



Environmental, Social and Governance (ESG) Framework

Promoting Support for Quality Education for All

[Approved by the Board on 7 October 2025]

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Vision

A society in which all children are learning and realising their full potential

Mission

To promote support for quality education for all through assessment, research, engagement and influencing, in collaboration with other stakeholders

Principles

Treat all children as equal

Understand the context

Prioritise lasting practical changes

Work evidence-based

Develop appropriate content

Be prepared to adapt

Collaborate based on trust and mutual respect

1.0 Introduction

This Environmental, Social and Governance (ESG) framework responds to a growing necessity globally across sectors to build a society that is sensitive to sustainable and socially responsible development. Embedding ESG in Uwezo's operations therefore will enable Uwezo support Uganda's education sector to build a sustainable and socially responsive education system with effective governance, operations, policies and processes for a conducive learning environment.

1.1 Understanding ESG

ESG refers to a set of standards measuring a business's impact on society, the environment, and how transparent and accountable it is. It measures how a business integrates environmental, social, and governance practices into operations, as well as the business model, its impact, and its sustainability¹. ESG considers how an organisation safeguards the environment and its policies addressing the environment, as well as how the organisation manages its relationships with the community, customers, employees and the suppliers it works with. It also considers the organisation's leadership, internal controls, audits and donor rights and expectations.

Linnenluecke (2022) refers to ESG as a framework used to evaluate how organisations operate responsibly and sustainably, beyond their respective business goals. Originally rooted in the investment world, ESG is now used widely across non-profits, educational institutions, and advocacy groups to align operations with global best practices and societal expectations. In the education sector, ESG provides a set of guidelines for internal and external quality assurance guidance, covering vital areas for successful quality education provision and learning environments.

The aim of this ESG framework is to guide Uwezo's work in establishing a systematic approach towards managing risks and opportunities related to environmental, social, and governance in Uganda's education sector.

1.3 Justification

The requirement to develop this ESG framework stems from the internal audit finding that Uwezo Uganda has no mechanisms in place to integrate ESG in its operations and reporting. Audit observed that there were neither policies to support ESG risk actions nor oversight support provided to management by the board to provide accurate and reliable reports on ESG efforts. Implications to this are that Uwezo Uganda stood a risk of missing out on opportunities with some development partners who consider ESG essential in their development cooperation. Uwezo Uganda's interest in addressing this gap reflects an appreciation of the audit finding and shows a commitment to achieve sustainability, corporate responsibility, and stakeholder engagement as foundational principles for modern development work.

¹ <https://www.british-business-bank.co.uk/>

2.0 ESG Regulatory Landscape

The ESG regulatory environment for educational institutions is evolving (though at a slow pace compared to private corporations) to support the accelerated shift towards a sustainable future and the challenges which may arise in the process. In addition, ESG regulations provide a guiding framework for businesses to address sustainability challenges effectively, while promoting sustainable and responsible business practices. Unlike private corporations, schools and educational advocacy institutions often fall under broader public sector governance, non-governmental organisations (NGO) regulation, or developmental frameworks rather than strict ESG compliance mandates. However, ESG-aligned principles and standards are increasingly being applied in the education sector through policy, donor requirements, and global frameworks. It is also increasingly becoming a requirement of major donors such as USAID, FCDO, EU, DANIDA and World Bank for ESG-aligned practices such as environmental sustainability in school construction, gender equity programs, transparent governance structures; and some of these are embedded in funding agreements and monitoring frameworks.

Uwezo Uganda needs to actively advocate for educational institutions to proactively embed action plans to help them navigate the complexities of advancing the regulatory agenda in Uganda's education system.

2.1 Global ESG Regulatory Landscape for Educational Institutions

There is no universal ESG law or standard for the education sector. However, various global standards, frameworks, and expectations influence ESG practices in education.

2.1.1 UN Sustainable Development Goals (SDGs)

The United Nations' Sustainable Development Goals (SDGs) are a comprehensive set of global objectives aimed at creating a more sustainable and equitable world by 2030. Consisting of 17 goals and 169 targets, the SDGs cover a wide range of interconnected issues including poverty, hunger, education, health, gender equality, clean energy, climate action, and more.

