDS and STDs, GBV, SEA, SH and VAC, COVID-19, GM, Codes of Conduct, alcohol, and substance abuse).

INSTITUTIONAL ARRANGEMENTS AND IMPLEMENTATION

The implementation of this plan requires coordination of organizations and agencies which include the World Bank and Water Utilities Corporation (WUC) as well as the Letlhakane Sub-District Council and the community including the Tribal Administration and Settlement Development Committee. The institutional arrangements to be followed are detailed in the main text.

I. GRIEVANCE MECHANISM

A system for managing grievances during project implementation is key to ensuring project success. A project-level grievance mechanism has been established in consultation with the Basarwa and other stakeholders. The procedures for addressing and registering grievances are included in Chapter 13.

J. MONITORING AND EVALUATION

Proposed measures and timeframe for implementation of the plan will be monitored closely to (i) ensure the progress towards implementation of the plan, including mitigation measures; (ii) assess the effectiveness of the measures and propose supplementary measures if necessary; (iii) identify potential or actual problems to the VCP during the implementing period of the project; and (iv) identify quick response measures to mitigate these issues. The supervision consultant (Project Liaison Officer) will be monitoring the implementation of project instruments and reporting to the WUC social and environmental safeguards team, with the PIU (and safeguards team) being ultimately responsible for project implementation.

K. PERFORMANCE MONITORING

The overall aim of the programme will be to measure the extent to which the goals of the Vulnerable Community Plan have been achieved. To do this, indicators and targets will be established including specific indicators.

L. COST ESTIMATES

The total budget for implementing the project measures within this VCP is **Pula 768,400 (USD 57,215.70)**.

M. VALIDATION AND DISCLOSURE

The presentation of VCPs to the communities will be communicated in Setswana language which is the main language spoken in both communities. However, provisions will be made for Sesarwa interpretation so that the Basarwa who do not speak or understand Setswana are able to understand the issues, processes, and mechanisms detailed in this VCP. The plan and its implementation activities and processes will be communicated to the Basarwa at all stages of implementation using language and approaches that are culturally appropriate. The final VCP will be disclosed on WUC's website, hard and soft copies will be made available to the VDC, district WUC offices, Buuhe Kgotla offices, and will be disclosed by the World Bank on its external website.

1. INTRODUCTION

1.1 Background Information

The Government of Botswana through Water Utilities Corporation (WUC) is undertaking the Botswana Emergency Water Security and Efficiency Project (BEWSEP) with funding from the World Bank. The Letlhakane Wastewater Treatment Plant Project is a sub-project under this BEWSEP. The sub-project is part of a series of projects designed to respond to Botswana's ongoing drought in the medium to long run to reduce vulnerability. The drought declared in July 2015 was the worst in the past 34 years and extended to a second year with a slightly lower level of severity. As droughts in Botswana are chronic, the current acute dry spell has aggravated the water balance further. The Wastewater Collection and Treatment Project will take an active part within a collection of measures to improve the current water balance. The project will support strategic investments in the refurbishment /rehabilitation of wastewater collection and treatment facilities to protect surface and groundwater sources; and enable the upscaling of wastewater reclamation and reuse in the Letlhakane area.

1.2 Water Supply

The current water production with a pumping time of about 18 h/d covers water demand only until 2023. If the population of Letlhakane is to be growing further, all households in town are to be connected to the central supply system. The water supply of Letlhakane must be expanded soon. It must also be considered that the proper functioning of the water supply system has important consequences for the selection of future wastewater system and its design.

1.3 Waste Management

Currently, the existing sanitation system in Letlhakane is mainly based on the use of septic tanks and pit latrines. Most households (60%) use flush toilets to be connected with septic. Septic tanks are emptied by vacuum trucks in regular intervals. The septic tank sludge is discharged into existing wastewater ponds in the village. This practice causes unpleasant odours around the pond sites. Existing off-site sanitation facilities comprise central sewer systems at Letlhakane Senior Secondary School, Letlhakane Primary Hospital, the State Prison and Government offices. The collected wastewater is being discharged to the existing pond system (the prison is served by their own pond system). As the current wastewater management facility is limited to servicing only some Government institutions (Letlhakane Senior Secondary School, Letlhakane Primary Hospital and Government offices), the bulk of the wastewater is transported to the nearest facility which is about 200 km away in Serowe.

The proposed Letlhakane Wastewater Treatment facility will have the capacity to handle all the wastewater from the entire Letlhakane village. This will prevent environmental contamination caused by the current wastewater treatment facility which has limited capacity and often discharges inadequately treated wastewater into the Letlhakane River. The new wastewater pipeline to the propose WWTP will connect to the existing sewer pipeline at the existing wastewater treatment ponds from manhole MH1550 (**See Figure 1**).

1.4 Vulnerable Community Plan

A Vulnerable Community Plan has been prepared specifically for Buuhe ward within Letlhakane village, which is inhabited by the Basarwa (historically known as San), and this therefore marks their presence in Letlhakane village. The Buuhe community will be part of the beneficiaries of this wastewater treatment facility once connection has been made to households. The wastewater treatment facility is far from the Buuhe community and currently no pipeline would pass through this community. The social assessment undertaken for the sub-project as per the World Bank's Indigenous Peoples Policy (OP4.10) determined that they meet the criteria of 'Indigenous people' (Vulnerable Community in the context of Botswana). However, Letlhakane village in the context of Botswana is classified as a primary centre under the National Settlement Policy (NSP).

The objectives of the VCP are as follows:

- To ensure that Vulnerable Communities (VCs) are included in project preparation, implementation, and monitoring, and inclusive of individuals who may be further marginalised due to age, gender, or disability,
- To ensure VCs are consulted extensively and appropriately over issues that affect them including cultural benefits, in a manner that is in line with free, prior and informed consultation achieving broad community support for the project,
- To consider the expectations, economic and social development needs of the vulnerable community,
- Assess the possibility of involving local CBOs and NGOs with expertise in VCs issues
- To identify potential positive and negative adverse effects of the project on the vulnerable community and provide an appropriate action to mitigate against adverse effects,
- To ensure that the vulnerable communities receive social and economic benefits that are appropriate
- To ensure that there are accessible procedures appropriate to the project to address grievances by the affected vulnerable community from project implementation,
- To provide a budget to implement the VCP as well as monitoring and evaluation provisions in consultation with the VC.

1.5 Project Description

The main components of the works to be undertaken within the settlements are as follows:

- Design and construction of a sewer network for selected institutions within the Letlhakane village
- Construction of sewer manholes and lift stations
- Construction of a WWTP.
- Operation of the constructed sewer network and the WWTP with ancillary infrastructure.

1.6 Project Beneficiaries

The project is estimated to benefit 177,000 people which include the vulnerable communities of Buuhe ward in Letlhakane.

1.7 Project Location

Letlhakane is a village situated in Boteti Sub-district in the Central District of Botswana. It is located 25 km southeast of the mining town of Orapa and 180 km northwest of Serowe, which is the district headquarters of the Central District. The village is found 230km west of Francistown, which is the second capital city of Botswana. **Map 1** below shows the location of Letlhakane village, the location of the existing wastewater sewage ponds and the location of the wastewater pipeline, the existing and the location of the proposed one and the location of new WWTP.

1.8 Methodology

The preparation of this VCP included a mixed method approach where qualitative and quantitative study approaches were used including focus group meeting consultations with the community, one-on-one discussions with community leaders, review of anthropological and other relevant literature. The use of different methods ensured quality of the data collected as the methods complement each other. Each method filled in the gaps that the assessors may not have anticipated and picked, and this strengthened the preparation of the VCP.

Field Site Surveys. Field survey is compulsory to identify the status of the project area. The main objective of this activity was to carry out on-site field assessments of the expected effects of the planned developments on the physical, biological, and socio-economic environment. During these surveys, interviews were carried out with key informants who included government institutions, local leaders, and community representatives to understand the project area better.

Preliminary Literature Review. This included studying relevant legislation, policies; national, regional, local secondary (collated) data sources; development plans, other reports and documents related to the sub-project and World Bank safeguards policies and associated guidelines. These were critical for appreciation of the different aspects of the environmental and social setting of the project area. It was also used to identify the legislative instruments that govern the various aspects of the receiving environment. The review of existing literature and collection of baseline information for the sub-project was undertaken with the aim to familiarize the specialists with and gain insights into the sub-project area. The review also served to contextualize how the greater area would be affected by the implementation of the sub-project. In addition, a review of relevant, policies, plans, programmes, and legislation that has a significant bearing on the implementation of the proposed sub-project was undertaken

Primary and Secondary Data Collection. Different methods were employed for primary and secondary data collection in preparation for the development of the VCP. Primary data was collected at the settlements and district level. At the community level focus group discussions, household survey, interviews with the key informants were held. The consultants also used

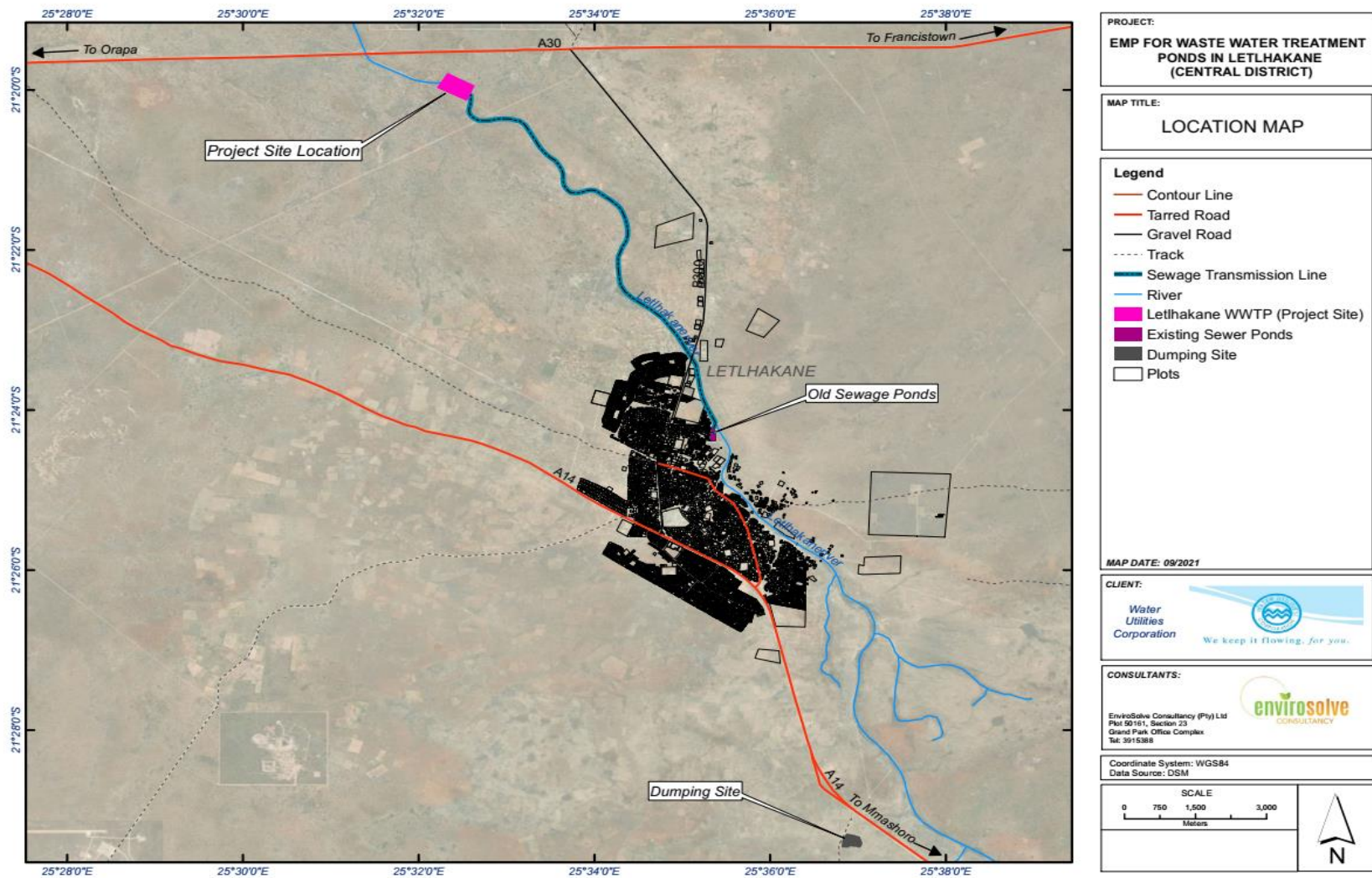
the observation method by moving around the settlements and taking photographs where necessary. The data collection tool administered in the surveys was made up of mainly close ended questions. And this made it easy for coding and analysis of data collected from the respondents. In focus group discussions both open and close ended questions were used to allow for discussions and capturing of people's attitudes and perceptions about the project. All the consultations were conducted in the national official language, Setswana, to ensure that respondents and the interviewers understand each other well.

Public Consultation. Project Information Dissemination: appointments with the respective *Dikgosi* were made and confirmed through telephone calls to hold Kgotla meetings with Kgosi, Village Development Committee (VDC) members and other committees' representative.

- **Methods of Engagement**

Kgotla meetings and focus group discussions were held with *Dikgosi* and VDC members at different dates and times, to solicit their views about the proposed project.

Stakeholder Identification: Stakeholders were identified based on project impacts on them. Those who were directly affected by the project (project affected people) were consulted for this VCP, including the VCs in the project area.



Map 1: Letlhakane Location

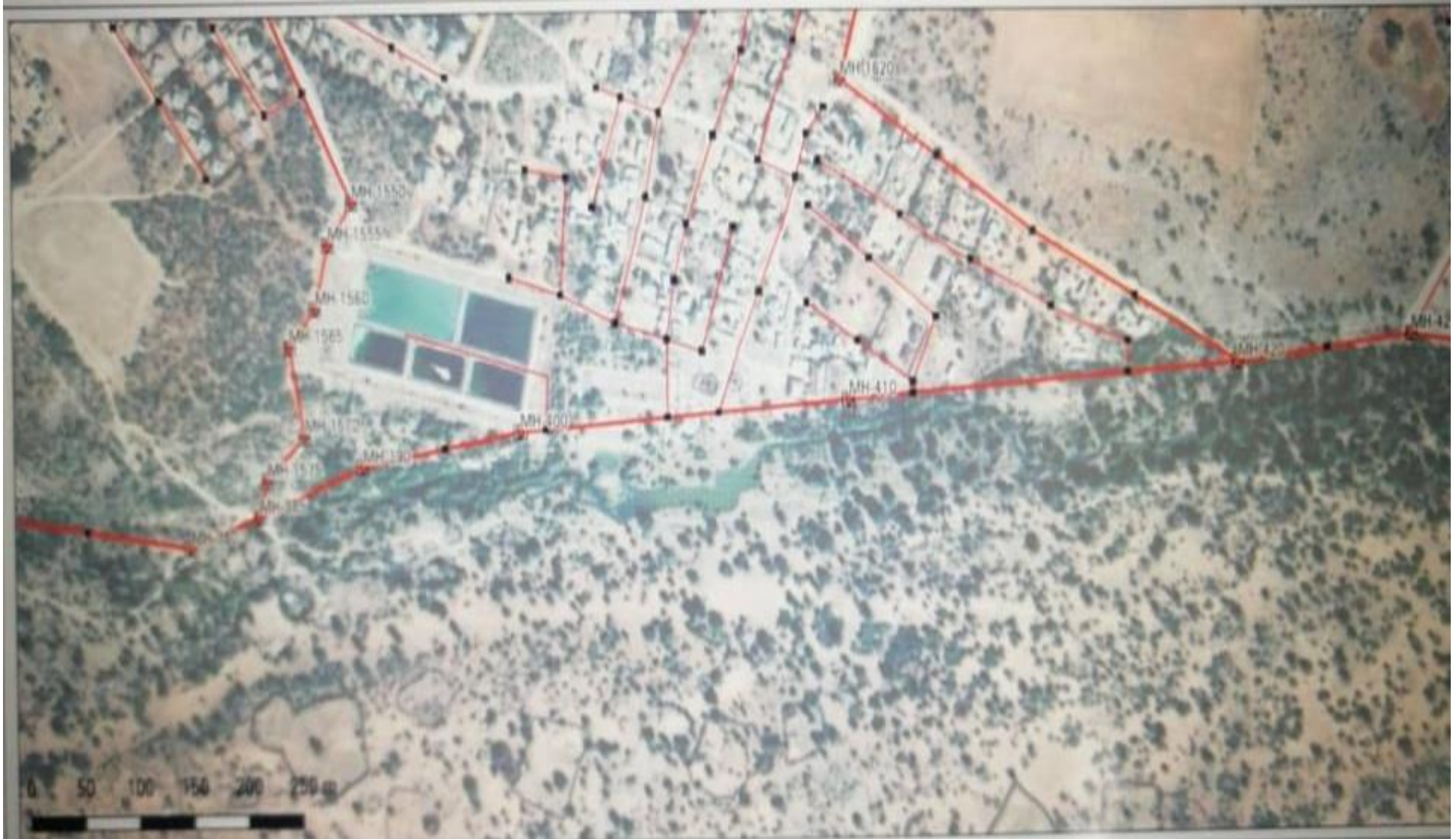


Figure 1: New WWTP Pipeline Connection to Manhole MH 1550 at the Existing Treatment Ponds

2. LEGAL AND INSTITUTIONAL FRAMEWORK APPLICABLE TO VULNERABLE COMMUNITY

This section depicts some of the key national and international legislative instruments, policies and guiding principles that are relevant to the VCP. It briefly outlines their objectives and explains their relevance to the project.

2.1 Legal and Institutional Framework and Gap Analysis

Table 1: World Bank Policies Triggered

World Bank Safeguards Operational Policy (OP)	Triggered by this Project	Relevance to the Sub-Project
OP 4.37 Dam Safety	Yes	This policy is triggered at project level but not relevant for this sub-project.
OP 7.50 Projects on International Waterways	Yes	This policy is triggered at project level but not relevant for this sub-project
OP 4.01 Environmental Assessment (including public participation)	Yes	Preliminary evaluation has identified potential negative environmental and social impacts, thus, there is a need for an environmental and social assessment to ensure appropriate mitigation measures are in place during all stages of the sub-project.
OP 4.11 Physical Cultural Resources	Yes	There were no sites of cultural or historical significance affected or identified in this project. Notwithstanding, Chance Finds Procedures are described in case of any discovery (refer to Annex 14).
OP 4.12 Involuntary Resettlement	Yes	There are possibilities of resettlement or economic displacement especially along the pipeline route. A Resettlement Action Plan (RAP) will be prepared to properly capture all activities associated with the resettlement or displacement.
OP 4.10 Indigenous Peoples Policies	Yes	Basarwa are present at Buuhe/Metsiaela Ward who meet the criteria of OP 4.10.

2.2 Summary of Social Assessment in OP4.10 Criteria

2.2.1 History of San (Basarwa) in Botswana

The social assessment of the Basarwa against the OP 4.10 criteria can be best understood against the historical background on tribal recognition in Botswana.

Despite the existence of more tribes in the country, initially the Constitution (in 1966) recognized eight major Tswana tribes (the Bamangwato, Batawana, Bakgatla, Bakwena, Bangwaketse, Bamalete, Barolong and Batlokwa). Their hereditary chiefs were guaranteed a seat in the *Ntlo ya Dikgosi* (“House of Chiefs”), an advisory body to Parliament.¹ Further, the Chieftainship Act of 1933 defined “chief” and “tribe” by reference to the eight dominant Tswana tribes only. However, several other ethnic groups have recently obtained such official recognition such as the Basarwa (San) through amendment of Section 77 of the Botswana Constitution in 2016.

Botswana is a culturally diverse country. Traditionally, the Basarwa were a semi-nomadic people who practised a hunter-gatherer and agro-pastoralist lifestyle, moving within designated areas based on the seasons and availability of resources, such as water, game and edible plants and had seasonal use to their traditional lands. Their association with the land was based on complex intra-cultural negotiated systems and because they had no formally recognized land tenure system, they were often seen as having no land of their own (and therefore no rights to land). The territory available to the Basarwa has shrunk over the last century through successive in-migrations, land use changes, development (including of parks and other development enterprises) of both Government and other African tribal groups. The Basarwa (San) have been historically excluded for their distinct cultural characteristics and that affirmative action is necessary to ensure their survival. In fact, the San are the oldest original peoples of Africa (and in Botswana it is estimated they arrived approximately 200,000 years ago).²

Tribal customary law, primarily based on oral tradition, has been incorporated into the legal framework of Botswana since independence. Under the Customary Law Act, tribal customary law is valid to the extent that it “is not incompatible with provisions of any written law or contrary to morality, humanity or natural justice”. Customary law is administered by all courts of Botswana, when applicable, in cases involving tribal members, including by customary courts operating under the authority of Chiefs or Headmen. These customary courts derive their authority from oral tradition as well as from the Customary Courts Act. Customary courts have been developed in connection with the Kgotla system, which is a system for handling

¹ The House now consists of 35 members, up from its initial 15. Eight members are hereditary Chiefs (Kgosi in Setswana) from Botswana's eight dominant tribes. Another 22 members are indirectly elected and serve five-year terms. Of these, four are chosen from sub-chiefs in the districts of North-East, Chobe, Ghanzi, and Kgalagadi. The remaining 5 members are appointed by the President of Botswana. They must be at least 21 years of age, proficient English speakers, and have not participated in active politics in the past five years. Chiefs may not belong to political parties. The House is an advisory body to the Parliament and has no legislative nor veto power. All bills affecting tribal organization and property, customary law, and the administration of customary courts go through the House before being discussed in the National Assembly. Members must also be consulted when the Constitution is being reviewed or amended. The body has the power to summon members of Government to appear before it.

² See IPPF for Human-Wildlife Conflict Management (HWCM) in Northern Botswana Project (2016); T. Tlou, and A. Campbell, 1984. History of Botswana. Botswana, Gaborone: Macmillan; and a more recently study on this issue, Chan, E.K.F., Timmermann, A., Baldi, B.F. *et al.* Human origins in a southern African palaeo-wetland and first migrations. *Nature* **575**, 185–189 (2019). <https://doi.org/10.1038/s41586-019-1714-1>

matters of concern to the tribe through community meetings, and which is based on Tswana custom.

Robert Watts, 1981 notes that after independence, the land security of the Basarwa was further eroded by the Tribal Grazing Lands Policy (TGLP) — a large-scale land reform and livestock development program adopted in 1975 which virtually left no land “in reserve” for the Basarwa. Robert Watts further notes that it resulted in the removal of an estimated 28,000-31,000 people from the TGLP ranch areas, and their subsequent relocation in Government established settlements, and in the case of the Basarwa community around Letlhakane, most recently relocations related to the expansion of the Debswana Orapa Game Park.

In the case of Basarwa relocations from conservation areas, the settlements were part of the Government’s efforts to integrate them into wider society. As per the RADP Policy position of 2007 observation, the official policy goal for relocations was to enhance the Basarwa development through the adoption of agriculture and cattle-raising as livelihood options as well as enhance their access to social amenities. However, while the settlements provide water, schools, and health posts, most Government projects have not fully succeeded in providing culturally appropriate sustainable livelihoods for them.

The Basarwa population is now about 50,000–60,000 at the national level, and comprises a number of subgroups, including Ju’hoansi, Bugakhwe, //Anikhwe, Tsexakhwe, Xoo, Naro, G/wi, G//ana, Kua, Tshwa, Deti, †Khomani, †Hoa, =Kao//’aesi, Shua, Danisi and /Xaisa. Basarwa communities are said to reside in seven districts: The Southern, Kweneng, Kgatleng, Ghanzi, Kgalagadi, Central, and Northwest districts.

2.2.2 History of San (Basarwa) in Letlhakane

Buuhe is one of the fourteen (14) wards in Letlhakane. According to its Headman, Buuhe started as a cattle post around the 1960s and gained momentum in 1976 as people were attracted to the area by the availability of water from the Metsiaela Borehole. Most of its inhabitants are of Basarwa origin. Since the Basarwa prefer to live on their own, and amongst themselves, they kept moving away from the Letlhakane village expansion until 2006/07 when the Government decided that they should settle in Buuhe, then called Metsiaela. During this time Kgosi Keantshiwa Amotseng was their first Kgosi but not recognised by the Government (only recognised as an elder). For them to be recognised in 2006/07 the Letlhakane Land Board had issued eviction letters which were set aside by the then Minister of Local Government, Dr. Margaret Nasha. Kgosi Keantshiwa Amotseng was officially recognised only to pass away in 2010. In 2011 Kgosi Alfred Petelelo succeeded him as the Kgosi and holds the tribal throne to date.

The Letlhakane Land Board is now allocating land in Buuhe and most of the plots are planned. Some Basarwa who were displaced by developments elsewhere were relocated to Buuhe. Some still prefer to live amongst their clan and have deserted their allocated plots to go and squat elsewhere. The Basarwa communities in Buuhe Ward were screened against the criteria of OP 4.10 and were found to meet the characteristics, in varying degrees, as a distinct social and cultural group. Despite changes in their traditional livelihoods and cultural practices because of cumulative impacts of various policies on them. The assessment is detailed below.

