

**THE EUROPEAN UNION EMERGENCY TRUST FUND FOR STABILITY AND  
ADDRESSING THE ROOT CAUSES OF IRREGULAR MIGRATION AND  
DISPLACED PERSONS IN AFRICA**

**Action Document for the implementation of the Horn of Africa Window  
T05-EUTF-HOA-UG-68**

**1. IDENTIFICATION**

Title	<b>Security, Protection and Economic Empowerment (SUPREME) in Uganda</b>		
Total cost	Total estimated cost: EUR 18 000 000 Total amount drawn from the Trust Fund: EUR 18 000 000		
Aid method/ Method of implementation	<i>Component 1:</i> Justice/Rule of Law: Direct grant to Justice, Law and Order Sector (JLOS); grant(s) through a restricted call for proposals and/or contribution agreement <i>Component 2:</i> livelihood: grant (Consortium with at least one local actor through a restricted call for proposals)		
DAC-code	150	Sector	Government and civil society
Derogations, prior approvals, exceptions authorised	Direct awards may be granted after due prior approval (prior approval 20.a)		

**2. RATIONALE AND CONTEXT**

**2.1. Summary of the action and its objectives**

The action aligns with **Strategic Objectives 1, 2, and 4** of the EUTF, **Priority Domains 1 and 3 of the Valetta Action Plan**, and **Sustainable Development Goals 8, 10, and 16**. It aims to support Uganda in the implementation of the Comprehensive Refugee Response Framework (CRRF) objectives and further development of an integrated and development-led approach to refugees hosting areas supporting both refugee and host populations.

The **overall objective** of the action is to improve overall safety and economic well-being for refugees and host communities in Northern Uganda.

The **intervention logic** of this programme is that strengthening access to justice, peaceful conflict resolution and the rule of law will have both a direct impact on people's overall safety and protection as well as support an environment conducive to enhancing economic opportunities of refugees and host communities through measures supporting financial inclusion, public private partnerships and overall livelihood support. In doing so, people will be able to enhance their material situation to their own benefit and the wider development of the refugee hosting regions. The action is fully in line with the agreed objectives outlined in the CRRF roadmap for Uganda and the European Union Humanitarian and Development Nexus Action Plan for Uganda.

**2.2. Context**

### 2.2.1. Country/regional context

Uganda plays a pivotal role in the stability and development in East Africa. Following a period of turbulence in the first decades after independence, and drawn out civil conflict in the North of the country, Uganda is today a stable country that has the potential to develop into a robust growth economy. However, sources of potential fragility exist and key challenges include high population growth, youth unemployment and related lack of economic opportunities and rising inequality. Fragility is also deeply connected to continuing regional instability. Uganda, a country with a population of approximately 42 million, has a long history of hosting refugees and asylum seekers. Today, a record 4 million refugees live in the wider region of the Horn and East Africa, one fifth of the global total. Since fighting renewed in South Sudan in mid-2016, Uganda has quickly become the largest refugee hosting country in Africa, hosting more than 1,1 million refugees, including half of the total South Sudanese caseload as well as refugees from the Democratic Republic of Congo, Burundi and Somalia.<sup>1</sup>

### 2.2.2. Sector context: policies and challenges

While the influx of South Sudanese into Uganda has stabilised during 2018 and remains at around 100 people per day, the re-emergency of political strife and ongoing fighting in the Eastern regions of the Democratic Republic of Congo resulted in a rapid influx of Congolese, with more than 90 000 having arrived since 1 January 2018. According to UNHCR contingency planning, up to 350 000 additional refugees could arrive by the end of 2018.<sup>2</sup> While the worst case scenario has not yet materialised, the evolution of the political and security context in the Democratic Republic of Congo can rapidly evolve in unprecedented numbers of new arrivals (especially factoring in planned presidential elections in December 2018).

Despite daily arrivals of refugees from South Sudan for more than 2 years, Uganda has kept its borders open and maintained freedom of movement as well as its agricultural refugee-settlement approach, around which humanitarian and increasingly additional development assistance are centred. Host communities and District Local Governments are at the frontline of the country's refugee response that includes a perpetual cycle of emergency response to urgent needs as well as the need to address a growing protracted refugee situation in the medium to long-term.

**Many refugee-impacted areas are located in the poorest districts** in Uganda. The poverty level in West Nile Sub-region stands at 27.2 percent, with an observed national increase in poverty levels from 23 percent (2012/13) to 36 percent (2016/17) of those mostly engaged in subsistence crop production as their main source of income.<sup>3</sup> Uganda has one of the youngest populations in the world.

Refugee-hosting districts are now recognised under the vulnerability criteria of Uganda's second **National Development Plan 2015/16-2019/20 (NDP II)**, prioritising them for development interventions. The **Justice, Law and Order Sector (JLOS)** is charged with the mandate of providing safety of the person, security of property, observance of human rights and access to justice to accelerate growth, employment and prosperity and is a key enabling sector under the NDP II and recognised as essential to provide a conducive environment and framework for the efficient performance of all other sectors. JLOS, with an established technical assistance

---

<sup>1</sup> A verification exercise, conducted by UNHCR and Government of Uganda, finalised its results in October 2018. According to the findings from the exercise which ran in the period of March - October 2018, close to 1.1 million refugees were verified and biometrically enrolled from the target population of 1.4 million refugees. This represents 75% of the population that had sought asylum in Uganda prior to the verification start date in March 2018.

<sup>2</sup> UNHCR, *Uganda Refugee Response –DRC Situation*, 8 June 2018.

<sup>3</sup> Uganda Bureau of Statistics, Presentation on Uganda National Household Survey (2017), 26 September 2017.

secretariat, provides a platform for a holistic approach to improving access to and administration of justice through the sector wide approach (SWAP) to planning, budgeting, programme implementation, monitoring and evaluation. The JLOS Strategic Development Plan IV (SDP IV) recognises the need to strengthen measures to address justice needs of refugees and host communities. Under the leadership of Line Ministries, and with support from the CRRF Secretariat, refugee-response sector plans are currently being developed, including on livelihoods.<sup>4</sup> These plans should serve as 'entry points' for development actors and, ultimately, be integrated in the Uganda NDP III (2020-2025).

