

TERMS OF REFERENCE

Consultancy to Undertake a Thematic Study on the Working Environment of NGOs and CBOs Supporting Artisanal and Small-Scale Mining Communities in Karamoja, Uganda.

Project: Civic Space Improvement Project

Duration: Two (2) months

Geographical Focus: Karamoja Sub-region.

1. Introduction

Human Rights Centre Uganda (HRCU), under the Civic Space Improvement Project, seeks to strengthen the relationship between Government and civil society and contribute to an enabling environment in which Non-Governmental Organisations (NGOs), Community-Based Organisations (CBOs) and other civil society actors can effectively promote and protect human rights, participate in governance and contribute to inclusive development. Under this project, HRCU seeks to conduct a thematic report focused on organisations supporting artisanal and small-scale miners and mining communities in the Karamoja sub-region.

Artisanal and Small-Scale Mining (ASM) is an important source of livelihoods and employment in Uganda, particularly in rural and mineral-rich areas (UNDP, 2024). Uganda's current development framework recognises the extractives sector as an important contributor to industrialisation, employment and economic transformation (NPA, 2025). At the same time, the Fourth National Development Plan (NDP IV) identifies persistent informality, rudimentary mining methods, inadequate institutional capacity and weaknesses in legal, coordination and regulatory systems as significant constraints affecting the mining sector.

The Government has undertaken reforms intended to formalise and regulate ASM, including through the Mining and Minerals Act, 2022 and subsequent regulations. The Act provides for artisanal mining areas and licensing and seeks to formalise artisanal and small-scale mining activities. However, evidence continues to indicate challenges in translating the legal and policy framework into accessible and effective

formalisation for many artisanal miners. The current situation in Karamoja illustrates the continuing complexity of the ASM operating environment. The region remains an important area for gold mining and also hosts marble, limestone and other mineral activities. Mining intersects with customary land ownership, community livelihoods, environmental concerns, occupational safety, local governance and questions relating to participation and benefit sharing.

Recent developments demonstrate the continuing urgency of these issues. In March 2026, three artisanal miners, including a 15-year-old, died following the collapse of a gold mine in Kaabong District, highlighting continuing occupational safety concerns associated with unregulated or poorly regulated mining operations¹. In August 2026, authorities closed the Somalia gold-mining site in Moruita Sub-county, Nakapiripirit District, reportedly affecting more than 5,000 artisanal miners, with authorities citing concerns including poor hygiene, child labour, unregistered mining groups and security risks.²

At the same time, efforts to formalise and organise artisanal miners are continuing. Recent national initiatives have sought to strengthen miners' associations, improve occupational safety, environmental management and technical skills, and support miners' transition towards formalisation. These developments increase the importance of NGOs, CBOs, Human Rights Defenders (HRDs), Women Human Rights Defenders (WHRDs), miners' associations and other civil society actors working with mining communities. Such organisations provide legal and human rights awareness, community mobilisation, advocacy, referrals, documentation of violations, environmental and social accountability, organisational strengthening, support to miners' associations, engagement with government and mining companies, and facilitation of dialogue between communities and duty bearers. However, the organisations performing these roles do not operate in a vacuum. Their ability to work effectively is influenced by the wider civic, legal, regulatory, institutional, financial, political, operational and protection environment.

¹ *Daily Monitor*, "Boy, 15, among three killed in Kaabong goldmine collapse," 23 March 2026.

² Uganda Radio Network (URN), "5000 Artisanal Miners Upset over Nakapiripirit [Gold Mine Closure]," 3 August 2026.

The NGO regulatory framework requires organisations to comply with registration, permitting, reporting, governance and operational requirements. The NGO Bureau currently identifies the NGO Act 2016, NGO Regulations 2017, NGO Policy 2010, NGO Guidelines 2019 and NGO Inspection and Inspectors Guidelines 2020 among the key instruments governing the sector. NGOs are also required to obtain and maintain valid permits and comply with various requirements relating to their operations and reporting. For organisations operating in Karamoja, these regulatory requirements interact with practical realities including geographical remoteness, limited infrastructure, resource constraints, insecurity, limited access to information, dependence on project-based financing, weak institutional capacity, relationships with local authorities and security agencies, and the risks associated with advocacy on land, natural resources, environmental protection and corporate accountability. There are also particular protection concerns for HRDs and WHRDs working on extractive-sector issues. Civil society actors may need to engage powerful private-sector and government actors while supporting communities affected by mining activities. Such engagement may expose defenders and organisations to intimidation, threats, surveillance, restrictions on access, reputational attacks, legal or administrative pressure and other risks.