The primary objective of these goals is to tackle pressing global challenges, promoting economic, social, and environmental sustainability. The goals address critical areas such as eradicating poverty and hunger, ensuring quality education and healthcare, promoting clean energy and sustainable economic growth, combating climate change, fostering peaceful and inclusive societies, and protecting the planet's biodiversity and ecosystems.

The SDGs recognise the interconnected nature of development challenges and promote an integrated approach. They highlight the need to address systemic issues such as inequality, gender discrimination, and unsustainable consumption and production patterns. Achieving one goal often depends on progress in other areas, emphasising the importance of a holistic approach.

The SDGs act as a roadmap for a more sustainable and inclusive future. They provide a common framework for action, encouraging governments, organisations, and individuals to work together to build a better world for present and future generations.

2.1.2 Sustainability Accounting Standards Board (SASB)

The Sustainability Accounting Standards Board (SASB) provides industry-specific standards for disclosing financially material ESG issues. While SASB primarily focuses on for-profit companies, its "Education Services" standard is highly relevant for private education institutions, higher education, edtech companies, and large educational organisations.

SASB's insights in the education sector help to build transparent, responsible, and impact-driven development. Under Education Services (SASB Code: SV0101), the standard focuses on the material ESG issues that affect the long-term financial performance and stakeholder trust of education providers. Key ESG Disclosure Topics in the Education Sector (SASB) include:

- i. *Affordability & Accessibility*: This addresses how institutions ensure access to education for all socioeconomic groups and encourages disclosure on tuition trends, student debt, financial aid policies, and support for underrepresented students. This is essential for equity, inclusion, and program accessibility for vulnerable children.
- ii. *Quality of Education & Outcomes*: Addresses learning outcomes, graduation rates, and student employability (for tertiary institutions). It also recommends transparent metrics on program success, skills development, and student satisfaction. This is important for organisations can report on child learning assessments, teacher quality, and community impact.
- iii. *Employee Engagement, Diversity & Inclusion*: This covers school well-being, inclusivity, staff diversity, and labour practices. It encourages metrics on training, retention, and employee satisfaction. It addresses teacher welfare, gender diversity, and ongoing professional development.
- iv. *Environmental Footprint of Operations*: This emphasises reporting energy use, carbon emissions, and sustainable infrastructure. It encourages investment in green school environment and reduction of waste and resource use. This is geared towards building eco-friendly schools and teaching environmental sustainability.

2.1.3 Global Reporting Initiative (GRI) Standards

The Global Reporting Initiative (GRI) is a globally recognised, independent, nonprofit organisation dedicated to facilitating responsible reporting on the impacts of businesses and organisations worldwide. Established in 1997, GRI emerged through a collaboration between the United Nations Environment Programme (UNEP) and the Coalition for Environmentally Responsible Economies (CERES), with a mission to provide a universal language for communicating organisational impacts.

One of GRI's defining features is its inclusivity. It extends its applicability to any organisation, irrespective of size, ownership (public or private), sector, or geographical location. This inclusivity allows businesses and entities from diverse backgrounds to use the GRI Standards effectively.

The GRI Standards are structured as a modular, interconnected system, facilitating adaptable and context-specific reporting. Organisations are encouraged to follow three core sets of standards:

- i. *Universal Standards*: These are the foundational building blocks of GRI reporting and are designed to help organisations and their stakeholders understand the broader context of the report, thereby highlighting the significance of the impacts being reported.
- ii. *Sector Standards*: Organisations can choose sector-specific standards that align with their industry, ensuring that reporting is tailored to their unique challenges and opportunities.
- iii. *Topic Standards*: These standards delve into specific aspects of organisational impacts, each listing disclosures relevant to a particular topic.

A central feature of the GRI Standards is the specification of indicators known as disclosures. These disclosures provide organisations with a structured framework for transparent reporting on their operations and their impact on society and the environment. Each topic standard includes both general management approach disclosures and topic-specific disclosures, ensuring comprehensive and in-depth reporting.

In an era where stakeholders increasingly demand transparency and accountability, the GRI Standards offer organisations a clear path to responsible reporting. By utilising this globally recognised framework, organisations can effectively communicate their efforts, achievements, and impacts, fostering trust among stakeholders and contributing to a more sustainable and responsible business ecosystem.