2.2.3 Assessment of OP 4.10 Criteria of San (Basarwa) in Letlhakane

Self-identification: As detailed above, the Basarwa of Buuhe self-identify as members of a distinct indigenous cultural group and are recognized as such by others in Letlhakane, Botswana and even internationally. Although most of their traditional ways of life have been modernised, they still identify by their language and other traditions. They are even affiliated to the national organisation that represents and advances the interest and traditions of the Basarwa, the Botswana Khwedom Association which is also affiliated to the Southern Africa Regional Organisation of Basarwa.

Collective attachment to ancestral lands or geographically distinct habitats: The Basarwa in Buuhe has formed a collective attachment to the land they currently occupy, even though historically this area would not be considered their ancestral territories. Given the time they have collectively occupied this land that is not their ancestral land proper since the 1960s, it could be argued that they have developed a sense of belonging and sentimental attachment to the area. They now consider it their land (home).

Distinct customary cultural, economic, social, or political institutions: The Basarwa of Buuhe have a distinct cultural and social way of life that is different from the rest of the community in Letlhakane. They primarily marry amongst themselves without any lobola paid. This is slowly changing to conform to other tribes' practices of paying dowry. They have maintained hunting albeit at a small scale as they now must apply for a permit and women still gather wild fruits and tubers for subsistence. A new practice of commercializing veld products gathering has ensued as any surplus is sold by the roadside. The Basarwa of Buuhe still practice their ancestral dance of 'tsutsube'. Kgosi Alfred Petelelo, Headman of Buuhe, noted that this practice is slowly dying as the practitioners slowly pass on by, one by one, without passing the knowledge to the current generation. However, efforts have been made to link up with the Kgalagadi and Ghanzi groups to preserve this practice. To a lesser extent, they still practice 'botsetsi' to commemorate the transition of a girl to womanhood at first menstruation, as well as rites of passage for boys who are maturing into manhood. Kgosi Petelelo noted with concern that the period a girl is confined to the house under the tutelage of the elderly women on what this transition meant and how she should carry herself has greatly reduced from one month to one week. There are traditional healers in Buuhe who provide healing through prayers to the gods and burning of herbs or traditional medicine. Traditional religions are practiced alongside Christianity.

Distinct language or dialect: The Basarwa proudly converse daily in their distinct dialect, Sesarwa, a click-based language that differs from other languages in the country. Even though they have become multi-lingual due to interactions with other tribes, by and large they converse in their language. Even young children are fluent in their language, a sign that the language will not disappear any time soon. In view of the above, the Basarwa of Buuhe are considered as a Vulnerable Community as per OP 4.10. They were consulted extensively and in a culturally appropriate manner to scope out their issues and concerns in relation to the project (**Annex 1**). Their feedback was harnessed in the identification process of potential adverse project impacts and provision of relevant and adequate mitigation measures in relation to the vulnerable community, meeting local and international requirements and good practice.

Table 2: Botswana Environmental and Social Safeguards Policies and Laws Relevant to the Sub-Project

Legislation/Policy	Remarks
Constitution of Botswana, 1966	<p>The Constitution of Botswana does not use the term “Indigenous” but however recognizes the fundamental rights and freedom of individuals including the vulnerable or indigenous people. The Constitution protects the rights to life, personal liberty, from slavery and forced labour, inhumane treatment, deprivation of property, the privacy of home and other property, freedom of conscience, freedom of assembly and association, freedom of movement, from discrimination on the grounds of race and gender.</p> <p>The vulnerable community are entitled to these rights but within the confines of the law. The Government of Botswana, therefore, ensures enjoyment of these rights through establishment of institutions such as the District Councils, the Police Service, the Tribal Administration and the Courts of law. These institutions are available in Letlhakane and the Boteti District as a whole.</p>
Tribal Land Act (1968) and Tribal Land (Amendment) Act, 1993	<p>The Act establishes Tribal Land Boards. It transferred all the powers previously vested in a chief and a subordinate land authority under customary law in relation to allocation of land to the Land Board. The Land Board grants customary land rights to all Botswana citizens including members of vulnerable communities. Most vulnerable communities fall under the care of the area social worker. After assessment, if found that a family of a vulnerable community/individual has no land or place of residence, the social worker will make an application to the Land Board, on their behalf, for them to be allocated land urgently. Such applications are fast tracked by the Land Board. Upon allocation of land, a recommendation is then made to the District Council for such a family to be included for consideration under the Destitution Policy. The Village Development Committee (VDC) or concerned community member can also alert the social worker about the existence such a family or individual if they were not identified during social assessments.</p> <p>The Act is relevant to the project as it makes provision for the displaced to be granted the right to use another land if available and is entitled to adequate compensation. The Act makes it mandatory for the establishment of an assessment committee to assess properties to be affected by the project.</p>
The Acquisition of Property Act, 1971	<p>This Act will come in effect as and when land is expropriated for the proposed Wastewater Treatment Plant. Reference should therefore be made to this Act during compensations that may be conducted by WUC and the Land Board in line with the World Bank safeguards policies OP 4.12 as well as Resettlement Policy Framework of 2017.</p>
Domestic Violence Act, 2008	<p>The Act seeks to provide protection of survivors of domestic violence. According to the Act domestic violence is defined as any controlling or abusive behaviour that harms the health or safety of the survivor including, physical abuse or threats, sexual abuse or threats, emotional, verbal or psychological abuse, economic abuse, intimidation and harassment. The Act lists penalties for those found to be in violation of the Act.</p> <p>The sub-project will conduct sensitization and awareness training to community members and workers to mitigate against exploitative, abusive and gender-based violence, especially against women, children, and elders. It will also provide a screening of social and legal services for survivors to access as part of the GM.</p>

<p>Revised National Policy on Destitute Persons, 2002</p>	<p>This policy was developed in 1980 which stated that the Government must confront the larger issue of providing programmes and opportunities which will enable persons to help themselves and not call upon Government subsidy. Therefore, a strong rehabilitation programme is vital so that the destitute person, if possible can become self-sufficient.</p> <p>A destitute person is defined as:</p> <p>An individual without assets (resources and assets defined as cattle, other livestock, land, cash, cannot plough due to ill-health or handicaps, close family members cannot/will not assist and is;</p> <ul style="list-style-type: none"> • Physically or mentally incapable of working due to old age, physical or mental handicap; or • A minor child or children whose parent(s) has/ have died or deserted the family. <p>The 1980 policy was revised in 2002 due to changes in the circumstances of poor people in Botswana. The revised Policy articulates that;</p> <ul style="list-style-type: none"> • Assistance will be provided in the household context. In the same vein, assistance provided will be proportional to the size of the family; • One destitute person plus two dependants will get one food basket; • One destitute person plus three or four dependants will get one additional food component ration package.
<p>Botswana National Settlement Policy, 1998</p>	<p>It allows for the identification of areas that need to be preserved and zoned as preservation areas, fragile and environmentally sensitive areas and compatible land use zones. This policy protects the areas of historical and cultural importance to the community and the heritage sites.</p>
<p>Revised National Policy on Rural Development, 2002</p>	<p>It is recommended that the Contractor together with WUC come up with programmes to 'give back' to the community, as indicated in objective 9, to reduce rural poverty and to improve livelihoods.</p>
<p>Children's Act, 2009</p>	<p>The Act provides for the promotion and protection of the rights of children, including promoting their physical, emotional intellectual and social development wellbeing. As children are among the most vulnerable, the project will ensure due diligence to protect the rights and well-being of children.</p>
<p>Revised Guidelines for Implementation of Ipelegeng Programme (Labour Based Public Works Programme), 2012</p>	<p>Ipelegeng was started in the 1960s as a poverty eradication strategy. This programme provides temporary employment to members of the community in various settlements throughout Botswana through temporary supplement to rural incomes through wages. Unemployed residents who have registered with the programme are offered temporary manual work which is on a rotational basis among the community members. Ipelegeng workers work for six hours and earn P500 (US \$45.00) per month for the three months that they are enrolled for. Ipelegeng workers thereafter receive nothing for the subsequent months as they are laid off to make way for others due to the rotational system of employment under this programme.</p>
<p>Botswana Vision 2036</p>	<p>The prime objective of the new vision for the Government is to enhance prosperity for all and ensuring that every Motswana enjoy a dignified livelihood. The Letlhakane Wastewater Treatment Plant sub-project will align to Vision 2036, the two pillars being sustainable economic development and human and social development.</p>
<p>Poverty Reduction Strategy, 2003</p>	<p>Sets poverty reduction as its main goal. It charts the strategic pathway for poverty reduction, primarily through broad based labour-absorbing economic growth, the provision of basic quality social services to the poor, the promotion of cost-effective</p>

	pro-poor social safety nets, an enhanced effective response to the HIV/AIDS epidemic and strengthening institutions for the poor. It provides a multi-sectoral approach for overseeing the design, implementation and monitoring of poverty reduction interventions.
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Table 3: International Treaties and Conventions Relevant to Vulnerable Community

Treaty/Convention	Relevance to Vulnerable Community
ILO Convention on Indigenous and Tribal Peoples	This international convention spells out that self-identification as Indigenous Peoples is essential for determining the groups to which the provisions of this Convention apply. It emphasizes inclusive decision-making of Indigenous Peoples in matters that affect them, and recognizes the cultures, traditions of Indigenous Peoples. Governments shall have the responsibility for developing, with the participation of the peoples concerned, protect the rights of these peoples and to guarantee respect for cultures.
African Commission on Human and Peoples Rights Working Group on Indigenous Peoples Report on Indigenous Peoples in Africa (2005)	This regional report elucidates the understanding of Indigenous Peoples in the African context, which does not mean 'primordially' (those who were here first) but those who have persistent marginalization and disadvantage to perpetuate their livelihoods, distinct cultures and languages within the mainstream of society, and whose livelihoods, identity and cultural survival depend on access to ancestral lands, territories and natural resources.
UN Declaration on Rights of Indigenous Peoples (2007)	The UN Declaration affirms the minimum standards for the survival, dignity, security and well-being of Indigenous Peoples. It delineates the individual and collective rights of Indigenous Peoples, including rights to cultural and ceremonial expression, identity, language, employment, health, education and other issues. It "emphasizes the rights of Indigenous peoples to maintain and strengthen their own institutions, cultures and traditions, and to pursue their development in keeping with their own needs and aspirations". It "prohibits discrimination against indigenous peoples", and it "promotes their full and effective participation in all matters that concern them and their right to remain distinct and to pursue their own visions of economic and social development".
African Union Agenda (2063)	Africa's strategic framework that aims to deliver on its goal for inclusive and sustainable development and is a concrete manifestation of the pan-African drive for unity, self-determination, freedom, progress and collective prosperity pursued under Pan-Africanism and African Renaissance. The goal is to prioritize inclusive social and economic development, continental and regional integration, democratic governance and peace and security amongst other issues aimed at repositioning Africa to becoming a dominant player in the global arena.
Sustainable Development Goals (SDGs)	The Sustainable Development Goals (SDGs) (or the Global Goals), are a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity. These 17 Goals build on the successes of the Millennium Development Goals (MDGs) and include new areas such as climate change, economic inequality, innovation, sustainable consumption, peace and justice, among other priorities. The goals are interconnected – often the key to success on one will involve tackling issues more commonly associated with another.

Table 4: Gap Analysis of Environmental and Social Safeguards Policies

a) Indigenous Peoples OP 4.10

Objectives	Operational Principles	Gaps and Resolution
Indigenous Peoples OP 4.10		
<p>To design and implement projects in a way that fosters full respect for Indigenous Peoples’ dignity, human rights, and cultural uniqueness and so that they: (a) receive culturally compatible social and economic benefits; and (b) do not suffer adverse effects during the development process.</p> <p>-</p>	<p>1. Screen early to determine whether Indigenous Peoples are present in, or have a collective attachment to, the project area. Indigenous Peoples are identified as possessing the following characteristics in varying degrees: self-identification and recognition of this identity by others; collective attachment to geographically distinct habitats or ancestral territories and to the natural resources in these habitats and territories; presence of distinct customary cultural, economic, social or political institutions; and an indigenous language.</p>	<p>Botswana does not have legislation on Indigenous Peoples. Botswana Government does not recognize any specific group of people as being Indigenous Peoples in the country, maintaining that instead all citizens of the country are “Indigenous” or understood as those who are original to Botswana. However, this interpretation does not reflect the Bank’s or the ACHPR understanding of the term which does not necessarily mean those who were there first.</p> <p>Nevertheless, in its recent statement to the UN Permanent Forum on Indigenous Peoples (UNPFII) in April 2019, the Government of Botswana stated, “the promotion and protection of human rights remains a top priority for the Government of Botswana [and attaches] great importance to the 1948 Universal Declaration on Human Rights, Declaration on the Rights of Indigenous Peoples and other regional and international human rights Instruments”.</p> <p>As such, those of certain tribes such as the San (Basarwa) are considered as Vulnerable Communities as per the criteria of OP 4.10.</p> <p>Fieldwork carried out for the project identified a distinct group of the Basarwa (San) community living in Buuhe/Metsiaela Ward of Letlhakane and therefore the criteria of OP 4.10 has been met.</p> <p>A VCP has been prepared for this sub-project as there are VCs at Buuhe/Matsiaela Ward.</p> <p>The sub-project will ensure that the requirements under OP 4.10 are fulfilled for the communities where Vulnerable Communities are present.</p>
	<p>2. Undertake free, prior, and informed consultation with affected Indigenous Peoples to ascertain their broad community support for projects affecting them and to solicit their participation: (a) in designing, implementing, and monitoring measures to avoid adverse impacts, or, when avoidance is not feasible, to minimize, mitigate, or compensate for such effects; and (b) in tailoring benefits in a culturally appropriate manner.</p>	<p>No gaps identified</p>
	<p>3. Undertake social assessment or use similar methods to assess potential project impacts, both positive and adverse, on Indigenous Peoples. Consider options preferred by the affected Indigenous Peoples in the provision of benefits and design of mitigation measures. Identify social and economic benefits for Indigenous Peoples that are culturally appropriate, and gender and inter-generationally inclusive and develop measures to avoid, minimize and/or mitigate adverse impacts on Indigenous Peoples.</p>	<p>No gaps identified</p>
	<p>4. Where a restriction of access of Indigenous Peoples to parks and protected areas is not avoidable, ensure that the affected Indigenous Peoples’ communities participate in the design, implementation, monitoring, and evaluation of management plans for such parks and protected areas and</p>	<p>No gaps identified</p>

Objectives	Operational Principles	Gaps and Resolution
Indigenous Peoples OP 4.10		
	share equitably in benefits from the parks and protected areas.	
	5. Put in place an action plan for the legal recognition of customary rights to lands and territories, when the project involves: (a) activities that are contingent on establishing legally recognized rights to lands and territories that Indigenous Peoples traditionally owned, or customarily used or occupied; or (b) the acquisition of such lands.	No gaps identified
	6. Do not undertake commercial development of cultural resources or knowledge of Indigenous Peoples without obtaining their prior agreement to such development.	No gaps identified
	7. Prepare an Indigenous Peoples Plan that is based on the social assessment and draws on indigenous knowledge, in consultation with the affected Indigenous Peoples' communities and using qualified professionals. Normally, this plan would include a framework for continued consultation with the affected communities during project implementation; specify measures to ensure that Indigenous Peoples receive culturally appropriate benefits, and identify measures to avoid, minimize, mitigate or compensate for any adverse effects; and include grievance procedures, monitoring and evaluation arrangements, and the budget for implementing the planned measures.	This is not done in Botswana, but the VCP will be used to close the gap
	8. Disclose the draft Indigenous Peoples Plan; including documentation of the consultation process, in a timely manner before appraisal formally begins, in an accessible place and in a form and language that are understandable to key stakeholders.	This is not done in Botswana, but the VCP will close the gap
	9. Monitor implementation of the Indigenous Peoples Plan, using experienced social scientists.	This is not done in Botswana, but the VCP will close the gap

3 SUMMARY OF SOCIAL ASSESSMENT AND BASELINE DATA

3.1 Socio-Economic Environment

3.1.1 Land Use

According to the African Natural Resources Centre and the African Development Bank (2016) the Boteti Sub-District land tenure is predominantly tribal land with some state land found in the Makgadikgadi Pans National Park. Letlhakane constitutes the sub-district headquarters and is noted to be densely populated and sub-divided in to fourteen (14) wards. **Table 6** below presents the mainland uses in the sub-district and notably, grazing is by far the major land use in the Boteti sub-district, covering 25, 465 km².

Table 5: Land Use in Boteti Sub-District

Land Use	Area (Km ²)	Percentage (%)
Settlements (Built up area)	No figure	No figure
Grazing	25,465	72.5
Recreation/Conservation	8,255	23.5
Arable	1,223	3.5
Mining	204	0.5

Source: Department of Lands, 2000.

3.1.2 Land Use in Letlhakane Village

Table 7 below was adapted from the Letlhakane Development Plan (2007) and presents the general land use in Letlhakane village. It shows that much of the land coverage is non-developed area at 85.3%, followed by the developed area with 14.7%, built up area with 13.3%, arable land with 10% and rangeland/grazing with 8%. Roads constitute the least land use at 1.4%.

Table 6: Land Uses in Letlhakane

Land Use	Area (Ha)	Total Percentage (%)
Developed Area	1,617.4	14.7
Built-up Area	1,467.6	13.3
Roads	149.8	1.4
Non-Developed Area	9,366.7	85.3
Arable Fields	1,101.5	10.0
Rangeland/ Grazing	7,389.1	8.0
Total	10,984.1	100.0

Source: Draft Letlhakane Development Plan (2007-2031)

Table 7 presents land use distribution within Letlhakane built up area. The land uses distribution in Letlhakane indicate that the Civic and Community make only 34.9% coverage of the built-up area, this entail Government amenities and other facilities inclusive of the CBD. The residential make 83.3% and the Institutional housing make up 7.8%, the neighbourhood pattern include both traditional (unplanned) and the modern (planned) patterns of plot arrangement. The industrial area covers only 2.5%.

Table 7: Land Uses Within Letlhakane Built-Up Area

Land Use	Developed		Undeveloped		Total			
	Ha	Plots	Ha	Plots	Ha	%	Plots	%
Residential	376.4	2777	268.8	2483	645.2	52.3	5260	83.3
Institutional Housing	33.9	451	5.8	44	39.7	3.2	495	7.8
Industrial	7.4	26	23.8	88	31.2	2.5	114	1.8
Civic & Community	199.0	84	8.5	28	207.5	16.8	112	1.8
Prison	223.2	1	-	-	223.2	18.1	1	0.0
Commercial	32.9	148	10.1	43	43	3.5	191	3.0
Sport & Recreation	13.0	10	1.9	2	14.9	1.2	12	0.2
Infrastructure	3.0	9	-	-	3	0.2	7	0.1
Agriculture	4.1	21	6.2	5	10.3	0.8	26	0.4
Open Spaces	-	20	15.2	20	15.2	1.2	20	0.3
Total	892.9	3547	340.3	2713	1233.2	100.0	6238	98.8

Source: Draft Letlhakane Development Plan (2007-2031)

3.2 Population Characteristics

3.2.1 General Demographics

Figure 2 presents the population trends in the major villages of the Boteti Sub-District. The population of Letlhakane increased from 8, 583 to 1 4,962 and 2 2,911 in 1991, 2001 and 2011 respectively. This represents an annual increase of approximately 3%. This represented a population growth rate of 0.41% from 2001 and 2011. The population of Letlhakane is estimated to be approximately 30,000 in 2021. The pull factor is the mines located in that area.

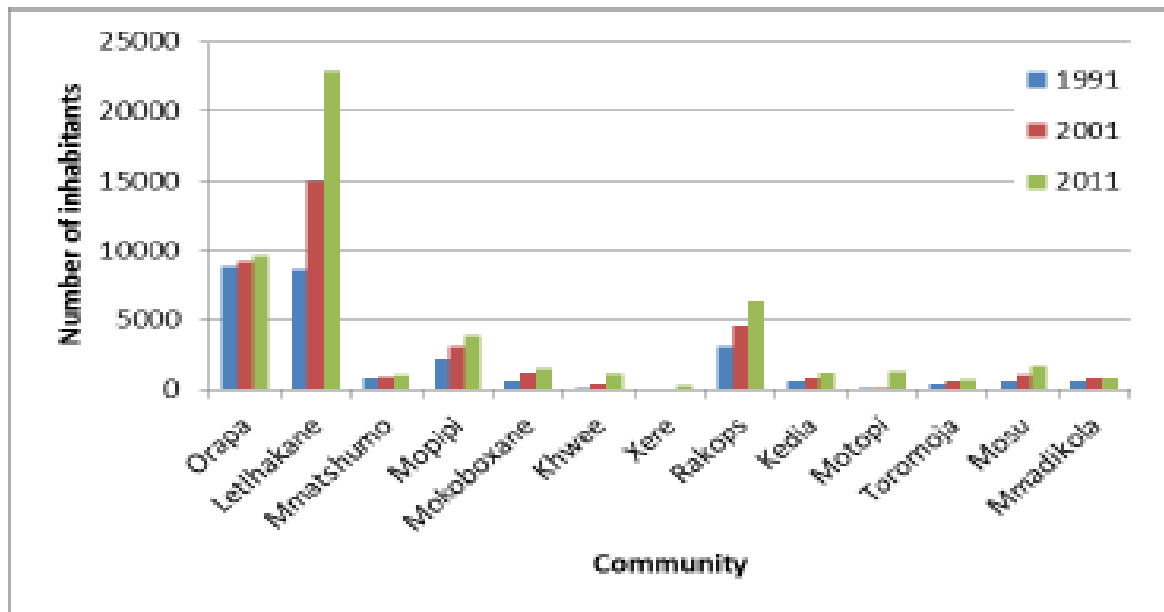


Figure 2: Population Trends in the Major Villages of the Boteti Sub-District Source. (Statistics Botswana 2011).

3.2.2 Population of Major Villages and Settlements in Boteti Sub-District 1991-2011

Population growth rate of a certain location is indicative of pressure on social amenities. The higher the growth rate the higher the pressure on resources. With regards to Letlhakane the growth is fuelled by in-migrants who seek job opportunities at Orapa and other mines around Letlhakane. From the population growth trends, it is possible to anticipate the impact this project will have on the population growth rate of Letlhakane and its social infrastructure.

Sex Ratio

The sex ratio for Central Boteti was 99.2% in 2013. This represents 99 males per 100 females as compared to the national average of 92.3%, an indication that there are more males in Letlhakane than the country average. In effect, the ratio is almost perfect i.e., almost 1:1.

Letlhakane has been serving as a dormitory for the miners that work in Orapa, and of late is serving the same purpose for about four mines that occur around the village. Mining being an industry that is predominated by males, it is not surprising that Letlhakane has more males than average town/village in the country. With almost a perfect sex ratio, the project has to devise strategies to provide equal opportunities for employment.

Population Structure

Youth

Most of the population in the Central Boteti is in the age group 15-35, the youth³. Demographers have concluded that in the developing world, as a rule of thumb, the youth constitute about 60% of the population. Botswana presents a youthful population with more than two-thirds (70%) of the total population under 35 years of age (UNFPA Botswana,

³ The Revised National Youth Policy (2010) defines the youth as those aged 15–35 years.

undated). About 33.5% of the population is aged 10 -24 years (ibid). Analysis of the age structure of Central Boteti shows that most of the population were in the age bracket 25-29 (26.4%), closely followed by 20-24 (26.1%), then 30-35 (24.1%) and lastly 15-19 age group with (22.4%). This confirms the predominance of the youth group in Central Boteti.

Predominance of the youth presents both an opportunity and a challenge. According to UNFPA Botswana website, a youthful population is the beam of hope in realizing the demographic dividend. Whilst they indicate readily available labour, employment is never available for everyone in each setting. Their predominance is mostly associated with unemployment. For this reason, the youth are considered a vulnerable group.

Elderly

The elderly is classified as those aged over 65 years. The elderly constituted 4.6% of the total population in Central Boteti in 2013. These are below the national rate of 5.4%. As is evident from the foregoing, the elderly constitutes a minority in most populations. This predisposes them to being forgotten and to be excluded from decision making processes. This project must devise ways of engaging them. The elderly is a non-active population that is dependent for support on the active population. Their predominance, together with those under 15 years indicate a high dependency ratio in a population.

3.2.3 Population Density

According to Government of Botswana (2003), Boteti Sub-District had the least population density of 1 person per km² in 1991 and 2001. Letlhakane is a densely populated settlement with a population density that increased from 32.7 in 1991 to 56.9 in 2001 per km². This is attributed to an accelerated population increase in Letlhakane due to in-migration (Ministry of Lands and Housing, 2008). This poses spatial planning implications in the area, especially in view of increasing pressure on provision of services.