Key relevant policy developments over the past years include the Ugandan pledges at the Leaders' summit that followed the adoption of the **New York Declaration on Refugees and Migrants** and its Annex 1, the **Comprehensive Refugee Response Framework** in September 2016 in New York. Uganda's commitments were: 1) to continue its rural settlement approach, 2) to provide access to education and formal employment to some 120,000 newly arrived refugees in 2016, and 3) to sustain and work on the Refugee and Host Population Empowerment (ReHoPE) framework. Uganda also participated in the **IGAD Special Summit on Durable Solutions for Somali Refugees and Reintegration of Returnees in Somalia** on 25 March 2017, where Heads of State of the IGAD member states adopted the Nairobi Declaration, committing to maintain an open-door policy for refugees and asylum seekers, expand opportunities for local integration of individual refugees, create an enabling business environment and to increase economic opportunities for refugees and host communities. The Nairobi Declaration and Plan of Action agreed at the Summit are being rolled out across the region as the regional application of the CRRF.

At national level, and building on the above, the country's CRRF road map provides a guiding document for in-country coordination and priority-setting. The EU strongly supports Uganda's roll out of the CRRF and plays a pro-active role in its implementation. To support the CRRF and increase the effectiveness of the EU's contribution, the EU has developed an **Action Plan** operationalising the humanitarian, development and peace nexus across the EU policies and instruments in Uganda.<sup>5</sup> The Plan contains thematic priorities and suggested interventions based on a nexus workshop held in Kampala in April 2018 together with the EU Member States and partners.

Despite progress on the policy side, a number of fundamental challenges remain. **One is a gap in the inclusion of refugees in formal and informal justice structures.** Most of the support within the refugee response, in particular through the humanitarian assistance, has so far been addressing immediate needs. Only limited efforts have been made to date to comprehensively address the justice challenges both refugees and host communities face.<sup>6</sup> This underlines the need for increased support to meet justice needs in the region without which social cohesion could be undermined in the long run.

Indeed, the JLOS SDP IV highlights the challenges faced by refugees in accessing justice. These include language barriers, absence of suitable persons to stand surety, lack of knowledge of the laws and procedures and lack of means to secure legal representation. It advocates for meeting

---

<sup>4</sup> At various stages: Education Response Plan (launched on 14<sup>th</sup> of September 2018), Water/environment (6-months consultancy to develop this sector plan starts by the end of 2018), WASH (not yet finalised), livelihoods (initial stage).

<sup>5</sup> On 11 September 2017, EU Ministers requested the operationalisation of the humanitarian-development-peace nexus in Uganda, as one of six pilot countries. Other pilots are Chad, Iraq, Myanmar, Nigeria, Sudan. Initially, Uganda was the only country, which was a pilot for both the CRRF and the EU Nexus process with Member States (MS) until recently, when Chad also became pilot for both.

<sup>6</sup> Background Document prepared for the Humanitarian – Development Nexus Workshop in Uganda (April 2018); also an outcome from sector working group sessions with EU MS and EU services at the Nexus workshop.

specific needs of refugees, as well as the need for robust structures to address conflict within the settlements and with neighbouring host communities. In its monthly 'Protection updates'<sup>7</sup>, UNHCR identified a range of challenges. It stated that corruption, bureaucratic tendencies within the police and judiciary, mismanagement of case files, poor investigative capacities resulting from inadequate facilitation and shortages of personnel were some of the challenges facing the formal justice mechanisms, and that child protection structures are weak.

As a consequence, the local and institutional capacities are overstretched with refugees' justice needs significantly unmet and Sexual and Gender Based Violence (SGBV) prevention and response inadequately addressed. Furthermore, the updates noted that while the communities continue to demonstrate a preference for traditional justice systems, the role of community structures was hampered by limited incentives and support. Although legal aid, a key element of access to justice, can ameliorate some of the challenges, it is currently largely limited to basic legal assistance only to persons charged with capital offences. The JLOS supported pilot legal aid Justice Centres (JCs) lie outside the refugees hosting districts in Northern Uganda and efforts by JCs and some legal aid service providers to expand to these districts have been hampered by financial constraints.

**Lack of access to economic opportunities remains one of the key challenges** for both refugee and host communities. In a comprehensive 2017 study of Uganda's refugee settlements, 32,7% of responders reported engaging in no specific economic activity. This is often due to insufficient education and vocational training, limited access to land and markets, or the lack of tools and resources for restarting economic activity.<sup>8</sup> Women in particular face challenges in accessing capital and financial services. Unemployment is not only widespread among refugees. Ugandan nationals themselves are severely affected by under- and unemployment (48% with only 7.9 million people employed<sup>9</sup>). The refugee hosting districts in Northern Uganda are especially affected, as they are among the least developed and most remote districts in Uganda.

The refugee-hosting districts are also characterised by **increased pressure on limited natural resources** and lack of value addition to agricultural produce. A large majority of the economically active population is involved in farming, of which 86.1% is for subsistence<sup>10</sup>. However, agricultural activity is severely impaired by limited access to water, land and skills deficit for production. It is widely acknowledged that off-farming activities need more support and are key to achieving a long-term resilience given the limitations in subsistence farming. Additionally, many refugees have never worked in the farming sector, and are in need of alternative income generating opportunities.

There is a severe shortage of **business support services for non-agricultural livelihoods**. A recent market assessment indicates only 2% of refugees are employed in the formal sector, and an overall unemployment rate of 70% among youth.<sup>11</sup> This high unemployment rate has been attributed to redundant skills that are not relevant to the needs of the labour market, with less than 5% of refugees having the relevant skills needed to take advantage of economic activities in their new environment. There is a need for financial, entrepreneurship and life-skills training that will equip, upgrade and adapt beneficiaries' skills to better match possible economic and livelihood opportunities. The refugee influx into West Nile has increased pressure on existing

---

<sup>7</sup> Community Based Protection, September 2018; Urban Protection Response, January – September 2018; Legal and Physical Protection, September 2018; Sexual and Gender Based Violence, September 2018; and, Child Protection Thematic Report, September 2018.

<sup>8</sup> UNHCR: *Livelihood Socioeconomic Assessment in the Refugee Hosting Districts*, February 2017, pp. 16.

