



**IMPROVING BUSINESS &
HUMAN RIGHTS (BHR):
MAPPING THE EAST
AFRICAN BHR SECTOR**



ACKNOWLEDGEMENTS

We would like to acknowledge Joseph Kibugu for undertaking this mapping and drafting the paper. We are also grateful to Thomas Istasse and

Patrick Karanja of A4ID for their inputs. Additional thanks are due to Raahat Currim and Stephanie Lynch for editorial and production oversight and to Neha Bhansali for layout and design.

ABOUT A4ID

Advocates for International Development (A4ID) was founded in 2006 with a clear vision – to see the law and the skills of lawyers used effectively to fight global poverty. Today, A4ID is the leading, international, civil society organisation that harnesses global legal expertise toward the achievement of the UN Sustainable

Development Goals (SDGs). Through A4ID, the world's top lawyers offer free legal support to organisations that work to advance human dignity, equality and justice. As of November 2019, A4ID currently works with **50,000+ lawyers**, supports over **800 non-governmental organisations (NGOs)**, has delivered over **£45 million worth of legal advice**, and has carried out work impacting **130 countries**.

ROLE UK

The Rule of Law Expertise (ROLE UK) Programme is managed by A4ID and is funded by the UK Government's Department for International Development (DFID).

www.roleuk.org.uk | roleuk@a4id.org
Find us on Twitter: [@ROLE_UK](https://twitter.com/ROLE_UK)

FOREWORD

According to the African Development Bank, East Africa is the fastest-growing region on the continent, with a projected GDP growth of 6% in 2019 and 2020.¹ The region thus offers many business opportunities, further amplified by the discovery of new natural resource deposits and economic policy reforms brought about by East African Community integration. Governments of the region tend to prioritise private sector-led development, particularly in the sectors of agriculture, tourism and extractive industries, and seek to create a more conducive environment for doing business.

However, increasing private sector involvement in the region's development has not always been accompanied by adequate efforts from States to ensure that businesses respect human rights and to provide victims exploited by business activities with remedy for the violation of their rights. This means that without deliberate action, corporations could pose a greater threat to democracy, human rights and rule of law, unless the legal profession provides proactive advice to their corporate clients, which ensures they understand and mitigate the potential impact of their business activities on communities that may be affected. Law firms and lawyers in East Africa must be at the forefront in


advising leading companies, not only on investment but also on legal risks and policy compliance for their businesses. To advance the business and human rights (BHR) agenda, the legal community should work closely with governments, business associations, national human rights institutions, NGOs and civil society organisations.

A4ID'S WORK ON BUSINESS AND HUMAN RIGHTS

A4ID was the first organisation to compile and publish A Guide for the Legal Profession on the United Nations Guiding Principles on Business and Human Rights (the UNGPs) in 2016. A4ID has since run an international Business and Human Rights Training Programme, which has successfully equipped commercial lawyers around the world to comply with, and advise their corporate clients on, the UNGPs.

PARTNERSHIP WITH THE EAST AFRICA LAW SOCIETY (EALS) AND EFFORTS TO FOSTER BHR IN THE REGION

The partnership between A4ID and EALS, supported by A4ID's ROLE UK programme, seeks to promote sustainable and inclusive responsible business practices in East Africa.



“A4ID was the first organisation to identify the relevance of the application of the Guiding Principles to the practice of law beyond pro bono work.”

– INTERNATIONAL BAR ASSOCIATION (IBA),
PRACTICAL GUIDE ON BUSINESS AND HUMAN
RIGHTS FOR BUSINESS LAWYERS (2016)

The underlying objective is that private sector businesses will offer sustainable and decent work opportunities to the local population, thereby contributing to the reduction of poverty, while respecting the human rights of people who work for them and ensuring that communities have a say in projects undertaken in their localities.

To achieve this, A4ID and EALS will seek to contribute to an inclusive, transparent and participatory process, inputting into East African States' National Action Plans on Business and Human Rights (NAPs).

The partnership also provides responsible corporate practice trainings to ensure that businesses receive legal advice, which is informed by human rights and roundtables that bring together business leaders and the managing partners of law firms to discuss the importance of responsible business and share best practices on BHR. Between 2016 and 2019, in close collaboration with world-leading law firms and respected local practitioners, A4ID and EALS have already successfully trained more than 500 lawyers and business leaders in East Africa on human rights due diligence.

Finally, EALS and A4ID work with national law societies to agree upon a unified definition of pro bono, as a first step toward promoting a pro bono culture within the legal sector in East Africa.

By moving forward on these three fronts – improving the regulatory environment, enabling lawyers to provide human rights-based legal advice, and promoting a pro bono culture in the legal profession – we will create the necessary conditions for private sector actors to change their practices towards inclusive and sustainable growth for the benefit of all.

In mapping the BHR stakeholders across East Africa, this report is part of A4ID's wider efforts to bring legal and development stakeholders



together to advance the Sustainable Development Goals.

THE ROLE UK PROGRAMME

A4ID’s ROLE UK programme helps to realise A4ID’s mission by supporting partnerships to provide high-quality pro bono legal and judicial expertise with the aim of strengthening the rule of law in developing countries.

Through its Knowledge Hub, the ROLE UK programme provides the UK pro bono legal sector with access to targeted and relevant

information to inform and improve their technical assistance in developing country contexts. This mapping report will benefit all pro bono providers working to advance human rights in the East African region, and is part of the programme’s efforts to ensure that pro bono legal assistance becomes more strategic and impactful through better understanding of the BHR landscape in East Africa, and better collaboration between BHR stakeholders.

YASMIN BATLIWALA
Chief Executive
A4ID

LIST OF ACRONYMS

A4ID	Advocates for International Development
AFJB	Association des Femmes Juristes du Burundi
BHR	Business and Human Rights
BHRRC	Business and Human Rights Resource Centre
BHRT	Business and Human Rights Tanzania
BRICS	Brazil – Russia – India – China – South Africa
CEHURD	Center for Health Human Rights and Development
CHRAGG	Tanzania’s Commission for Human Rights and Good Governance
CJGEA	Center for Justice Governance and Environmental Action
CLADHO	Collectif des Ligues et Associations de Défense des Droits de l’Homme au Rwanda
CNOOC	China National Offshore Oil Company
CSOs	Civil Society Organisations
DFID	UK Government’s Department for International Development
DIHR	Danish Human Rights Institute
EACOP	East African Crude Oil Pipeline
EALS	The East Africa Law Society
EPZ	Export Processing Zone
ESRA	Economic and Social Rights Advocacy
GLISS	Great Lakes Institute for Strategic Studies
GRA	Global Rights Alert
HURINET	Human Rights Network Uganda
IOM	International Organization for Migration
IPIS	International Peace Information Service

ISER	Initiative for Social and Economic Rights
KAM	The Kenya Association of Manufacturers
KEPSA	The Kenya Private Sector Alliance
KHRC	The Kenya Human Rights Commission
KNCHR	Kenya National Commission on Human Rights
LAPSSET	Lamu Port, South Sudan, Ethiopia Transport Corridor
LBT	Legal Brains Trust
LHRC	Legal and Human Rights Center Tanzania
LSK	Law Society of Kenya
NAPs	National Action Plans on Business and Human Rights
NGOs	Non-Governmental Organisations
NHRIs	National Human Rights Institutions
PAPs	Project Affected Persons
PILAC	Public Interest Law Clinic at Makerere University Law School
RAID	Rights and Accountability in Development
ROLE UK	Rule of Law Expertise Programme
SDGs	Sustainable Development Goals
SEATINI	The Southern and Eastern Africa Trade Information and Negotiation Institute
SIRD	Supporting Inclusive Resource Development in East Africa
SOMO	Stichting Onderzoek Multinationale Ondernemingen
UCCA	Uganda Consortium on Corporate Responsibility
UHRC	Uganda Human Rights Commission
UMA	Uganda Manufacturers Association
UNGPs	The United Nations Guiding Principles on Business and Human Rights
UNICEF	The United Nations Children's Fund

CONTENTS

01 Executive Summary

04 Rationale of the Mapping

05 Overview of Business and Human Rights in East Africa

11 Stakeholders and their Contribution to the BHR Agenda

13 Kenya

19 Uganda

24 Tanzania

26 Rwanda

27 Burundi

28 South Sudan

29 East Africa

31 Conclusion – Potential for Partnerships

32 List of Interviewees

33 Notes

37 Websites

EXECUTIVE SUMMARY

The impact of business on human rights is a relatively new area of engagement among the legal community, government and businesses alike in East Africa, consistent with a global



Business and Human Rights is now recognised as an emerging area of law.

trend. The last decade has seen a growing engagement on this issue in the East Africa region, partly due to the adoption of the UNGPs by the United Nations Human Rights Council in 2011. The UNGPs do not create legal obligations for states but reiterate and clarify the duty of states to protect those under their jurisdiction from human rights abuses by third parties including businesses; the responsibility for business to respect human rights; and the need for both states and businesses to ensure that those whose

rights have been infringed by businesses have access to an effective remedy. There is a growing consciousness among affected communities about the gaps in ensuring respect for human rights by businesses.

The extent of engagement with business and human rights issues by either state or non-state actors in East Africa varies from country to country. It largely depends on the dominant business sectors, civil society's current agenda, the extent to which civil society organisations (CSOs) can operate without restrictions, and political will to ensure strong regulatory institutions.