3.2.4 Migration

Letlhakane indicated level of growth was due to in-migration of employment seekers who settle in the settlement and those that work in the nearby areas. Mineral discoveries especially diamonds in Orapa and Letlhakane have caused migration of people from Boteti and other areas to Orapa and Letlhakane in search of jobs and business opportunities. Availability of employment opportunities, commercial and administrative centres in Letlhakane act as pull factors for migration (Navaneetham, 2013). Letlhakane urbanised at an annual rate of 4.3%, thus indicating that Letlhakane was rapidly urbanising between 1991 and 2011 (Gwebu, 2014).

The project will also contribute to in-migration into Letlhakane due to pull factors, thereby exacerbating pressure on social infrastructure like health facilities, roads, utilities, and accommodation facilities.

3.3 Education

Education has important indicators such as literacy rate, transition rate from primary to junior secondary school and enrolment rate that are determinants of the socio-economic status of a population. They are discussed below in respect of Boteti Sub-District and Letlhakane in particular.

School Facilities

The Boteti sub-district has a total of twenty-eight (28) primary schools all of which are Government owned. A total of five (5) primary schools are in Letlhakane village. Letlhakane has 5 primary, 2 Junior Secondary, 1 Senior Secondary and Orapa has 3 primary and 1 Junior secondary and the Orapa Technical College. Additionally, Letlhakane has a Brigade, the Boteti Brigade.

Literacy Rate

As stated in National Literacy Survey (2014), national literacy rate for age range of 10-70 was 86.5% in 2014, males had literacy rate of 85.7% while for females it was at 87.3%. Gaborone as the capital city had a literacy rate of 97.7%, the highest in the country. In the Central District, Central Bobonong had the highest literacy rate of 91.5 followed by Central Boteti with a literacy rate of 89.5% constituted by the literacy rate of 90.7% for males and 88.3% for females.

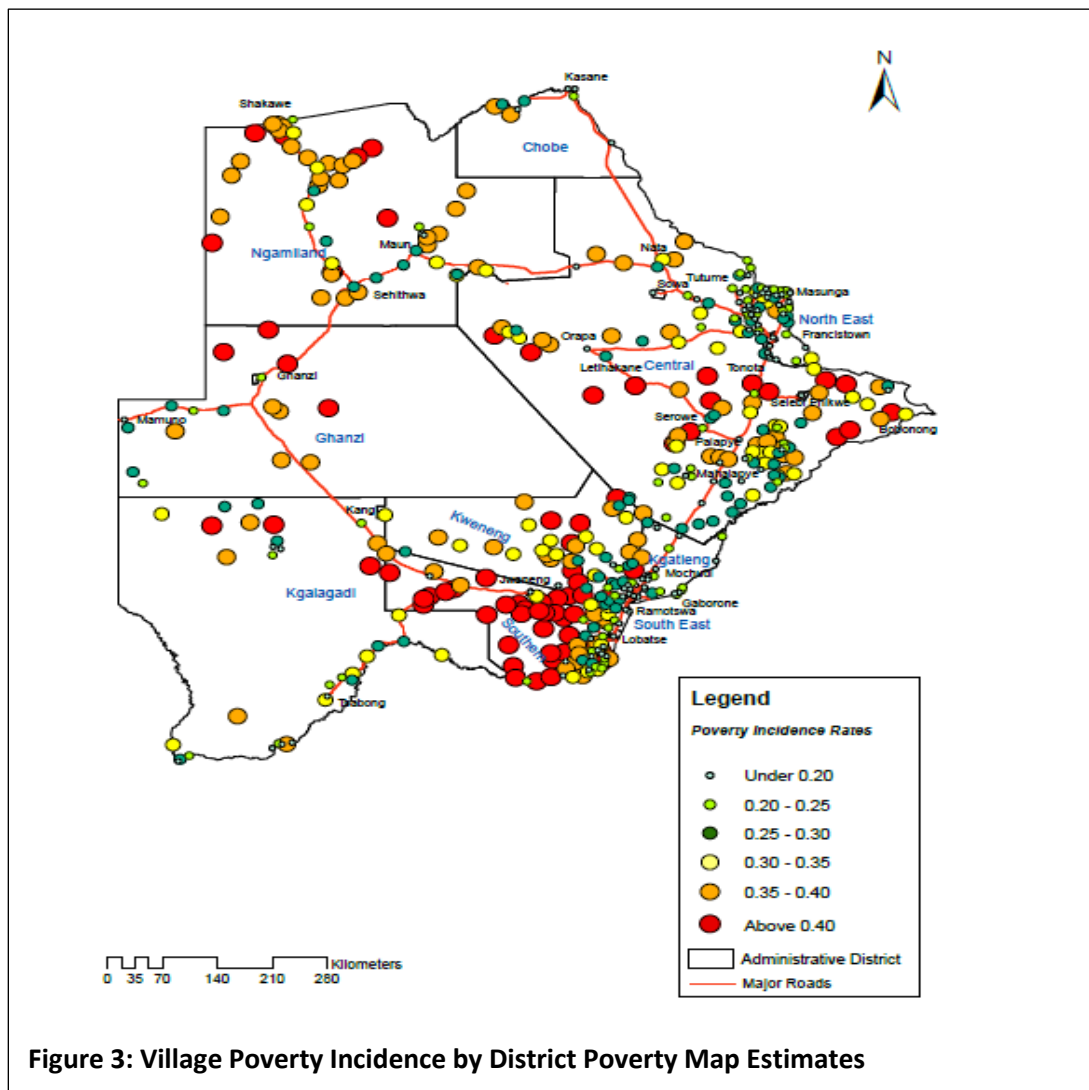
3.4 Poverty

Table 8 shows poverty levels in Central Boteti as captured by the Poverty Map Report of the Central Statistics office (2010) whilst **Figure 3** shows Village Poverty Incidence by District Poverty Map Estimates. There was a total of 20, 289 poor households in the 2010 Census. As indicated in the report, the rural Boteti sub-District constituted of 16, 461 poor people from the stated 20, 289 poor people in the sub-district. Furthermore, Central Boteti Sub-District has poverty levels of between 40-50% (**Figure 3**) whilst Letlhakane had a total of 6,467 poor people. The Sub-District indicated that in rural areas poverty increased to between 50-60%. Letlhakane has a much lower poverty levels than the sub-district average. Letlhakane poverty was between 20-30% that is, about a total of 6,467 poor people. It reveals higher than national average poverty levels in the Central Boteti Sub-District. The construction of the proposed project will create temporary employment for the persons residing in Letlhakane to improve their livelihood.

Table 8: Poverty Levels by Sub-District and Locality

Disaggregated Levels	Total Population	Poverty Headcount (P0)	Number of Poor Households	Estimated Poor in Village
Central Boteti	47, 738	0.33	20, 289	16,461
Letlhakane	23,013	0.281	6,069	6,467

Source: Statistics Botswana, 2015



3.4.1. Destitution in Central Boteti

Destitution is an extreme form of poverty where a person does not have assets and/ or any means to support themselves. Such people are registered as destitute by district social workers. Boteti district had registered a total of 2,182 destitute persons by February 2011. The villages with high numbers of destitute are Letlhakane (840), Rakops (259) and Mmadikola (200). Orapa had the lowest number of destitute persons, with only 7 people registered by February 2011. **Table 9** further shows the number of destitute persons since March 2009, the percentage increase of destitute persons in each village and the proportion of destitute in relation to the population.

Table 9: Destitute Statistics in Central Districts

Name of village	March 2009	March 2010	February 2011	2009-2011 % increase	Population Projections 2011	Destitute in proportion of population	Distance from Orapa
Letlhakane	665	785	840	26.32%	16, 686	5.03%	25.83
Rakops/Tsienyane	208	247	259	24.52%	5, 080	5.1%	124.03
Mopipi	108	123	144	33.3%	3, 419	4.21%	241.70
Xhumo	57	53	70	22.81%	1, 774	3.95%	96.36
Mmadikola	155	159	200	29%	923	21.67%	116.50
Mmatshumo	82	86	92	12.92%	965	9.53%	42.47
Mosu	69	69	87	26.09%	1, 227	7.09%	82.95
Makalamabedi	41	44	50	21.95%	1, 246	4.01%	278.70
Toromoja	31	38	42	35.48%	724	5.8%	109.18
Khumaga	25	33	40	60%	1, 032	3.88%	192.95
Moreomaoto	12	18	18	50%	587	3.06%	236.25
Motlopi	48	62	65	35.42%	1, 260	5.16%	57.34
Kecha	85	82	94	10.53%	884	10.63%	75.49
Khwee	69	78	94	36.23%			89.41
Mokoboxane	73	79	80	9.59%	1, 439	5.56%	45.40
Orapa	6	7	7	16.6%	9, 275	0.08%	-
Total	1734	1963	2182				

Source: DEA, (2010)

3.5 Livelihood Activities

3.5.1. Employment

The mining sector is the most dominant in the Boteti area with about four (4) mines within a 20 km radius. **Table 10** presents four main characteristics that dominate employment statistics of the settlements. These include being employed and paid in cash, students, homework, and active job seeking. It is also observed that most people in most settlements are employed and paid in cash. This might be due to the existence of mines where many people are usually employed.

In 2011 Letlhakane had an unemployment rate of 17.8% with more unemployed females than males. According to Statistics Botswana's Multi-Topic Household Survey 2015/16 Orapa had an unemployment rate of 10.7%. Mmatshumo settlement had an unemployment rate of 16.6% in 2011 with more unemployed females than males at 18.1%. Mopipi had an unemployment rate of 10.3% with more unemployed males at 13.3% compared to females while Mokoboxane had an unemployment rate of 19.2% with males dominating at 21.9% and Khwee had an unemployment rate of 2.6 whereby more males were unemployed compared to females.

Mosu settlement, it had unemployment of 13.1% amongst males and 14.2% amongst females in 2011. Furthermore, Motopi level of unemployment was amongst males in the area and remained high at 22.4% in 2011. Kedia also had an unemployment rate of 19.8% with males dominating at 26.3% and Toromoja had an unemployment rate of 12.0% in 2011 of which more males were unemployed at 19.2% compared to females. Moreover, Mmadikola had the highest unemployment rate of 25.5% in the Central Boteti Region with more unemployed males at 34.5% (Statistics Botswana, 2011). In the above explanations it has indicated that unemployment is one of the problems that many suffer from. Therefore, with high level of unemployment many issues arise such as illegal means of survival and results in depression and stress. The project will draw its labour from the population and improve the standard of living of most people. Therefore, the proposed project will have people to employ as a result, this will reduce frustration and stress among other problems of lack of employment in Letlhakane.

Table 10: Employment Statistics in Percentages (%)

	Employee - Paid Cash	Employee - Paid In kind	Self-employed (No employees)	Self-employed (With employees)	Unpaid Family Helper	Working at Own Lands/ Cattle Post	Actively Seeking Work	Home Work	Students	Retired	Stok	Other	Unknown
Orapa	62.7	0.1	1.6	0.3	0.0	0.1	7.3	8.6	16.6	0.5	0.4	0.0	1.8
Letlhakane	34.7	0.1	2.9	0.9	0.1	1.4	13.3	15.9	22.5	1.3	1.7	0.4	4.8
Mmatshumo	27.8	0.1	3.3	0.0	0.3	8.0	12.9	25.3	9.9	2.4	1.6	0.0	8.6
Mopipi	19.8	0.2	3.3	0.2	0.2	8.8	6.3	17.7	26.7	1.1	1.9	0.0	13.8
Mokoboxane	20.3	0.3	8.1	0.9	0.4	10.7	13.1	16.2	10.7	1.1	5.0	0.0	13.0
Khwee	31.9	0.0	2.0	0.4	0.4	0.7	1.3	30.6	21.4	0.0	1.7	1.5	8.0
Xere	22.1	0.0	0.4	0.0	1.3	5.6	33.3	14.7	11.3	2.6	1.7	0.0	6.9
Rakops	19.8	0.3	1.8	0.4	0.6	9.5	10	18.4	26.3	0.8	3.6	-	8.7
Kedia	21.8	-	2.3	-	0.3	1.2	7.4	30.5	26.4	0.2	4.3	-	5.7
Motopi	14.3	0.3	2.4	0.2	0.4	2.9	11.6	15.0	38.6	0.4	3.8	-	10.0
Toromoja	17.7	-	1.6	0.1	0.4	9.3	6.3	26.3	11.9	0.8	2.1	-	17.0
Mosu	26.1	-	1.7	0.4	0.3	7.2	10	12.2	33.2	0.6	2.5	-	5.9
Mmadikola	15.9	-	0.6	0.2	-	8.0	18.8	30.5	12.2	2.3	6.5	-	5.1

Source: Statistics Botswana (2011)

3.6 Agriculture

Apart from the mining activities in the Boteti Sub-District, pastoral and arable farming are also practised. The growth of population as indicated in this report has an influence on a number of sectors, including agriculture. The project may have the effect of increasing demand of agricultural products in Letlhakane. The livelihoods of Letlhakane farmers would improve as they experience a better market. Performance of the agriculture sector is discussed within the broad topics of pastoral and arable farming below.

3.6.1. Pastoral Farming

The dominant local economic activity in the area is rearing of cattle. Households' own livestock such as sheep, goats, donkey and horses. Pastoral farming has been undertaken in purposes of subsistence farming especially at cattle post areas. In support of their livelihood some farmers sell their cattle to the Francistown abattoir and butcheries. **Table 11** indicates percentage of households that own livestock, it shows that the most owned livestock is goats, cattle and poultry but other livestock are in small numbers.

Table 11: Percentage of Households owning Livestock

Name of Area	Cattle	Goats	Sheep	Poultry	Mule/Donkey	Horses	Game
Letlhakane	35.9	18.2	0.4	37.9	5.6	0.3	1.7

Source: Statistics Botswana, 2011

3.6.2. Arable Farming

Arable farming is also one of the agricultural activities found in the Boteti sub-District. **Table 12** shows the types of crops ploughed by households in 2011. In the settlements the most common crops are the drought resistant crops such as maize and sorghum. Mopipi and Mokoboxane plough mainly maize because they are located close to the Boteti River. Flood recession agriculture occurs along the Boteti River valley during periods of river flow, but when the river dries up, the same areas are used for rain-fed agriculture

Table 12: Percentage Number of Households that Ploughed Crops

Name of Area	Maize	Millet	Sorghum	Beans/Pulses	Sweet reeds	None	Other melons (magapu, marotse, etc)
Orapa	1.8	0.1	0.2	0.2	0.2	97.5	0
Letlhakane	3.1	0.3	0.3	0.2	0.1	95.9	0
Mmatshumo	1.7	0.3	2.1	0	0	95.8	0
Mopipi	24	0	0	0.2	0	75.4	0.4
Mokoboxane	14.5	0	0.8	0.8	0	83.9	0
Khwee	12.8	0	2.6	0.6	0	84	0

Xere	24.7	0.2	0	0	0	75.3	0
Rakops	7.3	0	0.5	0.2	0.1	92	0
Kedia	9.5	0	0	2	0	89	0
Motopi	12	0	0	0	1	87.3	0
Toromoja	12	0	0	1	0	88	0
Mosu	3.4	0	2.3	0	0.3	94	0
Mmadikola	17	0	0	1	0	83	0

Source: Statistics Botswana, 2011

3.7 Tourism

Tourism is a major global economic force in terms of its contribution to economic development, particularly in developing countries. Tourism in mining areas in both abandoned and live sites has recently become the main tourist attraction around the world (Delacy, 2009). As a result, Orapa, Letlhakane and Damtshaa Mines are attractive tourist attractions for mining tourists. Tourism development in the Boteti region appears to be on the increase due to the availability of several tourism sites which have different tourism products or resources that appeal to tourists. Orapa, Letlhakane and Damtshaa Mines are important tourism products in the Boteti Region, it has been evident by lodging facilities in the area.

Orapa is noted as being the largest diamond mine in the world (Debswana, 2016). As a result, Orapa, Letlhakane and Damtshaa Mines create the possibility of the area developing into a major mining tourism site in Botswana. Orapa and Letlhakane have a rich cultural history, for instance, the name Orapa means the "resting place for lions" (Debswana, 2016). Therefore, cultural heritage tourism can be developed. There are tourism opportunities of Urban and domestic tourism that can also be developed in the area based on the availability of resources and services provided in the two centers.

3.8 Collection of Veld Products

Some households in the Boteti area collect veld products as means of sustaining their livelihoods. These products include wild fruits like *moretlwa* (*Grewia flava*), *mogwana* and *moretologa*. Other products include *mokolwane* which is used for food and to weave baskets, edible roots and *mopane worms* (*Gonimbrasia belina*). The veld products are gathered for both commercial and subsistence purposes in the settlements. The Basarwa have traditionally subsisted through collection of veld products, and this still continues on a small scale. Firewood collection is also a common practice in the area. Mopane trees (*Colophospermum mopane*) are known to be valuable species for firewood in the area.

Albeit undocumented, fishing is also an important activity especially when the Boteti River is flowing, and Lake Xau is flooded.

3.9 Social Safety Nets/Programme for Destitute Persons

A number of programmes have been promulgated by the Government of Botswana to support the most marginalized groups in all settlements e.g., monthly family food baskets, Ipelegeng (Public Works Programme) and Poverty Eradication Programme. Those targeted include the poor, needy terminally ill patients, people with disabilities, elderly and orphans (S& CD Officer – personal communication). Through the Rural Area Development Program (RADP), underprivileged households receive livestock grants in some settlements that qualify to be covered by the RADP. Universal to the entire Botswana, the elderly (65+ years old) receives the monthly old-age pension allowance.

3.9.1. Destitute Programme

The Government of Botswana is also implementing a destitute⁴ programme which provides minimum assistance to needy persons to improve their health, welfare conditions and to alleviate poverty. There are conditions/criteria one must satisfy to qualify for the destitute programme. To be registered as a destitute one either must come forward as an individual or they are referred/nominated by family members, individuals or community leaders which would then be followed by an assessment of the candidate by social workers. Once admitted into the programme, beneficiaries are provided with food, cash payment, access to social services including rehabilitation, provision for funeral expenses, and shelter. Beneficiaries are also exempted from paying for publicly provided services such as medical fees, school fees, water charges, service levy and electricity charges. The programme has an empowerment component that equips beneficiaries with relevant skills, knowledge, and the right attitude to confidently partake in viable economic and social activities.

Most of the Buuhe community/Basarwa members that were interviewed were beneficiaries of this programme due to their vulnerability. Graduation from this programme was said to be a challenge to the Buuhe community due to limited access to jobs and economic opportunities.

3.9.2. Supplementary Feeding for Vulnerable Groups

The Supplementary Feeding for Vulnerable Groups programme is one of the oldest social safety nets established in 1966 at independence. Nutritional supplements are provided to beneficiaries that include malnourished individuals and women of childbearing age from poor or low-income households but a specific focus on pregnant and lactating mothers, nutritionally at-risk under-fives and patients suffering from tuberculosis. When a drought year occurs, supplementary feeding is provided to all under-fives as well as food rations for lactating mothers. However, in non-drought years, supplementary feeding is based selectively on the weight progression of the child (Students in all public primary and secondary schools in Botswana are provided with prepared free meals at schools to alleviate short term hunger thereby improving classroom learning).

⁴ In Botswana, destitute persons are classified as people who are socio-economically disadvantaged.

3.9.3. Universal Old Age Pension Scheme

Having been promulgated in 1996 to provide senior citizens aged 65 years and above with a monthly allowance disbursed through Post Offices, the Old Age Pension Scheme's main objective is to help the elderly to sustain their livelihoods and as an effort to eradicate poverty. The monthly allowance currently stands at P500 (US\$ 50).

3.9.4. Labor-Based Drought Relief Program (Ipelegeng)

Ipelegeng was started in the 1960s as a poverty eradication strategy coordinated from the Office of the President. Its main objective is provision of temporary employment to community members throughout Botswana through momentary supplement to their incomes through wages. Unemployed community members register with the program and are offered temporary manual work on a rotational basis to work for six hours and earn P547 (US \$54.70) per month. The rotation is on a three-month basis and thereafter beneficiaries receive nothing for the subsequent months as they are laid off to make way for others due to the rotational system of employment under this programme

A lot of Buuhe community members reported this programme as main source of income.

3.10 Sanitation

The Waste Management Act, 1998, notes that inappropriate management of solid waste has the potential to result in serious public health problems and have deleterious impacts on the environment. The United Nations Human Settlement Programme (UNHABITAT) (2010) has been more specific in spelling out the impacts alluded to by the Waste Management Act, 1998, when they advise that uncollected wastes often cause water stagnation, water contamination and influences mosquito breeding environments. Below is a discussion pertaining to the sanitation situation (toilet facilities and household refuse disposal) in the project area.

3.11 Toilet Facilities

In Orapa the most used toilet is owned flush toilet and shared flush toilet. Most households in other settlements do not have access to improved toilet facilities. The settlements are rural, and the households mostly use owned shared pit latrines and communal toilet facilities (see **Table 13**). As observed in Letlhakane (**Table 13**) the most common type of household waste disposal facility is shared pit latrine. While the project is underway during construction there would be need for mobile toilet provision at construction sites and waterborne toilet facilities at the camp.

Table 13: Household waste disposal facilities in percentages (%)

Name of Area	Own flush toilet	Own pit latrine	Neighbour's pit latrine	Shared pit latrine	Shared flush toilet	None	Other (communal pit latrines, communal flush toilet)
Orapa	77.6	0.03	0.03	0.03	22.1	0	0.1
Letlhakane	14.6	14.6	4.4	28.6	10.8	19.9	7.2

Source: Statistics Botswana, 2011

3.12 Refuse Collection and Disposal

Table 14 shows the different refuse disposal methods used by households in the key settlements. Most households in Orapa receive a regular refuse collection service with a small percentage of households getting an irregular collection service. This is due to Debswana Diamond Company being responsible for all sanitation services as the company runs the township. In the other settlements, many of the households either burn or use rubbish pits to dispose off their refuse, although these settlements have access to regular collection services, irregular collection services, roadside collection and taking refuse to the dumpsite. It should be noted that burning and burying refuse in pits is problematic, as it poses a risk to human health and the environment.

Table 14: Household refuse disposal in percentages (%)

Name of Area	Regularly collected	Irregularly collected	Rubbish pit	Burning	Roadside collection	Dumping site	Other
Orapa	94.6	4.2	0.3	-	0.9	-	-
Letlhakane	21.9	6.1	27.5	38.2	5.4	0.5	0.3

Source: Statistics Botswana, 2011

3.13 Water Supply

Table 15 indicates statistics for household water supply for the key settlements in the Boteti Sub-District. Most of the household water supply is from either outdoor standpipe within yards or communal taps. Settlements such as Letlhakane, Mmatshumo and Mopipi get the majority of their water supply from an outdoor standpipe within the yards. Statistics show that majority of the water supply for Mmatshumo and Mopipi comes from the wells, boreholes, bowsers, rivers, dams and rainwater tanks. Mokoboxane, Khwee and Xere get most of their water supply from communal taps. Orapa's water supply is from piped indoor water.

According to Water Utilities Corporation (WUC) records about 6,821 households in Letlhakane are connected to treated water supply, 5,183 of which use standpipes. WUC records also show that there are 13 public standpipes, 12 of which are in operation (see **Table 16**).

Table 15: Statistics of the Village Water Supply

Name of Area	Water Indoors	Own Standpipes in Yard	Neighbour's Taps	Communal Taps	Other sources (river, borehole, etc)
Orapa	95.5	4.3	-	0.2	-
Letlhakane	21.8	50.8	2.8	11.9	12.8
Mmatshumo	6.7	2.8	13.4	11.9	40.1
Mopipi	6.3	25.4	8.3	22.1	37.9
Mokoboxane	4.4	28.5	14.1	47.5	5.5
Khwee	13.4	10.6	1.1	74.9	0
Xere	14.7	16.5	0.9	67	0.9
Rakops	15	39	15.5	12	20
Kedia	9	7.2	8.2	75.3	0.5
Motopi	9	26	1.7	46.2	18
Toromoja	0.9	0.5	3	44	52
Mosu	12	19	9.1	23.2	37.3
Mmadikola	30	16.2	13.3	17	24

Source: Statistics Botswana, 2011

Table 16: Water and Sanitation Status in Letlhakane

Water and Sanitation Indicator	Number
Households connected	6,821
Households using standpipes	5,183
Total No. of standpipes	13
Total No. standpipes working	12
Total No. standpipes not working	1

3.14 Energy Sources

Table 17 presents energy sources for cooking and lighting in selected settlements in the Boteti Sub-District. statistics Botswana (2011). The common source of energy used in the different households is electricity or paraffin. Orapa and Letlhakane settlements use electricity as the most common source of lighting while the other settlements use paraffin mostly. Xere is the only settlement that mostly uses other sources of lighting and cooking (62.4%). For cooking, Orapa and Letlhakane households use gas while other settlements commonly use firewood because it is cheaper than using gas or electricity. The project will increase energy consumption for cooking and lighting therefore, renewable energy could be used in promotion of using clean energy sources.