<sup>9</sup> Uganda Bureau of Statistics (UBOS), 2017.

<sup>10</sup> NRC, *Labour Market Assessment*, May 2018.

<sup>11</sup> *Market Analysis and Livelihoods Capacity Assessment*, International Rescue Committee, April 2017.

resources and exacerbated the shortage of services. This has heightened tensions between refugees and host communities.

### 2.3. Lessons learnt

A number of issues directly linked to both current responses as well as the wider strategic planning of the CRRF in Uganda underline the need to increase attention to conflict, justice and security issues. Existing baseline assessments of justice and rule of law challenges for refugees in South-Western Uganda<sup>12</sup> highlight many of the challenges also experienced in the North, including lack of legal awareness and legal services in general, the importance of informal justice structures and the overall minimal presence of police and justice structures. For example, the increasing distance refugees have to walk to their allocated lands also increases demands for security; and the increasing stress on natural resources means that more attention needs to be given to conflict-prevention over natural resources. The US State Department has noted that South Sudanese children in refugee settlements in northern Uganda are vulnerable to trafficking.<sup>13</sup>

It is important in Uganda to engage with the hybrid justice and dispute resolution mechanism in the country: The majority of people in Uganda use Local Council Courts (LCCs) and other informal justice and dispute resolution mechanisms.<sup>14</sup> This was confirmed in the Hague Institute for Innovation of Law (HiiL) study on Justice Needs in Uganda (2016) which confirmed that the LCCs, particularly at the lowest level (LC1), hold an important place in Uganda's justice system and are the most widely used institution for dispute resolution.<sup>15</sup> In a later report by HiiL on family justice (2017), it was noted that the majority of Ugandans (almost 65%) have trust in their local traditional mechanisms to resolve disputes - the level of trust in the informal system being superior to that in formal courts (42%) or the police (41%). The findings were also consistent with those of the Refugee Law Project's study on informal justice structures in refugee settlements in Uganda (2016).

A study by the Norwegian Refugee Council (NRC), drawing lessons from Uganda's former displacement situation, has recommended strengthening support to housing, land and property rights to foster self-reliance, promote harmony between host communities and refugees as well as improve tenure security and livelihoods for refugees.<sup>16</sup>

Key findings of a 2018 political economy and conflict analysis of Bidibidi settlement in Yumbe include the important role of ongoing, but insufficiently supported dialogue mechanism to manage and avoid conflicts over resources in an environment of scarcity. The report also highlighted significant gaps in formal adjudication and dispute resolution mechanism. It especially pointed to the particular difficulties of women to access mechanisms dominated by men in a context where many issues requiring adjudication disproportionately affect women. It noted the need to sensitise and educate refugees to their new legal environment.<sup>17</sup>

---

<sup>12</sup> *Baseline Survey Report on Access to Justice for Forced Migrants*, Refugee Law Project, June 2013.

<sup>13</sup> *2016 Report on Trafficking in Persons*, US Department of State, 2016.

<sup>14</sup> Formal justice system or mechanisms refers to dispute resolution processes with clearly defined structures, written procedures and enforcement institutions e.g. courts, police, judges and prisons backed by law and the state whereas informal justice mechanisms e.g. traditional, tribal, and religious courts, and community-based systems usually apply unwritten norms or customs, on the basis of unwritten procedures.

<sup>15</sup> *Justice Needs in Uganda*, HiiL, 2016.

<sup>16</sup> *Living on the Edge: Housing, Land and Property Rights of Refugees in Uganda*, NRC, October 2018 (Draft).

<sup>17</sup> *Contested Refuge: Political Economy and Conflict Dynamics in Bidibidi refugee settlement*. Danish Refugee Council with support from the EUTF in Uganda, October 2018.

The JLOS through the SWAP has been instrumental and widely acclaimed for providing a holistic framework for improved coordination and institutional collaboration, policy coherence and joint planning and budgeting. Nevertheless, the formal justice system remains weak, and is notoriously expensive, complicated and cumbersome. The system is characterised by lengthy delays and huge backlog in the different justice institutions as a result of resource constraints and inefficiencies within the justice chain. This situation is exacerbated in the often poorer refugee hosting regions. JLOS has adopted a number of initiatives and strategies to tackle impediments to access to justice. These include encouraging the use of Alternative Dispute Resolution mechanisms (ADR) and reaffirming the role of Local Council Courts as the most favoured avenue for dispute resolution, implementing plea bargain, increasing physical presence of JLOS frontline institutions and one-stop service points and piloting the mobile courts system. In some of the refugee hosting districts, non-state actors have complemented the role of JLOS by providing critical legal aid and protection interventions but these too have been limited in scope. More support is warranted.

A further key lesson is that demand for local economic empowerment also increases demand for effective justice delivery and dispute resolution. This was confirmed in a recent study done by the Regional Durable Solutions Secretariat (ReDSS) which further concluded that focusing on productive capacities of refugees needs to go hand in hand with addressing political and legal barriers they face. Ultimately, an effective justice system is required to ensure the personal safety and security of property and allow the population to fully enjoy services or infrastructure, which are all vital for most productive activities, investment and planning. Indeed, JLOS SDP IV recognises that increasing the impact of efficient and effective justice delivery is fundamental for poverty reduction and economic development and growth. Furthermore, a just and safe environment in which voices are being heard, rights granted and mutual obligations honoured, diminishes the likelihood of individuals to resort to conflict and violence and, in combination with measures like economic empowerment and others, reduces the risk to fall prey to extremism. Both suggested components, individually and in their complementarity, are thus a concrete contribution to preventing violent extremism.

A further key lesson identified has been that limited prioritisation of livelihoods at the early stages of the emergency is difficult to compensate for at later stages. Often, funding is solely short-term and focused on immediate life-saving activities and serious gaps remain in the area of economic self-reliance and resilience of refugee and host communities.

Existing engagement in the livelihood sector has highlighted the problems associated with limited access to financial opportunities for vulnerable communities, including refugees. Limited access to formal and informal financial services constrains the capacity of refugees and the host communities to interact with the market, a factor that is further amplified by the location of the settlements, which are often located in remote areas. The latest conflict analysis study published by the Danish Refugee Council (DRC) through the EUTF Support programme for Refugee Settlements in Northern Uganda (SPRS-NU) programme in Uganda (October 2018) highlights very clearly that interpersonal interactions at the market or other informal gatherings are the foundation for increasing links between the communities.<sup>18</sup> Therefore, markets are not only important for livelihoods, but also for bridging divides.