After the adoption of the UNGPs, the Human Rights Council encouraged states to adopt NAPs on Business and Human Rights to clarify their priorities and support the implementation of the UNGPs. Kenya, Uganda, and Tanzania are at different stages in their adoption of an NAP on Business and Human Rights.²

The same applies to industry associations, with some having codes of conduct that include human rights provisions, while others are yet



The extent to which a country ensures its businesses follow responsible practices depends on a healthy civil society and strong political will.

to engage with the subject. On their part, civil society organisations have been active on BHR and are increasingly using UNGPs and other international standards as frameworks for engagement in their advocacy efforts to defend individuals and communities impacted by business operations. However, the growing restrictions on CSOs by governments in the region threatens their ability to advocate for the respect of human rights by businesses.³

While there have been past initiatives to train bar associations and law firms on the UNGPs, there

remains more to be done. Current debate and programmes that focus on BHR are still limited. For instance, in Kenya, there was very little input from the bar association in the NAP process. Fortunately, the bar is now eager to engage on how to accelerate their understanding of the subject and mainstream the BHR agenda into their operations. BHR is also now recognised as an emerging area of law, and EALS is taking deliberate steps to build the capacity of lawyers in the region in collaboration with its constituent bar associations.



Growing government restrictions on civil society threatens their ability to call on businesses to respect human rights for all.

This mapping report includes BHR stakeholders that could be classified into three broad categories:

- First, organisations with BHR initiatives.
- Secondly, organisations that have a broader mandate that could allow introducing BHR without leading to a ‘mission creep’ by the organisation. For instance, those that have an economic, social and cultural rights programme that could easily incorporate BHR issues.
- Finally, there are several organisations which do not have any BHR-related programmes but have expressed openness to include BHR in their current and near-future initiatives.



Collaboration and partnership are central to ensuring that businesses operate responsibly.



RATIONALE OF THE MAPPING

A4ID's ROLE UK Programme, funded by DFID, builds long-term partnerships between the UK legal sector and legal actors in developing countries to strengthen the rule of law and facilitate progress towards the SDGs. It focuses on the eradication of poverty, gender equality, reduced inequalities, peace, justice, and strong institutions, and partnerships for development.

The ROLE UK programme supports partnerships between the international development and legal pro bono sectors to provide high-quality pro bono legal and judicial expertise.

One of the key projects supported by the programme is the partnership between A4ID and EALS. EALS is the umbrella Bar Association of East Africa and its membership comprises of over 10,000 individual members, as well as seven national bar associations (Law Society of Kenya, Tanganyika Law Society, Uganda Law Society, Zanzibar Law Society, Rwanda Bar Association, Burundi Bar Association, South Sudan Bar Association). Through their partnership, EALS and A4ID seek to promote sustainable and inclusive responsible business practices in East Africa. To

ensure that businesses receive human rights-informed legal advice, A4ID and EALS will facilitate capacity building toward regular, responsible business practices and the UN Guiding Principles on Business and Human Rights. A4ID and EALS aim to contribute to meaningful progress on National Action Plans on BHR in East African countries by ensuring the voice of the legal community is heard.

This mapping is to help the ROLE UK programme better understand and disseminate learning on the landscape of BHR in East Africa, to better support partnerships involved in this area. It will help the programme to improve its support to existing partnerships working on BHR in East Africa and inform decisions on whether to support other stakeholders.

The mapping covers organisations from Kenya, Uganda, Tanzania, South Sudan, Rwanda, Burundi and the United Republic of Tanzania, which have been selected non-randomly, based on the researcher's knowledge of the organisation's ongoing work on BHR or their potential to begin carrying out BHR related projects. Many were chosen due to their earlier

work with A4ID.

This mapping was done through desktop research and telephone/skype interviews with relevant personnel in different stakeholder

organisations. In total, the researcher conducted 32 interviews and used semi-structured questions to obtain information from the interviewees.⁴



OVERVIEW OF BUSINESS AND HUMAN RIGHTS IN EAST AFRICA

This section gives an overview of the most common human rights concerns related to businesses in East Africa that receive significant attention from government regulatory agencies, the media, and human rights organisations. The business and human rights issues addressed by different stakeholders depend on the economic activity in the country and the stakeholder's niche, and whether it is a state or a non-state actor, with state actors mainly playing a policy and regulatory role.

The following section provides a brief background of the BHR legal and policy framework, and then highlights the most common concerns in different countries in the region.

1. KENYA

The Constitution of Kenya, 2010, imposes a high threshold for the conduct of businesses. It obligates businesses to respect human rights as contained in the constitution's bill of rights.⁵ This obligation has been affirmed several times by the higher courts of record. Other relevant legislation includes the Environmental Management and Coordination Act,⁶ the Water Act,⁷ the Companies Act,⁸ the Community Land Act,⁹ the Mining Act,¹⁰ the Proceeds of Crime and Anti-Money Laundering Act,¹¹ the Ethics and Anti-Corruption Commission Act,¹² the Climate Change Act¹³ and the Employment Act.¹⁴

MOST COMMON BUSINESS AND HUMAN RIGHTS CONCERNS ACROSS EAST AFRICA:

- Unsafe working conditions for people working in mines.
- Forced evictions.
- Low wages.
- Displacement of indigenous communities due to tourism.
- Sexual violence against women.
- Internet shutdowns by telecom companies that limit freedom of expression and access to information.
- Pollution and health concerns related to the oil sector.
- Exploitation and human rights abuses of migrant workers.

The Kenyan NAP identifies environment protection, access to remedy, revenue transparency, land rights and labour as the key BHR priority issues.¹⁵ For more information, see Kenya Country Guide on Business and Human Rights,¹⁶ and the Baseline Assessment on business and human rights in Kenya.¹⁷ The most prevalent concerns by sectors include:

- **Agribusiness:** Working conditions including worker's safety.
- **Mining:** Land rights and lack of local community benefits.¹⁸
- **Manufacturing:** Casualisation of labour, working conditions and lack of access to non-judicial remedies.

2. UGANDA

The Constitution of the Republic of Uganda, 1995, is the foundational document providing for labour rights, environmental rights, equality rights and land rights.¹⁹ Besides the constitution, other statutes that deal with BHR-related issues include The Persons with Disabilities Act,²⁰ The Equal Opportunities Act,²¹ The Land Act²² and Land Amendment Act²³ 2004 & 2010, The Employment Act,²⁴ The Worker's Compensation Act,²⁵ The Occupational Health & Safety Act,²⁶ The National Environment Act,²⁷ and The Children Act.²⁸

Uganda is in the process of adopting an NAP.

The process is broad-based and involves actors including trade unions, individuals and communities impacted by business operations, industry associations, CSOs, and relevant government agencies. Uganda has identified the environment, labour, revenue, and land issues as key priority areas for the NAP. The following are the main BHR issues in key sectors in Uganda.

- **Oil:** Several infrastructure projects have been implemented or are under implementation in preparation for commercial production. These include the proposed pipeline from the oil-rich Hoima area traversing to Tanzania's port of Tanga, a road network to serve the oil areas, an airport, an oil refinery, and the oil waste processing facility.²⁹ The prevalent human rights issues in the oil sector include a lack of capacity by oil host communities to meaningfully engage in revenue sharing agreements leading to perceptions that they are not tangibly benefiting from the oil sector;³⁰ a lack of information and consultation with the local communities displaced by oil infrastructure;³¹ a lack of compensation for those who are displaced;³² and the attendant loss of livelihoods for Project Affected Persons (PAPs).³³ Reports have suggested that women are marginalised from discussions on compensation, despite being disproportionately impacted by the oil-related disruption.³⁴

- **Mining:** There have been reports about a

lack of safety and poor working conditions for gold miners. Government agencies have raised safety concerns for those who mine limestone,³⁵ along with complaints about the sector's lack of benefits for locals.³⁶ There have also been allegations of child labour in artisanal mining.³⁷

■ **Agribusiness and horticulture:** Some of the human rights issues in this sector include hazardous working conditions, low wages,³⁸ and forced evictions to pave the way for agribusinesses.³⁹

For more information on BHR in Uganda, visit the Uganda Business & Human Rights Country Guide.⁴⁰

3. TANZANIA

The Constitution of the United Republic of Tanzania is the primary law that has a bill of rights, which businesses are expected to respect.⁴¹ Other relevant laws include the Mining Act (2010 as amended in 2017),⁴² Land Acquisition Act (1967),⁴³ Persons with Disabilities Act (2010),⁴⁴ Workers' Compensation Act,⁴⁵ Environmental Management Act (2004),⁴⁶ and the Employment and Labour Relations Act (2004).⁴⁷

Tanzania's Commission for Human Rights and Good Governance (CHRAGG) has partnered with other organisations to commence the adoption of an NAP. Towards this, CHRAGG has conducted a baseline assessment on BHR.⁴⁸ The following are the main BHR concerns in Tanzania:

■ **Mining:** Allegations include sexual assault and killings of local community members by private security guards,⁴⁹ and tax evasion by the mining companies.

