



UGANDA  
COMMUNICATIONS  
COMMISSION

Communications for all

# **CORPORATE PHILANTHROPY & SOCIAL RESPONSIBILITY (CP&SR) POLICY**

---

**20  
22**

# TABLE OF CONTENTS

---

TERMS AND DEFINITIONS

3

1.0 INTRODUCTION

4

2.0 SCOPE

4

**SECTION A: CORPORATE PHILANTHROPY**

5

3.1 Why is corporate philanthropy important to UCC?

5

3.2 Areas of philanthropy / donations

5

3.3 Criterion for evaluation of beneficiaries?

6

3.4 Corporate philanthropy implementation framework

7

**SECTION B: CORPORATE SOCIAL RESPONSIBILITY**

9

4.0 Introduction

9

4.1 ISO 26000 -Guidance on social responsibility

9

4.2 Justification for CSR

10

4.3 Objectives of implementing CSR

10

4.4 Areas of Social Responsibility

11

4.4 Implementation framework for CSR.

12

5.0 Monitoring Evaluation and Reporting

13

5.1 Monitoring and Evaluation

13

5.2 Reporting

13

5.3 Policy Review

14

# TERMS & DEFINITIONS



For the purposes of this document, the following terms and definitions apply.

**Community:** The immediate geographical surrounding of the UCC offices.

**Corporate philanthropy:** The act of donating to a cause, charity, institution, or a foundation whose mission is to deliver social impact. The donations can consist of monetary help as well as in-kind contribution.

**Employee:** individual in a relationship recognized as an “employment relationship” in national law or practice.

**Environment:** natural surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, people, outer space, and their interrelationships

**Initiative:** programme or activity expressly devoted to meeting a particular aim related to social responsibility

**Organization;** entity or group of people and facilities with an arrangement of responsibilities, authorities, and relationships and identifiable objectives

**Social responsibility:** responsibility of an organization for the impacts of its decisions and activities on society and the environment, through transparent and ethical behavior that contributes to sustainable development, including health and the welfare of society; considers the expectations of stakeholders; is following applicable law and consistent with international norms of behavior; and is integrated throughout the organization and practiced in its relationships

**Stakeholder:** individual or group that has an interest in any decision or activity of an organization

**Stakeholder engagement:** activity undertaken to create opportunities for dialogue between an organization and one or more of its stakeholders, with the aim of providing an informed basis for the organization's decisions.

**Sustainable development:** development that meets the needs of the present without compromising the ability of future generations to meet their own needs

**Departments:** The Departments within UCC that are directly accountable for the implementation of this policy. 1. Corporate Affairs, 2. Human Resource and Administration, 3. Finance, 4. Legal – Procurement and Disposal.

# INTRODUCTION

The Uganda Communications Commission (the Commission) is the regulator of the Communications sector in Uganda and a responsible organization that recognizes that its activities (decisions, operations, and services) have a wider impact on society and can significantly affect and or contribute to the well-being of society and communities in which we operate.

Organizations around the world, and their stakeholders, are becoming increasingly aware of the need for and benefits of socially responsible behavior. The objective of social responsibility is to contribute to sustainable development. The Commission aims to consider this by engaging in appropriate interventions as outlined in this policy, in line with legal requirements and established standards.

## SCOPE

The scope of this policy is twofold. The sections are aligned to the scope of CSR in the context of UCC.