Another study, this time by the ReDSS and commissioned by the EUTF in Uganda, concludes that supporting economic empowerment is also important in order to mitigate conflicts in the long term. As it states, there is a predominance of agricultural support in the settlements which,

---

<sup>18</sup> *Contested Refuge: Political Economy and Conflict Dynamics in Bidbidi refugee settlement*. Danish Refugee Council with support from the EUTF in Uganda, October 2018.

in the absence of sufficient productive land, is not leading to sustainable livelihoods. As a result, the absence of off-farming opportunities undermines an overall integration of refugees.<sup>19</sup>

## 2.4. Complementary actions

A large number of programmes already target refugees and host communities and provide support to CRRF objectives in Uganda. This programme will aim for complementarity with priorities as identified in the humanitarian and development Nexus Action plan for Uganda. A strong focus will be given to complementarity with ongoing and planned programmes under ECHO (including reflection on Humanitarian Implementation Plan 2019) and EU MS funding.

**Netherlands** are providing targeted programme support to the JLOS SWAP Development fund and complementing this with a project (EUR 2.3M, ending 04/2019) implemented by the Refugee Law Project (RLP) to enhance the protection, well-being and dignity of South Sudanese refugees and their hosts in Adjumani, Kiryandongo and Lamwo districts.

**UNDP** is currently conducting an assessment of rule of law, access to justice and security needs in refugee hosting districts (Isingiro and Arua districts) to provide the basis for a pilot project to respond to the identified needs.

**UNHCR** through a network of partners, is supporting protection interventions in settlements countrywide. The interventions include detention monitoring, legal assistance and access to legal remedies, mobile court sessions and community policing.

**Sweden** plans to support a Community Justice Programme, an approximately EUR 15M and 5 year action expected to commence before the end of 2018 and to be implemented by the International Development and Law Organisation (IDLO). The program focuses on legally-empowering grassroots communities and enhancing the capacity of duty bearers within the JLOS at the community level to provide the most vulnerable and marginalised citizens with quality legal knowledge, legal aid and other justice services to uphold their basic rights, challenge their grievances in an equitable manner, and obtain effective justice remedy and reparation or compensation from both formal and informal justice mechanisms.

Interventions under the **Democratic Governance Facility**, a multi-donor and country-wide funded programme interventions target protection of human rights, access to justice and gender equality.

Interventions under the **Development Response to Displacement Impact Project (DRDIP)**, a Government of Uganda 5-year programme, starting in 2018, with USD 50 million support from the World Bank under the International Development Association 18 (IDA-18), target 3 priorities (1): Infrastructure; (2) environment restoration and access to alternative energy; (3) support to livelihood. This programme targets 11 districts (Arua, Adjumani, Yumbe, Koboko, Moyo, Lamwo, Hoima, Kamwenge, Isingiro, Kiryadongo and Kyegegwa).

The **European Union** is supporting several relevant initiatives: In the Justice and Accountability Sector Reform Performance Contract (JAR SRPC), access to state funded legal aid and increase in the proportion of districts with frontline JLOS services are performance indicators. As JAR SRPC funds are not earmarked, the proposed interventions are expected to indirectly reinforce the attainment of the relevant indicators in the targeted locations. In addition, the EU is supporting the Development Initiative for the Northern Uganda (DINU), a EUR 150 million

---

<sup>19</sup> *Are Integrated Services a step towards integration?*, pp. 28, ReDSS study, supported through the EUTF SPRS-NU in Uganda (draft).

integrated programme under the 11<sup>th</sup> EDF which is targeting Northern Uganda. The SUPREME programme will complement the DINU activities in the refugee-hosting districts in Northern Uganda, primarily related to value chains (Yumbe, Adjumani, Moyo districts) and land conflict (Moyo district). The SUPREME programme activities will also reflect on the Jobs & Growth Compact for Uganda, with improved business environment (livelihood component) and investment climate (justice component).

Links will be created with already existing **EUTF programmes in Uganda**. The EUR 20 000 000 **EUTF Support programme for Refugee Settlements in Northern Uganda (SPRS-NU)**, ongoing in Adjumani, Kiryandongo, Arua and Yumbe districts, has some relevant components, including (1) increasing access to quality skills development through training, scholarships and entrepreneurial skills and start up kits (implemented by Enabel); and (2) livelihoods interventions and conflict prevention management (under the Danish Refugee Council's lead of an NGO Consortium). Links will also be created with the **Response to increased demand on Government Service and creation of economic opportunities in Uganda (RISE)** programme. This programme is starting in 2018, and focuses, among others, on increasing financial inclusion of refugees and host population, improving local processing of agricultural products and market access, access to private jobs, and value chains and market linkages. The SUPREME programme will build on experiences and lessons learned from the SPRS-NU activities (e.g. associated studies and assessments, Mid-Term Reviews, narrative reports), as well as initial phases of the RISE programme, to ensure multiplication effects of the interventions.

#### **2.4.1. Justification for use of EUTF Africa funds for this action**

The European Union has undertaken a clear commitment to support the implementation of the CRRF and to support countries hosting large numbers of refugees. The hosting of refugees can be an additional burden for governments and poses severe challenges to the delivery of public services. The EUTF has been the key instrument in providing a quick and targeted support to the ongoing challenges and in support of CRRF objectives in Uganda. The EUTF Board confirmed the focus on refugee management in its latest meeting in September 2018.

**The European Union Delegation is well placed to intervene in the outlined areas.** Legal inclusion of refugees and strengthening economic environments were clearly identified during the Nexus process for further interventions. The sector budget support programme 'JAR' targeting the accountability and JLOS sectors started in 2017, hence the EU Delegation has knowledge of the sector. Under the Nexus Action Plan, the EU Delegation further leads on coordinating the EU and Member States work under one of the identified areas "Vulnerable population, including refugees and host communities, has access to increased livelihood opportunities".