■ **Infrastructure:** The growth in infrastructure development, such as roads and railways, has seen increased concerns about evictions without compensation.⁵⁰

■ **Agribusinesses:** Communities surrounding large scale agribusinesses have raised concerns about displacement that compromises their land rights and food availability.⁵¹

■ **Conservation:** Concerns have revolved around the displacement of indigenous communities in the demarcation of land for hunting and tourist resorts.⁵²

4. RWANDA

The Constitution of the Republic of Rwanda's bill of rights provides for, among other rights, the right to a clean environment, to form and join trade unions, to collective bargaining, to strike, and to freedom of press, expression and access to information.⁵³ Other laws relevant to BHR include the law establishing the National Human Rights Commission,⁵⁴ and the Environment and Climate Change Law (2019).⁵⁵ The National Commission for Human Rights has identified its capacity on business and human rights as a challenge.⁵⁶

There are several recurring themes concerning business operations in Rwanda. These are:

- **Mining:** There have been concerns about the safety of the mines, with several reported cases of work-related injuries and fatalities.⁵⁷
- **Agribusiness and horticulture:** Concerns include child labour and poor working conditions.⁵⁸ A human rights impact assessment on the coffee sector in Rwanda raised issues related to workers' rights and whether the coffee sector is contributing to poverty reduction in Rwanda.⁵⁹

5. BURUNDI

The Constitution of the Republic of Burundi has a bill of rights that guarantees, among other rights, the freedom from discrimination on any grounds, freedom from slavery and servitude, freedom of assembly and expression, responsible use of natural resources in a manner that conserves the environment, and the right to strike at the workplace.⁶⁰ There are several common BHR concerns in reports on Burundi:

- **Mining:** Safety issues in mining include mine collapse⁶¹ and use of hazardous chemicals in artisanal mines.⁶²
- **Telecommunications companies and right to information:** Several NGOs have raised concerns about the role of telecommunications

companies in internet shutdowns limiting freedom of expression and access to information.⁶³

- **Agribusiness:** This includes coffee which is a significant revenue earner. With coffee production increasingly affected by climate change, there have been concerns about whether businesses along the value chain are willing to support small-scale farmers to adopt climate-friendly practices, or they will move to new regions.⁶⁴

- **Freedom of association and expression:** Several reports have raised concerns about the repression of freedom of association and expression in Burundi. A report of the UN Commission of Inquiry on Burundi stated that 'serious human rights violations have continued... in a culture of impunity.'⁶⁵ Although this particular report does not identify any responsibility or complicity of the business sector in the repression of human rights, the private sector has a role to play in leveraging its influence to promote a climate where government agencies are more respectful of human rights.⁶⁶

6. SOUTH SUDAN

The Transitional Constitution of the Republic of South Sudan (2011) has a bill of rights that guarantees freedom from discrimination, the right to access information, privacy, and the right to own property, among other rights and freedoms.⁶⁷

Other legislation that is relevant to BHR includes the Southern Sudan Anti-Corruption Commission Act,⁶⁸ the Petroleum Act⁶⁹ and the Public Financial Management and Accountability Act.⁷⁰

The main BHR allegations include:

- **Oil:** South Sudan predominantly relies on oil as the main foreign exchange earner. Oil has been an essential factor in the conflict that has caused many deaths and displacements.⁷¹

Prosecutorial authorities have charged some oil companies' executives for alleged corporate atrocity crimes committed in South Sudan.⁷²

Environmental and health concerns related to the oil sector prompted the president to order an independent international inquiry to assess the alleged impacts.⁷³

- **Civil War:** There have been concerns that businesses are benefiting from or complicit in the conflict and may not be carrying out the necessary due diligence to ensure that their operations do not cause human rights harm. These allegations have touched on business in both the banking and oil sectors.⁷⁴

CROSS-CUTTING EMERGING ISSUES

There are emerging BHR issues that are yet to get significant attention from state and non-state actors in the region, but require consideration.

These include money laundering, bribery, and corruption. The rise in digital lending platforms has also created a regulation challenge amidst reported cases of predatory lending without stringent financial profiling, leading to blacklisting of many borrowers from borrowing in the future, including from mainstream financial institutions.⁷⁵

Denial of access to credit could have a significantly negative impact on the borrowers' future livelihood.

There are also many renewable energy projects in the region, with the significantly sized ones based in traditionally economically and politically marginalised areas. There have been grievances by local communities who feel disenfranchised and alienated in some areas by renewable energy projects.⁷⁶ It will be imperative for their proponents within and outside of the government to ensure the transition to green energy is fair and just.



Emerging BHR issues that cut across East Africa include money laundering, bribery and corruption.

STAKEHOLDERS AND THEIR CONTRIBUTION TO THE BHR AGENDA

Businesses have a responsibility to respect human rights by taking measures to identify, avoid and mitigate human rights risks related to their operations.

Stakeholders contribute to BHR in diverse ways depending on their mandate and resources. The following section highlights some of the key stakeholders and how they contribute to BHR.

- **Businesses and Business Associations**

Businesses have a responsibility to respect

human rights by taking measures to identify, avoid and mitigate human rights risks related to their operations. Business associations may represent either the whole private sector, or a specific sector. For instance, the Association of Skilled Migrant Agencies of Kenya is specific to recruitment agencies while the Kenya Private Sector Alliance is open for all private sector actors. They advance BHR by adopting codes of conduct, giving guidelines on industry standards, representing members in policy discussions, including in the development of NAPs, and building the capacity of members on BHR issues.

- **Non-Governmental Organisations (NGOs)**

These include international, national and community-based organisations. International NGOs often engage with local actors and may be more specialised with BHR issues. National-level NGOs have mostly been dealing with broader human rights issues, but have embraced BHR as part of their intervention areas.

However, there are specialist NGOs that are doing significant work, such as Business and Human Rights Tanzania, and the Uganda

Coalition for Corporate Accountability. The community-level NGOs are formed to address specific concerns emanating from business operations at the local level, such as mining or agribusiness.



You can address BHR issues by monitoring and documenting human rights abuses, conducting research, building capacity or through public interest litigation.

Their intervention strategies include strategic litigation, documentation, and monitoring of human rights abuses, public interest litigation, research, and capacity building.

■ **National Human Rights Institutions (NHRIs)**

NHRIs are established by statute and have varying mandates. These include receiving complaints of human rights violations, advising governments on compliance with international human rights obligations, monitoring compliance with human rights obligations, and investigating alleged abuses including through conducting inquiries. Additionally, they support capacity building for different actors on diverse human rights issues. NHRIs in the region are increasingly playing a significant role in BHR, including participating in the adoption of NAPs in Kenya, Uganda and Tanzania.

■ **Government Agencies**

There are three ways in which government agencies influence BHR. First, different government agencies regulate different business-related issues. These include labour, mining, water extraction and use, environment, work-place safety and anti-corruption measures. Secondly, there are ministries charged with trade promotion responsibilities and hence need to ensure that investors respect people's rights. Finally, there are state-owned enterprises that may be established by statute, but also conducting businesses and have a higher obligation to ensure their operations do not harm people or violate their rights.

■ Law Firms and Bar Associations

Law firms provide legal advice to individuals and communities impacted by businesses, as well as to businesses through legal assistance with their establishment, mergers, acquisition or when concerns about their conduct have been raised, either through litigation or in non-judicial fora. Law firms employ strategic litigation, provide paid and pro bono legal advice to individuals impacted by businesses, and advise businesses on their main strategies to advance respect for human rights.

Bar associations are responsible for regulating legal practice and promoting the members' welfare, including supporting capacity building using their continuous legal development programmes to educate their members on new areas of law. The following section discusses the key stakeholders for each of the countries and some of the initiatives they have engaged in to promote respect for human rights.

■ Judiciary

The judiciary has an essential role to play by providing effective remedy to victims of corporate human rights abuses. States have a responsibility to investigate, punish and redress business-related human rights violations when they occur. Grievance mechanisms may take a range of forms and include non-judicial systems, but courts and tribunal are at the core of ensuring access to justice for victims of human rights abuses. The judiciary's ability to provide effective remedy depends on its impartiality and protection from corruption and undue influence from political and economic actors. However, many barriers potentially prevent victims' access to judicial remedy: financial costs, cultural traditions, insufficient courts in remote areas, lack of adequate representation, and sometimes lack of knowledge among the judicial profession of human rights law and businesses' obligations.



KENYA

BUSINESS AND BUSINESS ASSOCIATIONS

1. GLOBAL COMPACT NETWORK KENYA

Global Compact Network Kenya is the local affiliate of the UN Global Compact, which has been popularising the UNGPs to its member companies. It was actively involved in the NAP development process, where it was a member of the Steering Committee. Its current BHR-related plans include championing four SDGs. These are SDG 3 on promoting good health, SDGs 14 and 15 on promoting a clean environment through plastic waste reduction and SDG 4 on harnessing technology to promote quality education.

The business community in Kenya has adopted a Code of Ethics (the code) which mirrors the principles of the UN Global Compact. By September 2019, 575 members of the business community had signed the code.⁷⁷ Signatories have committed to respect the human rights and dignity of employees and non-tolerance of discrimination or favouritism. Members also commit to provide a decent, safe and healthy

work environment for employees, as well as developing their talents. The Code of Conduct includes a commitment to comply with labour laws and attendant health and safety policies, and standards of decent work.

From the second year following commitment to the Code of Ethics, companies are supposed to publicly report on the progress they are making. The report should include the measures taken to integrate the Code into the company's operations. Non-adherence to the Code of Ethics may invite sanctions, including public reprimand and public exclusion from the Code if necessary, until the offending business takes the appropriate corrective action.

2. KENYA ASSOCIATION OF MANUFACTURERS (KAM)

KAM is the umbrella organisation for businesses involved in manufacturing value addition. It seeks to promote competitive and sustainable Kenya-based manufacturing by working with the government and other stakeholders, to promote trade and investment. KAM has partnered with other organisations, including Agence Française de Développement, to create the Green

Financing initiative which seeks to mitigate climate change by enhancing green energy projects through concessional debt financing and offering technical assistance. The initiative has already incubated 300 green energy projects.

3. KENYA PRIVATE SECTOR ALLIANCE (KEPSA)

KEPSA is the umbrella body of the private sector in Kenya with more than 500,000 members, directly and through membership organisations. Its mission is to work with the government and other stakeholders to improve the environment for doing business in Kenya. Some of its initiatives relevant to BHR include the Sustainable Inclusive Business Africa programme which supports responsible business practices among its members, including having a global outlook on the impact of its activities on 'People, Planet and Profit.' Past initiatives include a partnership with UNICEF to improve maternal and infant nutrition through making workplaces mother and baby-friendly, and a partnership with the government to raise the profile of online work among Kenyans.

4. SAFARICOM

Safaricom is the largest telecommunications company in eastern Africa and is a member of the UN Global Compact. The company has published its strategy of integrating the SDGs into its business model, including the goals on good health and well-being, quality education, affordable

and clean energy, decent work, industry innovation and infrastructure, reducing inequalities, responsible consumption and production, peace, justice and strong institutions, and forging partnerships to realise the goals.⁷⁸ The company has made commitments to improve its business practices and ensure that they are responsible and sustainable. Some of the measures the company has taken include increasing the gender balance of its staff (though it admits that it needs to do more regarding managerial staff), providing appropriate facilities for staff with infants, and increasing the number of employees living with disabilities.