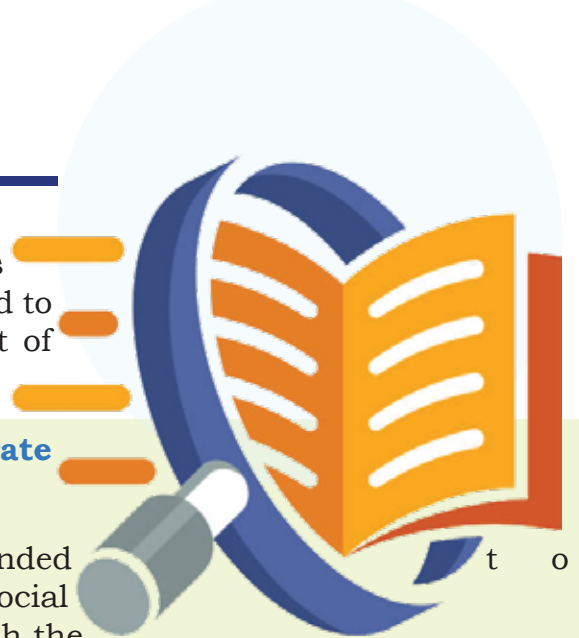
### 2.1 SECTION A: Corporate philanthropy and donations.

This section of the policy is intended guide the Commission's social philanthropy and interaction with the community and broader stakeholders in which it operates and will be anchored on the Commission's Mission, Vision, and Values. This also includes engagements as a response to UCC's immediate community needs.

### 2.2 SECTION B: Corporate Social Responsibility (CSR)

This section of the policy UCC intends to include CSR in its operations, stakeholder engagement and decision-making process. Corporate Social Responsibility is aimed at creating and breeding "Responsible corporate culture of UCC staff.

Some examples of Social Responsibility include but are not limited to: Environmental Sustainability, Responsible Consumption, Energy Efficiency, Green procurements and operations, Stakeholder consultation, operational transparency, human rights awareness and consideration, consumer protection, and anti-corruption.



# COPORATE PHILANTHROPY



## 3.1 Why is corporate philanthropy important to UCC?

### 1. Positive Brand image

UCC's donations to the set causes, charity organisations, relevant sectoral issues and social engagements within its immediate community; will contribute positively to its brand image and reputation. It will show the Commission to be well meaning institution for the public and community over and above its regulatory mandate. Strategic corporate donations, provide the Commission with the opportunity to show its human face.

### 2. Gain Customer Support

Corporate philanthropy provides an opportunity for the Commission to gain intrinsic trust from its customers by being responsive to community needs, issues and national causes and services beyond the core ICT regulation.

### 3. Strengthening staff engagement and corporate culture

One of the key objectives of the corporate strategy is to enhance staff engagement and corporate culture. In our daily routines, it can be difficult to interact with all employees. Engagement in corporate philanthropic activities provides an opportunity for staff to engage with each other towards a common cause, beyond their job functions. Providing employees with a fruitful opportunity to give back is an important factor in team building, company pride, and intrinsic motivation.

### 4. Positive and free Publicity

Getting involved in philanthropic initiatives shall create good publicity for the Commission. It provides an opportunity to make the brand relatable to everyday human and nationalistic causes. It creates broader partnerships on national issues that can reciprocate by drumming up our regulatory mandate campaigns.

**5. Stakeholder engagement** – Through evaluation of potential corporate donations, the engagement in open dialogue and constructive partnership with government and other possible beneficiaries will open the Commission to broader areas of possible engagement and intervention even within the scope of its mandate.



### 3.2 Areas of philanthropy / donations

The Commission will have an annual schedule of corporate philanthropy areas/ causes. These will be guided by:

1. Prevalent National and community issues
2. Direct requests from government
3. Management's discretion

#### The areas of corporate philanthropy will include:

1. **Health** – “He, who has health, has hope. And he, who has hope, has everything.” – An Arabian proverb. UCC considers good health a person's greatest capital. Contributing to the growth of the health sector is one of our areas of corporate donations. Specifics of these shall be advised by the requests received and consultation with the line ministry.
2. **Education** – Education grooms better citizens that contribute to the social economic transformation of a country. Over and above the role of ICTs in the growth of the education sector, because of its role to national transformation, UCC shall seek to engage in broader corporate donations in that sector.
3. **Youth livelihood transformation and empowerment** – Cognizant of the current demographics of Uganda show that it has a population of more than 67% being youthful, the Commission considers youth

transformational initiatives as one of its areas of donations. The productive youth are the engine of the economy.