Table 17: Household statistics for energy, cooking fuel and lighting (%)

Name of Place	Electricity	Paraffin	Candle	Other sources (solar power, gas (LPG), biogas, solar, firewood)
Orapa	98.9	0.1	0	1
Letlhakane	60.1	14	11.3	14.5
Mmatshumo	5.8	37.4	25.9	30.9
Mopipi	21.7	45.2	17	16.1
Mokoboxane	13.5	42.5	32.3	11.6
Khwee	18.4	28.5	25.7	27.4
Xere	13.8	5.5	18.3	62.4
Rakops	32	42	14	13
Kedia	1	40.2	37	23
Motopi	18	58	13	11
Toromoja	5	53.1	21.4	21
Mosu	12	49.1	11.3	28
Mmadikola	16	56	21	7

Statistics Botswana, 2011

3.15 Health and HIV/AIDS

3.15.1. HIV and AIDS Prevalence

Table 18 below presents selected HIV and AIDs related statistics for Letlhakane Village. Notable from Table 1 is that the incidence of STIs has been increasing between 2017 and 2019; TB cases have been declining between 2016 and 2019; HIV and AIDS incidence increased from 2016 to 2018 and then declined slightly in 2019; number of men undergoing circumcision declined between 2016 and 2017 and then rose sharply between 2017 and 2019; home based care patients increased between 2016 and 2017 then slightly declined in 2018 to only increase again in 2019; number of beneficiaries under the orphan care programme has been declining between 2016 and 2017 then increased by 1 in 2018, to then decrease again in 2019, and, number of condoms distributed has been increasing since 2017.

Table 18: Letlhakane HIV & AIDS and Related Statistics

Indicator	Statistics				
	2016	2017	2018	2019	2020
Teenage pregnancy	356	270	356	335	Not available
STIs	4681	2716	3572	3670	Not available
HIV and AIDS	288	487	495	424	Not available
TB Patients	201	198	197	179	Not available
Home Based Care Patients	94	173	162	197	Not available
Circumcision	263	213	500	788	Not available
Patients on ARV	9241	11001	8278	7583	Not available
Patients on PMTCT	598	629	633	545	Not available
Orphan Care	1287	1087	1088	911	Not available
Condom distribution	-	166882	252899	343560	Not available

3.16 Health Infrastructure and Service Provision

Table 19 presents health facilities that are available in the Boteti Sub-District. There are two primary hospitals and one general hospital in Orapa. Letlhakane has a Primary Hospital with maternity ward and ten clinics without maternity ward. There is only one HIV/AIDS testing centre.

The in-migration induced by the project will add to the already high pressure on health facilities in the district. It would be best if the Contractor appoints a private medical facility for its employees in Letlhakane. The project will also need to work with the HIV and AIDS Coordinating Office to develop a comprehensive HIV/AIDS mitigation plan during project construction and decommissioning phases.

Table 19: Number of Health Facilities in Boteti Sub-District

Type of Health Facility	Number in 2001	Number in 2011	Location	Ownership
General hospital	-	1	Orapa	Debswana
Primary Hospital	-	2	Rakops and Letlhakane	Botswana Government
Clinic without maternity ward	10	10	Letlhakane Clinic,	Botswana Government
			Morale- De Beers Clinic (Orapa),	Debswana
			Occupational Health Clinic (Orapa Mine, De beers AK1)	Debswana
			AK1 Clinic,	Debswana
			Xhumo,	Botswana Government
			Tawana,	Botswana Government
			Letlhakane prison,	Botswana Government
				Debswana
			Damtshaa Clinic,	Botswana Government
			Mmatshumo,	Karowe Diamond Mine
	Karowe Diamond Mine			

HIV/AIDS Testing Centre	1	1	Letlhakane (Tebelopele Voluntary Testing and Counselling Centre)	Botswana Government (with support from donors)
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Source: CSO, 2007 and Ministry of Local Government (2016)

3.17 Physical Infrastructure

3.17.1. Road Network

According to Letlhakane Development Plan, Debswana has maintained some of the roads in the village and most of these are in areas where some Debswana employees are housed. There is the A14 and A30 road linking Orapa to Maun and the Okavango Delta. Thus, there are public distance transportation between Orapa and Letlhakane. Furthermore, Letlhakane is serviced by a road network comprised of both gravel and tarred roads and these are well maintained. In addition, there are internal minibuses and taxis operating in Letlhakane. A bus rank has just been completed in Letlhakane.

There has been an indication of human migrations in and out of Letlhakane and Orapa. A good road network will allow workers access to shopping facilities in Francistown, Serowe and Palapye as well as Gaborone.

3.17.2. Communication Linkages

Telecommunications infrastructure/services in the Boteti Sub-District are provided by Botswana Telecommunications Corporation (BTC), Orange Botswana, and Mascom. The invention of a dual sim card cellular phone promotes multiple phone network usage and good service provision in-case network access of one sim network does not work, the other can be available to work. All the network providers also provide mobile internet. They also provide office and home internet through routers. In addition to cellular network offered by other service providers mentioned above, BTC offers cable telephones to offices and homes.

3.17.3. Electricity

Letlhakane is supplied with power by the Botswana Power Corporation. According to the Letlhakane Development Plan (2007 -2031) as of 2007, Letlhakane had a total of 1766 connections covering domestic, commercial, institutions, and Government properties. The Substation in Letlhakane comprises of 3 x 0.8MVA transformers with a total capacity of 2.4MVA and firm capacity of 1.6MVA. The substation was upgraded to 2 x 3MVA in 2005 when the village load increased to 1.6MVA which makes a total installed capacity of 6MVA and firm capacity of 3MVA.

4 BASELINE INFORMATION OF BUUHE WARD

4.1 Community Infrastructure

Buuhe Ward although it is at the periphery of Letlhakane Village, it does not have basic facilities and amenities. There is no school. The children have to walk close to 5km to a school

in another ward. There is no health post or an ambulance on standby. The residents' access medical services from a clinic at Tawana Ward and in case of emergencies they have to call the clinic for an ambulance or find their own transport. There is no telephone that the community could use if they do not have access to mobile phones.

The Buuhe ward does not have electricity most people in the ward collect water from a public standpipe due to the costs associated with water reticulation.



Figure 4: Buuhe Ward - Kgotla and Administration Office

4.2 Livelihoods

There is a high rate of unemployment, even though these Basarwa reside in a township. Most people depend on the provision of the social safety nets. The youth depend more on piece jobs because they never get to know when the mines and companies in the township are hiring. Also, most employers need experience and skills which they do not have.

4.3 Land Ownership

The ward started as a squatter camp for the Basarwa but now they have been given allocation certificates for their residential plots. They have customary land rights for residential plots. They do not own ploughing fields. With the residential plots any person aged 21 can apply for one and will be allocated but lack the confidence to make the applications on their own behalf. **The community will be encouraged to make land applications during the VCP implementation and the Land Board will be engaged to sensitise them on the land application processes.**

4.4 Literacy Level

Literacy level is very low because most Basarwa even though they live in the township do not value education hence why they “drop out of school without valid reasons and stay home. They end up drinking alcohol excessively as a way of keeping busy and entertain themselves. Some of the reasons for dropping out might be because of:

- Poverty;
- Child labour;
- Language barriers;
- Resistance to school rules;
- Loss of interest in school;
- Negative attitude towards school; and
- Parents’ lack of formal education and, as a result, parents’ failure to encourage their children to complete their education (Mokibelo 2014). Most parents never persuade their children to stay in school as they did not go to school themselves.

4.5 Livestock

The only livestock some of the Basarwa in Buuhe ward have access to are small livestock like goats and sheep.

4.6 Veld Products

The Basarwa community in Letlhakane due to poverty they still use natural resources to build their huts which are mostly made from mud wooden poles and grass which are collected from their surroundings

They barely do the harvesting of veld products because the area is highly populated and with mines and the only way to get veld products is by taking trips to areas outside Letlhakane. They stated that they used to take long trips to places such as Bobirwa Sub-District to harvest mophane worms. This was not productive because they had to pay the transport fees with the bulk of mophane worms they harvested.

4.7 Sewage System

There are only a few pit-latrines in the ward that they said were donated to some households by their council through facilitation of a volunteer who was doing community development and he sourced funding for those toilets to be built. While some people built themselves pit-latrines. However, when these pit-latrines are full they abandon the toilet/hole and move to another point. This is because they cannot afford the cost of emptying the pit-latrine which is around P 4000.00 through a private company.

4.8 Civil Society Support

The community members in the ward have been organised into groups for economic empowerment initiatives. They have groups for woodwork tannery and beadwork. All the groups have attended training workshops but have not yet started production.

This is because before they could start production, they need empowerment on organisational development. The market for their products needs to be identified and they also need funds to mobilise resources which is basically start-up capital. Therefore, an advisor or a Civil Society Organisation is required to guide them until they reach a level of entrepreneurship. Furthermore, for their crafts to compete in the market with other craft producers they need further training and benchmarking. Lastly, they need to implement strict craft quality assurance for consistency in their product development and quality.

To support these economic empowerment initiatives the contractor/WUC will engage the Local Entrepreneurship Authority (LEA). The mandate of the authority is to promote and facilitate entrepreneurship and SMME development through targeted interventions in pursuit of economic growth and job creation. The LEA will help the civil societies to attain skills on entrepreneurship and Small, Medium and Micro-Enterprise (SMME) development through:

- ✓ Providing business development services inter alia through; screening, business plan facilitation, training and mentoring;
- ✓ Identifying business opportunities for existing and future SMMEs;
- ✓ Promoting domestic and international linkages, especially between SMMEs and government, large business entities and other SMMEs;
- ✓ Facilitating changes in regulations, quality management systems and standards, infrastructure and access to finance;
- ✓ Promoting general entrepreneurship and SMME awareness

On one hand the Contractor/Engineer will cater for the civil society's craft by displaying their craft in the corner of their office so that any site visitor who is interested in their products can purchase in order to expand the market of their products. A receptionist can act as a link to liaise with the society if their items has found buyers and payment can be arranged.

On another hand companies trading in Botswana could be encouraged to donate to the communities they are conducting projects in as a corporate social responsibility. This can be used as a leverage to other upcoming projects to invest in the VC communities so as to improve their economic empowerment initiatives. The societies will be encouraged to approach the contractor with their requests than the contractor, will determine how they can assist.

5 PUBLIC AND STAKEHOLDER CONSULTATION

In observing community protocol, the consultants obtained agreement from the Kgosi to engage with the community of Buuhe Ward. Objectives of Free, Prior and Informed Consultation with the Basarwa community also referred to as the Vulnerable Community as per WB OP 4.10 was to:

- Inform the affected vulnerable community/Basarwa about the proposed project and obtain their opinions/views and support for the project.
- Assess in a participatory manner the possible project benefits and adverse impact.
- Agree on measures to enhance benefits or mitigate adverse impacts that will be incorporated into the project design.
- Confer with the VCs at the outset on how they wish to be engaged.
- Understand and respect local entry protocols as they relate to permission to enter a community and access their traditional lands.
- Ensure that all representatives of the WUC and executing partner agencies (including third party subcontractors) are well briefed on local customs, history and the elements in the plan.

The dates of consultations and purpose are shown in **Table 20** below.

Table 20: Date and Purpose of Consultations

Date of Consultation	Purpose of Consultation	Time	Number of Participants
February 14, 2021	Prior consultation with Kgosi to discuss the origins of Basarwa at Buuhe ward.	09:38hrs	Kgosi and Consultant
February 16, 2021	Safety Nets for Vulnerable People	09:00-12:00hrs	Community Development Officer and Social Welfare officer
February 16, 2021	Consultation with Buuhe Male youths	14:00hrs	12 males
February 19, 2021	Social and developmental issues	09:00hrs	Advisory Council to Buuhe Kgosi (Member and Chairman)
February 19, 2021	Consultation with Buuhe youth single mothers	11:17hrs	13 single mothers
February 20, 2021	Developmental issues of Buuhe Ward	09:00hrs	Buuhe Multi-Purpose Cooperative (Chairperson)
February 21, 2021	Discuss issues affecting the disabled	09:00hrs	Gabotsalelwe (Disability Organisation) (Chairperson)
February 22, 2021	Issues affecting all committees and development in Letlhakane.	09:00hrs	Letlhakane Umbrella VDC: 1 Male (Treasurer and 2 females Chairperson and Vice Chairperson)

Date of Consultation	Purpose of Consultation	Time	Number of Participants
February 23, 2021	Issues affecting the community including those in Buuhe Ward.	10:00hrs	Area Councillor for Letlhakane
February 24, 2021	Issues affecting the Basarwa community in Buuhe Ward.	09:00hrs	Botswana Khwedom Association (Public Relations Officer)
February 16- 24 th 2021	Consultation with Basarwa Community in Buuhe Ward (One on One Interviews)		133 Females 69 Males

In addition to consultations that were carried out during the preparation of the sub-project, a framework for free prior and informed consultation for implementing this VCP has been designed in a consultative manner and following the guidelines for free, prior and informed consultation set forth by OP. 4.10. Consultations with the Vulnerable Community will be carried out through culturally appropriate processes but observing the COVID-19 protocols. Consultations will also consider the issues of gender and inclusion of vulnerable groups (elders, youth, persons with disabilities, etc.).

After finalization of the VCP and through agreement with the community, WUC will consult with the community to validate the VCP with the VCs, in a culturally appropriate language and format. For any changes made to the VCP, the same approval and disclosure protocols as of the original VCP will be followed. Following validation, the VCP will be disclosed on WUC's website, hard and soft copies will be made available with the Kgosi and will be disclosed by the World Bank on its external website.

5.2 Consultation Strategy

The community agreed to a consultation strategy whereby the Project team (Project Liaison Officer and WUC safeguards team) would meet with the community (and will request the attendance of as many Buuhe community members as allowed by the COVID-19 protocols) at least once a month for the entire project lifecycle to answer community questions as well as updates on the project, in addition to sensitization trainings (such as GM or GBV) as agreed to in the project ESIA/ESMP. The method of engagement will be at the Kgotla and would observe a culturally appropriate language and format. Ad hoc meetings will be called to address pressing issues as needed either by the community or by the Project team.

Table 21 presents the proposed schedule for future consultation of Vulnerable Communities and other stakeholders.

Table 21: Community Consultation Schedule

Phase	Activities	Institution Responsible	Dates
Preconstruction	Inform community of commencement of project works	WUC (E&S specialists)/PLO	2 weeks before the Contractor comes to site
	Community input on selection and choice of Contractor's camp, any access roads if needed, etc.	Contractor/PLO/CLO	2.5 weeks before contractor moves to site
	Appointment of Community Liaison Officer	WUC (E&S specialists)/PLO/Kgotla	4 weeks before appointment of officer introduction of officer should be done 1 week after appointment
	Development of the GBV Action Plan and mapping of services	WUC GBV specialist/Gender Dept (and NGOs) and WUC E&S specialists	3 weeks before construction starts
	Awareness talks on the GM process	WUC (E&S specialists) /PLO/CLO/Kgotla	2 weeks after the Community liaison officer is appointment
	Procurement of local labour	WUC/Contractor	Should be 4 weeks before selection process and 4 weeks before application deadline
Construction	Educational talks GBV, SEA, HIV AIDs and community consent	WUC E&S specialists (and NGOs working on GBV)/CLO/PLO	2 weeks before training and sensitization is to take place.
	Update on progress of the project and implementation of VCP	PLO/CLO	Once a month and additional meetings related to urgent issues
Decommissioning (post construction)	Discuss how community can communicate with the project following decommissioning and feedback from the community on the project implementation	WUC (district officer and E&S specialists)	At the start of decommissioning WUC to capture meeting in minutes and produce report (for WB) and leave a copy with Kgosi's office/VDC

Table 22: Consultation with NGOs and Government Institutions

Phase	Activities	Institution Responsible	Dates
Preconstruction	After award of contract – update on project start	WUC (district officers and E&S safeguards)/PLO	2 weeks before the Contractor comes to site
	Selection of Contractor's camp	Letlhakane Sub Land board, Letlhakane Sub District Council	2.5weeks before contractor moves to site
	Use and existence of GM	WUC (district officers and E&S safeguards)/PLO/CLO	

	Procurement of labour	Kgotla, Khwedom	Should be 4 weeks before selection process and 4 weeks before application deadline
Construction	GBV/SHEA/VAC, HIV/AIDs	NGOs such Tebelopele for HIV AIDs, Gender Links GIDA, The local Health Post Department of Gender Affairs Local Enterprise Authorities (LEA) – and service providers	NGOs will be involved around the start of construction in supporting the implementation of GBV risk mitigations measures and grievance management in the project area. These NGOs are already the responsible institutions for these issues. There after they will be called once a month during construction for workshops/toolbox talks or as agreed with NGOs.
	Update policing on project, solicit feedback from policing services and Min. of Youth, Culture and Sport	WUC (district officers and E&S safeguards)/PLO/CLO	Once a month (pre-construction kick off meeting 2 weeks prior to construction and once a month thereafter or as agreed with NGOs
	Basarwa NGOs (Khwedom,) to update on project activities, status	WUC PIU (coordinator, E&S specialists)/PLO/CLO/Kgosi	Once a month or as agreed to with NGOs

5.3 Consultation with the Basarwa (VCs) and Other Community Members

Focused group meetings as well as one on one interviews with the Basarwa community in Buuhe Ward were conducted from the 16th of February to 24th February 2021 in Letlhakane. The list of all attendees is attached in **Annex 1**. The key informants were Buuhe Kgosi, Buuhe youth groups (single mothers and all male), S&CD and social welfare officers and Buuhe community members. The main aim of the focus group discussions was to find out key details about the history of the Basarwa of Buuhe ward, the challenges affecting the community in general and the VC in particular and how they think the project is going to affect them.

5.3.1 Outcome of the Focus Group Discussion

History of Buuhe Ward

Buuhe started as a cattle post in 1976 influenced by the Metsiaela borehole that was in use around 1960/65, and people were residents here. Many of the people are of Basarwa origin and they prefer to seclude themselves. They kept on moving away from the village expansion until 2006/07 when the Government decided that they should settle down in Buuhe. Kgosi Keantshiwa Amotseng was the first Kgosi but not installed by the Government but by recognition as an elder. The Government wanted them to be issued eviction letters.

- Dr. Margaret Nasha decided to recognise the ward and Kgosi Keantshiwa Amotseng was recognised.
- Kgosi Keantshiwa Amotseng died in 2010 and Alfred was appointed in 2011.
- The Landboard is now allocating everyone there.

Livelihood

- The community of Buuhe has long requested to be allocated ploughing fields.
- Currently they sustain themselves by working as cattle herders.
- Social safety nets including food rations, labour intensive works (Ipelegeng) and giving of uniform to school going children also form an important part of livelihoods of people of Buuhe.
- Some also sell artefacts and crafts.
- There is also an S&CD programme that give them some goats; and
- The elderly benefit from old age pension (*Tandabala*).

Challenges regarding livelihoods?

- Government should be willing to allocate land for ploughing and do so through a special programme for people of Buuhe.
- Education: This project you are talking about is going to recruit employees. My people will be side-lined because of low education; and
- Low economy activity: here those considered well-off are those given about 10 goats by social service.

Education

- Literacy is very low, influenced by low living standards of their parents due to:
 - Girls getting pregnant and leaving school; and
 - Boys get employment at the cattle posts and fields.
 - Most children drop out of school to stay home with parents and parents do not encourage them because they do not see and know the benefits of education
 - Some children leave school and go and become street kids in the township

Gender Roles and GBV

- Women gather *phane* (mophane worm) and grass by the road.
- Craft: *Kika*, *mafetlho* and *dibaga* no longer last because the weather is not the same (climate change).
- Men dominate women in most decision making.
- Get involved in love affairs at a young age at about 14 years.
- No legal marriages, long term cohabitation.
- High gender-based violence rate but not being reported.
- GBV (Gender based violence): GBV issues are handled by the Police, and we hear there are many from Buuhe. Men want to control women to stick to them while they have many partners. The first point of call is my office (Kgosi). We call their parents and have a discussion. Sometimes this resolves the issue but in other cases the man would act like he is fine but later on passion kill their partner.

Water supply

- Water supplied by WUC, and people have to apply for connections, but due to poverty, people have not connected water and get water from standpipes located in Buuhe Ward. There are seven (7) standpipes, of which three (3) are operational.

Electricity

- Just like water, people cannot afford the cost so there is no electricity in the ward

Land ownership

- Have only residential plots
- Do not have fields because Land Board cannot allocate them fields near their ward, they have been told to submit applications for fields to be allocated fields in one of the villages outside Letlhakane and have not submitted because they want fields near their homes in Letlhakane.

Community Issues/Problems

- Unemployment
- Lack of household water connections
- Disruption of school activities due to water shortages
- Lack of water for livestock
- Disruption or failure of potential businesses due to water shortage

Consultations with the community affirmed several times that this project should leave a “positive legacy on the community”. The community felt that the following interventions would be important for community development in terms of additional project benefits:

- Job creation and youth employment.
- CSI project on the ploughing field; A permaculture garden (to improve livelihoods and access to nutritious food, skills and training and materials to be able to successfully achieve yields and to bring it to market).
- Health capacity and infrastructure development.
- Consultation throughout.
- Subcontract the local companies; and
- Use excess gravel to fill up gullies in the village.

5.3.2 Summary of Community Meetings

The following conclusions or decisions were made following the consultations and focus group meetings:

- a) People should be employed from within VCs.
- b) The community will co-operate with the influx of workers.

- c) The project should commence as soon as all permissions have been obtained.
- d) The ward will be informed of the status of the project on a periodic basis.
- e) The management plan and VCP will be disclosed to the VCs before project implementation.
- f) They will elect two members to be part of the GM.
- g) They would like to be part of the monitoring for the implementation of the VCP

5.3.3 Summary of Consultation with NGOs and Stakeholders

There were consultations with non-project affected organizations as part of consultations such as NGOs representing Basarwa Youth, Botswana Khwedom Association, Disability organization, Buuhe Multi-Purpose Cooperative, Advisory Council to Buuhe Kgosi, Community Development Officer & Social Welfare Officer. **(Refer to summary in Annex 1).**

6 BENEFITS AND ADVERSE IMPACTS

The action plan for potential culturally appropriate benefits of the project is captured in **Table 25**. Project actions to benefit the VC through this plan are as follows:

- Creation of employment
- Lack of household connections to sewer line
- Possible increase in teenage/unplanned pregnancies
- Erosion of Societal Norms and Values
- Connection of VC households to the wastewater sewer line
- Empower the community to establish their proposed horticultural garden
- Provide training for unskilled workers

The action plan for mitigations and monitoring potential adverse impacts on VCs are presented in **Table 26 and 27**.

6.2 Impact Assessment Methodology

The assessment of impacts will be determined by analyzing the magnitude, significance and duration of potential negative impacts and positive impacts of the development on the environment as well as the various constraints the various environmental factors may have on the development. Short term impacts as well as long term ones will be assessed.

The Impact Assessment Model is applied when considering the effects on all phases of the project. This model has been adopted along with others for undertaking ESIA's and ESMPs in Botswana and we have adopted it based on our experience with its effectiveness in the VCP process. Evaluation of environmental impacts with this model is undertaken to determine the significance of the environmental impacts.

Significance of Environmental Impact = Probability x Consequence

The consequence of impacts can be described by considering the:

- Severity of impacts; and
- Spatial extent and duration of the impacts.

Combining the consequence of the impact and the probability of occurrence, the overall risk (significance) (**Table 23**) of impacts will be arrived at, as follows:

Consequence (severity + duration + spatial scale) x probability = significance.

Table 23: Consequence and Probability Ranking Scales

Severity/ Magnitude	Duration	Spatial Scale	Cumulative// Non-Cumulative	Probability
10 – Very High / Do not know	5 – Permanent	5 – International	4–High (Capacity to withstand change and further stress is close to being exceeded)	5 – Definite / Do not know
8 – High	4–Long-term (Ceases after operational life)	4 – National		4 – Highly Probable
6 – Moderate	3 – Medium- term (4-40 years)	3 – Regional	2–Medium (Capacity to withstand change and further stress is reduced)	3 – Medium Probability
4 – Low	2 – Short-term (0-3 years)	2 – Local		2 – Low Probability
2 – Minor	1 – Immediate	1 – Site only	1–Low (Significant capacity to withstand change & further stress)	1 – Improbable

The maximum value, which can be obtained, is 100 significance points (**SP**). Environmental effects are rated as either of **High**, **Moderate** or **Low** significance on the following basis:

- SP>60 - Indicates **high** environmental significance.
- SP 30 to 60 - Indicates **moderate** environmental significance.
- SP<30 - Indicates **low** environmental significance.

The overall significance rankings of the negative environmental impacts are judged on the guidelines for decision-making given in **Table 24**.

Table 24: Guidelines for Decision-making

Overall Ranking	Significance	Nature of Impact	Decision Guideline
High		Unacceptable	Likely to be fatal flaw.
Moderate		Noticeable/measurable	These are unavoidable consequences, which will need to be accepted if the project is allowed to proceed.
Low		Minor	These impacts are not likely to affect the project decision.