NON-GOVERNMENTAL ORGANISATIONS

1. KENYA HUMAN RIGHTS COMMISSION (KHRC)

KHRC is the oldest national human rights organisation in Kenya. It has an Economic and Social Justice programme which focuses on:

- Unfair trade practices and corporate impunity revealed as gross injustices.
- Labour rights in 'select precarious economic belts' including agribusiness and Export Processing Zones (EPZ).
- Supporting the democratisation of labour unions.

- Corporate accountability, including advancing the implementation of the UNGPs. Under this programme, KHRC has represented communities that have been impacted by agribusinesses, horticulture and mining businesses.

2. KENYA LAND ALLIANCE

Kenya Land Alliance’s Land and Governance programme has been supporting communities in the Turkana area to protect their community land rights, given the oil exploration and anticipated drilling going on in the region. The programme was meant to reduce inter-community conflict and stand-offs with the businesses operating in the area.



3. HAKIJAMII

Hakijamii is a national organisation focusing on the social, cultural and economic rights of marginalised communities in Kenya. It has a network of local partners and innovatively blends this community partnership work with its public interest litigation programmes. Recent cases include legal representation for slum dwellers who were evicted to pave way for road construction within Nairobi City County. It has also filed lawsuits to support local communities affected by proposed infrastructure development under the Lamu Port, South Sudan, Ethiopia Transport Corridor (LAPSSET Corridor).



4. NATURAL JUSTICE

Natural Justice's work in Kenya entails supporting communities to pursue their environmental rights. It also supports groups impacted by development projects in demanding their involvement in decision-making, as well as groups in resource-rich areas to negotiate benefit sharing.

In supporting litigation, Natural Justice was one of the organisations instrumental in facilitating a local community, that would have been impacted by a proposed coal power project, to petition the Support National Environment Tribunal to revoke the National Environment Management Authority's decision to grant the power project licence.

Other projects include the legal empowerment of communities impacted by infrastructure projects in northern Kenya, ensuring legal compliance of a port project, and supporting community-led environmental audits of extractive projects in the coastal area.

5. THE ROUTE TO FOOD

The Route to Food initiative is an alliance working towards the right to food in Kenya. One of their current campaigns (toxic business) is advocacy on the proper regulation of pesticides that are harmful to human health and the environment, some that were banned in Europe many years ago. The focus is on the regulatory

agencies, but there is interest in looking at the corporate accountability angle to the campaign.

5. HAKI MADINI COALITION

The coalition draws its membership from CSOs and faith-based organisations working in the extractive sector to promote responsible business by the companies and protect local communities. The organisation has supported advocacy efforts in communities surrounding fluor spar, coal, titanium, oil, gold mining and limestone mining. Most of its engagement is through policy advocacy, though it is developing its corporate accountability strategy.

6. SAVE LAMU

Save Lamu focuses on the environmental and social risks posed by the proposed Lamu Port and the Lamu coal power plant. The organisation, supported by others including Natural Justice and Katiba Institute, successfully petitioned the National Environmental Tribunal and had a license granted to the Amu Power revoked on the basis that there had been no adequate public participation before the granting of the license. The organisation's strategies include capacity building, lobbying and advocacy, litigation, training, workshops, and research.

7. KATIBA INSTITUTE

Katiba Institute is one of the leading public interest litigation organisations defending the bill of rights under the 2010 Constitution. The organisation has taken advantage of Articles 22 and 258 of the constitution that have made it easier for public-spirited organisations and individuals to file cases in court. Most of the litigation undertaken has been on establishing transparency and accountability, good governance and the rule of law. Significant cases in the recent past include representation of Save Lamu at the National Environment Tribunal, and also representation of communities affected by LAPSSSET Corridor infrastructure.

8. CENTER FOR JUSTICE GOVERNANCE AND ENVIRONMENTAL ACTION

The Center for Justice Governance and Environmental Action (CJGEA) is an environmental lobby group that has filed a lawsuit on behalf of members of the Uhuru Owino community who were exposed to toxic heavy metal poisoning from a smelter, leading to deaths and life-long health complications. Visit www.centerforjgea.com/litigation.php for an overview of two strategic lawsuits by CJGEA.

GOVERNMENT AGENCIES

1. KENYA LAW REFORM COMMISSION

The Kenya Law Reform Commission is mandated to review existing legislation and draft new legislation. The Constitution of Kenya (2010) has an expansive bill of rights that obligates businesses to respect it, a position that courts have reiterated in several cases. All laws, therefore, need to support this constitutional position that obligates businesses to respect human rights. Additionally, the Kenya NAP has made several recommendations to the NAP implementing committee to consider law review to promote respect for human rights by businesses. The Kenya Law Reform Commission is therefore crucial in any legislative agenda that relates to BHR.

2. KENYA NATIONAL COMMISSION ON HUMAN RIGHTS

The Kenya National Commission on Human Rights (KNCHR) is the constitutional body mandated by Article 59 (2) (c) of the Constitution to promote the protection and observance of human rights by all institutions, whether private or public. Its mandate includes the promotion of respect for human rights by businesses. It has a specialist BHR section, which has responsibility for coordination of the NAP adoption process.

KNCHR has conducted public inquiries in cases of alleged widespread violations of human rights by businesses including by mining companies, horticulture and agribusiness sectors.

KNCHR's complaint handling department receives grievances from individuals and communities impacted by business operations, with labour-related claims making up most grievances. A relatively new area of focus for the commission is supporting the capacity of the relevant government agencies, as well as labour recruitment agencies to promote responsible recruitment practices and protect migrant workers from exploitation.

LAW FIRMS AND BAR ASSOCIATIONS

1. LAW SOCIETY OF KENYA (LSK)

The Law Society of Kenya is the statutory bar association in Kenya and is involved in, among other functions, facilitating the continuous professional development of the members. LSK members have received training on BHR. However, there is an expressed need for more sustainable capacity building, either as stand-alone training or part of the Continuous Professional Development programme mandatory for practising advocates.

UGANDA

BUSINESS AND BUSINESS ASSOCIATIONS

1. UGANDA MANUFACTURERS ASSOCIATION (UMA)

The Uganda Manufacturers Association is an industry association that works with government agencies and private sector organisations

to enhance industrial growth in Uganda and balance it with environmental protection. Its current membership is at 1,221, drawn from all manufacturing sectors. The UMA Training Centre organises training courses for members, including on workplace health and safety, and labour.

NON-GOVERNMENTAL ORGANISATIONS

1. GREAT LAKES INSTITUTE FOR STRATEGIC STUDIES (GLISS)

GLISS is a think tank on policy issues affecting the Great Lakes region. Some of GLISS' programmes that are relevant to BHR include:

- Research and advocacy to understand BRICS' impact (Brazil - Russia - India - China - South Africa) on development in East Africa and whether their economic and investment policies are inclusive
- Enhancing understanding and learning on good practices in strategic minerals & land governance

In 2018, GLISS organised an executive training programme on the extractive industry in the East Africa region that brought together stakeholders from businesses, academia, NGOs and government officials.

2. HUMAN RIGHTS NETWORK UGANDA (HURINET)

HURINET is a network of human rights organisations in Uganda, with membership drawn from both local and international organisations dealing with diverse human rights issues. Besides supporting the capacity of its members, it delivers programmes on human

rights and rule of law, which include BHR elements. HURINET has conducted studies to help it support communities impacted by mining operations in the Karamoja area. HURINET has also been one of the leading conveners on NAP related meetings.

3. UGANDA CONSORTIUM ON CORPORATE RESPONSIBILITY (UCCA)

UCCA is a coalition of NGOs pursuing corporate accountability by corporations, states, international finance institutions and development partners for violation of Social and Cultural Rights. The founding NGOs specialise in different areas of human rights protection (further discussed in their respective right later in this section). These include the Initiative for Social and Economic Rights (ISER), the Public Interest Law Clinic at Makerere University Law School (PILAC), Legal Brains Trust (LBT) and the Center for Health Human Rights and Development (CEHURD). Other members include the Ecological Christian Organization, Centre for Economic and Social Cultural Rights in Africa, and Environment Agriculture and Education, among others.

Some of its current initiatives include supporting the people affected by the proposed central oil processing facility in Buliisa area; action-oriented research on the social and economic impacts of large-scale sugar production; and a study on the

human rights impacts of limestone mining in the Karamoja area.

At the continental level, UCCA has actively participated in discussions on the proposed binding treaty on BHR. This participation ensures that the conveners of these discussions include and listen to local voices in the deliberations. UCCA members are also engaged in the ongoing NAP development process.

4. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER)

ISER has advocacy programmes around the right to health, right to food, social accountability, citizen participation, and BHR (through its UCCA membership). Some of ISER's ongoing initiatives include analysing the impacts of public-private partnerships on the rights to health and education. ISER has also been publishing the Economic and Social Rights Advocacy (ESRA) Brief, a bi-annual publication on socio-economic rights in the Ugandan context.

5. THE SOUTHERN AND EASTERN AFRICA TRADE INFORMATION AND NEGOTIATION INSTITUTE (SEATINI)

SEATINI has been instrumental in leading conversations in East Africa on engagement in trade policy processes and negotiations at all levels. The organisation also seeks to influence regimes that promote inclusive and sustainable

development. One of their recent successes was when they initiated a large advocacy movement to convince the government of the Republic of Tanzania to drop trade agreements with the Netherlands based on their human rights dimensions.