The study will therefore examine the working environment of the organisations themselves, rather than undertaking a general assessment of ASM. It will investigate the conditions under which NGOs and CBOs operate, the factors that enable or constrain their work, the risks they face, their relationships with government and private-sector actors, and the extent to which the existing legal and policy framework enables meaningful civil society participation in mining governance. This focus is consistent with the Civic Space Improvement Project's broader objective of improving civic space through stronger collaboration between Government and civil society.

2. Background

HRCU is a national nongovernmental organization that has operated in Uganda since 2008 with the objective of promoting and protecting the rights of HRDs, especially those operating at the grassroots.

HRCU with support from the Royal Danish Embassy, Embassy of the Netherlands, Embassy of Sweden and the Embassy of Ireland in Uganda, under the Programme on Accountability, Civic Engagement and Rights (PACER) are implementing the "**Civic Space Improvement Project**" (CSIP). The project is being implemented in the 6 districts of Arua, Nebbi and Yumbe in West Nile, and Nakapiripiriti, Kaabong and Kotido in Karamoja and at national level in Kampala. The primary goal of this project is to 'improve civic space through collaboration between Government and NGOs by 2027'

The project directly targets both NGOs and government entities responsible for regulating the NGO sector in Uganda. NGOs, encompassing both NGOs and CBOs as defined by the NGO Act Cap 109, that are engaged with the promotion of human rights and good governance, are key beneficiaries. The project also includes all HRDs, as defined by the UN Declaration on HRDs and HRCU's Strategic Plan 2022-2027. Through the project, NGOs and CBOS will receive tailored support, including knowledge and tools to improve their understanding of and compliance with relevant laws and regulations. The project will also provide platforms for organizations to engage directly with the relevant government agencies enabling constructive dialogue, addressing regulatory concerns and promoting greater mutual understanding. By strengthening NGOs and CBOs' capacity and improving NGO-government, the project will contribute to a more conducive and collaborative operating environment for the organizations, with improved relations, stronger compliance and reduced state interference. Government entities mandated with the regulation of the NGO sector will also benefit from this initiative. These include key MDAs such as the National Bureau for NGOs, Uganda Registration Services Bureau (URSB), Uganda Revenue Authority (URA), Financial Intelligence Authority (FIA), the Personal Data Protection Office (PDPO), the Ministries of Internal Affairs and Local Government, as well as the District and Subcounty NGO Monitoring Committees (C/DNMCs and SNMCs). Through the project government entities will gain a deeper understanding of their roles and responsibilities, while having opportunities to engage with organizations on regulatory issues and any potential changes. This will promote more balanced and transparent regulation, strengthen cooperation between NGOs and government, and contribute to a more stable and effective regulatory

environment, for promoting human rights and good governance in Uganda. The interventions will also indirectly benefit stakeholders, including NGOs working beyond human rights and governance, local communities in Karamoja and West Nile, and the general public. NGOs will benefit from improved civic space with fewer barriers to registration, reduced government interference, and more enabling laws and regulations. In addition, local communities will benefit from better services and increased confidence in addressing human rights challenges, such as security and environmental sustainability. The general public will benefit from enhanced civic engagement and the positive contributions of NGOs to human rights, good governance and access to services.

2. Rationale for the Consultancy

Existing literature provides substantial information on artisanal mining livelihoods, environmental impacts, land governance, occupational safety and mineral resource management in Karamoja (Green Deal Uganda, 2024; Twinomujuni et al. 2018). However, there is comparatively limited systematic evidence specifically examining the working environment of NGOs and CBOs that support artisanal and small-scale mining communities.

In particular, there is insufficient evidence on: the practical impact of NGO regulatory and compliance requirements on organisations operating in mining communities; the accessibility of government institutions and mining regulatory structures to civil society actors based in Karamoja; financial and institutional constraints affecting NGOs and CBOs; access to information and participation in mining governance processes; relationships between NGOs/CBOs, local governments, national regulatory institutions, security actors and mining companies; civic space constraints affecting advocacy and community mobilisation; protection risks faced by HRDs and WHRDs; barriers to community-based and locally led civil society action; the ability of organisations to monitor corporate conduct and advocate for community rights; the effectiveness of existing dialogue, accountability and grievance mechanisms; and opportunities for strengthening collaboration between government, civil society, mining companies, miners' associations and communities. The study will therefore

generate evidence that can inform HRCU's engagement with Government, civil society networks, development partners and other stakeholders on measures to strengthen the operating environment for NGOs and CBOs.