#### **2.5. Donor co-ordination**

The overall coordination of the CRRF is ensured through the CRRF Steering Group, chaired by the Government, which represents the views of key stakeholders involved in the refugee response. The strategic directions will be reflected in the implementation of this programme. More precisely on the coordination mechanisms:

(1) The CRRF Steering Group sets the overall strategic direction for the implementation of CRRF in Uganda, supported by the technical and analytical work of the CRRF Secretariat. The Steering Group is the policy and decision-making platform providing donors' key strategic directions on implementation.



2) The Government of Uganda – with support from the CRRF Secretariat – is now developing Refugee Response Plans across various sectors (Health/environment, Education, livelihoods, WASH). These sector plans, currently at different stages of development, will allow for better alignment of donors with the overall developmental objectives of the Government of Uganda.

(3) Under the leadership of the EU Delegation and in light of the recently validated Nexus Action Plan, EU Heads of Cooperation regularly meet and exchange information on programming and projects, lessons learnt and planned actions.

### **3. DETAILED DESCRIPTION**

#### **3.1. Objectives**

The **overall objective** is to improve overall safety and economic well-being for refugees and host communities in Northern Uganda.

- **Specific Objective 1:** *Peaceful and safe co-existence under the rule of law within the refugee-hosting districts*
- **Specific Objective 2:** *Access to decent employment and increase of economic opportunities for refugees and host communities*

Beneficiaries will be selected through vulnerability and capacity assessment approaches, reflecting on the agreed Nexus steps forwards and the overall CRRF process in Uganda.

#### **3.2. Expected results and main activities**

##### **Expected results under objective 1:**

1. Strengthened capacities of formal and informal justice actors for coverage of additional population and response to specific needs and vulnerabilities of refugees
2. Strengthened capacities and knowledge of refugees and host communities to access their rights and fulfil their legal obligations
3. Increased support to refugee and host communities to peacefully resolve conflicts, have access to justice, be protected from infringements of legal and human rights

##### *Indicative activities:*

1. Increase access to justice through, inter alia, expansion of legal aid and counselling services and mobile courts, paralegal services, translation services, training and support for duty bearers with a specific focus on gender
2. Promote participation and/or inclusion of refugees and hosts challenges in accessing JLOS services e.g. through strengthening the role and effectiveness of the District Chain-linked Committees in planning and monitoring of JLOS service delivery and targets
2. Increase access to information on rights and duties, the peace process, peaceful co-existence, legal or JLOS services, official/civil or legal documentation through innovative communication tools and media ; Support civic or peace education, including in schools, settlements; promote social cohesion, and support to anti-discrimination campaigns
3. Strengthen the sexual and gender based violence prevention, response/support and coordination structures including expansion of specialised services and support a holistic response including establishment of female-to-female reporting, medico-legal response, psychosocial support and baseline assessments
4. Enhance access to community, local and national protection mechanisms (information campaigns and strengthened linkages to communities' own protection structures) ; Support

initiatives aimed at increasing physical protection and reducing incidents of crime e.g. community policing ; Strengthen child and family protection structures and services including community based child-protection groups

5. Strengthen community, informal and collaborative or alternative conflict resolution mechanisms and structures

### **Expected Results under objective 2:**

1. Strengthened capacities and skills of displaced persons and host communities to engage in productive activities
2. Increased access to employment and private sector jobs
3. Strengthened value chains with a larger indirect and positive benefit for employment

### *Indicative Activities*

1. Conduct a comprehensive market and investment analysis
2. Provide market-oriented and demand driven skills training, with specific focus on gender-sensitive approaches and engagement of female-headed households
3. Support the provision of trainee- and internships in the private sector in rural and urban areas and link with ongoing Technical and Vocational Education and Training activities under other EUTF programmes
4. Promote targeted enterprise development activities and support entrepreneurship and financial inclusion especially in agro-processing and off-farm livelihood options (e.g. use of challenge grant mechanism, promote the use of mobile money transfer tools)
5. Support green entrepreneurship with smart natural resource management (e.g. re-planting schemes)
6. Establish private-public partnership platforms in relevant value-chains

### **3.3. Risks and assumptions**

A key assumption is that the Government remains committed to its pledges made at the New York Summit and the implementation of the Nairobi Declaration and Plan of Action. It is assumed to largely maintain the current policies towards the refugees and asylum seekers and to continue to support the CRRF implementation with increasing ownership and integration into the national development plans. In doing so, the Government will ensure a balanced support between refugees and host communities. The political situation is assumed to remain stable and no major conflict, extreme weather event, or epidemics will occur during its lifespan.

<b>Risks</b>	<b>Level</b>	<b>Mitigation measures</b>
Social unrest, conflicts, and competition over limited resources may reduce the ability of the Government of Uganda to sustain the current model.	Medium	The EU will continue to engage with GoU and other stakeholders within the framework of CRRF for coordinating and improving the refugee-response and in ensuring CRRF objectives are integrated in the NDPs.
Unwillingness of OPM and line ministries to develop and implemented refugee response sector plans	Low	The EU will support and advocate for development of the sector plans and integration in the long-term policies of the Government of Uganda.
The space for civil society and non-	Medium	Interventions will be informed by

state actors decreases further thereby negatively affecting the potential to effectively engage in the planned intervention.		continuous analysis and feedback, and reinforced by policy or political dialogue with relevant authorities or regulatory institutions.
--	--	--

### 3.4. Cross-cutting issues

The programme will mainstream climate change and biodiversity into all activities in order to mitigate damage to the natural environment caused by the increased pressure on natural responses within the refugee-hosting areas, e.g. deforestation, land quality degradation, water source depletion.

In line with best practice recommendations for conflict-sensitive development, the project will include members of different religious and ethnic communities, both as final beneficiaries. This will be in particular relevant for the design and implementation of the justice component. Project resources will be allocated in such a way that they encourage co-operation between different communities with the objective of promoting peaceful co-existence and that they do not visibly exclude adjacent areas. This principle also applies to the procurement of goods and services.

The project will use a rights-based approach and promote the entitlement to non-discriminatory access to public services, and the rights of women, children and disabled persons in line with the corresponding United Nations Conventions. All result indicators and technical reports will be gender-disaggregated. The project will promote HIV/AIDS awareness, support the rights of women in reproductive health, and promote family planning. It is an integral part of the programme to analyse the impact of gender on livelihood activities and access to justice and ensure that measures are in place to redress gender imbalances.