SEATINI also publishes policy briefs that have a BHR dimension. For instance, a policy brief on Public-Private Partnership in Large Investment Projects, which urged the regional government to be cautious due to potentially adverse human rights implications for local populations.⁷⁹

6. GLOBAL RIGHTS ALERT (GRA)

GRA's Corporate Accountability and Transparency programme promotes national and international best practices on transparency and accountability in the governance of natural resources, especially in the oil sector. Through its Gender and Inclusiveness programme, GRA highlights the structural inequalities experienced by different groups, including women, youth and children and how this disenfranchises them from benefiting from natural resources extraction. For example, a recent study highlighted the human rights abuses experienced by women in gold mining sites, including sexual exploitation, discrimination, and lack of protective gear.⁸⁰

The organisation also works with stakeholders to reduce the high incidences of land conflicts,

disruption, loss of livelihoods, and the interruption of social cohesion brought about by the exploitation of natural resources, especially the relatively nascent oil sector. GRA has achieved this by amplifying the voices of the host communities and bringing their issues to the attention of duty bearers. This has facilitated discussions to promote respect for human and community resource rights.

GOVERNMENT AGENCIES

1. EQUAL OPPORTUNITIES COMMISSION

The Equal Opportunities Commission is a statutory body mandated to eliminate discrimination and inequality against persons. It is mandated to receive and investigate complaints on discrimination against individuals and corporate entities. If it finds there is a violation of the law, it may start a conciliation process, and where conciliation fails, it may write a report giving its verdict. In the past, the commission has conducted a public inquiry where there are concerns about widespread discrimination within a specific sector. For instance, in 2018, it held an inquiry on the diversity of the workforce in Mayuge Sugar Industry.⁸¹

2. UGANDA HUMAN RIGHTS COMMISSION (UHRC)

UHRC is the national human rights institution whose mandate includes receiving complaints, investigations, and through the commission's tribunal, awarding remedies where there is a finding of violations. Labour-related grievance, including from the private sector, forms the highest percentage of complaints made to UHRC. Additionally, UHRC is one of the state departments that are spearheading the NAP adoption process.

LAW FIRMS AND BAR ASSOCIATIONS

1. CRISTAL ADVOCATES

Cristal Advocates practices commercial law, including providing legal and advisory support on the energy and infrastructure sectors to businesses. The firm publishes a regular update on the developments in the oil sector in Uganda, including the regulatory regime.

2. UGANDA LAW SOCIETY

The Uganda Law Society is part of a project supported by the Canadian Bar Association which seeks to 'increase sustainable economic growth for East Africans, especially women and vulnerable groups, affected by the extractive industries'.⁸² The society has a legal aid project, but has not covered BHR. The secretariat, however, expressed interest in capacity building on BHR issues.



TANZANIA

BUSINESS AND BUSINESS ASSOCIATIONS

1. EAST AFRICAN CRUDE OIL PIPELINE (EACOP)

EACOP is a joint venture of Uganda National Oil company, Tanzania Petroleum Development Corporation, China National Offshore Oil Company (CNOOC), Total and Tullow Oil Plc. EACOP will run the Uganda-Tanzania oil pipeline for the export of oil from Uganda to the international market. Due to the potential human rights impacts of the pipeline construction, including evictions to pave the way for the pipeline, EACOP has committed to ensuring that it complies with all 'national legislation and international requirements'. It will also pay special attention to vulnerable persons to ensure that its operations do not compromise livelihoods. EACOP has included a stakeholder engagement policy and a grievance handling procedure in its operations. The company has also committed to ensuring its workplace safety and environment throughout its life cycle.

NON-GOVERNMENTAL ORGANISATIONS

1. LAND RIGHTS RESEARCH AND RESOURCE INSTITUTE (HAKI ARDHI)

Most communities and individuals do not have the title document for the land that they rely on for their livelihoods. This lack of title compromises their ability to negotiate for compensation from either the government or businesses if their land is acquired on the grounds of the public interest. Haki Ardhi's mission is to secure the land rights of more than 80% of rural-based communities who are mainly small-scale farmers.

2. HAKI RASILIMALI TANZANIA

Haki Rasilimali is a platform to support joint learning and advocacy by CSOs involved in the extractive sector by organising regional conferences, workshops and seminars.

3. BUSINESS AND HUMAN RIGHTS TANZANIA (BHRT)

BHRT is one of the specialist organisations working on BHR in Tanzania. Its focus includes promoting gender governance, conducting investigations on the human rights impacts of

extractive industries and applying the study findings to encourage businesses to operate within the UNGP framework. Other programmes include monitoring compliance with labour regulations by corporations; empowering communities surrounding mining projects to ensure they negotiate with mining companies; and influencing policy to promote a culture of corporate accountability.

4. LEGAL AND HUMAN RIGHTS CENTER (LHRC) TANZANIA

LHRC is among the oldest human rights organisations in Tanzania. It was the first to establish a business and human rights programme. Under the programme, it works with state agencies and businesses to promote the UNGPs. LHRC has been publishing an annual report on business and human rights (the Tanzania Human Rights and Business Report) which gives an overview of the topical business and human rights sectors and their issues, and uses this as a basis for advocacy with the state regulatory agencies and the concerned businesses.

5. HAKI MADINI TANZANIA

Haki Madini's human rights and legal empowerment programme focuses on ensuring human rights of miners and mining-affected communities are protected. It aims to support local small-scale mining community activism through the

recognition and articulation of their legal, economic and social rights. The Gender and Mining Programme encourages women to make inroads into the male-dominated mining sector by helping women access business finance on an equal basis as men. It also challenges the mining community to address discrimination, intimidation, and violence against women, as well as promoting safe and hygienic workplaces for women.

GOVERNMENT AGENCIES

1. COMMISSION FOR HUMAN RIGHTS AND GOOD GOVERNANCE (CHRAGG)

CHRAGG is the national human rights institution in Tanzania with a wide-ranging mandate, including on BHR. It has collaborated with CSOs to draft the baseline assessment for BHR as a precursor to an NAP on Business and Human Rights. In its complaints handling role, it receives grievances from members of the public about the human rights impacts of business operations. Its response includes raising the issues with the business and mediating a resolution between the aggrieved individual or community and the business. It has also conducted inquiries about the human rights impacts of businesses in Special Economic Zones and made recommendations to businesses operating in the zones to take steps to address identified human rights concerns especially labour-related issues.

LAW FIRMS AND BAR ASSOCIATIONS

1. TANGANYIKA LAW SOCIETY

The Tanganyika Law Society members have participated in workshops to build their capacity on BHR issues hosted by the Canadian Bar

Association. The focus was to improve their awareness on the human rights dimensions of the extractive sector, including gas and oil projects. A recent workshop emphasised how to protect women and girls from discrimination in the extractive sector.

RWANDA

BUSINESS AND BUSINESS ASSOCIATIONS

1. RWANDA MINING ASSOCIATION

Rwanda Mining Association is a private sector body in charge of promoting mineral exploitation in Rwanda. One of its objectives is to ensure that the members operate within the applicable directives and legislation. Its main strategies are advocacy and capacity building.

about 40 organisations from 5 categories. There are trade unions, NGOs, professional organisations, university legal aid clinics, and international non-governmental organisations.

NON-GOVERNMENTAL ORGANISATIONS

1. LEGAL AID FORUM RWANDA

The Legal Aid Forum Rwanda is a coalition of

A significant contribution of the Legal Aid Forum is successfully lobbying for the adoption of the Law of the Bar, allowing CSOs the right to represent parties to a case, which has enabled the coalition members to provide free legal representation to poor and vulnerable people. The coalition also coordinates the participation of its member organisations in the Universal Periodic Review Process.⁸³ The Legal Aid Forum is open to engagement on BHR, including building the capacity of its members.

2. COLLECTIF DES LIGUES ET ASSOCIATIONS DE DÉFENSE DES DROITS DE L'HOMME AU RWANDA (CLADHO)

CLADHO is the umbrella organisation for 12 local human rights organisations. It does not have a BHR mandate, but is open to learning more about business and human rights.

GOVERNMENT AGENCIES

1. NATIONAL COMMISSION FOR HUMAN RIGHTS

The Rwanda National Commission for Human

Rights has a broad mandate, including working with other organisations to design strategies to prevent human rights violations. The commission is also mandated to monitor compliance with human rights, including the rights of children, women, persons with disabilities, and migrant workers and persons living with HIV/AIDS. It has identified BHR as a strategic area for involvement. It has also held internal capacity building sessions with the support of the Office for United Nations High Commissioner for Human Rights.

BURUNDI

NON-GOVERNMENTAL ORGANISATIONS

1. ASSOCIATION DES FEMMES JURISTES DU BURUNDI (AFJB)

AFJB works with other stakeholders to address gender discrimination by defending victims of gender discrimination and also by lobbying for legislative reforms. The organisation does not currently have BHR as a thematic area.

LAW FIRMS AND BAR ASSOCIATIONS

1. RUBEYA & COMPANY ADVOCATES

The firm advises local and international companies already represented in Burundi, and those wanting to establish local operations on corporate matters and compliance with the country's company legal and regulatory framework.

2. BURUNDI BAR ASSOCIATION

Burundi Bar Association's mission is to protect the interest of its members and Burundi's

citizens. Apart from the BHR initiatives that are coordinated by EALS, the association does not have any ongoing BHR projects.

SOUTH SUDAN

NON-GOVERNMENTAL ORGANISATIONS

1. THE ADVOCATES FOR HUMAN RIGHTS & DEMOCRACY

This organisation is dedicated to the advancement and protection of human rights of South Sudanese people through educating them on human rights principles and democratic concepts guaranteed by the South Sudan constitution and applicable laws. It supports the implementation of international human rights standards and peacebuilding through advocacy for justice, human rights and good governance to ensure peace.

LAW FIRMS AND BAR ASSOCIATIONS

1. THE SOUTH SUDAN LAW SOCIETY

The South Sudan Law Society is involved in general legal aid provision and capacity building for members and government officials. It does not have a BHR component.



EAST AFRICA

Several organisations are active in multiple countries including international organisations and the East Africa Law Society. The following section highlights what the international organisations are doing on BHR, the countries they operate in and their strategy.