4. **Complimentary programs from other sector players** – These include programs like marathons, wards ceremonies, competitions, and other engagements of ICT sector players to which the Commission might be invited to contribute as a key stakeholder
5. **Management's Discretion** – This area shall cater to unique and or special requests to management in the event of a national emergency, force majeure, or direct request.



### 3.3 Criterion for evaluation of beneficiaries?

This section seeks to guide on the factors that UCC will consider when selecting which requests for donations to honor and also which community needs to address.

1. **Budgetary availability** – This shall seek to evaluate the cost of the donation; visa vie the budgetary status of the CSR budget line.
2. **Social impact of the donation** – This shall seek to evaluate the



immediate, short term and long-term impact and beneficiaries of the donation. Requests shall be evaluated with a score of 1 to 5, with 5 being the highest, for Impact, and beneficiaries.

3. Legitimacy of the requesting entity. This includes whether it is registered and fully incorporated by the relevant legal and administrative structures. This will include certificated of incorporation and tax clearance.
4. Background check on other prevailing stances and affiliations of the requesting entity. This will seek to ensure that the requesting entity does not have conflicting existing stances and or affiliations that go against the values of the Government of Uganda and UCC corporate values.
5. Transparency: This will seek to ensure that the request has not been manipulated or founded in unclear circumstances.
6. Justification: This criterion shall be used for corporate philanthropic initiatives which are undertaken without an external request.

### **3.4 Corporate philanthropy implementation framework**

This section seeks to outline how UCC shall implement its corporate philanthropy and donations annually.

1. **Budget** – The Commission shall allocate an annual budget line for corporate donations. This budget shall administratively be under the Corporate Affairs Departments.
2. **Request Evaluation Committee (REC):** The Commission shall Constitute an

inter-departmental Request Evaluation Committee (REC) that will evaluate received request in line with the set criterion. The Committee shall be headed by the Director Corporate Affairs. It shall have 4 other members from within the UCC staff. The recommendations of the REC shall be to the Executive Director.

Discretion on when to report to the Top management Team (TMT) and or the Board will depend on the financial implications of the donation. This will be aligned to the approval requirements of the different financial thresholds as described in the UCC finance Manual.

The duration of the membership term of the other members of the REC shall be for 2 years. The Committee shall convene once every quarter.

The PR section of the department of Corporate Affairs shall be the secretariat of the REC.

### **3. The Terms of Reference for the REC shall include:**

- i. Propose to Management the possible options of community corporate donations and social engagements.
- ii. Evaluate all received requests for donations in a quarter for eligibility against the set criterion.
- iii. Select and propose to management the agreed beneficiary (ies) for the quarter
- iv. Coordinate with the relevant departments on the implementation of corporate donation.



#### 4. Corporate philanthropy decision making structure.

The process flow that will guide the Commissions' corporate philanthropy is listed as:

1. All received requests (Formally addressed to the Executive Director) shall be routed to the Director Corporate Affairs for formal acknowledgment and compilation for a set quarter of the calendar year.
2. Compilation of the received requests shall form the agenda of the quarterly REC meeting for review and evaluation.
3. An evaluation report proposing possible beneficiaries shall be done and addressed to Management (TMT) for information.
4. Where the financial implications of the selected beneficiary are above the Executive Director's approval threshold, the recommendations of the REC shall be addressed to the relevant entity in compliance to the UCC Finance manual.
5. Implementation of donations.
6. Where no requests are received, the Committee shall propose to management possible areas of donation either to the immediate community (In the neighborhood of UCC premises at both Head Office and Regional Office) or to a cause in line with the areas listed in section 3.2.

The financial implications of these proposals shall not exceed 30% of the total CSR budget allocation.





# COPORATE SOCIAL RESPONSIBILITY

## SECTION B:

### 4.0 Introduction

This section of the policy stipulates the attributes of social responsibility that will be modeled in UCC.

As society's concerns change, its expectations of organizations also change to reflect those concerns. Some examples of Social Responsibility include, human rights, environmental sustainability, consumer protection, responsible usage and consumption, and anti-corruption.