3. Purpose of the Consultancy

The purpose of the consultancy is to undertake an evidence-based thematic study of the working environment of NGOs and CBOs supporting artisanal and small-scale mining communities in Karamoja, identifying the legal, regulatory, institutional, financial, operational, civic space and protection factors that enable or constrain their work.

The study will generate practical recommendations for improving the operating environment of civil society organisations and strengthening their contribution to human rights protection, community participation, accountability and inclusive mining governance.

4. Overall Objective

To assess and document the working environment of NGOs and CBOs supporting artisanal and small-scale mining communities in Karamoja and generate evidence-based recommendations for strengthening civic space, civil society effectiveness, protection of rights and inclusive mining governance.

Specific Objectives

The study specifically aims to:

1. To assess the legal, policy, regulatory, institutional and civic space environment governing the work of NGOs and CBOs supporting artisanal and small-scale mining communities.
2. To examine the operational, financial, organisational, gender, protection and security factors affecting the effectiveness, sustainability and safety of NGOs, CBOs, HRDs and WHRDs working in ASM communities.
3. To assess stakeholder relationships and civil society engagement in ASM governance and identify practical and policy measures to strengthen the

enabling environment, protection, sustainability and effectiveness of civil society actors.

5. Scope of the Consultancy

5.1 Geographical Scope

The study shall cover the Karamoja sub-region of north-eastern Uganda, comprising:

Kaabong District;

Kotido District;

Moroto District; and

Nakapiripirit District.

The study shall not be expected to conduct fieldwork in every mining site or every sub-county in all mentioned districts. Instead, the consultant shall undertake a purposive selection of study locations based on: concentration and type of artisanal/small-scale mining; presence of NGOs/CBOs supporting mining communities; presence of HRDs and WHRDs; presence of mining companies or significant private-sector interests; reported governance, human rights, environmental or protection concerns; accessibility and security; diversity of mining contexts; and feasibility within the consultancy period.

The proposed fieldwork should include at least four highlighted districts, with the final districts and sites agreed with HRCU during the inception phase. The study should, as far as practicable, include Moroto and Nakapiripirit because of the importance of mining activities and current governance concerns in these locations, while ensuring representation from other districts with significant ASM activity. The consultant shall also conduct targeted consultations in Kampala with relevant national-level institutions, particularly where such institutions influence the working environment of NGOs/CBOs operating in Karamoja.

5.2 Thematic/Content Scope

The study shall focus specifically on the working environment of NGOs and CBOs, while examining the ASM context only to the extent necessary to understand that working environment.

The study shall cover the following thematic areas:

Assess the legal, policy and regulatory environment governing the establishment, registration, operation, funding, reporting and engagement of NGOs and CBOs working with artisanal and small-scale mining communities.

Examine the operational environment in which NGOs and CBOs work, including access to mining communities and sites, infrastructure, information, government institutions, local authorities and other relevant stakeholders.

Assess institutional and financial factors affecting the sustainability and effectiveness of NGOs and CBOs, including organisational capacity, human resources, funding availability, donor requirements, project duration and opportunities for locally led programming.

Assess the civic space environment affecting civil society engagement in mining governance, including freedom of association, participation, advocacy, access to information, dialogue with government, community mobilisation and engagement with private-sector actors.

Document protection and security risks affecting NGOs, CBOs, HRDs and WHRDs working on mining, land, environmental and human rights issues, including threats, intimidation, harassment, surveillance and other forms of pressure.

Examine the gender dimensions of the working environment, including the specific experiences, risks and opportunities affecting WHRDs and women-led/community-based organisations working in mining-affected communities.

Assess the relationship between civil society actors and key duty bearers, including the NGO Bureau, Ministry of Energy and Mineral Development, local governments, environmental authorities, security actors and other relevant government institutions.

Examine civil society engagement with mining companies and other private-sector actors, particularly regarding community consultation, land rights, compensation, environmental responsibility, corporate accountability, grievance mechanisms and access to remedy.

Assess the extent to which existing legal and policy frameworks create an enabling environment for civil society participation in ASM governance and identify gaps between policy commitments and implementation.

Identify practical and policy measures that can strengthen the operating environment, protection, sustainability and effectiveness of NGOs and CBOs supporting artisanal mining communities.