1. DANISH HUMAN RIGHTS INSTITUTE (DIHR)

DIHR has been working with NHRIs, business associations and NGOs in Kenya and Uganda to support capacity building on BHR and guide the NAP development process.⁸⁴

2. BUSINESS AND HUMAN RIGHTS RESOURCE CENTRE (BHRRC)

BHRRC covers all the countries in the region and is involved in empowering advocates through capacity building. The Centre also promotes accountability and transparency through its website, weekly updates and other tools.⁸⁵

3. OAKLAND INSTITUTE

The Oakland Institute has been conducting research in Uganda and Tanzania on the impact of businesses on land rights.⁸⁶

4. INTERNATIONAL PEACE INFORMATION SERVICE (IPIS)

IPIS has been supporting NGOs and the Commission for Human Rights and Good Governance to build their capacity. It has also been collaborating with them to conduct research on various sectors and publishes periodic reports.⁸⁷

5. STICHTING ONDERZOEK MULTINATIONALE ONDERNEMINGEN (SOMO)

SOMO, or the Centre for Research on Multinational Corporations has engaged in capacity building on advocacy strategies for NGOs in Kenya and Tanzania. It has also collaborated to monitor and document selected cases of human rights violations by businesses.⁸⁸

6. EALS

The East Africa Bar Association is the regional association made up of the constituent bar associations from the regional countries. EALS is involved in building the capacity of the members of the constituent bar association on various legal issues. It has a Memorandum of Understanding with A4ID to collaborate in training on BHR in

East Africa.⁸⁹ In addition, EALS has been part of the Supporting Inclusive Resource Development in East Africa (SIRD) project led by the Canadian Bar Association that has been seeking to ‘increase sustainable economic growth for East Africans, in particular the women and vulnerable groups affected by extractive industries’.⁹⁰

7. RIGHTS AND ACCOUNTABILITY IN DEVELOPMENT (RAID)

In Tanzania, RAID supports local communities to document the human rights impacts of mining companies.⁹¹

8. UN AGENCIES

The following UN agencies have a bearing on BHR in the region:

- The United Nations Development Programme.
- The Office of the United Nations High Commissioner for Human Rights.
- The International Organization for Migration (IOM). IOM has been working with recruitment agencies in Kenya to promote ethical recruitment, including of emigrant labour.⁹²
- UNICEF.



CONCLUSION – POTENTIAL FOR PARTNERSHIPS

Despite the different contexts of the six focus countries, the following common trends have emerged from this research.

The actors involved in business and human rights in East Africa are many and varied: bar associations, local and international NGOs, private companies, public authorities and human rights institutions, among others. Despite a global backlash against human rights, and even in countries where the space for civil society is shrinking, NGOs and grassroots organisations that work to promote human rights are very active in the region. However, their degree of involvement in BHR varies greatly. Some, like the Business and Human Rights Centre, an international organisation that is active in East Africa, are specialised in this field. Others are more generally active in the field of human rights, but have a dedicated BHR programme, such as the Legal and Human Rights Centre in Tanzania, while still others focus on a particular sector, such as the Rwanda Mining Association. Among the legal sector, most lawyers and in-house counsels have yet to take full ownership of this agenda, despite the joint efforts of A4ID and EALS.

A common feature of all these organisations is their appetite to enhance their capacity on BHR. The type of capacity building required varies depending on the respective stakeholder's level of understanding and engagement with BHR issues. While some have already made significant strides in using the BHR framework to promote respect for human rights by businesses, others have not had such opportunities, but have nonetheless expressed strong interest in collaboration on BHR. Capacity building activities targeted at the legal and business communities, involving the pro bono delivery of technical assistance and peer-to-peer exchanges between the UK and East African stakeholders, definitely have a crucial role to play to enhance business compliance with human rights norms and labour standards.

The most promising approach for UK stakeholders willing to support BHR in the region is to be flexible and adapt their programmes to align with the potential partners' area of interest, as opposed to coming up with a predefined programme for partners to work around. Different BHR programmes should be designed for different stakeholders due to their varying needs and

approaches. This segmentation will ensure that stakeholder engagement is conducted within an environment where particular sectoral interests can be expressed and responded to. In turn, this is likely to increase sustained engagement with partnerships promoting BHR. For instance, rather than coming up with new projects, external stakeholders willing to enter the BHR field in East Africa should take into account any existing programmes to ensure that the BHR elements are complementary to the organisation's existing activities and that there is the possibility of continuity at the end of the project. In the case of bar associations, stakeholders could take advantage of continuous legal development training to introduce BHR and identify lawyers and law firms that are interested in further engagement or support in understanding BHR issues.

In considering how to engage with BHR in the region, foreign stakeholders should be alert to several constraints faced by local NGOs and grassroots organisations. First, organisations that focus on one or more areas beyond BHR would likely require greater internal capacity building before any roll out the programme to the public. This is due to the fast-evolving nuances within the BHR field, which the local partner may not be up to speed on. Second, any BHR programme should ensure that its activities are sustainable beyond its time-limited support, especially in terms of financial

sustainability. Finally, both external and local actors will need to be realistic about external factors that could drag projects beyond their intended term. For instance, if the focus is on public interest litigation, the judicial process may extend well beyond the project's life cycle. Political events, such as upcoming presidential elections in a number of countries in the region, may also slow down public engagement or shift the focus of potential institutional partners.

Strengthening multi-stakeholder partnerships – involving international, regional and local actors from the public and private sectors and civil society – is the way forward to build the capacities of these actors and advance the BHR agenda in East Africa. In mapping key actors working on BHR in the region, this paper hopes to make a contribution to this process.

LIST OF INTERVIEWEES

- **ARNOLD KWESIGA**
Coordinator, Uganda Coalition on Corporate Accountability
- **PATRICK KARANJA**
Consultant Project Lead - Africa, Advocates for International Development
- **PAULINE VATA**
Executive Director, Hakijamii
- **TITUS MAGOTI**
Programme Officer, Legal and Human Rights Centre
- **ZAWADI**
Programme Officer, Haki Madini Tanzania
- **ROSE UGULUMU**
Programme Manager, Business and Human Rights Tanzania
- **ANDREWS KANANGA**
Executive Director, Legal Aid Forum
- **WINNIE NGIGE**
Partner, Winnie Ngige & Advocates
- **SAVE LAMU**
- **JAMES MWENDA**
Senior Human Rights Officer, Kenya National Commission for Human Rights
- **JOVINA MUCHUNGUZI**
Human Rights Officer, Commission for Human Rights and Good Governance
- **ROSE KIMOTHO**
Consultant
- **WANGARI KAGAI**
Programme Officer, Law Society of Kenya
- **FRANKLIN MASIKA**
Programme Officer, LEAT Tanzania
- **GODFREY KEROSI**
Programme Officer, HakiJamii
- **VICTOR KAMAU**
Director of Legal Services, Kenya National Commission for Human Rights
- **MARTIN MBUGUA**
Partner, PKC Advocates
- **CRISPINE ODHIAMBO**
Partner, Kiptiness Odhiambo and Company Advocates
- **CHRISTINE AWORI**
Programme Officer, Uganda Law Society
- **ANGELA**
Administrator, Onyango and Company Advocates
- **MUSEMBI MUTIE**
Partner, BM Mutie and Company Advocates
- **ISAAC BIZUMURENYI**
Partner, Lex Chambers

NOTES

¹African Development Bank. (2019). African Economic Outlook 2019 [online]. Available at: <https://www.afdb.org/en/documents/african-economic-outlook-aeo-2019-english-version>

²In Kenya, the Attorney General has published an NAP. In Uganda, the process is at the consultation stage, while in Tanzania, the national human rights institution has already conducted a baseline assessment as a precursor to the public consultation stage.

³There have been concerns about the increasing barriers faced by CSOs to operating freely; either due to restricted funding sources, difficulty with registration, or arbitrary crackdown. See Oluoch, F. (2019). EA govts using punitive laws to rein in on civil society, gravely hurting democracy [online] *The East African*. Available at: <https://www.theeastafrican.co.ke/news/ea/Freedom-suffers-as-African-strongmen-target-NGOs/4552908-5121450-euaqhp/index.html>

⁴The list of key interviewees is included on page 32 of this report. Note that some interviewees requested to remain anonymous

⁵Kenyan Government. (2010). *The Constitution of Kenya, Nairobi*

⁶Kenyan Government. (1999). *The Environmental Management and Coordination Act*, No. 8, Nairobi [Read with: Kenyan Government. (2015). *The Environmental Management and Coordination (Amendment) Act*, Nairobi]

⁷Kenyan Government. (2016). *The Water Act*, Nairobi

⁸Kenyan Government. (2015). *The Companies Act*, No. 17, Nairobi

⁹Kenyan Government. (2016). *The Community Land Act*, No. 27, Nairobi

¹⁰Kenyan Government. (2016). *The Mining Act*, No. 12, Nairobi

¹¹Kenyan Government. (2017). *The Proceeds of Crime and Anti-Money Laundering (Amendment) Act*, No. 3, Nairobi

¹²Kenyan Government. (2011). *Ethics and Anti-Corruption Commission Act*, No. 12, Nairobi

¹³Kenyan Government. (2016). *The Climate Change Act*, No. 11, Nairobi

¹⁴Kenyan Government. (2007). *The Employment Act*, No. 11, Nairobi

¹⁵Attorney General of Kenya. (2019). *National Action Plan on Business and Human Rights* [online], Nairobi. Available at: <https://www.knchr.org/Portals/0/Business%20and%20Human%20Rights/2019%20FINAL%20BHR%20NAP%20JUNE%20PDF.pdf?ver=2019-07-24-154848-963>

¹⁶Kenya Human Rights Commission. (2016). *Human Rights and Business Country Guide Kenya* [online], Nairobi. Available at: <https://www.khrc.or.ke/mobile-publications/economic-rights-and-social-protection-er-sp/130-the-country-guide-on-business-and-human-rights/file.html>