#### 4.1 ISO 26000 -Guidance on social responsibility

The ISO 26000 is the international standard developed to help organizations effectively assess and address social responsibilities that are relevant and significant to their mission and vision; operations and processes; customers, employees, communities, and other stakeholders.

ISO 26000 provides guidance on how an organization can run its business in a socially responsible or accepted way for sustainable development

**This standard is guided by 7 principles. These are:**

- 1. Accountability** - An organization (UCC) should be accountable for its impacts on society, the economy, and the environment. This includes the impact of our institutional operations and way of doing things on society and the environment
- 2. Transparency** - An organization (UCC) should be transparent in its decisions and activities that impact on society and the environment. The Commission will endeavor to disclose in a clear, accurate and complete manner, and to a reasonable and sufficient degree, the policies, decisions, and activities for which it is responsible, including their

known and likely impacts on society and the environment.

**3. Ethical behavior** - The Commission's behavior as an organization will be based on the values of Excellence, Professionalism, Integrity and Commitment. These values imply a concern for the people we serve and the environment and a commitment to address the impact of our activities and decisions on all our stakeholders.

**4. Respect for stakeholder interests** - The Commission in executing its mandate; will respect, consider, and respond to the interests of its stakeholders. UCC acknowledges the peculiar needs of different stakeholders including but not limited to persons with specific needs and that other individuals or groups may also have rights, claims or specific interests that should be considered.

**5. Respect for the rule of law:** The Commission accepts that respect for the rule of law is important. The rule of law refers to the supremacy of the laws of Uganda and to the idea that no individual or organization stands above the law and that government is also subject to the laws of the land. In doing this, UCC shall seek to ensure that all its operations and decisions are founded in the ACT as well as all other relevant legal instruments including the Constitution of Uganda.

**6. Respect for international norms of behavior** - The principle is: an organization should respect international norms of behavior while adhering to the principle of respect for the rule of law.”

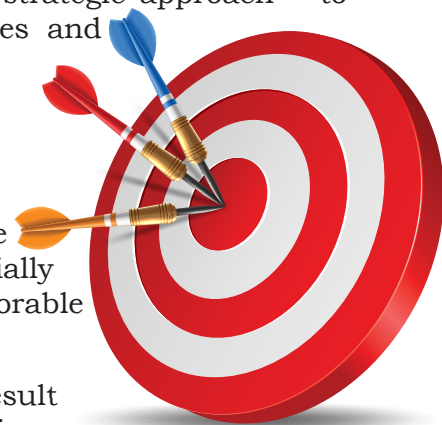
**7. Respect for human rights - The principle is:** an organization should respect human rights and recognize both their importance and their universality. “Human rights” refers to respectful treatment of all individuals, regardless of any of their personal characteristics, just because they are human beings”

#### 4.2 Justification for CSR

Corporate social responsibility (CSR) is not just doing the right thing, it is building a reputation as a responsible organization which sets you apart from the rest. As a corporate entity, the Commission brand transcends local boundaries, stands to gain more visibility regarding socially responsible behavior whereby; adopting an effective and strategic approach to CSR will open new partnerships and opportunities and enhance brand/image and company reputation.

#### 4.3 Objectives of implementing CSR

- a. Improved reputation management where the Commission's good performance as a socially responsible corporate entity can build a favorable reputation locally and internationally.
- b. Stronger Corporate culture. This can be the direct result of pride in the Commission's practices or of introducing improved human resources practices and policies. This can also be the direct result of programs and activities that improve employee morale and loyalty.



Employees become champions of the organisations for which they are proud to work. Employees become champions of social responsibility.

- c. Ability to address change. Corporate Social Responsibility inspires long-term behavioral change in the people that work with UCC. The transition to socially responsible behavior encourages constant engagement at all levels and this in turn nurtures a culture that embraces positive change.

#### 4.4 Areas of Social Responsibility

This section lists the operational areas in which the Commission shall exhibit social responsibility in its operations and engagements.