### 3.5. Stakeholders

The main stakeholders of the programme are the following: JLOS (e.g. Judiciary, Uganda Human Rights Commission, Uganda Police Force), CRRF Steering Group and CRRF Secretariat, relevant Line Ministries (e.g. Ministry of Land, Housing and Urban Development, Ministry of Justice and Constitutional Affairs, Ministry of Local Government, Ministry of Finance, Planning and Local Development, Development Partners, International Organisations) and civil society as well as other forms of local community or business/economic associations.

## 4. IMPLEMENTATION ISSUES

### 4.1. Financing agreement, if relevant

To implement this action, it is not foreseen to conclude a financing agreement with the partner country.

### 4.2 Indicative operational implementation period

The initial implementation period will be 48 months from the date of contract signature.

### 4.3. Implementation components and modules

The justice component (objective 1) will be implemented through a) a direct grant to JLOS to support initiatives related to the formal justice structures/mechanisms (within the JLOS SWAP

framework). The Solicitor General, by virtue of being the Accounting Officer for the Ministry of Justice and Constitutional Affairs and JLOS, will be the principal interlocutor for the direct grant. He will be supported by the JLOS Secretariat already established. Ministry of Finance, Planning and Economic Development will be a co-beneficiary of the direct grant. Should this option not be feasible, this sub-component a) would alternatively be implemented through a contribution agreement with a European or International partner; and **b)** grant(s) to consortium/a of CSOs with at least one local actor for informal or complementary interventions.

The local economic empowerment component (objective 2) will be implemented through a grant (consortium with at least one local actor).

For components 1.a) and 2, restricted calls for proposals may be used with a shorter deadline. Direct award may be granted after due prior approval.

#### 4.4. Indicative budget

Component	Amount in EUR
<b>Objective 1:</b> Peaceful and safe co-existence under the rule of law <i>a) support to formal justice structures and mechanisms</i> <i>b) informal or complementary interventions with above</i>	<b>8 018 511</b> (4 707 262) (3 311 249)
<b>Objective 2:</b> Local economic empowerment	<b>9 581 489</b>
Monitoring, audit and evaluation	200 000
Communications and visibility	200 000
<b>Total</b>	<b>18 000 000</b>

The progress of the action will be monitored by the implementing partners and a dedicated programme manager in the EU Delegation. The project may be included in the annual ROM monitoring plan. The progress will be overseen by the same Steering Committee already overseeing the SPRS-NU and RISE programmes to benefit from complementarity and make full use of existing structures. This Steering Committee, co-chaired by the Office of the Prime Minister and the EU Delegation and with participation of the local authorities and other stakeholders, meets regularly to monitor the programme and ensure that activities are in line with government's guidelines and national plans. The Steering Committee will also be complementary with the CRRF Secretariat and other CRRF structures.

#### 4.5. Monitoring and reporting

All components of this action will have to be integrated with the EUTF Monitoring and Learning System (MLS)<sup>20</sup> for the reporting of selected output and outcome indicators, and project implementing partners must take part in case study exercises and the learning strategy developed by the MLS. Project implementing partners will be expected to provide regular (at least quarterly) data to the MLS in a format which will be introduced during the contract negotiation stage.

Project implementing partners will have to report against a selected number of the MLS output indicators (see full list in annex IV). The monitoring of these indicators will therefore have to be included in the M&E systems of each component (in addition to the indicators already existing in the project logical framework, see annex III).

<sup>20</sup> T05-EUTF-HOA-REG-28

#### **4.6. Evaluation and audit**

If necessary, ad hoc audits or expenditure verification assignments could be contracted by the European Commission for one or several contracts or agreements.

Audits and expenditure verification assignments will be carried out in conformity with the risk analysis in the frame of the yearly Audit Plan exercise conducted by the European Commission. The amount allocated for external evaluation and audit purposes should be shown in the budget at section 4.4. Evaluation and audit assignments will be implemented through service contracts, making use of one of the Commission's dedicated framework contracts or alternatively through the competitive negotiated procedure or the single tender procedure.

#### **4.7. Communication and visibility**

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU. This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action. Appropriate contractual obligations shall be included in the procurement contracts. The Communication and Visibility Manual for European Union External Action<sup>21</sup> will be used to establish the Communication and Visibility Plan and the appropriate contractual obligations. Lessons learnt and best practices will be drawn from the existing EUTF programmes in Uganda. The Akvo RSR<sup>22</sup> on-line reporting platform, which is available to the public, will be used to communicate and report on this action as well as on all project components. Akvo RSR links directly to the EUTF website. The project logical frameworks will be encoded in their respective Akvo pages and regular reporting of project activities and outputs will take place on this platform.