2.1.4 Task Force on Climate-Related Financial Disclosures (TCFD)

The Task Force on Climate-related Financial Disclosures (TCFD) was established in 2015 by the Financial Stability Board (FSB) with a goal of developing a set of voluntary climate-related financial risk disclosures. Its primary objective is to assist companies in disclosing information that enables investors, lenders, and insurance underwriters to assess climate-related risks accurately. The TCFD focuses on enhancing transparency regarding an organisation's impact on the global climate and seeks to standardise and improve the comparability of climate-related disclosures.

The TCFD's core framework, released in 2017, comprises of four thematic areas: governance, strategy, risk management, and metrics and targets. These recommendations are interrelated and supported by 11 disclosure requirements designed to help stakeholders understand how companies perceive and address climate-related risks and opportunities.

In the area of governance, companies must outline the board's oversight of climate-related issues and management's role in evaluating and handling these risks and opportunities. Under strategy, organisations are expected to identify climate-related risks and opportunities over the short, medium, and long term, along with their impact on business operations, strategy, and financial planning. Additionally, they should assess their strategy's resilience to various climate-related scenarios, including a 2°C or lower scenario.

In risk management, organisations must detail their processes for identifying, assessing, and managing climate-related risks and explain how these processes integrate into their overall risk management approach. Finally, in metrics and targets, organisations should disclose the metrics used to assess climate-related risks and opportunities, disclose greenhouse gas emissions (Scope 1, Scope 2, and, if relevant, Scope 3)², and describe the targets set for managing climate-related risks and opportunities, along with their performance against these targets.

The TCFD's recommendations are designed to provide a comprehensive framework for companies to disclose critical climate-related information, enabling stakeholders to make informed decisions regarding capital allocation and investments categories.

2.2 ESG Regulatory Landscape in Uganda's Education Sector

Like at the global level, Uganda has no single ESG law specific to the education sector. However, the regulatory environment supports Environmental, Social, and Governance (ESG) principles through various laws, policies, and institutions. These frameworks shape how education institutions, especially those working with young children, should operate responsibly and sustainably.

2.2.1 Environmental (E) Regulations

Although education-specific environmental laws are limited, environmental sustainability is integrated into infrastructure policies, curriculum reforms, and development projects. For example, it is a requirement for any school construction funded by government or donors to first conduct an Environment and Social Impact Assessment (ESIA) to assess potential environmental and social impacts that are likely to be experienced as a result of the project. Developers must therefore meet certain criteria for green building such as solar power installation, rainwater harvesting and eco-friendly sanitation such as ventilated improved pit latrines. Key policies and regulations are summarised in Table 1.

² <https://www.carbonchain.com/carbon-accounting/scope-1-2-3-emissions> defines scope 1, 2 &3 emissions as:

Scope 1 emissions are direct emissions from operations that are owned or controlled by the company, including fuels combusted in vehicles, etc Scope 2 emissions are emissions from the generation of purchased or acquired electricity, steam, heating or cooling consumed by the company. Scope 2 emissions occur at the facility where electricity is generated, not at the company's own. Scope 3 emissions are all other indirect emissions (not included in Scope 2) that occur in the value chain of the company.

Table 1: Key Environmental (E) Policies & Regulations aligned to ESG

Regulation / Authority	ESG Focus
National Environment Act, 2019 – Enforced by NEMA (National Environment Management Authority)	<ul style="list-style-type: none"> Requires Environmental and Social Impact Assessments (ESIAs) for new school projects. Promotes eco-friendly construction, water management, and biodiversity conservation.
National Climate Change Policy, 2015	<ul style="list-style-type: none"> Encourages integration of climate change education in schools and climate resilience in infrastructure.
Green School Guidelines (under MoES)	<ul style="list-style-type: none"> Promotes energy efficiency, water conservation, tree planting, and sustainable school gardens.

2.2.2 Social (S) Regulations

Uganda's education sector strongly aligns with social (S) ESG goals, especially on inclusion, gender equity, child rights, and quality education. Social (S) ESG examples include use of school feeding programs to retain children in school, safe spaces for girls and anti-harassment policies and community engagement in school governance.