The methodology for assessing impacts presented above allows for clear assessment of both negative and positive impacts while eliminating subjectivity in assessment of impacts. It also shows clearly acceptable impacts whose effects can be ameliorated by implementing mitigation measures, and those that are not acceptable, and in so doing indicating to the decision maker whether a project should proceed or not.

6.3 Description and Assessment of Impacts

There are several identified impacts for all the project stages and the majority are adverse while there are a few positive impacts as well. Most of the impacts have a short-term duration which means the environment will return to its normal state past construction. Most of the impacts affect a large portion of the region since the project covers most of the villages. Most of the adverse impacts are avoidable and reversible while the positive impacts are irreversible. All the impacts were assessed and rated as presented in **Table 25**.

Table 25: Impact Assessment and Ranking

Impact	Avoidable	Duration	Spatial Scale	Reversible/Irreversible	Severity/Magnitude	Probability	Significance
Creation of employment	No	Short-term	Local	Irreversible	Moderate	Highly probable	Moderate
Lack of household connections to sewer line	Yes	Long-term	Local	Reversible	High	Highly probable	High
Possible increase in teenage/unplanned pregnancies	Yes	Short-term	Local	Irreversible	Moderate	Medium	Moderate
Erosion of Societal Norms and Values	Yes	Short-term	Local	Reversible	Moderate	Medium	Moderate
Connection of VC households to the waste water sewer line	No	Long-term	Local	Reversible	Moderate	Highly probable	High
Empower the community to establish their proposed horticultural garden	Yes	Long-term	Local	Reversible	High	Highly Probable	High
Provide training for unskilled workers	Yes	Long-term	Local	Reversible	Moderate	Medium	High
Possibility of incidents of GBV/SEA/SH/VAC	Yes	Short-term	Local	Irreversible	Moderate	Medium	Moderate

6.4 MITIGATION AND MONITORING PLANS

The social assessment identified risks of the proposed project to the vulnerable community in Buuhe Ward. Those risks were analysed to establish their impact level and details for example, severity and significance. The results were used to draw a mitigation plan that indicates the estimation cost of the mitigation activities and the responsible persons/institution for each activity. In addition to that a monitoring plan was also drawn. (See **Tables 26 and 27** below).

6.4.1 Potential Benefits of the Waste Water Treatment Plant project to the VCs

- Connection of VC households to the waste water sewer line, improved health outcomes.
- Temporary employment creation
- Provide training for unskilled workers to be able to be hired.
- Empower the community to establish their proposed horticultural garden

Table 26: Mitigation Plan and Cost Estimates

Potential Risks, and Negative Impacts to be Mitigated	Objectives	Action	Time Period	Responsibility for Implementing Action	Estimated Cost (BWP)
Creation of employment	To ensure that the Vulnerable community members get equal opportunity for employment during the project implementation.	<ul style="list-style-type: none"> ▪ Skills Trainings to empower VCs to find employment in the project ▪ Recruitment of unskilled labour so that they learn from the skilled labour (skills transfer). To enable the unskilled to acquire necessary skills needed in employment opportunities ▪ As much as possible, labour should be sourced from local communities, with special attention paid to the VCs ▪ Consideration should be given to gender balance during the recruitment exercise ▪ Recruitment process should be transparent and fair as far as possible i.e., to be carried out at Buuhe Kgotla in the presence of the community leadership ▪ Job advertisements should be put up at strategic locations such as tribal administration office notice boards to ensure equitable information dissemination. 	<ul style="list-style-type: none"> • Throughout the project implementation period 	<ul style="list-style-type: none"> • Contractor • WUC 	60,000.00

Potential Risks, and Negative Impacts to be Mitigated	Objectives	Action	Time Period	Responsibility for Implementing Action	Estimated Cost (BWP)
Possible increase on GBV, SEA, SH, and VAC cases	To prevent GBV, SEA, SH, and VAC cases	<ul style="list-style-type: none"> • Raising awareness among the vulnerable communities on GBV, SEA, SH, and VAC • Sensitization training workshops for adolescents and VCs on sexuality issues • Awareness raising in the community of the existence of the grievance mechanism • Create common awareness about GBV and VAC and ensure a shared understanding that they have no place in the project • Create a clear system for identifying, responding, and sanctioning GBV and VAC incidents • If a concern of a highly sensitive nature is raised such as GBV, SHEA, VAC, the CLO shall invoke the special procedures related to GBV, SHEA, VAC and will ensure the anonymity and confidentiality of the survivor 	Throughout the project period	Contractor District Health Management Team Social Worker Botswana Police CLO Teachers	P50,000.00
Enhanced socio-economic development (livelihoods)	To enhance the community economic opportunities	<ul style="list-style-type: none"> ▪ The introduction of cash flow in the community through the payments of people employed in the project, will improve the community's buying power. This will provide market for the local produce, small businesses in the community and the service providers. ▪ The local people can also benefit from tender opportunities for 	Throughout the project period	<ul style="list-style-type: none"> • CLO, PLO • Tribal authorities 	10,000.00

Potential Risks, and Negative Impacts to be Mitigated	Objectives	Action	Time Period	Responsibility for Implementing Action	Estimated Cost (BWP)
		<p>supplying materials and small construction subcontracts.</p> <ul style="list-style-type: none"> ▪ Optimize and upgrade waste water transmission infrastructure for reticulation efficiency. ▪ Provide sewer connections to VC's households for sanitation. ▪ Implement a water supply strategy that is reasonably priced to ensure adequate, reliable, and sustainable water supply system for the community. ▪ Land Board to sensitize VCs on land application processes. 			
Possible increase in teenage/unplanned pregnancies	To avoid teenage/unplanned pregnancy among VCs	<ul style="list-style-type: none"> ▪ Educate both workers and VCs on contraceptive use. ▪ Prohibition of sexually activity between workers and anyone under 18 years and reinforcement of sanction measures. ▪ Monitoring of Codes of Conduct of Workers ▪ Sensitization training workshops for adolescents and VCs on sexuality issues. ▪ Include GM that is survivor centered to report sexual contact/ activities that are unwanted/rape and/or with a minor. 	During construction	<ul style="list-style-type: none"> • Contractor • Tribal authorities • S&CD 	Part of construction cost

Potential Risks, and Negative Impacts to be Mitigated	Objectives	Action	Time Period	Responsibility for Implementing Action	Estimated Cost (BWP)
Community being paid unfair wages, wages not paid timely, and mistreatment from Contractor and Sub-Contractor	To ensure that the Contractor pays according to the stipulated rates	<ul style="list-style-type: none"> ▪ Employment agreements should be signed before starting work. ▪ Contractor to abide by the Code of Conduct. ▪ The Labour Office should be engaged for labour disputes ▪ Provide an avenue for complaints by employees (GM). 	During construction	<ul style="list-style-type: none"> • Contractor, WUC • Department of Labour • Tribal authorities 	No cost
Potential gender discrimination	To ensure gender equality during hiring of labour	<ul style="list-style-type: none"> ▪ Include specific provisions in procurement documents for Construction Contractor to develop a Hiring Plan that includes VCs and measures to ensure women and men are hired (i.e., at least 30% of women). ▪ Hiring to be done at the Buuhe Kgotla in the presence of Kgosi and VDC ▪ Recruitment process should be transparent and fair as far as possible i.e., to be carried at neutral venues ▪ Job advertisements should be put up at strategic locations such as Kgotla notice boards to ensure equitable information dissemination. 	Before implementation and during construction	<ul style="list-style-type: none"> • Contractor • WUC • Tribal authorities 	Budgeted for by the Construction Contractor

Potential Risks, and Negative Impacts to be Mitigated	Objectives	Action	Time Period	Responsibility for Implementing Action	Estimated Cost (BWP)
Erosion of Societal Norms and Values	To avoid social ills that later on erode societal norms and values.	<ul style="list-style-type: none"> ▪ Raise awareness amongst the local communities on various social ills and their implications. ▪ Sensitize the construction workers on community values and norms. ▪ Participate in local crime prevention activities. ▪ Closely liaise with the police and other crime law enforcement authorities to address crime and social problems. 	Throughout the project period	<ul style="list-style-type: none"> • Contractor • WUC • Tribal authorities 	Part of construction cost
Empower the community to establish their proposed horticultural garden	To help the community to establish their garden	<ul style="list-style-type: none"> ▪ Provision of effluent collection tank and associated irrigation infrastructure. ▪ Supply manure from the treatment plant. ▪ Provision of boundary fence around the garden. 	Throughout the construction period	WUC	P 260, 000.00
Connection of VC households to the waste water sewer line	To improve health/hygiene outcomes	<ul style="list-style-type: none"> ▪ Provision of a sewer network to connect all the VCs households ▪ Provision of water-based system toilets to those under the S&CD social safety nets. 	Throughout the construction period	WUC	Part of construction cost
VCP Budget For Mitigation of Adverse Impact - Sub-Total					P 380,000.00
VCP Budget For Potential Culturally Appropriate Benefits – Sub-Total					P120,000.00
VCP Budget for Enhancing Potential Benefits & Mitigation of Adverse Impacts					P500,000.00
TOTAL					USD37,493.39

Table 27: Monitoring Plan for Potential Adverse Impacts on VCs

Issue	The Parameter to be Monitored	Monitoring Objective	Location of Monitoring	Key Performance Indicator	Method of Monitoring	Responsible Agent for Monitoring	Frequency of Monitoring
Creation of employment	The number of vulnerable community members employed in the project	To ensure that the vulnerable community members benefit from the project employment opportunities	Project Site Offices	Presence of Basarwa as part of the work teams Number of hours they work Conditions of their service	Documents review	Enviro Solve, PIU, WUC, Department of Labour and Home Affairs CLO	Monthly during the Project Implementation phase
Possible increase on GBV, SEA, SH, and VAC cases	The number of GBV, SEA, SH, and VAC cases	To prevent increase in cases recorded	Buuhe Community	Number of trainings done	Social Monthly Monitoring report	WUC, PIU, Resident Sociologist Contractor's CLO CLO District Health Management Team, S&CD office	Monthly throughout the project
Enhanced socio-economic development (livelihoods)	Purchasing power and sales	To enhance socio-economic development	- VC - Community - S&CD office	Number of people employed by the project	Review of employment records	WUC PIU CLO	Monthly throughout the project
Possible increase in teenage/unplanned pregnancies	Incidences of teenage /unplanned pregnancy	To avoid teenage/unplanned pregnancy among VCs	- VC - Community - S&CD office	Number of cases recorded	VCP Monthly Monitoring Report	WUC, PIU, District Health Management Team,	Monthly throughout the project

Issue	The Parameter to be Monitored	Monitoring Objective	Location of Monitoring	Key Performance Indicator	Method of Monitoring	Responsible Agent for Monitoring	Frequency of Monitoring
						S&CD office	
Community being paid unfair wages, wages not paid timely, and mistreatment from Contractor and Sub-Contractor	Complaints about wages	To avoid late payment, and underpayment	<ul style="list-style-type: none"> - WUC, - PIU - District Labour Office 	Number of complaints recorded	Review of employment contract and agreement	WUC, PIU, District Labour Office CLO	Monthly throughout the project
Potential gender discrimination	Incidences of gender discrimination	To avoid gender discrimination	Buuhe Community	Number of cases recorded	VCP Monthly Monitoring Report	WUC, Tribal admin District Gender Affairs Office	Monthly throughout the project
Empower the community to establish their proposed horticultural garden	Availability of effluent storage tank, irrigation equipment, and boundary fence	To improve their livelihoods and employment creation	Buuhe community	<ul style="list-style-type: none"> ▪ Functional horticultural garden ▪ Number of people employed 	VCP Monthly Monitoring Report	WUC CLO	Monthly throughout the project
Connection of VC households to the waste water sewer line	Number of households connected to the sewer line	To ensure improved hygiene/health	Buuhe community	<ul style="list-style-type: none"> ▪ Availability of sewer network ▪ Number of household connections made 	VCP Monthly Monitoring Report	WUC CLO	Monthly throughout the project

7 FINANCIAL PLAN

Table 28 presents a summary of cost associated with the implementation of this VCP. As over 95 percent of the Buuhe ward comprises the Vulnerable Community, this financial plan is embedded in the costs associated with the ESIA/ESMP. The project will have a Resettlement Action Plan (RAP) mainly due to the sewage transmission pipeline and that is likely to displace or affect some properties within Buuhe Ward. The likely to be affected parties have already been consulted and will be consulted in detail during the RAP study.

Table 28: Summary of Cost of Implementation

Activity	Time Frame	Budget (Pula)	Responsibility
Capacity Building			
Capacity building of VCs involved in monitoring the implementation of the VCP implementation (See Cost Details in Table 4)	Within first 3 months of project implementation	Part of the ESMP 120,000.00	WUC
VCP Implementation, Monitoring, Evaluation and Reporting			
Regular monitoring of Project site and VCP activities including GM Implementation	Entire project period, of 18 months and defect liability of 12 months – monthly with periodic reporting	Budgeted for under the ESMP	WUC & Consultant
VCP implementation of mitigation measures (See Cost Details in Table 5)	Before and during construction	380,000.00	WUC & Contractor
VCP implementation of mitigation measures	During operations and maintenance annually	Part of Operational Cost	WUC
Implementation of GM	Before and During construction	268,400.00	WUC
TOTAL		P 768, 400.00 (USD 57,215.70)	

8 GRIEVANCE MECHANISM (GM)

8.1 Introduction

The GM is structured to accommodate everyone from the public and Government stakeholders. In addition, clear procedures must be established for complaints and made easily available to the public by way of public notices.

The grievance mechanisms will be designed to:

- Provide a way to reduce risk for projects,
- Provide an effective avenue for expressing concerns and achieving remedies for grievances,
- Promote a mutually constructive relationship; and
- Prevent and address community concerns.

The responsibility, implementation of the GM will rest with the safeguards specialists of the Project Steering Committee which shall function as the Project Implementation Unit (PIU).

The mechanism for grievance redress includes:

- Provision for the establishment of a Grievance Committee (see GC members below)
- Multiple grievance uptake locations and multiple channels for receiving grievances
- Fixed service standards for grievance resolution, include adjudication process and process of handling situations related to gender-based violence/sexual exploitation and abuse
- Prompt and clear processing guidelines (including reviewing procedures and monitoring system)
- A time frame for responding to grievances
- A reliable and effective reporting and recording system
- Procedure for assessing the grievance
- Grievance escalation process.

8.2 Opportunities to Access the GM Using Languages and Formats that is Culturally Acceptable

The grievance mechanism is designed with the objective of solving disputes at the earliest possible time before they escalate. In addition, World Bank OP 4.12 emphasizes that the PAPs should be heard and as such, they must have access to a fair, transparent, and accessible means to address their concerns and views related to the project. Furthermore, the mechanism should be effective in addressing grievances at the project-level so that grievances are not referred through the court system for resolution, especially since the court system may not be financially accessible to all and may add cost and time burdens.

8.3 General Principles and Key Aspects of the GM

The sub-project will put in place an extra-judicial mechanism for the management of grievances and disputes. The PAPs will be able to trigger this mechanism, while still being able to resort to the judicial system. Key aspects of the GM are:

- The community needs to be informed about the GM and how they can make use of this process.
- Grievances will be recorded using a Grievance Form (in local language, also available in English). Grievance Forms will contain details regarding the grievance as well as the name and address of the applicant, application date, type of application and the name of the persons receiving the grievance. The forms will be logged in a register where they will be tracked through to final resolution.
- Complainant will receive notification that their grievance has been received (if complainant is known) in writing.
- Grievance monitoring
- Closure sheet, copy of which will be handed to the complainant after he/she has agreed to the resolution and signed off.
- The PIU will maintain a digital grievance database, containing the logs and records of all grievances received, with an indication of the respective status of a grievance (i.e. resolved, not resolved, pending, etc.), in addition to a hard copy.
- Resolution options will be developed through unilateral proposal, bilateral discussion and/or third party mediation. If a complaint is not legitimate the case will be closed without agreement with the complainant. Any response will be communicated clearly either orally or in writing, and a grievance case will only be closed when an agreement with the complainant is reached.
- Community members will have access to third party legal advice, through referral to Botswana Legal Aid, at no cost. Information on access to legal advice will be communicated to the affected people.

8.4 Management Functions and Responsibilities

During the implementation phase of the project, the mechanism for grievance redress shall include:

- Provision for the establishment of a grievance redresses committee with a sitting allowance budgeted for the Grievance Committee (GC) members.
- Multiple grievance uptake locations and multiple channels for receiving grievances (project hotline, project website, Facebook page, WhatsApp blasts, PIU office, Kgosi and VDC, grievance box at the Kgotla).
- Fixed service standards for grievance resolution which include adjudication process.
- Prompt and clear processing guidelines: including reviewing procedures and monitoring system .
- A time frame for responding to grievances.
- A reliable and effective reporting and recording system (grievance register, complaints logbook – hard copy)
- Procedure for assessing and responding to the grievance

8.5 Responsibilities for Implementing Stakeholder Engagement Activities

The PIU in consultation with the respective community will appoint Community Liaison Officers (CLOs) in the project area villages where there are project works, to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise. The CLOs will act as key points of contact to bring project grievances from PAPs, stakeholders, construction workers, residents, and community members to the Grievance Committee (GC). They will liaise with the WUC Safeguards Team to inform them of all complaints and outcomes. The CLO will contact the PIU Safeguards Team in case a complaint is not resolved within two weeks after receiving the alert. The PIU Safeguards Team will go to the field in order to obtain further information and resubmit the case to the GC. The complainant will be notified that further information is being collected and kept informed about the status.

8.6 Community Liaison Officers (CLOs)

The PIU will in consultation with the community appoint Community Liaison Officer(s) (CLO). The CLO(s) will be situated where there are project works, will be designated to receive, review, record and address project related complaints. Every two weeks, the CLO will consolidate complaints and submit to the GC. Their contact information will be published and communicated via public announcements and information sharing about the project, (radio, television and newspapers, community meetings), to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise. Key functions of the CLO are:

- Create awareness on the sub-project and GM.
- Act as the key point of contact to bring grievances from project affected people, construction workers, local residents, and community members to the GC.
- Register the grievance/complaints on the Grievance Logbook and acknowledge receipt within 5 days.
- Respond back to the beneficiary's queries/complaints lodged, giving their status and/or their outcome if they had been resolved.
- Ensure that all queries/complaints from beneficiaries have been formally recorded following the existing procedures.
- Review and evaluate grievances/complaints and ensure that complainant is given feedback within 14 days.
- Conduct community consultations to provide inputs into the GM.
- Facilitate communication which in the form of reports PIU and Project Contractor and distribution of information, education and communication material to the community.
- Represent the project during Kgotla meetings.
- Represent the interests of vulnerable individuals and groups following consultations with them to better understand their concerns and issues, and keep notes and records of such meetings.
- Ensure that the recommendations of the GC are implemented and advising PIU during ESMP implementation, and Contractors to make any appropriate adjustments to their works.

- Work closely with the WUC Principal Sociologist and Environmental Officer and flag any issues of concern as well as report incidents as they occur.
- If a concern of a highly sensitive nature is raised such as Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment and Violence Against Children (VAC), the CLO shall invoke the special procedures related to GBV, SEA, SH and VAC and will ensure the anonymity and confidentiality of the survivor.

In addition to the CLO, the grievance forms will be available in the project area (at the Kgotla office) as an accessible venue for filing a grievance and a Grievance Box. In collaboration with the communication and IT team for the project, the WUC telephone hotline and website will be also available to receive complaints anonymously or they can identify themselves. Every two weeks, the CLOs will collect forms filled out to submit them to the GC and record them in the grievance logbook.

The PIU Safeguards Team will work closely with the WUC communication and IT Team, who will oversee compiling complaints received on social media, website and WUC hotline. A meeting will be held at least one time per month to review complaints and submit them to the GC. For illiterate persons, CLOs will assist them to write and submit complaints. To be sure that the adequate confidentiality will be kept, the code of conduct will be issued to be signed by the VDC and CLO(s).

8.7 The Grievance Committee (GC)

The GC will be responsible for receiving and resolving in a fair, objective, accountable, effectively, timely and accountable manner. All concerns or complaints raised by project affected persons (PAPs) in the community during all phases of the project.

8.8 Composition and Membership of the Grievance Committee (GC)

The Project Grievance Committee (GC) will meet as and when required, at least once per month. Complaints will be submitted to the Project GC. In this regard, a Grievance Committee (GC) will be established with defined terms of reference.

The GC shall maintain all records from complaint to final decisions made by the GC for future reference, with an accurate and up to date grievance logbook (the PLO is to ensure the logbook is accurate and ensure they have a copy of updates to the logbook). The GC shall also ensure that public participation and consultation is always a part of the process to promote understanding, transparency, trust in the project, accountability and mitigate against unnecessary complaints and disputes. The Chairman of the GC will rotate amongst the committee members depending on the issues to be considered by the Committee. The GC members include:

- Project Contractor
- Land Board Representative
- WUC Representative

- Two Local Representatives (One man and one woman. In Vulnerable Communities, at least one representative of VC)
- Project Liaison Officer 1 (Resident Sociologist - Supervising Consultant)
- Project Liaison Officer Officer 2 (Resident Environmentalist - Supervising Consultant)
- Social Worker
- Police Officer
- Community Development Officer
- NGO representing Basarwa (e.g. Kwedom Council, San Youth Network).

The WUC PIU Safeguards Team Members will attend meetings when there is a matter that requires their urgent attention.

The broad responsibilities of the GC include:

- Publish the grievance management procedures.
- Receive, review, investigate and keep track of grievances referred to them by the CLO.
- Adjudicate grievances
- Monitor and evaluate the fulfilment of agreements achieved through the GM.

8.9 Project Liaison Officers (PLOs)

The environmental and social safeguard monitoring consultants for the project will be tasked with the role of Project Liaison Officers (PLOs). **Two PLOs will be hired for this project, and they will be residents at the project site.** Their contact information will be published and communicated via public announcements and information sharing about the project, (radio, television and newspapers, community meetings, etc.), to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise.

Key functions of the PLOs include:

- Attend to households issues regarding the construction works and facilitate the liaison between the beneficiary (households), local community (community buildings) and the project team.
- Ensure prompt communication of concerns and issues about the project to the project team (not the Contractors).
- Assist the project communication team with all communication matters and to provide feedback on the effectiveness of the messages and means of communication used.
- Assist project team to arrange meetings and location of meeting for any consultation with the community.
- Monitor the implementation of the ESMP and report progress at onsite Project Progress Meetings.

8.10 The Contractor

During the implementation, Contractors shall work in line with the World Bank standards on Environmental, Social, Health and Safety (ESHS) and Occupational Health and Safety (OHS) in the workplace and on their relationship with affected communities. The application of these Codes of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV, SEA, SH, and VAC on the project and in the local communities. Contractors should make sure these Codes of Conduct are adopted by those working on the project and are meant to create:

- Awareness of the ESHS and OHS expectations on the sub-project.
- Common awareness about GBV, SEA, SH, and VAC ensure a shared understanding that they have no place in the sub-project.
- A clear system for identifying, responding to, and sanctioning GBV, SEA, SH and VAC incidents.

Three codes of conduct must be adhered to in this sub-project:

- i. Company Code of Conduct: Commits the company to addressing GBV, SEA, SH and VAC issues.
- ii. Manager's Code of Conduct: Commits managers to implementing the Company Code of Conduct, as well as those signed by individuals; and,
- iii. Individual Code of Conduct: Code of Conduct for everyone working on the project, including managers.

These codes of conduct will be explained and displayed in the work sites, workers and affected community members will be sensitized prior to works start. The CLO will work closely with PIU safeguards team to bring to the GC all complaints and special cases which affect the codes of conduct.

For issues regarding GBV, SEA, SH, and VAC, the Response Protocol which is the mechanisms set in place to respond to cases of GBV, SEA, SH, and VAC will be implemented. By doing that, the Contractor will first establish a GBV, SEA, SH, and VAC Compliance Team SSVCT. The SSVCT will include, as appropriate to the project, at least four representatives ('Focal Points') as follows:

1. A safeguards specialist from the WUC.
2. The occupational health and safety manager from the Contractor (or someone else tasked with the responsibility for addressing GBV, SEA, SH, and VAC on the Contractors side) with the time and seniority to devote to the position.
3. The PLO (also known as the supervision consultant); and,
4. A Social Worker with experience GBV, SEA, SH, and VAC (the 'Service Provider').
5. A Police Officer from the local Police Station

8.11 Community Level Grievance Mechanism

Local communities have existing traditional and cultural grievance mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the Project, Contractor(s), and or Government representatives at local and national level. The extended family, settlement and/or Kgosi may be involved at this level. This may be more suitable for issues and concerns that are minor. For example, if the Contractor needs to recruit housekeepers or other human resource needs, they can choose among the resumes collected by the community. The community and Contractor will be informed that the principle of non-discrimination and fairness as per the Botswana Labour Law will apply in the selection. Also, if the company wants to compensate the community for using their sand, gravel or because of the impact of its activity (dust dispersion), those grievances can be solved at the community level, without the GC, if the community chooses so.