---

<sup>21</sup> <https://ec.europa.eu/europeaid/node/17974>

<sup>22</sup> Akvo Really Simple Reporting

Annex I: Alignment with EUTF objectives, Valletta Action Plan and Sustainable Development Goals		
EU Trust Fund Strategy	Valletta Action Plan	United Nations Sustainable Development Goals
Four main areas of intervention	Five priority domains, and 16 initiatives	17 goals
<p>1) Greater economic and employment opportunities</p> <p>2) Strengthening resilience of communities and in particular the most vulnerable, as well as refugees and displaced people</p> <p>3) Improved migration management in countries of origin and transit</p> <p>4) Improved governance and conflict prevention, and reduction of forced displacement and irregular migration</p>	<p>1) Development benefits of migration and addressing root causes of irregular migration and forced displacement</p> <ol style="list-style-type: none"> <li>1. enhance employment opportunities and revenue-generating activities</li> <li>2. link relief, rehabilitation and development in peripheral and most vulnerable areas</li> <li>3. operationalise the African Institute on Remittances</li> <li>4. facilitate responsible private investment and boost trade</li> </ol> <p>2) Legal migration and mobility</p> <ol style="list-style-type: none"> <li>5. double the number of Erasmus scholarships</li> <li>6. pool offers for legal migration</li> <li>7. organise workshops on visa facilitation</li> </ol> <p>3) Protection and asylum</p> <ol style="list-style-type: none"> <li>8. Regional Development and Protection Programmes</li> <li>9. improve the quality of the asylum process</li> <li>10. improve resilience, safety and self-reliance of refugees in camps and host communities</li> </ol> <p>4) Prevention of and fight against irregular migration, migrant smuggling and trafficking of human beings</p> <ol style="list-style-type: none"> <li>11. national and regional anti-smuggling and anti-trafficking legislation, policies and action plans</li> <li>12. strengthen institutional capacity to fight smuggling and trafficking</li> <li>13. pilot project in Niger</li> <li>14. information campaigns</li> </ol> <p>5) Return, readmission and reintegration</p> <ol style="list-style-type: none"> <li>15. strengthen capacity of countries of origin to respond to readmission applications</li> <li>16. support reintegration of returnees into their communities</li> </ol>	<ol style="list-style-type: none"> <li>1) End poverty in all its forms everywhere</li> <li>2) End hunger, achieve food security and improved nutrition and promote sustainable agriculture</li> <li>3) Ensure healthy lives and promote well-being for all at all ages</li> <li>4) Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</li> <li>5) Achieve gender equality and empower all women and girls</li> <li>6) Ensure availability and sustainable management of water and sanitation for all</li> <li>7) Ensure access to affordable, reliable, sustainable and modern energy for all</li> <li>8) Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</li> <li>9) Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation</li> <li>10) Reduce inequality within and among countries</li> <li>11) Make cities and human settlements inclusive, safe, resilient and sustainable</li> <li>12) Ensure sustainable consumption and production patterns</li> <li>13) Take urgent action to combat climate change and its impacts</li> <li>14) Conserve and sustainably use the oceans, seas and marine resources for sustainable development</li> <li>15) Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss</li> <li>16) Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</li> <li>17) Strengthen the means of implementation and revitalise the global partnership for sustainable development</li> </ol>

## Annex II: Indicative Logical Framework

	Results chain	Indicators	Sources and means of verification	Assumptions
<b>Overall objective: Impact</b>	<b>To improve overall safety and economic well-being for refugees and host communities in Northern Uganda</b>			
<b>Specific objective(s):</b>	<b>1. Peaceful and safe co-existence under the rule of law within the refugee-hosting districts</b>	% of refugees and host community having access to formal and informal justice mechanism (disaggregated by sex/refugee/host)	Evaluation reports, M+E field reports, Project reports and beneficiary data base	<ul style="list-style-type: none"> <li>- Stability – no major political, social or economic change during implementation</li> <li>- No major influx of refugees into Uganda</li> <li>- No major shocks which result in further humanitarian – basic needs</li> <li>- Other development partners continue and step up longer-term investments in support of CRRF objectives</li> <li>- Effective participation by the target beneficiaries in the planned project activities</li> <li>- Weather patterns are normal</li> </ul>
<b>Specific Objectives (s):</b>	<b>2. Access to decent employment and increase of economic opportunities for refugees and host communities</b>	<p>% of refugees and host community having access to decent employment (disaggregated by sex/refugee/host)</p> <p>% of targeted households who report improved income (disaggregated by sex/refugee/host)</p>	M & E reports, progress reporting, policy documents	<ul style="list-style-type: none"> <li>Stability – no major political, social or economic change during implementation</li> <li>- The Government of Uganda remains committed to the CRRF process.</li> <li>- No major influxes of refugees that would affect Government policy or capacity.</li> </ul>

<p><b>Expected Results (s)</b></p>	<p>1.1. Strengthened capacities of formal and informal justice actors for coverage of additional population and for responding to specific needs and vulnerabilities of refugees.  1.2. Strengthened capacities and knowledge of refugees and host/resident communities to access their rights and fulfil their legal obligations.  1.3. Increased support to host and refugees communities to peacefully resolve conflicts, have access to justice, be protected from infringements of legal and human rights, and be properly informed about rights and obligations.</p>	<p># number of conflicts between refugees and host communities   # of peaceful conflict resolutions</p>		
<p><b>Indicative activities:</b></p>	<p>Selected indicative activities for SO1:  1. Support initiatives aimed at increasing physical protection and reducing incidents of crime e.g. community policing;  2. Increased access to justice through, inter alia, expansion of legal aid and counselling services and mobile courts, paralegal services, translation services, training and support for duty bearers with a specific focus on gender;  3. Promote participation and/or inclusion of refugees and hosts challenges in accessing JLOS services e.g. through strengthening the role and effectiveness of the District Chain-linked Committees (DCCs) in planning, monitoring of JLOS service delivery and targets,  4. Strengthen child and family protection structures and services including community based child-protection groups,  5. Support civic or peace education, including in schools, settlements; promote social cohesion, and support to anti-discrimination campaigns,  6. Strengthen the sexual and gender based violence (SGBV) prevention, response/support and coordination structures including expansion of specialised services and support a holistic response including establishment of female-to-female reporting, medico-legal response, psychosocial support,  7. Increase access to information on rights and duties, the peace process, peaceful co-existence, legal or JLOS services, official/civil or legal documentation through innovative communication tools and media,</p>	<p>% increase in JLOS presence in targeted areas,  # of community policing sessions conducted.  # of anti-discrimination campaigns  # of people benefitting from mobile court sessions, legal aid and counselling services (disaggregated by sex/refugee/host)  # DCC meetings held   # of SGBV cases prosecuted.</p>	<p>Surveys;  project reports;  M&amp;E reports</p>	



	<p>8. Enhance access to community, local and national protection mechanisms (information campaigns and strengthened linkages to communities' own protection structures),</p> <p>9. Strengthen community, informal and collaborative or alternative conflict resolution mechanisms and structures.</p>			
<b>Expected Results (s)</b>	<p>2.1. Strengthened capacities and skills of displaced persons and host communities to engage in productive activities</p> <p>2.2. Increased access to employment and private sector jobs</p> <p>2.3. Strengthened value chains with a larger indirect and positive benefit for employment</p>			
<b>Indicative activities:</b>	<p>Selected indicative activities for SO2:</p> <ol style="list-style-type: none"> <li>1. Comprehensive market and investment analysis</li> <li>2. Market-oriented and demand driven skills training, with specific focus on gender-sensitive approaches and engagement of female-headed households.</li> <li>3. Support to provision of trainee- and internships in the private sector in rural and urban areas and linking with ongoing TVET trainings under other EUTF programmes</li> <li>4. Establishment of private-public partnership platforms</li> <li>5. Support to green entrepreneurship with smart natural resource management (e.g. re-planting schemes).</li> <li>6. Targeted enterprise development activities, support to entrepreneurship and financial inclusion especially in agro-processing and off-farm livelihood options (e.g. 'challenge fund', promote the use of mobile money transfer tools)</li> </ol>	<p># of people benefitting from professional trainings and/or skills development (disaggregated by sex/refugee/host)</p> <p># of jobs supported</p> <p># associations/groups formed/supported (disaggregated by refugee/host)</p>	<p>Surveys; project reports; M&amp;E reports</p>	