Table 2: Key Social Policies & Regulations and related ESG alignment

Regulation / Framework	ESG Focus
Education and Sports Sector Strategic Plan (ESSP) 2021/22 – 2025/26	Prioritises equitable access, inclusive education for learners with disabilities, and early childhood development (ECD).
Children (Amendment) Act, 2016	Mandates child protection in schools, including safe environments, zero tolerance for abuse, and child participation.
Gender in Education Policy, 2009	Promotes gender-responsive education systems, menstrual hygiene management, and girl child education.
National Inclusive Education Policy (2019)	Ensures access for learners with special needs, disabilities, and marginalised communities (e.g., refugees, rural children).
National Early Childhood Development Policy (2013)	Focuses on integrated child development across health, education, and nutrition.

2.2.3 Governance (G) Regulations

Education governance in Uganda emphasises transparency, accountability, and decentralised management through policies and regulatory bodies. It is a governance requirement for instance that public schools must have auditable financial records and that School Development Plans must align with district and national education plans. Table 3 summarises governance alignment with key regulations.

Table 3: Key Governance Policies & Regulations and related ESG alignment

Institution / Act	ESG Governance Role
Ministry of Education and Sports (MoES)	Oversees education quality, curriculum development, school inspections, and governance.
Education Act, 2008	Establishes school management committees (SMCs) and boards of governors (BoGs) for public accountability.
Inspectorate of Schools	Monitors school compliance with policies and education standards.
NGO Act, 2016 – for CSOs in education	Requires registration, financial transparency, and regular reporting for NGOs working in education.
Public Finance Management Act, 2015	Guides how public education institutions manage and report financial resources.

3.0 Integrating ESG into Uwezo's operations

A thorough analysis of ESG related institutional framework, policies and regulations for Uganda's education sector shows that for an effective ESG Framework, educational institutions need to embed mainly the Environment (E) considerations into all components of education governance and delivery system, risk management and reporting and disclosure. This should then strengthen the fairly visible Social (S) and Governance (G) to enable a fully-fledged ESG framework in operation.

3.1 Environmental (E)-Promoting Sustainable Education Environments

The development of a robust environmental and climate risk management system is a critical step to ensuring a safe and secure school learning environment. The objective of this integration is to reduce environmental and climate risks and promote sustainability in early childhood education settings. To effectively demonstrate leadership in sustainability, Uwezo will initially focus on reducing its own ecological footprint and advocate for sustainable practices like conserving energy, minimising waste through effective recycling, and reducing resource consumption for instance through transitioning to digital platforms, cloud storage, and electronic communication to minimise paper dependency in education institutions. Building a sustainable infrastructure is the foundational step for education institutions aiming to effectively integrate ESG principles. To achieve this, the following actions shall be advocated:

Table 4: Integrating sustainability for a conducive school learning environment.

Focus area	Detailed action
Eco-friendly Construction Materials	<ul style="list-style-type: none"> Use locally sourced, low-carbon, non-toxic materials (e.g., stabilised soil blocks, bamboo, recycled metal)
Renewable Energy Integration	<ul style="list-style-type: none"> Install solar systems for classrooms, lighting, and ICT labs to reduce reliance on the grid and fossil powered energy sources.

Water Conservation	<ul style="list-style-type: none"> Implement rainwater harvesting for improved sanitation and gardening; water-efficient taps, and storage tanks.
Waste Management Systems	<ul style="list-style-type: none"> Promote composting pits, recycling stations, and proper sanitation waste disposal.
Green Learning Spaces:	<ul style="list-style-type: none"> Integrate tree planting and shaded learning areas. Establish school gardens for hands-on environmental education and food security. Promote organic farming and other climate smart agriculture practices
Climate Education and climate proofing:	<ul style="list-style-type: none"> Ensure buildings withstand extreme weather (e.g., raised foundations, storm drainage) Integrate environmental sustainability into the curriculum to foster eco-conscious young minds. Promote early childhood learning on climate change risks- erratic rainfall, floods, prolonged droughts, etc and adaptation measures. Partner with environmental NGOs for training and related resources

3.2 Social (S) - Child Welfare, Inclusivity, and Community Development

Integrating the Social (S) component of ESG in the education sector, especially for institutions focused on young children, means ensuring that the school environment is inclusive, equitable, protective, and empowers both learners and communities. The objective is to ensure equitable access to quality education, safeguard children's rights, and empower communities. This will be achieved through strategic actions presented in Table 5.

Table 5: Social inclusion in education institutions.