8.12 Project Level Grievance Mechanism

Many projects related grievances during the works are minor and site-specific. Often, they revolve around nuisances generated during construction such as noise, dust, vibration, workers disputes, etc. They can be resolved easily on site. However, regarding disputes that include differences between households over land, or boundaries, even on issues triggered indirectly by the project during its lifecycle, the GM will have a body, the GC to address disputes.

Other issues that are potential grievances may involve access to property arrangements, Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VACs) of workers Contractors and/or community members during construction phase. Most of these cannot be resolved immediately and on site and in the case of SEA/SH, require specific interventions and processes to protect the safety, well-being, and identity of survivors.

8.13 GM Procedures

The community will be informed and sensitized about the use of an existence of the GM (through radio notices, TV, community meetings, community signage, Kgotla, CLOs, PLOs) of the various uptake options where complaints can be submitted. The PIU Safeguards Team will meet every two weeks with the communication and IT team to review all complaints from social media, websites and hotline and inform the complainants within three days those complaints have been received and the procedures they must follow.

The PIU Safeguards Team will then organize a meeting for the GC to meet at the soonest to ensure compliance with the timeline for responses to complainants.

If the identity of the person who submitted a grievance is known, the GC must inform them within three days of the decision or when a decision is to be expected. The date of this outreach is to also be logged into the grievance log. The GM will commit decisions to be finalized within two weeks of date of receipt and complainants will be notified and will record

the complainant's comments about decision. If the complainant is not satisfied, they will be notified about escalation procedures.

Notices and signage will be erected at all sites providing the public information on the project and summarising the GM process, including contact details of the relevant CLO. All complainants should be free to lodge a complaint in one or as many of the uptake stations noted above.

A Complaints Register (or Grievance Log) will be at the PIU Safeguards Office and village Kgotla office with CLOs, but also with Contractors, who will log the: i) details and nature of the complaint (include categorization of sensitive/urgent, non-sensitive); ii) the complainant name and their contact details if known; iii) date the complaint was received; iv) corrective actions taken in response to the complaint; v) the date the response was made available to the community and the complainant; vi) the resolution; vii) the response of the complainant if response was acceptable to them or not; viii) the name of the person who received the complaint and location/method the complaint was lodged. This information will be included in WUC Safeguards Team progress reports to the World Bank. The CLOs are responsible for ensuring that they collect all grievances so that they can update the PIU logbook and their logbook.

8.14 The Grievance Structure

The structure or steps of the GM includes:

- Multiple and accessible uptake stations to receive complaints (text, phone number, project website, mailing address, grievance box, others, communication to CLO, VDC, Kgosi) and account for vulnerable or disadvantaged individuals (persons with disabilities, elderly, illiterate, lack access to phone/computer, etc.)
- Receive, register and acknowledge complaint in logbook
- Screen and establish the foundation of the grievance
- Implement and monitor decision
- Notify complainant of outcome and obtain feedback on acceptability
- If grievance is not escalated, conclusion to redress grievance and note in logbook
- Advise for a judicial proceedings as last resort if necessary
- Document the experience for future reference
- Notify the community (community boards, on project website, CLO, community meetings) about various complaints and outcomes without naming names).

A step-by-step process, with duration of each stage from the reception of the complaint to the notification of the resolution, with suggested timeframe and responsibilities is indicated in **Table 29**.

8.15 Grievance Process

The steps of the GM consist of:

- The Aggrieved Party (AP) will take his/her grievance to the CLO who will endeavour to resolve it immediately.
- Where AP is not satisfied, the CLO will refer the grievance to the GC.
- Receive, register and acknowledge complaint - CLO.
- Screen and establish the foundation of the grievance - CLO.
- If it is an easy non complicated grievance, notify the complainant of the result and obtain a response if the resolution is satisfactory – CLO.
- If it is complicated grievance, escalate to the GC - CLO.
- Notify the complainant of the result and obtain a response if the resolution is satisfactory. If not, inform the complainant of escalation process - CLO.
- Implement and monitor proposed resolution action.
- Advise for judicial proceedings as last resort if necessary
- Document the experience for future reference.

Where the traditional and administrative procedures fail to resolve disputes, the aggrieved party has the right to take the matter to the courts in accordance with the Constitution of Botswana, other national laws, and the Lenders' policies.

The process is highlighted in **Table 29** with suggested timeframe and responsibilities.

Table 29: Grievance Mechanism Process

Step	Process	Description/Required Action	Completion Timeframe	Responsible Agency/Person
1.	Receipt of Complaint	Document date of receipt, name of complainant, nature of complaint	1 day	CLO (Community Liaison Officer)
2.	Acknowledgement of Grievance	By letter, email, phone	1-5 days	CLO
3.	Screen and establish the foundation / merit of the grievance	Visit the site; listen to the complainant/community; assess the merit	7-14 days	GC members including the Community Liaison Officer, complainant and his/her representative
4.	Implement and Monitor a Redress Action	Where complaint is justified, identify and carry out the redress	21-30 days or at a time specified in writing to the complainant	Community Liaison Officers, WUC Social and Environmental Safeguard Specialists to coordinate the implementation of redress action
5.	Inform Complainant and Community (use of community boards, newspaper, radio, what's app group, Facebook page) to inform community of grievance outcome and solicit	Where complainant is not satisfied, inform complainant of escalation process.	1-2 days after making a decision on a grievance by the GC	CLO

	response from complainant if claim has been fully addressed or not.	If satisfied or not, ensure grievance logbook is updated.		
6.	Extra intervention for a dissatisfied scenario	Review the redress steps and conclusions, provide intervention solution	2-4 weeks of receiving status report	MLMWS, PLO, Social and Environmental Officers, and GC to review and react
7.	Judicial Adjudication	Complainant has the option to take complaint to court of law	No fixed time	Complainant
8.	Funding of Grievance Process	WUC logistics and training, redress compensation, court process	No fixed time	WUC

8.16 Escalation of Grievances

If the complaint is not resolved to the satisfaction of the aggrieved party by the GC, it will then be referred by the PIU Project Coordinator or to the Project Steering Committee (PSC).

The Project Steering Committee (PSC) will be composed of the:

- CEO – WUC
- Technical Services Director
- Water Resources Director
- Chief Financial Officer
- Senior Manager – Supply Chain
- Controls Coordinator
- Corporation Secretary
- Project Coordinator
- Project Planner

The NSC will meet when required to address escalated grievances and will be required to address the concern within 30 days. Should measures taken by the National Steering Committee fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Botswana judicial courts.

8.17 Judiciary Level Grievance Mechanism

The project level GM process will not impede affected persons access to the legal system. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per the laws of Botswana. However, the quality and effectiveness of the judicial system should be assessed, as well as issues related to accessibility and affordability.

8.18 Gender Based Violence, Sexual Exploitation and Abuse, Sexual Harassment or Violence Against Children

An exceptional or *ad hoc* meeting will be called the day after receiving this information. The GC, the National Steering Committee, the Contractor, and local authorities of the locality where this issue occurs will all meet as a plenary. At all times, the approach for such issues will follow a survivor-centred approach and the anonymity of the survivor will remain intact. In addition, the survivor will have been informed of options such as receiving psycho-social support, medical assistance and other services as required.

For those issues, the mechanisms set in place to respond to cases of GBV, SEA, SH, and VAC will be implemented. By doing so, the Contractor will first establish a 'GBV, SEA, SH and VAC Compliance Team' (SSVCT). The SSVCT will include, as appropriate to the project, at least four representatives ('Focal Points') as follows:

- Community Liaison Officer (CLO)
- Occupational health and safety manager from the Contractor, or someone else tasked with the responsibility for addressing GBV, SEA, SH, and VAC with the time and seniority to devote to the position
- Supervision Consultant (PLO)
- Social Worker
- Police Officer

8.19 Capacity of Local Institutions to Address Grievances and Disputes

The following local institutions are involved in addressing grievances and disputes:

- Village Development Committee (VDC): The village parliament has the responsibility to monitor developmental projects in their village. The interest of the community are their priority as per their mandate.
- Kgosi: The village tribal leader and is also an ex-offio member of the Village Development Committe and is a key figure in mediating among community members.
- Project Resident Engineer: As the head of the project, the engineer is responsible for ensuring that it is implemented smoothly.
- Supervising Project Engineer: Ensures that The Project Resident Engineer and ESMP Consultants are implementing the project as per their approved documents.
- Project Liaison Officer (PLO; social and environmental safeguards monitor): Has a responsibility to ensure that all the ESMP mitigation measures and plans are implemented accordingly.
- Community Liaison Officer (CLO): Liaises between the Project Officials/ Grievance Redress Committee and the Community. Reports all grievances to the GC.
- Grievance Redress Committee (GC): Has a responsibility to ensure that all grievances are addressed timely and properly recorded.
- Water Utilities Corporation (WUC): Has a responsibility to ensure that the objectives of the project are delivered as promised.

8.20 Good Communication and Information Sharing Practice

Community members, including the Vulnerable Community and other marginalized groups and individuals can:

- Report to the CLO who will be based at the village Kgotla.
- Report by phone to Community Liaison Officer/Resident Engineer.
- Send an sms to the CLO/Resident Engineer
- Place their grievances in an accessible grievance/complaints boxes in community areas which will be checked daily. For those who cannot write, CLO will facilitate submission of a grievance and will be guided by a ethical code of conduct to respect the privacy of the complainant
- Contact the Project Team by email (there will be a designated project email address for this purpose) and via the website. This will enable users to submit their grievances anonymously.

- Make use of the community WhatsApp group, which will be created for the community members who want to be informed on updates of the project.

All complaints must be acknowledged for receipt regardless if they are anonymous. Community boards and the project website will list complaints that were submitted (without names) and will include expected date of response. Once the response is determined, the response with the original complaint will also be posted on the community boards and on the project website.

There will be a specific person or persons who will be tasked to oversee the grievance process to ensure that all grievances are logged correctly and the GC is notified.

There will be specific training for the GC and the CLO to ensure quality control of the GM process.

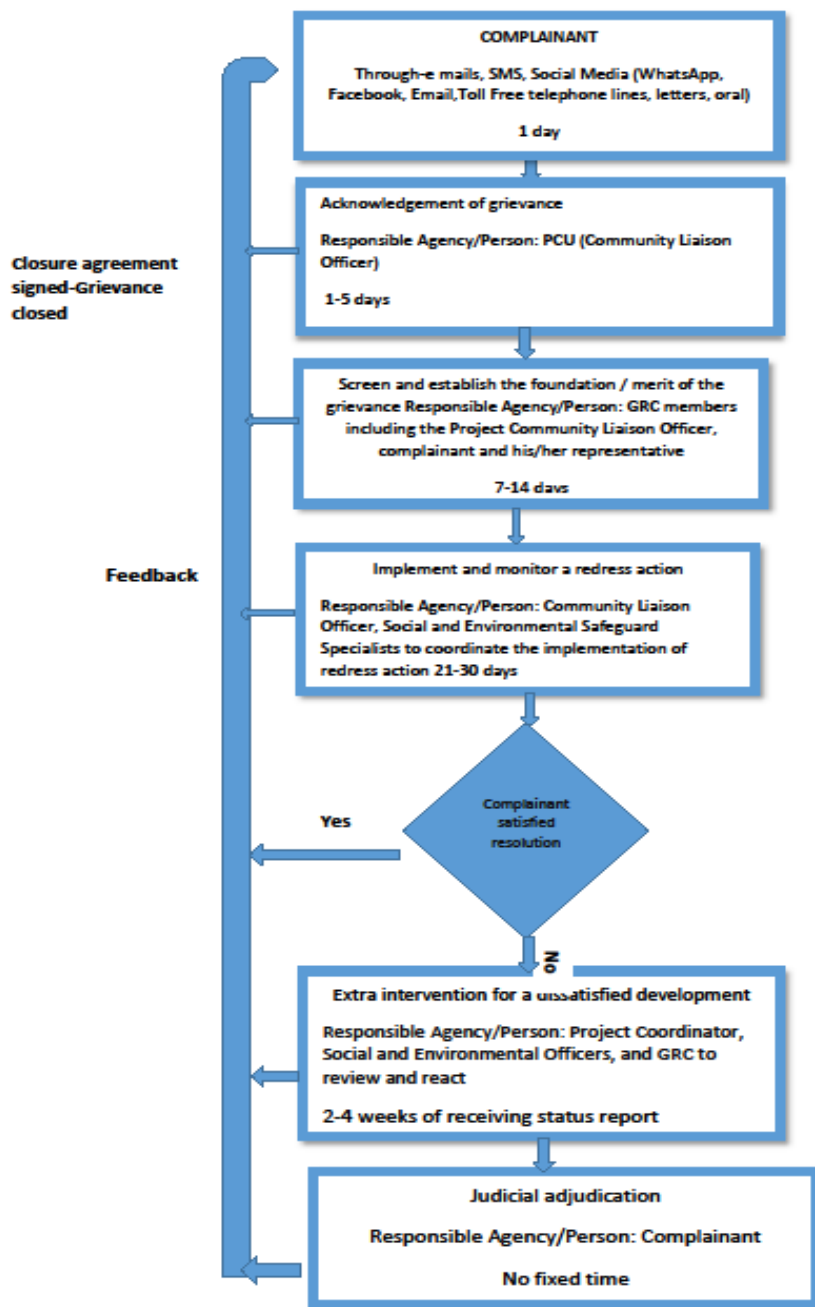


Figure 5: GM Procedures

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ANNEX 1: Minutes of Consultations

OUTCOME OF FOCUSED GROUP DISCUSSIONS Consultations for Buuhe/Metsiaela (ESIA for Letlhakane WWTP)

1. MEETING WITH BUUHE KGOSI

Date: 14/02/21

Time: 09:38

Venue: Kgosi Alfred Petelelo's Residence – Buuhe Ward

Facilitator: Mr. Unopa Sikuku

Discussants: Kgosi Alfred Petelelo

History of Buuhe

Buuhe started as a cattle post in 1976 influenced by the Metsiaela borehole that was in use around 1960/65, and people were residents here. Many of the people are of Basarwa origin and they prefer to seclude themselves. They kept on moving away from the village expansion until 2006/07 when the Government decided that they should settle down in Buuhe. Kgosi Keantshiwa Amotseng was the first Kgosi but not installed by the Government but by recognition as an elder. The Government wanted them to be issued eviction letters.

- Dr. Margaret Nasha decided to recognize the ward and Kgosi Amotseng was recognised.
- Kgosi Amotseng died in 2010 and Alfred was appointed in 2011
- The Landlord is now allocating everyone there.

Languages Spoken

- Languages spoken in Buuhe are:
 - Sesarwa.
 - Sekalaka; and
 - Sekhurutshi/Setswana

Livelihood

- The community of Buuhe has long requested to be allocated ploughing fields.
- Currently they sustain themselves by working as cattle herders.
- Social safety nets including food rations, labour intensive works (Ipelegeng) and giving of uniform to school going children also form an important part of livelihoods of people of Buuhe.
- Some also sell artefacts and crafts.
- There is also an S&CD programme that give them some goats; and
- The elderly benefit from old age pension (*Tandabala*).

What are the challenges regarding livelihoods?

- Government should be willing to allocate land for ploughing and do so through a special programme for people of Buuhe.
- Education: This project you are talking about is going to recruit employees. My people will be side-lined because of low education; and
- Low economy activity: here those considered well-off are those given about 10 goats by social service.

Tradition

- Used to gather veldt products, grass cutting and poles, but these are now not possible due to requirement for permits and stringent regulation.
- Entertainment through traditional songs, but now loud music has taken over.
- Seperu, a traditional happy celebration also no longer practised as the practitioners are now with the ancestors.
- What is still practiced on randomly and on a smaller scale are healing songs for traditional healing.
 - Those who led the songs has departed and Christianity/church has taken over.
- **Menstruation:** A few still uphold the tradition of xabakhwe/xhabaidzhayi (Ngwale in Setswana). This was a ceremony where a girl that was menstruating for the first time was confined to the house and seriously inducted on womanhood as well as treated with traditional medicine for a whole month. Today, for those who still practice it, only lasts for a week.

- **Boys:** Back then when a boy had a wet dream, they would hide behind a kraal. They would then be treated with traditional medication and get counselling. Their dressing code would also be upgraded from *tshaga* (hanging cloth) to *motseto* (more like pampers).
- **Marriage:** A man would show interest in a woman by hunting for them. The father to the lady would be grateful for the token and hand her daughter to the man. No lobola was charged. Now things have changed. Even when it's a marriage between Basarwa, lobola is charged; and
- **Burials:** They used to bury in the temporary structures they occupied. When a person passed on, they would be buried in one of the temporary structures they occupied and would then move to another place. Others buried in termites' mould, same day of the death. Currently social services are burying them.

Education

- Literacy is very low, influenced by low living standards of their parents due to:
 - Girls getting pregnant and leaving school; and
 - Boys get employment at the cattle posts and field.

Gender Roles and GBV

- Women gather *phane* (mophane worm) and grass by the road
- Craft: *Kika*, *mafetlho* and *dibaga* no longer last because the weather is not the same.
- Men dominate women in most decision making.
- GBV (Gender based violence): GBV issues are handled by the Police, and we hear there are many from Buuhe. Man wants to control women to stick to them when they have many partners. The first point of call is my office (Kgosi). We call their parents and have a discussion. Sometimes this resolves the issue but in other cases the man would act like he is fine but later passion kill their partner.

Boreholes in the area

- The described area for location of the WWTP is called Nkwanapedi; and
- People with boreholes in that area are:
 - Mokalake.
 - Kabuku; and
 - Moota.

Negative impacts

- Loss of grazing land.
- Not sure if cattle will be affected if drinking the water.
- Children can swim into the effluent. We lost a child at the current ponds in 2018.
- People can connect in Buuhe, but majority cannot; and
- Loss of bunnies for clan cap ties.

Mitigation measures

- Grazing - Encourage farmers to move to the Damtshaa side.
- Erect and maintain security fence. Also have security guards to discourage vandalism of the fence; and
- Affordability by majority of Buuhe people: A similar programme to the one wherein pits latrine toilets built by Peace Corps could be initiated for sewer line connections in individual households.

Positive Impacts

- Improvement of the stature of the village.
- This will spur investment in the village.
- Creation of employment for youth, a quota should be reserved for Buuhe instead of just job advertisement; and
- They have a registered corporative and a certain number of irrigated plots which could be reserved for women or Buuhe people.

Comments/Concerns

- Thankful for the project as it will aid development in the area.
- People will be able to develop their allocated plots.
- He requests that an employment quota for BUUHE residents be instituted; and
- Contractors should consult the village leadership when they set up, especially Kgosi.

2. SOCIAL AND COMMUNITY DEVELOPMENT

Date: 16/02/21

Time:

Facilitator: Mr. Unopa Sikuku

Discussants: Ms Oesi Matlotleng, Community Development Officer: Cell: +267 7685711
Mr. Victor Thake, Social Welfare officer: cell +267 72143804

Language: Setswana

1. Mandate

- Safety nets for vulnerable people.
- Human rights for vulnerable groups (destitute, children, people living with disabilities); and
- Vulnerability, socio-economy, lack of education, lack of access to information.

2. Positive impacts on the mandate

- Improve mandate.
- Employment will entice destitute.
- Increase life expectancy; and
- Improvement in health.

2. Negative impact on the mandate

- Increase in lawlessness.
- Increase in crime.
- Increase in violence.
- Family breakdowns; and
- Sexual exploitation.

3. Positive impact on community

- Improved health status.
- Improved investment; and
- Employment creation.

4. Negative impact on community

- Similar to impact on mandate.
- Might affect the ecosystem; and
- Ingestion by animals and/or people.

5. Buuhe community history

- Mostly Basarwa from Xhaiee and Khwee and some from Sekwe.
- Most were squatters; and
- Land board regularised their plots.

6. Livelihoods of Buuhe

- Cheap labour for other tribes.
- House maids.
- Cattle herders.
- Ipelegeng; and
- Low socio-economic status.

7. Programmes

- Ipelegeng by council earning BWP 561.00 per month.
- Vulnerable orphans are provided with food and school uniforms and clothes (P600 p/m, P2000 p/m and P1200 girls, P1500 boys respectively); and
- Destitute are provided with food for P500 p/m and shelter where possible at cost of P100 000 per year.

8. Social issues Buuhe

- Alcoholism.
- Absconding from school.
- Vulgar language.
- Child headed families; and
- Teenage pregnancy.

9. Tradition

- Still believe in migrating.
- Change employers very often.

- Not controlled by time.
- Forced into education; and
- Everyone cooks for themselves in the family.

10. Gender relations and gender-based violence

- Get involved in love affairs at a young age at about 14 years.
- No legal marriages, long term cohabitation; and
- High gender-based violence rate but not being reported.

11. Child welfare

- Child headed families as young children look after their siblings.
- Malnutrition teenage pregnancies; and
- Village protection committees made up of 2 children, 2 parents and Kgosi addresses issues relating to child welfare.

12. Gender base violence reports (rape)

- Victims report to police; and
- And the police also involve social services and healthcare.

11. Advice and comments

- Consultation with village leadership.
- Guarding against sexual exploitation and cheap labour.
- Rehabilitate the borrow pits; and
- Bid farewell when leaving.

3. BUUHE YOUTH - ALL SINGLE MOTHERS

Date: 19 February 2021

Time: 1117hrs

Venue:

Facilitator: Mr. Unopa Sikuku

Discussants: Baloi Petelelo – 75477271 - member

TIME: 1117HRS

Name	Surname	ID No.	Contact	Age	Edu. Level	No. child	EMPLOYMENT
Olathegile	Thari	-	72879056	34	-	6	Not
Tshedimoso	Piet	045424414	75390410	24	F 5	1	Not
Kefilwe	Chakowe	-	74188385	20	Std4	2	Not
Ditsietse	Aloxwae	889029317	76971226	32	Std6	6	Not
Orutilwe	Radikhudu	-	75518516	30	F 2	4	Not
Morapedi	Aloxwae	192724519	-	34	F 1	6	Not
Kefilwe	Tirelo	960322240	77645625	21	F 3	1	Not
One	Seatlanyana	273721120	72210233	21	F 3	1	Not
Basedi	Thari	794725610	76918556	30	Std5	3	Not
Ever	Thari	146025417	77136109	33	-	3	Not
Otsile	Thari	-	-	34	Std6	4	Not
kebonyemane	Xitsoee	821024628	71228087	26	Std4	4	Not

1. Expectations

- Employment.
- Livelihood's improvement.
- Developments.
- Affordability of the Wastewater Infrastructure.
- We do not even have houses to connect to; and
- We cannot afford.

2. Positive impacts

- Employment.

- Improvement of village structure; and
 - Improvement of water situation.
- 3. Negative impact**
- Increase in fights.
 - Increase in crime.
 - Increase in diseases.
 - Increase in fatherless children; and
 - Increase in school drop out
- 4. Assistance**
- Water reticulation.
 - Build houses.
 - Build toilets; and
 - Provide mosquito nets and food.
- 5. Challenges**
- Fatherless children not supported.
 - Diminishing prospects for marriage; and
 - Informal business not doing well.
- 6. Livelihoods**
- Piece jobs.
 - Limited jobs and draught.
 - Feeding programme at the clinic; and
 - No fields to plough.
- 7. Cooperative**
- People not aware of its existence.
 - GBV.
 - Very high cases.
 - Caused by jealousy; and
 - Reports to the police not responsive due to negligence by the police.
- 8. VAC**
- Very high cases.
 - They bribe children.
 - Peer pressure among children and the desire for better lifestyles; and
 - Parents use their children for sexual exploitation by men for them to gain money.
- 9. Prostitution**
- Very high; and
 - Mainly sex is exchanged for alcohol.
- 10. Rape**
- Very high.
 - Reporting to police does not help due to negligence; and
 - One of the respondents lost her sister last year due to rape and murder.
- 11. Comment**
- We request for help; livelihoods have been disrupted by covid-19.
 - Social and community development provide uniform and washing powder; and
 - Requesting for food.

4. BUUHE MULTI-PURPOSE COOPERATIVE

Date: 20/February 2021

Time:

Facilitator: Mr. Unopa Sikuku

Discussants: Onkemetse Bashi-1 year as a Vice Chairperson and 3 years as a chairperson

Language:

1. Mandate

- Development of the ward; and

- Creation of employment.
- 2. Achievements**
- Only managed registration of department of cooperation.
 - Joining fees unaffordable-P100, members not able to pay.
 - Only 3 people have paid: and
 - No bank account yet.
- 3. Challenges**
- Lack of funds for members to join; and
 - Arranging for members to get peace job.
- 4. Expectations**
- Some will get employment and Buuhe community will be able to join and pay shares.
- 5. Positive Impacts**
- Employment-income.
 - Improve in sanitation and health; and
 - Irrigated plots.
- 5.1 Mitigation measures**
- Hire from the Kgotla.
 - 40% quota; and
 - Education on how to balance at work.
- 6. Negative impacts**
- Increase in diseases: STIs.
 - Unplanned pregnancies.
 - Increase in school dropout.
 - Family breakdowns.
 - Increase in crime; and
 - Prostitution/sex work-looks like is happening underground by age 18-35.
- 7. Opportunities**
- Cooperatives can be prioritized for allocation of plots; and
 - Quotes for Buuhe community.
- 7.1 Mitigation**
- STIs –Education on prevention methods and availability.
 - Pregnancy-contraceptive.
 - School dropout-education.
 - Family breakdown-education; and
 - Theft-form cluster.
- 8. Livelihood**
- Ipelegeng mostly for women.
 - Men-piece jobs (sand-mining-Tswantsha)-open community.
 - Ploughing-allocation.
 - Goats rearing; and
 - S&CD-Food rationing, uniform for some.
- 8.1 Development Challenges**
- General roads because the area is sandy.
 - Streetlights.
 - Water (only 2 community standpipes)-4 needed.
 - 2.5km to clinic-mobile clinic at Kgotla.
 - Primary school - 2.5km, Junior school -3km, Senior school -5km. Number of schools going children want a school in Buuhe.
 - Lack of transport for disabled to reach social amenities; and
 - Disabled: Some involved in weaving/craft-funding for business and mentoring.
- 9. Gender Based Violence**
- Some down a bit due to supervision of alcohol where accountable just rift.
 - Lack of employment and alcohol are also the root cause; and
 - Most men abusing women.