¹⁷Kenya National Commission on Human Rights. (2017). *Kenya National Baseline Assessment on Business and Human Rights* [online], Nairobi. Available at: <https://mk0globalnapshvllfq4.kinstacdn.com/wp-content/uploads/2018/07/kenya-nba-final.pdf>

¹⁸Business & Human Rights Resource Centre. (2017). *Kenya: Report claims local community in titanium-rich area has not benefited from mining; Base Titanium responds* [online]. Available at: <https://www.business-humanrights.org/en/kenya-report-says-local-community-in-titanium-rich-area-has-not-benefited-from-mining-base-titanium-responds>

¹⁹Ugandan Government. (1995). *The Constitution of Uganda, Kampala*

²⁰Ugandan Government. (2006). *The Persons with Disabilities Act*, Kampala

²¹Ugandan Government. (2006). *The Equal Opportunity Act*, Kampala

²²Ugandan Government. (1998). *The Land Act*, Kampala

²³Ugandan Government. (2004 and 2010). *The Land Amendment Act*, Kampala

²⁴Ugandan Government. (2006). *The Employment Act*, No. 6, Kampala

- ²⁵ Ugandan Government. (2000). *The Worker's Compensation Act*, Kampala
- ²⁶ Ugandan Government. (2006). *The Occupational Health and Safety Act*, Kampala
- ²⁷ Ugandan Government. (2019). *The National Environment Act*, Kampala
- ²⁸ Ugandan Government. (2016). *The Children (Amendment) Act*, Kampala
- ²⁹ Business & Human Rights Resource Centre. (2019). *Ugandan Oil Map* [online]. Available at: <https://www.business-humanrights.org/en/oil-in-uganda/map#6.53/0.038/31.995>
- ³⁰ Kyeyune, M. (2018). Bunyoro residents turn to oil firms for jobs, water. [online] *Daily Monitor*. Available at: <https://www.monitor.co.ug/SpecialReports/Bunyoro-residents-turn-oil-firms-jobs-water/688342-4630962-44pe8tz/index.html>
- ³¹ Mwanza, K. (2018). Marked for demolition? Ugandans on pipeline route fear land loss. [online] *PLACE*. Available at: <http://www.thisisplace.org/ii/?id=d49d1cc6-ccb1-4144-9edb-3c950e9a5f49>
- ³² Businge, J. (2019). *Uganda: Residents from oil-rich region raise concerns on displacement without adequate compensation; includes CNOOC's comments* [online], Business & Human Rights Resource Centre. Available at: <https://www.business-humanrights.org/en/uganda-residents-from-oil-rich-region-raise-concerns-on-displacement-without-adequate-compensation-includes-cnoocs-comments>
- ³³ Nabiruma, D. (2018). *Op-ed – Uganda's hope in oil benefits is misplaced* [online], Uganda Journalists' Resource Centre. Available at <https://ugandajournalistsresourcecentre.com/op-ed-ugandas-hope-oil-benefits-misplaced/>
- ³⁴ Business & Human Rights Resource Centre. (2018). *Report on gender issues in Uganda's extractive industry* [online]. [online] Available at: <https://www.business-humanrights.org/en/report-on-gender-issues-in-ugandas-extractive-industry>
- ³⁵ Ssekika, E. (2017). *Uganda: Govt agency recommends suspension of Tibet Huma Mining's operations over safety concerns; company responds* [online], Business & Human Rights Centre. Available at <https://www.business-humanrights.org/en/uganda-govt-agency-recommends-suspension-of-tibet-hima-mining-over-safety-concerns-company-responds>
- ³⁶ Angurini, T. (2018). No glitter for Karamoja gold miners, says report. [online] *Daily Monitor*. Available at: <https://www.monitor.co.ug/Business/Commodities/glitter-Karamoja-gold-miners--report/688610-4314906-15r78vc/index.html>
- ³⁷ Stop Child Labour. (2019). *Nearly 15,000 children are working in gold mining in Uganda* [online]. Available at: <https://stopchildlabour.org/nearly-15000-children-are-working-in-gold-mining-in-uganda/>
- ³⁸ Prossy, N. (2016). *Uganda: Workers at Royal Van Zanten's farm develop health complications after allegedly inhaling toxic fumigant; company comments* [online], Business & Human Rights Centre. Available at <https://www.business-humanrights.org/en/uganda-workers-in-royal-van-zantens-farm-develop-health-complications-after-allegedly-inhaling-toxic-fumigant-includes-companys-comments#c147428>
- ³⁹ Business & Human Rights Resource Centre. (2019). *Uganda: Report claims Bidco's subsidiary benefited from land illegally acquired by govt. agency; includes company's comments* [online]. Available at: <https://www.business-humanrights.org/en/uganda-report-claims-bidcos-subsiary-benefited-from-land-illegally-acquired-by-govt-agency-includes-companys-comments>
- ⁴⁰ Ugandan Human Rights Commission. (2019). *Human Rights and Business Country Guide Uganda* [online], Kampala. Available at: <http://www.uhrc.ug/wp-content/uploads/2019/06/Uganda-Business-and-Human-Rights-Country-Guide.pdf>
- ⁴¹ Tanzanian Government. (1977). *The Constitution of the United Republic of Tanzania* [as amended in 2005], Dodoma
- ⁴² Tanzanian Government. (2010). *The Mining Act*, Cap 123, Dodoma
- ⁴³ Tanzanian Government. (1967). *The Land Acquisition Act*, Dodoma
- ⁴⁴ Tanzanian Government. (2010). *The Persons with Disabilities Act*, No. 9, Dodoma
- ⁴⁵ Tanzanian Government. (2008). *The Workers Compensation Act*, No. 20 [Revised in 2015], Dodoma
- ⁴⁶ Tanzanian Government. (2004). *The Environmental Management Act*, No. 6, Dodoma
- ⁴⁷ Tanzanian Government. (2004). *The Employment and Labour Relations Act*, No. 6, Dodoma
- ⁴⁸ The Commission for Human Rights and Good Governance. (2017). *National Baseline Assessment of Current Implementation of Business and Human Rights Frameworks in the United Republic of Tanzania* [online]. Available at: https://www.chragg.go.tz/images/publications/REPORTS/Tanzania-BHR-NBA_FINAL_Nov2017.pdf
- ⁴⁹ For instance, visit the Business and Human Rights Resource Centre page on Acacia to see both the concerns raised against

the company's subsidiary in Tanzania, and the company's perspective on those allegations. See: Business & Human Rights Resource Centre. (2019). *Tanzania: Report alleges pollution, rape, killings & injuries at Acacia's subsidiary; includes company's response & RAID's rejoinder* [online]. Available at: <https://www.business-humanrights.org/en/tanzania-report-alleges-pollution-rape-killings-injuries-at-acacias-subsi-dary-includes-companys-response-raids-rejoinder>

⁵⁰ Risk Magazine. (2018). *Bagamoyo: The Largest Construction Project in Tanzania* [online]. Available at: <https://riskmagazine.nl/article/2018-12-28-bagamoyo-the-largest-construction-project-in-tanzania>

⁵¹ Vina, C. and Boehm, S. (2018). *Women Get Shortchanged in Commercial Land Deals—Despite National Commitments to Gender Equality*. [online] World Resources Institute. Available at: <https://www.wri.org/blog/2018/03/women-get-shortchanged-in-commercial-land-deals-despite-national-commitments-to-gender-equality>

⁵² Oakland Institute. (2018). *Losing the Serengeti: The Maasai Land that was to Run Forever* [online]. Available at: <https://www.oaklandinstitute.org/tanzania-safari-businesses-maasai-losing-serengeti>

⁵³ Rwandan Government. (2003). *The Constitution of the Republic of Rwanda* [Revised in 2015], Kigali

⁵⁴ Rwandan Government. (1999). *Law N°04/99 of 12 March 1999*, Kigali

⁵⁵ Rwandan Government. (2019). *The Environment and Climate Change Law*, Kigali

⁵⁶ National Commission for Human Rights. (2018). *Strategic Plan 2018 – 2024* [online], Rwanda. Available at: http://www.cndp.org.rw/fileadmin/user_upload/NCHR_Strategic_Plan.pdf

⁵⁷ Mugisha, I. (2019). '14 killed after hill collapses on mine in Rwanda' [online], *The East African*. Available at: <https://www.theeastafrican.co.ke/news/ea/14-killed-after-hill-collapses-on-mine-in-Rwanda/4552908-4944872-yjd1d6/index.html>

⁵⁸ Nkurunziza, M. (2019). 'Businesses to face punitive measures if found engaging in child labour' [online], *The New Times*. Available at: <https://www.newtimes.co.rw/business/businesses-face-punitive-measures-if-found-engaging-child-labour>

⁵⁹ IHRB. (2017). *Human Rights Impact Assessment: East African Coffee Sector* [online]. Available at: https://om.coop.dk/Upload/om.coop.dk/Ansvarlighed/Human%20Rights%20Impact%20Assessment_%20East%20African%20coffee%20sector.pdf

⁶⁰ Burundian Government. (2018). *La Constitution de la*

République du Burundi, Bujumbura

⁶¹ RFI Afrique. (2019). 'Burundi: au moins 9 morts dans l'effondrement d'une mine de coltan à Kabarore' [online], *RFI Afrique*. Available at: <http://www.rfi.fr/afrique/20190519-burundi-effondrement-mine-coltan-kabarore-kayanza>

⁶² Senelwa, K. (2017). East Africa leads efforts to cut use of mercury in mining. [online] *The East African*. Available at <https://www.theeastafrican.co.ke/business/EA-efforts-cut-mercury-mining/2560-3969504-3lcejoz/index.html>

⁶³ Ryzdak, J. (2018). New Report! Disconnected: A Human Rights-Based Approach to Network Disruptions [online], *Global Network Initiative*. Available at: [insert link]; Micek P. (2015). *Internet kill switches are a violation of human rights law, declare major UN and rights experts* [online], Access Now. Available at: <https://www.accessnow.org/internet-kill-switches-are-a-violation-of-human-rights-law-declare-major-un/>