Focus area	Detailed action
Access & Equity	<p>Ensure all children, regardless of background, can access quality education through:</p> <ul style="list-style-type: none"> Eliminating hidden costs for the poor and marginalised (e.g., uniforms, PTA fees) Implementing school feeding programs Offering scholarships or sponsorships for vulnerable children Design targeted outreach for rural, refugee, or special-needs populations
Inclusive education	<p>Adapt teaching and learning environments for diverse learners through:</p> <ul style="list-style-type: none"> Training teachers on inclusive pedagogy Modifying infrastructure for physical accessibility (e.g., ramps, signage)

	<ul style="list-style-type: none"> Engaging caregivers in supporting inclusive practices Menstrual hygiene-friendly facilities for girls (washrooms, changing rooms)
Child Protection & Safeguarding	<p>Create safe environments free from abuse, violence, or neglect, through:</p> <ul style="list-style-type: none"> Establishing and implementing a child safeguarding policy and code of conduct Training staff on recognising and reporting abuse Setting up confidential reporting and referral mechanisms Partnering with social workers or child protection officers
Community Engagement	<p>Involve families and local leaders in decision-making and school activities through.</p> <ul style="list-style-type: none"> Establishing functional school management committees (SMCs) Conducting regular parent–teacher meetings Involving communities in school construction, feeding, and safety monitoring Celebrating cultural events and language diversity
Child Protection, health and Well-being	<ul style="list-style-type: none"> Implement strict child protection policies, offer health screenings, and provide access to nutritious meals. Provide clean water, handwashing stations, and latrines

3.3 Governance (G) - Ethical Leadership & Institutional Integrity

Embedding ESG-related considerations into Uwezo's governance framework allows the organisation to set the tone at the top, while ensuring accountability and transparency of the framework. The main objective of this is to uphold transparency, accountability, and ethical leadership within and in the education system. Uwezo will foster equitable governance practices through encouraging diverse leadership, ethical business practices, and maintaining accountability through clear policies and regular reporting. To achieve this, Uwezo shall:

- Define an oversight mechanism, which includes a governing committee or champion and personnel alike, for strategising and supervising the integration of ESG within the various facets of the organisation such as strategy, policies, and processes.
- Define and integrate ESG-related aspects such as Ethics and Integrity, Cybersecurity risks, Supplier Effectiveness
- Define the roles and responsibilities of the stakeholders involved with respect to managing ESG-related risks and impacts.

The governance criteria (Table 6) has been developed to guide Uwezo integrate Governance (G) component of ESG in its operations and advocacy work to enable educational institutions align and comply to ESG standards.

Table 6: Defining the governance criteria.

Focus area	ESG Governance Role
Board Oversight of ESG-related issues	<ul style="list-style-type: none"> i. Oversight over: <ul style="list-style-type: none"> a. Guiding strategy, major plans of action, risk management policies b. Setting the organisation's performance objectives c. Monitoring and Reporting ii. Representation in the Board for ESG-related considerations iii. Procedures and frequency of notification for ESG-related considerations
Management level committees/ ESG Steering Committee	<ul style="list-style-type: none"> i. Forming a management team responsible for driving ESG initiatives and reporting progress. ii. Description of organisational structure for ESG-related matters iii. Monitoring and Reporting of ESG-related matters
Data Protection & Privacy:	<ul style="list-style-type: none"> iv. Safeguard children's personal data and ensure ethical use of technology in education.
Ethics and Integrity	<ul style="list-style-type: none"> i. Inclusion of sustainability/responsible business in Code of Conduct ii. Whistle-blower Management iii. Anti-Financial Crime (Anti-corruption, Anti-bribery)
Human Capital	<ul style="list-style-type: none"> i. Equal Opportunities and Diversity & Inclusion ii. Training and Education iii. Occupational Health and Safety iv. Human Rights Assessment (Child Labour, Forced Labour, Rights of v. Indigenous People and Local Communities
Sustainability Materiality Assessment	Identifying and assessing potential environmental, social and governance issues that could affect the organisation and stakeholders
Procurement and Contract Management	<ul style="list-style-type: none"> i. Green Procurement Practices ii. Supplier Environmental and Social Assessment, to manage supplier risks (outside-in risks)

4.0 Monitoring, evaluation and verification

UWEZO will monitor this ESG framework using a simple Monitoring and Evaluation Framework (Table 7) with Key Performance Indicators (KPIs) aligned to each ESG pillar—Environmental, Social, and Governance (E, S, G). These KPIs aim to track implementation progress, outcomes, and impact, ensuring the framework supports continuous improvement and accountability. UWEZO Board and Management will oversee implementation, monitoring and evaluation of this framework to ensure effective delivery.