9.1 Mitigation

- Education

10. Rape

- Not too common; and
- Due to sponsorship through alcohol

10.1 Mitigation

- Project came at the right time to reduce employment; and
- Buuhe community uneducated: Live from the unskilled jobs.

5. YOUTH GROUP - ALL MALES

Date: 16/02/21

Time:

Facilitator: Mr. Unopa Sikuku

Name	Surname	Group Age	All Male Literacy	Contacts	ID NO	Material status	No of Children	Employment
Masika	Baratamang	24	Std 4	-	5603140	Single	-	-
Moagedi	Obue	20	Std3	77925563	768214126	Single	-	-
Kaene	Bashi	24	Form 5	77084338	864614324	Single	01	-
Pono	Mathe	24	Std5	-	062412128	Single	-	-
Mompoloki	Onthotse	24	Form 5	76697636	892712211	Single	-	-
Kenamile	Seabelo	24	Form 3	71925161	003218521	Single	-	-
Ditsame	Mathe	21	Std 6	-	316013922	Single	01	-
Kemeso	Mathe	21	Form 3	-	060811225	Single	-	-
Amogelang	Kelemogile	21	PSLE	74708053	069914322	Single	-	-
Chedza	Rankorata	21	Std 4	74029682	383911412	Single	-	-
Mmoloki	Thusetso	17	Form 3	76494468	-	Single	-	-
Moeketsi	Jonas	21	Form 3	77682300	-	-	-	-

1. Challenges

- Lack of job opportunities.
- Lack of money to stay long in school leading to school dropouts.
- Covid19 has reduced the already low opportunity of employments; and
- Lack of land/place for business operation to apply to for youth fund.

2. Opportunities

- Job opportunities; and
- Irrigated farming.

3. Livelihood

- **Piece jobs-loading sand-sand mining (Tshwantsha)**
- Drought.
- Cluster.
- Water fetching for alcohol.
- Heading cattle.
- Labouring in construction jobs; and
- Weeding in people's field.

3.1 Enhancement

- Quota for Buuhe youth; and
- Quota for allocation of irrigated plots allocation.

4 Assistance

- Sponsorship for football (kit, cones, football, lights); and
- Space for football pitch.

5 Developmental Challenges

- Only 2 standpipes currently.
- Gravel roads; and
- Mobile clinic and streetlights.

6 Social Challenges

- High crime rate including stock theft and fights.
- Youth groups terrorising the whole village.
- Teenage pregnancy due to poverty drive.
- High prostitution and high rape; and
- Very high HIV/AIDS.

7 Disability and Orphanage

- Many disable and orphans; and
- Assisted by social and community development.

8 Impacts

- Increase in HIV/AIDS.
- Increase in crime.
- Increase in sex work; and
- Livestock drinking contaminated effluent.

8.1 Mitigation

- Education and condom provision.
- Community volunteers work with the police.
- Provide jobs; and
- Fence and guard the pond.
-

9 Comments

- We have high expectation of jobs from the project.
-

6. AREA COUNCILLOR MEETING

Facilitator: Mr. Unopa Sikuku

Discussants: Ketshweleng Galeragwe -Councillor Letlhakane East

Language:

1. Mandate

- Advocate and lobby for developments.
- of information from Government and NGOs.
- Community consultation; and
- Provide feedback and leadership.

2. Enhancement of Mandate

- People living next to the pond has been complaining of smell.
- Pond have been breeding area for malaria; and
- Effluent has been discharged into the river were livestock drink from.

3. Impacts

- Located in the cattle post.
- Cattle straying due to availability of effluent.
- Contamination of boreholes.
- Less of grazing land; and
- Smell.

3.1 Mitigation

- Reuse of effluent after treatment.
- Relocate to another location and be compensated as well; and
- Emanates for industrial waste from abattoir and butchery pre-treatment.

5. Developmental Challenges

- Lack of central sewage system.
- Allocation of plots in Sekwe which have high water table have been frozen; and
- Investment will improve the village.

6. Gender Based Violence

- High cases due to alcoholism and drug abuse; and
- Norms changed due to the modern behaviours.

7. Solution

- Education in charges and school curriculum; and
- Raise the standard of living for P1500 married and P800 unmarried.

8. Rape

- High cases due to alcoholism and drug abuse.

9. Solution

- Educate people; and
- Family rape be reported as soon as possible.

10. Disability

- They are people living with disability.
- No special infrastructure for them.
- They are not catered for.
- No assessment by MOE for at least 5 years now.
- Rehabilitation offices are in the worst condition; and
- Very slow to assess.

11. Sex work

- High numbers due to unemployment and greediness.

11.1 Solution

- Legalise and regulate.

12. Social Challenges

- High numbers of the needy and unemployment.
- Many squatters due to lack of land; and
- High gender-based violence and passion killings.

13. Livelihoods

- Agriculture going up (both arable and small stock); and
- Tourism and mining sector are the main employer.

15. Comments

- Speed up the project.
- Prioritise local recruitment; and buy locally.

7. GABOTSALELWE (DISABILITY ORGANISATION)

Date:

Time:

Facilitator: Mr. Unopa Sikuku

Discussants: Sharp Bosupegeile age 67-chairperson

Language: Setswana

1. Mandate

- Membership of 50 plus people.
- To represent interest of the disabled.
- To look for resources; and
- Only have a plot.

2. Challenges

- Unemployment since they are not preferred.
- Lack of consultation.
- Cannot access office due to unfavourable infrastructures.
- Cannot use public transport.
- Caretakers are not paid anything; and
- Inaccessibility due to unpaved roads.

2.1 Assistance by the Government

- P400 disability allowance.

2.3 Solutions

- Government should know disabled people have the ability.
- Allocate cattle posts, farms and arable land.
- Ministry for the disabled.

- Special classes in schools.
- Hire in none demanding jobs; and
- Need to be involved in decision making.

3. Social Challenges

- We hear they are being sexually abused and/or raped.

4. Planned Projects

- Construction of offices and market for the disabled people.

5. Impacts

- One has a borehole there and is contaminated; and
- Cattle going astray.

6. Comments

- Consultation is key; and
- Contractors should have corporate responsibility and hire the disabled.

8. LETLHAKANE UMBRELLA VDC

Date: 22/February 2021

Time: 0900hrs

Facilitator: Mr. Unopa Sikuku

Name	Surname	VDC Name	Gender	Contact	Marital S	Position
Smally	Ganakgang	Central	F	76289404	-	Chairperson
Tshologetso	Thgokima	East	F	71701371	-	Vice Chair
Shadrek	Teseletso	North	M	71731192	-	Treasurer

1. Mandate

- Overseeing all committees in Letlhakane.
- Composed of VDC chairperson; and
- Meets 4 times in a year.

2. Development

- Hydroponics.
- Machines donated by Mrs Masisi for dress making.
- Overseeing VDCs projects.
- House for rentals (12 by 2 rooms).
- Ploughing fields (size not known); and
- Dumping or recycling area.

3. Expectations

- Job creation and youth employment.
- CSI project on the ploughing field.
- Health capacity and infrastructure development.
- Consultation throughout.
- Subcontract the local companies; and
- Use excess gravel to fill up gullies in the village.

4. Development challenges

- Population high but there is no hospital.
- High unemployment rate and worsened by covid-19.
- No internal roads, police station and storm water drainage.
- Congestion in the 2 junior school due to 5 primary schools; and
- Recreational facilities.

5. Impacts

- Youth employment.
- Market for vendors and catering services.
- Reduction of sanitation cost.
- Irrigated farming.
- Current pond not safe as a child and livestock have drowned; and

- Air pollution by the pond.

5.1 Enhancements

5.1.1 Youth Employment

- Involve village leadership and VDC.
- Unskilled labour to be hired for Kgotla; and
- Subcontracting to local companies.

5.2 Vendors

- Advertise through Kgotla.
- Giving catering contracts to them.
- Ensure workers are pay before they leave.
- Market structures; and
- Women.

5.3 Irrigated farming

7. Impacts

- Leaking pipes.
- Diseases (increase in HIV/AIDS).
- Teenage pregnancy.
- Increase in crime; and
- Increase in gender-based violence and family breakdowns.

8. Mitigation

- Build better pumps and use quality pipes.
- Fencing and guarding to protect livestock.
- Capacitate the hospital.
- Public education (peer educators).
- Condom provision.
- Strengthen neighbourhood watch; and
- Social welfare office.

9. Gender based violence

- Pressure to achieve and lack of proper planning.
- Lack of employment, women empowerment and resources.
- Loss of cultural values; and
- Lack of discipline by today's children leading to lack of respect of spouses.

9.1 Solution

- Use of customary courts to discipline the perpetrators; and
- Justice system on perpetrators.

10. Buuhe situation

- When they relocated for Ditawana, Tsatsing, Makolwane, they were grouped. Their culture is to stay with clans and relatives. They have left their allocated plots to go squat at Sekwe.
- Have no watering points for their livestock.
- Need education (they can refuse Morden housing thinking it's a play to kill them).
- Need school of excellence for their various talents; and
- They don't value education.

11. Comment and advice

- Please assist us develop our prime land.
- Irrigated farms be given a hectare; and
- Reserve quota for certain groups (especially disadvantaged).

12. People with disabilities

- No special classes for them.
- Do not learn appropriately in normal classes.
- Equip one class with infrastructure for them and the Government will provide teachers; and
- Reserve some posts for them such as SHE.

9. AREA COUNCILOR FOR LETLHAKANE

- **Date:**

- **Time:**
- **Facilitator:** Mr. Unopa Sikuku
- **Discussants:** Ntebogang Kgosi/34 years and single

1. Mandate

- Take development policies, goats projects to the people; and
- Taking decisions on behalf of the people.

2. Impacts

- Development of sewage line.
- Using drains that need emptying.
- People will be free to build buildings they want.
- Allowing investment; and
- Reduction of crimes.

3. Developmental challenges

- Investment low due to lack of sewage water.
- Swimming pool.
- Unemployment.
- Improvement in sanitation.
- No hospital.
- Small clinics in many areas; and
- No school in Buuhe.

4. Impacts

- Resettlement compensation not adequate to restore their lives to the previous levels.
- Replacement plots are smaller; and
- Likelihood for relocation of cattle posts and boreholes.

5. Gender based violence issues

- High rates.
- Lack of education on these issues.
- Dependency on men and cohabitation.
- Verbal abuse by women and physical abuse by men; and
- Parents allow their children to cohabit since they also depend on their children for survival.

6. VAC issues

- High rate but not as compared to GBV.
- They attract children with money and cell phones.
- Stepfathers abuse their stepchildren; and
- Basarwa are abused by cattle posts owners.

7. Poverty

- Despite many lives, unemployment is high.
- Most youth are uneducated, and some don't have Omang, therefore, they cannot be employed.
- Youth don't want to work, and Contractors and shops end up bringing their own workers; and
- They hire locals for manual labour.

8. Livelihoods

- Rentals or real estate.
- Cattle posts (meraka).
- Employment at the mines and shops; and
- Arable farming only when owning a borehole.

9. Buuhe

- Dependant on handouts from council.
- Not assertive and can't apply for land and want to be treated differently.
- They want to be treated like RADS, but they are in a planning area.
- Volunteerism very low, they always want to be paid.
- They are uneducated with no qualifications therefore cannot work in the mines; and
- Most of them cannot collect certificates even after completing form 5.

10. Solutions

- Affirmative action on Basarwa to enter schools of high learning.
- Council handouts; and

- Although Basarwa origin they don't qualify for programmes for RADS.

11. Comment and advice

- Hire locally especially from Buuhe area; and
- House crack and relocations should be settled and compensation

10. BOTSWANA KHWEDOM ASSOCIATION

- **Date:** 24 February 2021
- **Time:** 0900hrs
- **Facilitator:** Mr. Unopa Sikuku
- **Discussants:** Banyatsi Salutu-Pro

Pipeline route

1. Impacts

- Irrigated farming for the youth.
- Watering of animals if treated.
- Employment creation for the youth; and
- Market for artefacts.

2. Negative impacts

- Family break downs and splitting for partners.
- HIV/AIDS increases.
- Sex work.
- Eating of livestock and absconding from work; and
- Only old people and the youth are dedicated.

2.1. Enhancement measures

- Reserve land for the youth and the disabled.
- Treated to a required level.
- Will help move livestock from the village.
- Low skilled jobs; and
- Market shelters and increase production.

3. Mitigation

- Camp should be formed.

4. Livelihoods

- Had no lands gathered fruits in different seasons.
- Government did not consult with their representatives for social services; and
- Nomadic lifestyle yet it's not possible in recent times.

5. Achievement

- Just started the project.

6. Planned projects

- Proposal to Anglo-American.
- So, people to be trained in weaving and crafts; and
- Debswana Trust to change BUUHE.

7.1. Membership

- Board is elected; and
- Then 10 subcommittee members.

8. Mandate

- Advocating for San's rights in Botswana.
- Member of ICC international land coalition (Italy).
- IPAAC and UNESCO.
- All Bakhwee are members.
- Land squatting, they were relocated; and
- Council engaging the Government.

9. Concerns

- Bakhwee have no land, but some tribes have many plots.
- Engage us so that we represent our people; and
- All projects we were engaged were successful.

10. Social issues

- Low livelihoods and poverty; and
- Lack of employment and children drop out of schools.

11. Solution

- Have school in Buuhe.

12. Makolwane

- Relocated by Debswana.
 - Need amenities.
 - We're being relocated from Makolwane to Buuhe; and
 - We have stopped that.
-

ANNEX 2: PICTURES OF BUUHE CONSULTATION MEETINGS







ANNEX 3: CONTRACT CLAUSES TO BE INCLUDED IN CONTRACTOR'S AGREEMENTS AND CODE OF CONDUCT

The rules, including specific prohibitions and construction management measures, should be incorporated into all relevant bidding documents, contracts, and work orders.

Prohibitions: The following activities should be prohibited on or near the project site:

- Cutting of trees for any reason outside the approved construction area
- Hunting, fishing, wildlife capture, or plant collection
- Use of unapproved toxic materials
- Disturbance to anything with architectural or historical value
- Setting of fires
- Use of firearms (except authorized security guards)
- Use of alcohol or drugs by workers
- Employment of children in accordance with international law and the Children's Act.

Construction Management Measures:

Waste Management:

- Minimize the production of waste that must be treated or eliminated.
- Identify and classify the type of waste generated. If hazardous wastes are generated, proper procedures must be taken regarding their storage, collection, transportation and disposal.
- Identify and demarcate disposal areas clearly indicating the specific materials that can be deposited in each.
- Control placement of all construction waste (including earth cuts) to approved disposal sites. Dispose in authorized areas all of garbage, metals, used oils, and excess material generated during construction, incorporating recycling systems and the separation of materials.
- Establish and enforce daily site clean-up procedures, including maintenance of adequate disposal facilities for construction debris.

Maintenance:

- Ensure that all equipment maintenance activities, including oil changes, are conducted within demarcated maintenance areas; never dispose spent oils on the ground, in water courses, drainage canals or in sewer systems.
- Identify, demarcate and enforce the use of within-site access routes to limit impact to site vegetation.

Labour Health and Safety:

- Place signs and lighting at strategic locations informing community before works starts.
- Conduct safety training for construction workers prior to beginning work.
- Provide personal protective equipment and clothing (goggles, gloves, respirators, dust masks, hard hats, steel-toed boots etc.,) for construction workers and enforce their use.
- During heavy rains or emergencies of any kind, suspend all work.
- Safely store hazardous items away from the public.
- Educate on risks and prevention of STD/STIs and GBV, SEA, SH AND VAC
- Erect Speed bumps and speed limits.
- Cover up trucks transporting sand and gravel

Community Safety during Construction:

The Contractor's responsibilities include the protection of every person (workers and the public) and nearby property from construction accidents. The Contractor shall be responsible for complying with all national and local safety requirements and any other measures necessary to avoid accidents, including the following:

- Carefully and clearly mark pedestrian-safe access routes.
- If school children are in the vicinity, include traffic safety personnel to direct traffic.
- Keep the public away from construction sites

Nuisance and Dust Control should include:

- Maintain all construction-related traffic at minimum
- Maintain equipment and machinery to reduce noise
- In sensitive areas (including residential neighbourhoods, health centres, schools) more strict measures may need to be implemented to prevent undesirable noise levels, including controlled working times
- Minimize production of dust and particulate materials at all times, to avoid impacts on surrounding families and businesses
- Spray water as needed on dirt roads, cut areas and soil stockpiles or fill material.
- Apply proper measures to minimize disruptions from vibration or noise coming from construction activities.

Community Relations:

To enhance adequate community relations, the Contractor should:

- Inform the population about construction and work schedules, interruption of services, traffic detour routes as appropriate and inform the community about lodging grievances as per the GM.
- Avoid construction activities at night.

Environmental and Social Supervision During Construction

The bidding documents should indicate how compliance with environmental rules and design specifications would be supervised, along with the penalties for noncompliance by contractors or workers. Construction supervision requires oversight of compliance with the ESMP by the contractor or his designated environmental supervisor.

- The "*Codes of Conduct and Action Plan for Implementing ESHS and OHS Standards, and Preventing Gender Based Violence (GBV) and Violence Against Children (VAC)*" should be included in contracts and including procedures for reporting GBV.
- Ensure accuracy of and keep all records of correspondence between the contractors and project supervisors should be included in contracts.
- The bidding documents should all indicate that contractor will familiarize himself/herself with the GM and inform project workers about grievance procedures.

ANNEX 4: CODES OF CONDUCT FOR COMPANY, MANAGERS AND INDIVIDUAL EMPLOYEES

1. Background

The purpose of these *Codes of Conduct and Action Plan for Implementing ESHS and OHS Standards, and Preventing Gender Based Violence (GBV) and Violence Against Children (VAC)* is to introduce a set of key definitions, core Codes of Conduct, and guidelines that:

- i. clearly define obligations on all project staff (including sub-contractors and day workers) with regard to implementing the project's environmental, social, health and safety (ESHS) and occupational health and safety (OHS) requirements, and.
- ii. help prevent, report and address GBV, SEA, SH and VAC within the work site and in its immediate surrounding communities.

The application of these Codes of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV, SEA, SH and VAC on the project and in the local communities.

These Codes of Conduct are to be adopted by those working on the project and are meant to:

- i. create awareness of the ESHS and OHS expectations on the project.
- ii. create common awareness about GBV, SEA, SH and VAC and:
 - (a) ensure a shared understanding that they have no place in the project; and,
 - (b) create a clear system for identifying, responding to, and sanctioning GBV, SEA, SH and VAC incidents.

Ensuring that all project staff understand the values of the project, understand expectations for all employees, and acknowledge the consequences for violations of these values, will help to create smoother, more respectful and productive project implementation thereby helping ensure that the project's objectives will be achieved.

2. Definitions

The following definitions apply:

Environmental, Social, Health and Safety (ESHS): an umbrella term covering issues related to the impact of the project on the environment, communities and workers.

Occupational Health and Safety (OHS): Occupational health and safety is concerned with protecting the safety, health and welfare of people engaged in work or employment. The enjoyment of these standards at the highest levels is a basic human right that should be accessible by each worker.

Gender-Based Violence (GBV): is an umbrella term for any harmful act that is perpetrated against a person's will and **that is based on socially ascribed (i.e., gender) differences between males and females**. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. The term GBV is used to underscore systemic inequality between males and females (which exists in every society in the world) and acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls. The 1993 United Nations Declaration on the Elimination of Violence against Women defines violence against women as "any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women."⁵ The six core types of GBV are:

- **Rape:** non-consensual penetration (however slight) of the vagina, anus or mouth with a penis, other body part, or an object.
- **Sexual Assault:** any form of non-consensual sexual contact that does not result in or include penetration. Examples include attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks.
 - **Sexual Harassment:** is unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts but always involves a power and gender dynamic in which a person in power uses

⁵ It is important to note that women and girls disproportionately experience violence; overall 35 percent of women worldwide have faced physical or sexual violence (WHO, Global and regional estimates of violence against women: prevalence and health effects of intimate partner violence and non-partner sexual violence, 2013). Some men and boys also face violence based on their gender and unequal power relationships.

their position to harass another based on their gender. Sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome (e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts).

- **Sexual Favors:** is a form of sexual harassment and includes making promises of favorable treatment (e.g., promotion) or threats of unfavorable treatment (e.g., loss of job) dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- **Physical Assault:** an act of physical violence that is not sexual in nature. Examples include hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, acid attacks or any other act that *results* in pain, discomfort or injury.
- **Forced Marriage:** the marriage of an individual against her or his will.
- **Denial of Resources, Opportunities or Services:** denial of rightful access to economic resources/assets or livelihood opportunities, education, health or other social services (e.g., a widow prevented from receiving an inheritance, earnings forcibly taken by an intimate partner or family member, a woman prevented from using contraceptives, a girl prevented from attending school, etc.).
- **Psychological / Emotional Abuse:** infliction of mental or emotional pain or injury. Examples include threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, harassment, unwanted attention, remarks, gestures or written words of a sexual and/or menacing nature, destruction of cherished things, etc.

Violence Against Children (VAC): is defined as physical, sexual, emotional and/or psychological harm, neglect or negligent treatment of minor children (i.e., under the age of 18), including exposure to such harm,⁶ that results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. This includes using children for profit, labour⁷, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.

Grooming: are behaviors that make it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualize that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Online Grooming: is the act of sending an electronic message with indecent content to a recipient who the sender believes to be a minor, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Accountability Measures: are the measures put in place to ensure the confidentiality of survivors and to hold contractors, consultants and the client responsible for instituting a fair system of addressing cases of GBV, SEA, SH and VAC.

Contractors Environmental and Social Management Plan (CESMP): the plan prepared by the contractor outlining how they will implement the works activities in accordance with the project's environmental and social management plan (ESMP).

Child: is used interchangeably with the term 'minor' and refers to a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.

Child Protection (CP): is an activity or initiative designed to protect children from any form of harm, particularly arising from VAC.

Consent: is the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

Consultant: is as any firm, company, organization or other institution that has been awarded a contract to provide consulting services to the project, and has hired managers and/or employees to conduct this work.

Contractor: is any firm, company, organization or other institution that has been awarded a contract to conduct infrastructure development works for the project and has hired managers and/or employees to conduct this work.

This also includes sub-contractors hired to undertake activities on behalf of the contractor.

⁶ Exposure to GBV is also considered VAC.

⁷ The employment of children must comply with all relevant local legislation, including labour laws in relation to child labour and World Bank's safeguard policies on child labour and minimum age. They must also be able to meet the project's Occupational Health and Safety competency standards.

Employee: is any individual offering labour to the contractor or consultant within country on or off the work site, under a formal or informal employment contract or arrangement, typically, but not necessarily (e.g., including unpaid interns and volunteers), in exchange for a salary, with no responsibility to manage or supervise other employees.

GBV, SEA, SH and VAC Allegation Procedure: is the prescribed procedure to be followed when reporting incidents of GBV, SEA, SH and VAC.

GBV, SEA, SH and VAC Codes of Conduct: The Codes of Conduct adopted for the project covering the commitment of the company, and the responsibilities of managers and individuals with regards to GBV, SEA, SH and VAC.

GBV, SEA, SH and VAC Compliance Team (GBV SSVCT): a team established by the project to address GBV, SEA, SH and VAC issues.

Grievance Mechanism (GM): is the process established by a project to receive and address complaints.

Manager: is any individual offering labour to the contractor or consultant, on or off the work site, under a formal or informal employment contract and in exchange for a salary, with responsibility to control or direct the activities of a contractor's or consultant's team, unit, division or similar, and to supervise and manage a pre-defined number of employees.

Perpetrator: the person(s) who commit(s) or threaten(s) to commit an act or acts of GBV, SEA, SH and VAC.

Response Protocol: is the mechanisms set in place to respond to cases of GBV, SEA, SH and VAC.

Survivor/Survivors: the person(s) adversely affected by GBV, SEA, SH and VAC. Women, men and children can be survivors of GBV; children can be survivors of VAC.