6. Methodology and Approach

The consultant shall propose and apply a rigorous mixed-methods approach combining qualitative and, where appropriate, quantitative methods. The methodology should be designed to generate credible, context-sensitive and actionable evidence on the operating environment of NGOs and CBOs working with artisanal and small-scale mining communities in Karamoja. The approach should facilitate triangulation of evidence from documentary sources, institutional stakeholders, civil society actors, mining-affected communities and other relevant stakeholders.

The consultant shall undertake a comprehensive desk review of relevant literature and documentary evidence to establish the legal, policy, institutional, operational and socio-economic context within which NGOs and CBOs operate in mining-affected communities. The review shall cover relevant laws and regulations, government policies and development plans, NGO regulatory documents, mining sector policies and reports, previous studies on Karamoja, civil society reports, human rights reports, business and human rights documentation, environmental reports, relevant project and programme reports, academic literature and any other relevant evidence.

Particular attention shall be given to the current NGO regulatory framework and the legal and regulatory framework governing artisanal and small-scale mining and related activities. The consultant shall assess how these frameworks influence the establishment, registration, operation, funding, reporting, accountability and engagement of NGOs and CBOs working in mining-affected communities. The review should also identify relevant regulatory requirements, institutional mandates, implementation gaps, overlaps, barriers and opportunities for improved collaboration between government, civil society and mining-sector stakeholders. The NGO Bureau currently identifies the NGO Act, 2016, NGO Regulations, 2017, NGO Policy, 2010, NGO Guidelines, 2019, and NGO Inspection and Inspectors Guidelines, 2020, among the key instruments governing the NGO sector.

The consultant shall conduct Key Informant Interviews (KIIs) with a broad range of stakeholders who have relevant knowledge, experience or institutional responsibility in relation to NGOs, CBOs, human rights, governance, environmental protection and artisanal and small-scale mining in Karamoja. The consultant should ensure appropriate representation of different stakeholder perspectives and triangulate information obtained through KIIs with evidence from the desk review and other data collection methods.

The consultant shall conduct Focus Group Discussions (FGDs) with selected community and stakeholder groups to capture experiences, perceptions and perspectives that may not emerge adequately through individual interviews. Where necessary, groups should be appropriately separated by gender, age, role, vulnerability or other relevant characteristics to enable participants to speak freely and safely. The consultant shall develop a sampling matrix covering stakeholder category and proposed approach. The consultant shall incorporate appropriate risk assessment and mitigation measures into the fieldwork plan and shall comply with applicable safety, ethical and security requirements.

7. Ethical and Protection Considerations

Given the sensitivity of the subject matter, the consultant shall apply a Do No Harm and human rights-based research approach. The consultant shall apply an inclusive and conflict-sensitive approach when conducting the study. The consultant shall: obtain informed consent from participants; protect participant confidentiality; avoid collecting unnecessary identifying information; anonymise sensitive testimony where necessary. The consultant shall submit an appropriate ethical and safeguarding protocol as part of the inception report.

8. Expected Deliverables

The consultant shall produce the following:

1. Inception Report
2. Data Collection Tools
3. Preliminary Findings

4. Draft Thematic Report

5.A PowerPoint Presentation

6. Final Thematic Report

7. Policy Brief of approximately 6–10 pages translating the findings into concise policy and advocacy messages.

9. Duration and Timeframe

The consultancy will deliver the assignment within (2) months. The consultant will come up with a detailed work plan.

10. Required Consultant(s) Qualifications and Experience

The assignment may be undertaken by an individual consultant or a consulting team.

The Consultant/team should possess:

- A Master's degree in Development Studies, Social Sciences, Public Policy, Governance, Human Rights, International Development or a related discipline.
- At least 7 years of demonstrated experience in research or assessment of development, governance, artisanal and small-scale mining; business and human rights; land rights; human rights or civil society programmes.
- Demonstrated experience in Ugandan artisanal mining sector and civil society context.
- Demonstrated experience working with Government institutions, Private sector, CSOs and artisanal miners.
- Strong qualitative and quantitative research skills.
- Experience in stakeholder consultations and participatory research.
- Excellent analytical and report-writing skills.

11. Specifications for the Submission of Offers

Interested Consultants/consultants should submit a technical and financial proposal (with a budget in Uganda Shillings (UGX) and detailed CVs of the lead Consultant and proposed team members to snalukwago@hrcug.org and copied to info@hrcug.org not be later than **12th October 2026 at 5:00pm.**