Table 7: UWEZO Uganda ESG Monitoring and Evaluation Framework

ENVIRONMENTAL (E) – Promoting Sustainable Education Environments

Focus Area	Key Performance Indicators (KPIs)	Means of Verification / Data Sources	Frequency
Green Infrastructure & Eco-friendly Materials	% of supported schools adopting eco-friendly materials	Site visit reports; construction plans	Bi-annually
Renewable Energy	% of schools with installed solar systems	Project reports; utility bills	Annually
Water Conservation	% of schools with rainwater harvesting systems	Infrastructure audits; school surveys	Bi-annually
Waste Management	% of schools with functioning waste segregation and composting systems	Environmental audit reports	Bi-annually
Climate Education	Number of schools integrating climate content into curriculum	Curriculum reviews; teacher training reports	Annually
Digitalisation to reduce paper use	% reduction in internal paper usage at Uwezo offices	Procurement logs; printing logs	Quarterly

SOCIAL (S) – Child Welfare, Inclusivity, and Community Development

Focus Area	Key Performance Indicators (KPIs)	Means of Verification / Data Sources	Frequency
Access & Equity	% increase in school enrolment among marginalised children	Education Management Information System (EMIS); school records	Annually
	% of schools with school feeding programs	School reports; program records	Annually
Inclusive Education	% of schools with disability-friendly infrastructure	School assessments; inspection reports	Bi-annually
	Number of teachers trained on inclusive education	Training attendance sheets; certificates	Annually
Child Protection & Safeguarding	% of schools with an active child safeguarding policy	Policy reviews; interviews	Bi-annually
	Number of reported child protection cases addressed	Safeguarding logs; case follow-ups	Quarterly

Community Engagement	% of schools with active School Management Committees (SMCs)	SMC minutes; attendance records	Annually
	Number of community-school engagement events held	Event reports; photos	Quarterly

GOVERNANCE (G) – Ethical Leadership & Institutional Integrity

Focus Area	Key Performance Indicators (KPIs)	Means of Verification / Data Sources	Frequency
Board Oversight	ESG discussed in board meetings (% of meetings)	Board meeting minutes	Quarterly
ESG Steering Committee	ESG committee established and meeting regularly (yes/no)	Committee ToRs; minutes	Bi-annually
Ethics and Integrity	Number of staff trained on ethics and ESG principles	Training reports	Annually
	Number of whistleblower reports acted upon	Compliance logs	Annually
Human Capital	Gender and diversity balance in leadership positions	HR records	Annually
	% of staff trained in child safeguarding, data protection, etc.	Training records	Annually
Procurement & Supplier Screening	% of procurement screened using ESG criteria	Procurement reports	Quarterly
Data Privacy	Existence of data protection policy and % of staff trained	Policy document; training logs	Annually
ESG Reporting & Disclosure	Annual ESG report published (yes/no)	Report; website	Annually
Feedback Mechanism	Number of issues raised through feedback channels and resolved	Feedback logbook	Quarterly

5.0 ESG Reporting and Disclosure

ESG reporting and disclosure are integral to manage risks, attract investment, comply with regulations, enhance reputation, and build a sustainable future. This will basically cover two aspects, namely;

- i. *Annual ESG Report:* To document progress, challenges, and improvements.
- ii. *Community Feedback Mechanism:* To establish channels for students, parents, and teachers to provide feedback and suggestions.

6.0 Funding & Partnerships

Integrating ESG into institutional operations is a new phenomenon, not only in Uganda, but also globally. To ensure a successful integration therefore will require adequate resources amidst dwindling NGO funding opportunities globally. UWEZO will leverage resources and partnerships to ensure successful implementation of this framework. UWEZO will achieve this through:

- Seeking funding from like-minded development partners to support ESG compliant school infrastructure improvements or establishments.
- Partnering with local and international NGOs for program funding.
- Working with corporate sponsors on CSR initiatives supporting education.

References

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