Work Site: is the area in which infrastructure development works are being conducted, as part of the project. Consulting assignments are considered to have the areas in which they are active as their work sites.

Work Site Surroundings: is the 'Project Area of Influence' which are any area, urban or rural, directly affected by the project, including all human settlements found on it.

3. Codes of Conduct

This chapter presents three Codes of Conduct for use:

- i. **Company Code of Conduct:** Commits the company to addressing GBV, SEA, SH and VAC issues.
- ii. **Manager's Code of Conduct:** Commits managers to implementing the Company Code of Conduct, as well as those signed by individuals; and,
- iii. **Individual Code of Conduct:** Code of Conduct for everyone working on the project, including managers.

Company Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence Against Children

The company is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The company is also committed to creating and maintaining an environment in which gender-based violence (GBV) and violence against children (VAC) have no place, and where they will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives, including sub-contractors and suppliers, without exception:

General

1. The company—and therefore all employees, associates, representatives, sub-contractors and suppliers—commits to complying with all relevant national laws, rules and regulations.
2. The company commits to full implementing its ‘Contractors Environmental and Social Management Plan’ (CESMP).
3. The company commits to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV, SEA, SH and VAC are in violation of this commitment.
4. The company shall ensure that interactions with local community members are done with respect and non-discrimination.
5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and its representatives, including sub-contractors and suppliers.
6. The company will follow all reasonable work instructions (including regarding environmental and social norms).
7. The company will protect and ensure proper use of property (for example, to prohibit theft, carelessness or waste).

Health and Safety

8. The company will ensure that the project’s occupational health and safety (OHS) Management Plan is effectively implemented by company staff, as well as sub-contractors and suppliers.
9. The company will ensure that all person’s on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents and reporting conditions or practices that pose a safety hazard or threaten the environment.
10. The company will:
 - i. prohibit the use of alcohol during work activities.
 - ii. prohibit the use of narcotics or other substances which can impair faculties at all times.
11. The company will ensure that adequate sanitation facilities are available on site and at any worker accommodations provided to those working on the project.

Gender Based Violence and Violence Against Children

12. Acts of GBV, SEA, SH and VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment, and if appropriate referral to the Police for further action.
13. All forms of GBV, SEA, SH and VAC, including grooming are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker’s camps or within the local community.
 - i. Sexual Harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior, is prohibited.
 - ii. Sexual favors —for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior are prohibited.

14. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
15. Unless there is full consent⁸ by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the workplace are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
16. In addition to company sanctions, legal prosecution of those who commit acts of GBV, SEA, SH and VAC will be pursued if appropriate.
17. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and/or VAC by a fellow worker, whether in the same company or not. Reports must be made in accordance with project's GBV, SEA, SH and VAC Allegation Procedures.
18. Managers are required to report and act to address suspected or actual acts of GBV and/or VAC as they have a responsibility to uphold company commitments and hold their direct reports responsible.

Implementation

To ensure that the above principles are implemented effectively the company commits to ensuring that:

19. All managers sign the project's 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.
20. All employees sign the project's 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in GBV, SEA, SH and VAC.
21. Displaying the Company and Individual Codes of Conduct prominently and in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
22. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
23. An appropriate person is nominated as the company's 'Focal Point' for addressing GBV, SEA, SH and VAC issues, including representing the company on the GBV, SEA, SH and VAC Compliance Team (GBV SSVCT) which is comprised of representatives from the client, contractor(s), the supervision consultant, and local service provider(s).
24. Ensuring that an effective GBV, SEA, SH and VAC Action Plan is developed in consultation with the GBV SSVCT which includes as a minimum:
 - i. **GBV, SEA, SH and VAC Allegation Procedure** to report GBV, SEA, SH and VAC issues through the project Grievance Mechanism
 - ii. **Accountability Measures** to protect confidentiality of all involved; and,
 - iii. **Response Protocol** applicable to GBV, SEA, SH and VAC survivors and perpetrators.
25. That the company effectively implements the agreed final GBV, SEA, SH and VAC Action Plan, providing feedback to the GBV SSVCT for improvements and updates as appropriate.
26. All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to ESHS and OHS standards, and the project's GBV, SEA, SH and VAC Codes of Conduct.
27. All employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the GBV, SEA, SH and VAC Code of Conduct.

I do hereby acknowledge that I have read the foregoing Company Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and

⁸ **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

ESHS standards, and to prevent and respond to GBV, SEA, SH and VAC. I understand that any action inconsistent with this Company Code of Conduct or failure to act mandated by this Company Code of Conduct may result in disciplinary action.

Company name: _____

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Manager's Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence Against Children

Managers at all levels have a responsibility to uphold the company's commitment to implementing the ESHS and OHS standards, and preventing and addressing GBV, SEA, SH and VAC. This means that managers have an acute responsibility to create and maintain an environment that respects these standards, and prevents GBV, SEA, SH and VAC. Managers need to support and promote the implementation of the Company Code of Conduct. To that end, managers must adhere to this Manager's Code of Conduct and sign the Individual Code of Conduct. This commits them to supporting the implementation of the CESMP and the OHS Management Plan and developing systems that facilitate the implementation of the GBV, SEA, SH and VAC Action Plan. They need to maintain a safe workplace, as well as a GBV-free and VAC-free environment at the workplace and in the local community. These responsibilities include but are not limited to:

Implementation

1. To ensure maximum effectiveness of the Company and Individual Codes of Conduct:
 - i. Prominently displaying the Company and Individual Codes of Conduct in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
 - ii. Ensuring all posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
2. Verbally and in writing explain the Company and Individual Codes of Conduct to all staff.
3. Ensure that:
 - i. All direct reports sign the 'Individual Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.
 - ii. Staff lists and signed copies of the Individual Code of Conduct are provided to the OHS Manager, the GBV SSVCT, and the client.
 - iii. Participate in training and ensure that staff also participate as outlined below.
 - iv. Put in place a mechanism for staff to:
 - (a) report concerns on ESHS or OHS compliance; and,
 - (b) confidentially report GBV, SEA, SH and VAC incidents through the Grievance Mechanism (GM)
 - v. Staff are encouraged to report suspected or actual ESHS, OHS, GBV, SEA, SH and VAC issues, emphasizing the staff's responsibility to the Company and the country hosting their employment, and emphasizing the respect for confidentiality.
4. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees.
5. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:
 - i. Incorporate the ESHS, OHS, GBV, SEA, SH and VAC Codes of Conduct as an attachment.
 - ii. Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.
 - iii. Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures against GBV, SEA, SH and VAC, to investigate allegations thereof, or to take corrective actions when GBV, SEA, SH and VAC has occurred, shall not only constitute grounds for sanctions and penalties in accordance with the Individual Codes of Conduct but also termination of agreements to work on or supply the project.
6. Provide support and resources to the GBV SSVCT to create and disseminate internal sensitization initiatives through the awareness-raising strategy under the GBV, SEA, SH and VAC Action Plan.
7. Ensure that any GBV, SEA, SH and VAC issue warranting Police action is reported to the Police, the client and the World Bank immediately.
8. Report and act according to the response protocol, any suspected or actual acts of GBV and/or VAC as managers have a responsibility to uphold company commitments and hold their direct reports responsible.
9. Ensure that any major ESHS or OHS incidents are reported to the client and the supervision engineer immediately.

Training

10. The managers are responsible to:
 - i. Ensure that the OHS Management Plan is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,
 - ii. Ensure that staff have a suitable understanding of the CESMP and are trained as appropriate to implement the CESMP requirements.
11. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV, SEA, SH and VAC elements of these Codes of Conduct. This training will be separate from the induction training course required of all employees and will

provide managers with the necessary understanding and technical support needed to begin to develop the GBV, SEA, SH and VAC Action Plan for addressing GBV, SEA, SH and VAC issues.

12. Managers are required to attend and assist with the project facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations, including collecting satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.
13. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:
 - i. OHS and ESHS; and,
 - ii. GBV, SEA, SH and VAC required of all employees.
14. During civil works, ensure that staff attend ongoing OHS and ESHS training, as well as the monthly mandatory refresher training course required of all employees to combat increased risk of GBV, SEA, SH and VAC.

Response

15. Managers will be required to take appropriate actions to address any ESHS or OHS incidents.
16. With regard to GBV, SEA, SH and VAC:
 - i. Provide input to the GBV, SEA, SH and VAC Allegation Procedures and Response Protocol developed by the GBV SSVCT as part of the final cleared GBV, SEA, SH and VAC Action Plan.
 - ii. Once adopted by the Company, managers will uphold the Accountability Measures set forth in the GBV, SEA, SH and VAC Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV, SEA, SH and VAC (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
 - iii. If a manager develops concerns or suspicions regarding any form of GBV, SEA, SH and VAC by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GM.
 - iv. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made
 - v. If a manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify the respective company and the GBV SSVCT. The Company will be required to appoint another manager without a conflict of interest to respond to complaints.
 - vi. Ensure that any GBV, SEA, SH and VAC issue warranting Police action is reported to the Police, the client and the World Bank immediately
17. Managers failing address ESHS or OHS incidents, or failing to report or comply with the GBV, SEA, SH and VAC provisions may be subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:
 - i. Informal warning.
 - ii. Formal warning.
 - iii. Additional Training.
 - iv. Loss of up to one week's salary.
 - v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
 - vi. Termination of employment.
18. Ultimately, failure to effectively respond to ESHS, OHS, GBV, SEA, SH and VAC cases on the work site by the company's managers or CEO may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the foregoing Manager's Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV, SEA, SH and VAC requirements. I understand that any action inconsistent with this Manager's Code of Conduct or failure to act mandated by this Manager's Code of Conduct may result in disciplinary action.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Individual Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence Against Children

I, _____, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important.

The company considers that failure to follow ESHS and OHS standards, or to partake in GBV, SEA, SH and VAC activities—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV, SEA, SH and VAC may be pursued if appropriate.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV, SEA, SH and VAC as requested by my employer.
2. Will wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.
3. Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
4. Implement the OHS Management Plan.
5. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
6. Consent to Police background check.
7. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior (e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.).
10. Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
11. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
12. Unless there is the full consent⁹ by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
13. Consider reporting through the GM or to my manager any suspected or actual GBV, SEA, SH and VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

Regarding children under the age of 18:

14. Wherever possible, ensure that another adult is present when working in the proximity of children.
15. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
16. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
17. Refrain from physical punishment or discipline of children.
18. Refrain from hiring children for domestic or other labour below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.

⁹ **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

19. Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank's safeguard policies on child labour and minimum age.
20. Take appropriate caution when photographing or filming children.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

21. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
22. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
23. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
24. Ensure images are honest representations of the context and the facts.
25. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as GBV, SEA, SH and VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV, SEA, SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

ANNEX 5: GBV, SEA, SH, AND VAC ACTION PLAN

1. The GBV, SEA, SH and VAC Compliance Team

The project shall establish a 'GBV, SEA, SH and VAC Compliance Team' (GBV SSVCT). The GBV SSVCT will include, as appropriate to the project, at least four representatives ('Focal Points') as follows:

- i. A safeguards specialist from the client.
- ii. The occupational health and safety manager from the contractor¹⁰, or someone else tasked with the responsibility for addressing GBV, SEA, SH and VAC with the time and seniority to devote to the position.
- iii. The supervision consultant; and,
- iv. A representative from a local service provider with experience in GBV, SEA, SH and VAC (the 'Service Provider').

It will be the duty of the GBV SSVCT with support from the management of the contractor to inform workers about the activities and responsibilities of the GBV SSVCT. To effectively serve on the GBV SSVCT, members must undergo training by the local service provider prior to the commencement of their assignment to ensure that they are sensitized on GBV and Child Protection.

The GBV SSVCT will be required to:

- i. Approve any changes to the **GBV, SEA, SH and VAC Codes of Conduct** contained in this document, with clearances from the World Bank for any such changes.
- ii. Prepare the **GBV, SEA, SH and VAC Action Plan** reflecting the Codes of Conduct which includes:
 - (a) **GBV, SEA, SH and VAC Allegation Procedures**
 - (b) **Accountability Measures**
 - (c) **An Awareness raising Strategy**
 - (d) **A Response Protocol**
- iii. Obtain approval of the GBV, SEA, SH and VAC Action Plan by the contractor's management.
- iv. Obtain client and World Bank clearances for the GBV, SEA, SH and VAC Action Plan prior to full mobilization.
- v. Receive and monitor resolutions and sanctions regarding complaints received related to GBV, SEA, SH and VAC associated with the project; and,
- vi. Ensure that GBV, SEA, SH and VAC statistics in the GM are up to date and included in the regular project reports.

The GBV SSVCT shall hold quarterly update meetings to discuss ways to strengthen resources and GBV, SEA, SH and VAC support for employees and community members.

2. Making Complaints: GBV, SEA, SH and VAC Allegation Procedures

All staff, volunteers, consultants and sub-contractors are encouraged to report suspected or actual GBV, SEA, SH and VAC cases. Managers are required to report suspected or actual GBV and/or VAC cases as they have responsibilities to uphold company commitments and they hold their direct reports accountable for complying with the Individual Code of Conduct.

The project will provide information to employees and the community on how to report cases of GBV, SEA, SH and VAC Code of Conduct breaches through the Grievance Mechanism (GM). The GBV SSVCT will follow up on cases of GBV, VAC and Code of Conduct breaches reported through the GM.

¹⁰ Where there are multiple contractors working on the project, each shall nominate a representative as appropriate.

3. Addressing Complaints about GBV, SEA, SH and VAC

GM

The project operates a Grievance Mechanism (GM) which is managed by a designated GM operator with the project management unit. Reports of GBV, SEA, SH and VAC, other complaints, or other concerns may be submitted online, via telephone or mail, or in person.

All complaints regarding GBV, SEA, SH and VAC must immediately be reported to the World Bank task team by the GM operator.

The GM operator will refer complaints related to GBV, SEA, SH and VAC to the GBV SSVCT to resolve them. In accordance with the GBV, SEA, SH and VAC Action Plan, the GBV SSVCT through the Service Provider and Focal Point(s) will investigate the complaint and ultimately provide the GM operator with a resolution to the complaint, or the Police if necessary. The victim's confidentiality should also be kept in mind when reporting any incidences to the Police.

The GM operator will, upon resolution, advise the complainant of the outcome, unless it was made anonymously. Complaints made to managers, or the Service Provider will be referred by them to the GM for processing.

If the complaint to the GM is made by a survivor or on behalf of a survivor, the complainant will be directly referred to the service provider to receive support services while the GBV SSVCT investigates the complaint in parallel.

Service Provider

The Service Provider is a local organization which has the experience and ability to support survivors of GBV, SEA, SH and VAC. The client, the contractor(s) and consultant must establish a working relationship with the Service Provider, so that GBV, SEA, SH and VAC cases can safely be referred to them. The Service Provider will also provide support and guidance to the GBV, SEA, SH and VAC Focal Points as necessary. The Service Provider will have a representative on the GBV SSVCT and be involved in resolving complaints related to GBV, SEA, SH and VAC.

GBV SSVCT GBV, SEA, SH and VAC Focal Points

The GBV SSVCT shall confirm that all complaints related to GBV, SEA, SH and VAC have been referred to the World Bank by the GM operator.

The GBV SSVCT shall consider all GBV, SEA, SH and VAC complaints and agree on a plan for resolution. The appropriate

Focal Point will be tasked with implementing the plan (i.e., issues with contractor's staff will be for the contractor to resolve; consultant's staff the consultant; and client staff the client). The Focal Point will advise the GBV SSVCT on resolution, including referral to the Police if necessary. They will be assisted by the Service Provider as appropriate.

All the Focal Points on the GBV SSVCT must be trained and empowered to resolve GBV, SEA, SH and VAC issues. It is essential that all staff of the GM and GBV SSVCT understand the guiding principles and ethical requirement of dealing with survivors of GBV, SEA, SH and VAC. All reports should be kept confidential and referred immediately to the Service Provider represented on the GBV SSVCT¹¹. In GBV, SEA, SH and VAC cases warranting Police action, the Focal Points must appropriately refer the complaint to: (i) the authorities; (ii) the Service Provider; and (iii) management for further action. The client and the World Bank are to be immediately notified.

4. Accountability Measures

All reports of GBV, SEA, SH and VAC shall be handled in a confidential manner to protect the rights of all involved. The client, contractor and consultant must maintain the confidentiality of employees who notify any acts or threats of violence, and of any employees accused of engaging in any acts or threats of violence (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law). The contractor and consultant must prohibit discrimination or adverse action against an employee because of survivor's disclosure, experience or perceived experience of GBV, SEA, SH and VAC.

To ensure that survivors feel confident to disclose their experience of GBV, SEA, SH and VAC, they can report cases of GBV, SEA, SH and VAC through multiple channels: (i) online, (ii) phone, (iii) in-person, (iv) the local service provider, (v) the manager(s), (vi) village councils; or (vii) the Police. To ensure confidentiality, only the service provider will be privy to information regarding the survivor. The GBV SSVCT will be the primary point of contact for information and follow up regarding the perpetrator.

¹¹ Survivors of GBV, SEA, SH and VAC may need access to Police, justice, health, psychosocial, safe shelter and livelihood services to begin on a path of healing from their experience of violence.

5. Monitoring and Evaluation

The GBV SSVCT must monitor the follow up of cases that have been reported and maintain all reported cases in a confidential and secure location. Monitoring must collect the number of cases that have been reported and the share of them that are being managed by Police, NGOs etc.

These statistics shall be reported to the GM and the Supervision Engineer for inclusion in their reporting.

For any GBV, SEA, SH and VAC cases warranting Police action, the client and the World Bank are to be immediately notified.

6. Awareness-raising Strategy

It is important to create an Awareness-Raising Strategy with activities aimed to sensitize employees on GBV, SEA, SH and VAC on the work site and its related risks, provisions of the GBV, SEA, SH and VAC Codes of Conduct, GBV, SEA, SH and VAC Allegation Procedures, Accountability Measures and Response Protocol. The strategy will be accompanied by a timeline, indicating the various sensitization activities through which the strategy will be implemented and the related (expected) delivery dates. Awareness-raising activities should be linked with trainings provided by the Service Provider.

7. Response Protocol

The GBV SSVCT will be responsible for developing a written response¹² protocol to meet the project requirements, in accordance with national laws and protocols. The response protocol must include mechanisms to notify and respond to perpetrators in the workplace (See 4.9 for Perpetrator Policy and Response). The response protocol will include the GM process to ensure competent and confidential response to disclosures of GBV, SEA, SH and VAC. An employee who discloses a case of GBV, SEA, SH and VAC in the workplace shall be referred to the GM for reporting.

8. Survivor Support Measures

It is essential to appropriately respond to the survivor's complaint by respecting the survivor's choices to minimize the potential for re-traumatization and further violence against the survivor. Refer the survivor to the Service Provider to obtain appropriate support services in the community—including medical and psychosocial support, emergency accommodation, security including Police protection and livelihood support—by facilitating contact and coordination with these services. The client, contractor or consultant may, where feasible, provide financial and other supports to survivors of GBV, SEA, SH and VAC for these services.

If the survivor is an employee, to ensure the safety of the survivor, and the workplace in general, the client, contractor, or consultant, in consultation with the survivor, will assess the risk of ongoing abuse to the survivor and in the workplace. Reasonable adjustments will be made to the survivor's work schedule and work environment as deemed necessary. The employer will provide adequate leave to survivors seeking services after experiencing violence.

9. Perpetrator Policy and Response

Encourage and accept notification through the GM from employees and community members about perpetrators in the workplace. Through the GBV SSVCT and/or the Service Provider, oversee the investigation of these grievances, ensuring procedural fairness for the accused, and within the local laws. If an employee has breached the Code of Conduct, the employer will act which could include:

- i. Undertake disciplinary action up in accordance with sanctions in the GBV, SEA, SH and VAC Codes of Conduct.
- ii. Report the perpetrator to the Police as per local legal paradigms; and/or
- iii. If feasible, provide or facilitate counselling for the perpetrator.

10. Sanctions

In accordance with the Code of Conduct, any employee confirmed as a GBV, SEA, SH and VAC perpetrator shall be considered for disciplinary measures in line with sanctions and practices as agreed in the Individual Code of Conduct. It is important to note that, for each case, disciplinary sanctions are intended to be part of a process that is entirely internal to the employer, is placed under the full control and responsibility of its managers and is conducted in accordance with the applicable national labour legislation.

Such process is expected to be fully independent from any official investigation that competent authorities (e.g., Police) may decide to conduct in relationship to the same case, and in accordance with the applicable national law. Similarly, internal

¹² Develop appropriate protocol for written recording of GBV issues and VAC raised in case the notes are subpoenaed. Develop processes for record keeping including activities undertaken by the GBV SSVCT.

disciplinary measures that the employer's managers may decide to enact are meant to be separate from any charges or sanctions that the official investigation may result into (e.g., monetary fines, detention etc.).

Potential Procedures for Addressing GBV, SEA, SH and VAC

Accountability Measures to maintain confidentiality can be achieved through the following actions:

1. Inform all employees that confidentiality of GBV, SEA, SH AND VAC survivors' personal information is of utmost importance.
2. Provide the GBV SSVCT with training on empathetic and non-judgmental listening.
3. Take disciplinary action, including and up to dismissal, against those who breach survivor's confidentiality (this is unless a breach of confidentiality is necessary to protect the survivor or another person from serious harm, or where required by law).

GBV, SEA, SH and VAC Allegation Procedures should specify:

1. Who survivors can seek information and assistance from.
2. The process for community members and employees to lodge a complaint through the GM should there be alleged GBV, SEA, SH and VAC.
3. The mechanism for how community members and employees can escalate a request for support or notification of violence if the process for reporting is ineffective due to unavailability or non-responsiveness, or if the employee's concern is not resolved.

Financial and Other Supports to survivors can include:

1. Direct payment of medical costs.
2. Coverage of all medical costs related specifically to the incident.
3. Upfront payments for medical costs to later be recouped from the employee's health insurance.
4. Providing or facilitating access to childcare.
5. Providing security upgrades to the employee's home.
6. Providing safe transportation to access support services or to and from accommodation.

Based on the rights, needs and wishes of the survivor, survivor support measures to ensure the safety of the survivor who is an employee can include¹³:

1. Changing the perpetrator or survivor's span of hours or pattern of hours and/or shift patterns.
2. Redesigning or changing the perpetrator or survivor's duties.
3. Changing the survivor's telephone number or email address to avoid harassing contact.
4. Relocating the survivor or perpetrator to another work site/ alternative premises.
5. Providing safe transportation to and from work for a specified period.
6. Supporting the survivor to apply for an Interim Protection Order or referring them to appropriate support.
7. Taking any other appropriate measures including those available under existing provisions for family friendly and flexible work arrangements.

Leave options for survivors that are employees can include:

1. An employee experiencing GBV should be able to request paid special leave to attend medical or psychosocial appointments, legal proceedings, relocation to safe accommodation and other activities related to GBV.
2. An employee who supports a person experiencing GBV, SEA, SH and VAC may take care givers leave, including but not limited to accompanying them to court or hospital, or to take care of children.
3. Employees who are employed in a casual capacity may request unpaid special leave or unpaid care givers leave to undertake the activities described above.
4. The amount of leave provided will be determined by the individual's situation through consultations with the employee, the management and the GBV SSVCT where appropriate.

Potential Sanctions to employees who are perpetrators of GBV, SEA, SH and VAC include:

1. Informal warning

¹³ It is critical that a survivor centered approach be adopted. The survivor should be fully involved in the decision making. Except for exceptional circumstances the perpetrator should be required to take appropriate actions to accommodate the survivor (e.g., move, change hours, etc.), rather than the survivor changing.

2. Formal warning
3. Additional Training
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment. Referral to the Police or other authorities as warranted.

ANNEX 7: CHANCE FINDS PROCEDURES

Chance find procedures are in integral part of the project ESMP and civil works contracts.

The project will include a chance finds procedure.

If the Contractor discovers archaeological sites, historical sites, remains and objects, including graveyards and/or individual graves during excavation or construction, the steps to be followed are the Contractor shall:

1. Stop the construction activities in the area of the chance find;
2. Delineate the discovered site or area;
3. Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be arranged until the responsible local authorities - Department of National Museum and Monuments take over;
4. Notify the supervisor, Project Environmental Officer, and Archeological Officer and Project Engineer who in turn will notify the responsible local authorities (Kgosi), the Botswana Police and the Department of National Museum and Monuments immediately (within 24 hours or less);
5. Responsible local authorities, the Botswana Police and the Department of National Museum and Monuments would then be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologist of the project. The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage, namely the aesthetic, historic, scientific or research, social and economic values.
6. Decision on how to handle the find shall be taken by the responsible authorities - the Department of National Museum and Monuments. This could include conservation, preservation, restoration and salvage.
7. Implementation for the authority decision concerning the management of the finding shall be communicated in writing by relevant local authorities.
8. Construction work may resume only after permission is given from the Department of National Museum and Monuments or delegated authority concerning safeguard of the heritage.