⁶⁴ Jones, S. (2015). Coffee catastrophe beckons as climate change threatens arabica plant. [online] *The Guardian*. Available at: <https://www.theguardian.com/global-development/2015/may/01/coffee-catastrophe-beckons-as-climate-change-threatens-arabica-plant>

⁶⁵ Human Rights Council. (2019). *The Report on the Commission of Inquiry on Burundi* [online]. Available at: <https://undocs.org/en/A/HRC/42/49>

⁶⁶ Front Line Defenders. (2018). *Annual Report on Human Rights Defenders at Risk in 2017* [online]. Available at <https://www.frontlinedefenders.org/en/resource-publication/annual-report-human-rights-defenders-risk-2017>

⁶⁷ South Sudanese Government. (2005). *Constitution of South Sudan*, Juba

⁶⁸ South Sudanese Government. (2009). *Southern Sudan Anti-Corruption Commission Act*, Juba

⁶⁹ South Sudanese Government. (2012). *The Petroleum Act*, Juba

⁷⁰ South Sudanese Government. (2011). *The Public Financial Management and Accountability Act*, Juba

⁷¹ Al Jazeera. (2019). 'Is oil money fuelling war in South Sudan?' [online], *Al Jazeera*. Available at: [insert link]; Wroughton, L. (2018). 'U.S. targets South Sudan oil firms with sanctions to choke off war funds' [online], *Reuters*. Available at: <https://www.reuters.com/article/us-usa-southsudan-oil-sanctions/u-s-targets-south-sudan-oil-firms-with-sanctions-to-choke-off-war-funds-idUSKBN1GX27N>

⁷² Ingeson, M. (2018). 'The Road Less Traveled: How Corporate Directors Could be Held Individually Liable in Sweden for Corporate Atrocity Crimes Abroad' [online], *EJIL*. Available at: <https://www.ejiltalk.org/the-road-less-traveled-how-corporate-directors-could-be-held-individually-liable-in->

sweden-for-corporate-atrocity-crimes-abroad/

⁷³ Adukata, J. (2019). South Sudan to assess pollution in oil-producing areas. [online] *The East African*. Available at: <https://www.theeastafrican.co.ke/news/ea/South-Sudan-to-assess-pollution-in-oil-producing-areas/4552908-5250390-h0alxhz/index.html>

⁷⁴ APA News. (2018). 'Nairobi demo targets funders of South Sudan conflict' [online], *APA News*. Available at: <http://apanews.net/en/news/nairobi-demo-target-funders-of-south-sudan-conflict>

⁷⁵ Alushula, P. (2019). Alarm as easy digital loans yoke more Kenyans to debt [online] *Business Daily*. Available at: <https://www.businessdailyafrica.com/datahub/Alarm-as-easy-digital-loans-yoke-more-Kenyans-to-debt/3815418-5063014-en2bp7z/index.htm>

⁷⁶ For example, see: The Oxford Institute for Energy Studies. (2018). *The Politics of Renewable Energy in East Africa* [online]. Available at: <https://www.oxfordenergy.org/wpcms/wp-content/uploads/2018/08/The-politics-of-renewable-energy-in-East-Africa-EL-29.pdf?v=518f4a738816t>

⁷⁷ Global Compact Network Kenya. (2019). *Code of Ethics for Business in Kenya* [online]. <https://www.globalcompactkenya.org/index.php/en/about/code-of-ethics>

⁷⁸ For more information, please visit: <https://www.safaricom.co.ke/sdgs/>

⁷⁹ SEATINI Uganda. (2018). *Public Private Partnerships in Large Investment Projects* [online]. Available at: <https://www.seatiniuganda.org/publications/policy-briefs/293-public-private-partnerships-ppps-in-large-investment-projects-why-the-eac-governments-should-deal-cautiously-1/file.html>

⁸⁰ Global Rights Alert. (2018). *Working Conditions of Women in Mining: A Case of Buhweju and Mubende Gold Mining Sites* [online]. Available at: <https://www.globalrightsalert.org/sites/default/files/The%20Plight%20of%20Women%20in%20Gold%20Mining%20in%20Uganda%2C%20a%20case%20of%20Bubende%20and%20Buhweju%20districts.pdf>

⁸¹ Equal Opportunities Commission Uganda. (2018). *Mayuge Sugar Industry Workers Hopeful After EOC Inquiry* [online]. Available at: <http://www.eoc.go.ug/media-updates/2018/06/mayuge-sugar-industry-workers-hopeful-after-eoc-inquiry>

⁸² For more information, see: Uganda Law Society, *Supporting Inclusive Resource Development in East Africa* (SIRD) Project [online]. Available at: <http://www.uls.or.ug/projects/sird-project/>

⁸³ See: Legal Aid Forum. (2017). *Universal Periodic Review Programme Strategy 2017-2021* [online]. Available at: [https://](https://www.legalaidrwanda.org/IMG/pdf/upr_program_strategy_final_mail.pdf)

www.legalaidrwanda.org/IMG/pdf/upr_program_strategy_final_mail.pdf

⁸⁴ For more information on the support for the NAP development process in Kenya, see: <https://www.humanrights.dk/place/kenya>

⁸⁵ For more information on Business and Human Rights Resource Centre, visit: <https://www.business-humanrights.org/en/about-us/about-us>

⁸⁶ For more information on the Oakland Institute, visit: <https://www.oaklandinstitute.org/>

⁸⁷ For more information on IPIS' BHR initiatives in Tanzania, visit: <http://ipisresearch.be/home/business-human-rights/> for information on IPIS' BHR initiatives in Tanzania

⁸⁸ For more information on some of SOMO's work in the region, including in Tanzania, visit: <https://www.somo.nl/?s=tanzania+> for information on some of SOMO's work in the region, including Tanzania.

⁸⁹ For updates on one of the workshops organised following the Memorandum of Understanding, see: *A4ID*. (2017). *A4ID provides inaugural business and human rights training for the East African legal community* [online]. Available at: <http://www.a4id.org/a4id-provides-inaugural-business-and-human-rights-training-for-the-east-african-legal-community-in-partnership-with-the-east-africa-law-society/>

⁹⁰ For more information, see: Uganda Law Society, *Supporting Inclusive Resource Development in East Africa* (SIRD) Project [online]. Available at: <http://www.uls.or.ug/projects/sird-project/>

⁹¹ For more on RAID's work in Tanzania, visit: <http://www.raid-uk.org/search/site/TANZANIA>

⁹² IOM. (2019). *A Business Case for Ethical Recruitment by Kenyan Private Employment Agencies* [online]. Available at: <http://kenya.iom.int/article/business-case-ethical-recruitment-kenyan-private-employment-agencies-peas>

WEBSITES

KENYA

Global Compact Network Kenya:

www.globalcompactkenya.org/index.php/en/

Kenya Association of Manufacturers (KAM):

www.kam.co.ke/green-financing

Kenya Private Sector Alliance (KEPSA):

www.kepsa.or.ke

Safaricom:

www.safaricom.co.ke/about

Kenya Human Rights Commission (KHRC):

www.khrc.or.ke

Kenya Land Alliance:

www.kenyalandalliance.or.ke

Hakijamii:

www.hakijamii.com

Natural Justice:

www.naturaljustice.org/countries/kenya/

The Route to Food:

www.routetofood.org

Haki Madini Coalition:

www.hakimadinikenya.org

Save Lamu:

www.savelamu.org

Katiba Institute:

www.katibainstitute.org

Center for Justice Governance and Environmental Action:

www.centerforjgea.com

Kenya Law Reform Commission:

www.klrc.go.ke

Kenya National Commission on Human Rights:

www.knchr.org

Law Society of Kenya:

www.lsk.or.ke

UGANDA

Uganda Manufacturers Association:

www.uma.or.ug

Great Lakes Institute for Strategic Studies (GLISS):

www.gliss.org

Human Rights Network Uganda (HURINET):

www.hurinet.or.ug

Uganda Consortium on Corporate Responsibility (UCCA):

www.ucca-uganda.org

Initiative for Social and Economic Rights (ISER):

www.iser-uganda.org

The Southern and Eastern Africa Trade Information and Negotiation Institute (SEATINI):

www.seatiniuganda.org

Global Rights Alert (GRA):

www.globalrightsalert.org

Equal Opportunities Commission:

www.eoc.go.ug

Uganda Human Rights Commission (UHRC):

www.uhrc.ug

Cristal Advocates:

www.cristaladvocates.com

Uganda Law Society:

www.uls.or.ug

TANZANIA

East African Crude Oil Pipeline (EACOP):

www.eacop.com

Land Rights Research and Resource Institute (Haki Ardhi):

www.hakiardhi.org

Haki Rasilimali Tanzania:

www.hakirasilimali.or.tz

Business and Human Rights Tanzania (BHRT):

www.bhrt.co.tz (flaviacharlz@gmail.com)

Legal and Human Rights Center (LHRC) Tanzania:

www.humanrights.or.tz

Commission for Human Rights and Good Governance (CHRAGG):

www.chragg.go.tz

RWANDA

Rwanda Mining Association:

www.rma.co.rw

Legal Aid Forum Rwanda:

www.legalaidrwanda.org

Collectif des Ligues et Associations de Défense des Droits de l'Homme au Rwanda (CLADHO):

www.cladho.org.rw

National Commission for Human Rights:

www.cndp.org.rw

BURUNDI

Association des Femmes Juristes du Burundi:

https://web.facebook.com/afjuristesbu/?rdc=1&_rd

Rubeya & Company Advocates:

www.rubeya.bi/index.php/en/areas-of-practice/corporate

Burundi Bar Association:

www.bba.bi

SOUTH SUDAN

The South Sudan Law Society:

www.namati.org/network/organization/south-sudan-law-society-ssls

EAST AFRICA

Stichting Onderzoek Multinationale Ondernemingen (SOMO):

www.somo.nl/?s=tanzania+