## Annex III: EUTF indicators as a part of the Monitoring and Learning System

EUTF COMMON OUTPUT INDICATORS *					
1. Greater economic and employment opportunities		Optimal disaggregation (in addition to geographical location)		3. Improving Migration Management	Optimal disaggregation (in addition to geographical location)
1.1	Number of jobs created	Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of Job (permanent, short term, cash for work, etc.) Location		3.1	Number of projects by diaspora members Type of projects
1.2	Number of MSMEs created or supported	Type of support (access to finance, business development, training, equipment, market access, etc.)		3.2	Number of migrants in transit, victims of human trafficking, children in the mobility, IDPs and refugees protected or assisted. Gender Target groups (refugee, IDP, returnee, migrant in transit) Age group Types of Protection (protection measures, medical and psychosocial, shelter, food, legal, etc.)
1.3	Number of people assisted to develop economic income-generating activities	Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of support (funding, finance education, entrepreneurship prog., business dev service, etc.)		3.3	Number of migrants, or potential migrants, reached out by information campaign on migration and risks linked to irregular migration Gender Target groups (refugee, IDP, returnee, migrant in transit) Age group
1.4	Number of people benefiting from professional trainings (TVET) and/or skills development	Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of TVET (professional training, skills dev scheme, internship, other)		3.4	Number of voluntary returns or humanitarian repatriation supported Gender Age group Types of assistance (transportation, pre-departures counselling assistance to obtain documents, return tickets, travel escorts, assistance upon arrival, etc.)
1.5	Number of job placements facilitated and/or supported	Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of Job (permanent, short term, cash for work, incentive, etc.)		3.5	Number of returning migrants benefiting from reintegration assistance Gender Age group Types of assistance (income generating, medical, education, housing support etc.)
1.6	Number of industrial parks and business infrastructure created, expanded or improved			3.6	Number of institutions and non-state actors strengthened through capacity building or operational support on protection and migration management Types of support (capacity building, operational support, etc.)
1.7	Financial volume of new funding instruments for scholarships or self-employment			3.7	Number of individuals trained on migration management Target groups (state, non-state)
1.7 bis	Financial volume granted to individual recipients			3.8	Number of refugees and forcibly displaced persons receiving legal assistance to support their integration Gender Target groups (refugee, IDP) Age group
2. Strengthening resilience		Optimal disaggregation (in addition to geographical location)		3.9	Number of early warning systems on migration flows created
2.1	Number of local development plans directly supported			3.10	Number of people benefitting from legal migration and mobility programmes Gender Age group
2.1 bis	Number of social infrastructure built or rehabilitated	Use of infrastructure (health, education, water, sanitation, housing, domestic energy, legal, etc.)		3.11	Number of activities/events explicitly dedicated to raising awareness and sensitivity of general public regarding all aspects of migration Types of activity (media campaigns, etc.)
2.2	Number of people receiving a basic social service	Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of Service (health, education, water, sanitation, housing, energy, legal, nutrition, etc.)			
2.3	Number of people receiving nutrition assistance	Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group		4. Improved governance	
2.4	Number of people receiving food security related assistance	Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of assistance (social protection schemes, training on agri practice, agri inputs, land dev, etc.)		4.1	Number of border stations supported to strengthen border control
2.5	Number of local governments and/or communities that adopt and implement local disaster risk reduction strategies			4.2	Number of staff from governmental institutions, internal security forces and relevant non-state actors trained on security, border management, CVE, conflict prevention, protection of civilian populations and human rights Gender Type of capacity building
2.6	Hectares of land benefitting from improved agricultural management	Types of support (irrigation, rehabilitation, improved management, etc.)		4.2 bis	Number of Institutions and Non-State actors benefitting from capacity building and operational support on security, border management, CVE, conflict prevention, protection of civilian populations and human rights Gender Type of capacity building
2.7	Number of people reached by information campaigns on resilience-building practices and basic rights	Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of practices and rights (health, education, water, energy, rights, etc.)		4.3	Number of people participating in conflict prevention and peace building activities Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of Activities (community dialogue, civilian mediation, peacebuilding, awareness raising, etc.)
2.8	Number of staff from local authorities and basic service providers benefitting from capacity building for strengthening services delivery	Type of service (health, education, etc.)		4.4	Number of victims of trafficking assisted or referred to assistance services Gender Target groups (refugee, IDP, Host community, returnee, migrant in transit) Age group Types of Services (medical assistance, psycho-social assistance, counselling, accomodation, legal counselling, family tracking, travel docs, assistance to voluntary return, etc.)
2.9	Number of people having improved access to basic services	Target groups (refugee, IDP, Host community, returnee, migrant in transit)		4.5	Number of cross-border cooperation initiatives created / launched or supported
CROSS-CUTTING		Optimal disaggregation		4.6	Number of strategies, policies and plans developed and / or directly supported Types of output
5.1	Number of multi-stakeholders groups and learning mechanisms formed and regularly gathered	Type of actors (state-level, local authorities, civil society) Goal of the group/platform (coordination or learning)		4.7	Number of refugees benefiting from an Out-of-Camp policy
5.2	Number of planning, monitoring, learning, data-collection and analysis tools set up, implemented and / or strengthened	Types of tools (studies, needs assessment, market assessments, reporting and statistics, etc.)		4.8	Number of national/regional/local networks and dialogues on migration related issues newly established or functionally enhanced
5.3	Number of field studies, surveys and other research conducted	Focus of research			

\* Definition and methodology will be introduced to the implementing partners of the action