1. Stakeholder engagement and interfacing
  - a. Making Commission premises easily accessible for persons with special needs.
  - b. Making stakeholder engagement interfaces like the UCC website and social media handles accessible and usable by persons with specific needs.
  - c. Having sign language at physical stakeholder engagement forums.
  - d. Conducting transparent social impact on UCC's decisions and recommendations.

#### 2. Environmental Impact sustainability

UCC in all its operations and regulatory instruments seeks to contribute to maintaining the integrity of the earth. All of earth's environmental systems must be kept in balance while natural resources within them are consumed by humans at a rate where they are able to replenish themselves.

- a. *Encouraging restriction on printing unless necessary; and opting for duplex printing.*
- b. *Encouraging paper free operations and stakeholder engagements.*
- c. *Exhibiting environmentally friendly operational decisions including UCC events.*



#### 3. Responsible Consumption

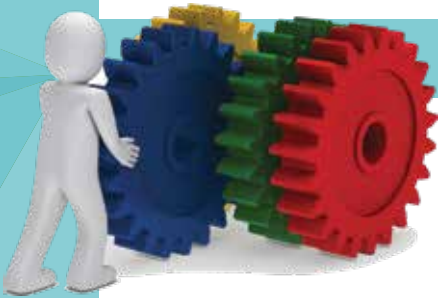
- a. *Responsible Energy Consumption –*
  - i. *Lighting - Consideration of energy efficient options like motion sensing lighting systems for office spaces that are not in use all the time like bathrooms and meeting rooms.*
  - ii. *Consideration of natural and solar options for lighting and water heating.*
- b. *Responsible water consumption – Choosing responsible usage for cleaning preferably using harvested or reused water.*

#### 4. Responsible Disposal

- a. Garbage Sorting at source
- b. Electronic disposal
- c. Recycling where possible

#### 5. Green procurements and supplies. This includes

- a. Choosing recyclable options for office supplies; like replacing disposable tumblers with reusable glasses, opting for recycled printing paper including letter heads
- b. Emphasizing sustainability and end of life disposal for all procurements



#### 4.4 Implementation framework for CSR.

The scope of CSR in this section of the policy seeks to inspire a behavioral change and transition from just corporate culture to responsible corporate culture. The transition to responsible corporate culture requires key decisions that have budgetary and administrative implications. It is against this background that this section of the policy proposes the constitution of a CSR committee.

##### 1. CSR Committee

The CSR committee shall be headed by the Executive Director. The Committee shall have functional members from 4 departments including

- Department of Corporate Affairs
- Department of Human Resource and Administration
- Department of Finance
- Department of Legal – Procurement and Disposal Unit.

2 additional staff members of the committee shall be selected on personal basis by the Executive Director and the Director Corporate Affairs.

This shall be bring the total number of members of the CSR Committee to 6. The PIR Unit of the Department of Corporate Affairs shall be the secretariat of the CSR Committee.

##### 2. Terms of Reference for the CSR Committee

The role of the CSR committee shall involve

- i. Advising Management on the CSR areas of intervention to work on for a given period.
- ii. Work with the relevant departments that support the



implementation of the intervention area to draw out an implementation plan and requisite budget.

- iii. Draw out a stakeholder dissemination schedule for staff on socially responsible behavior in and out of UCC.

### 3. Corporate Social Responsibility implementation budget

The CSR committee shall plan for and advise Management for a CSR budget line for implementation of the above listed areas of social responsibility.

### 4. Integration into Commission projects, processes, and operation.

To keep a strong pulse on responsible corporate behavior, this policy shall require that all Commission initiatives, projects, engagements, procurements, and processes have embedded CSR components. This includes but is not limited to sustainability and stakeholder engagement.

## 5.0 Monitoring Evaluation and Reporting

### 5.1 Monitoring and Evaluation

- Section 3.3- Criterion for evaluation of beneficiaries of this policy stipulates that during evaluation of the beneficiaries, due consideration shall be given to the immediate, short term and long-term impact and beneficiaries of the donation.

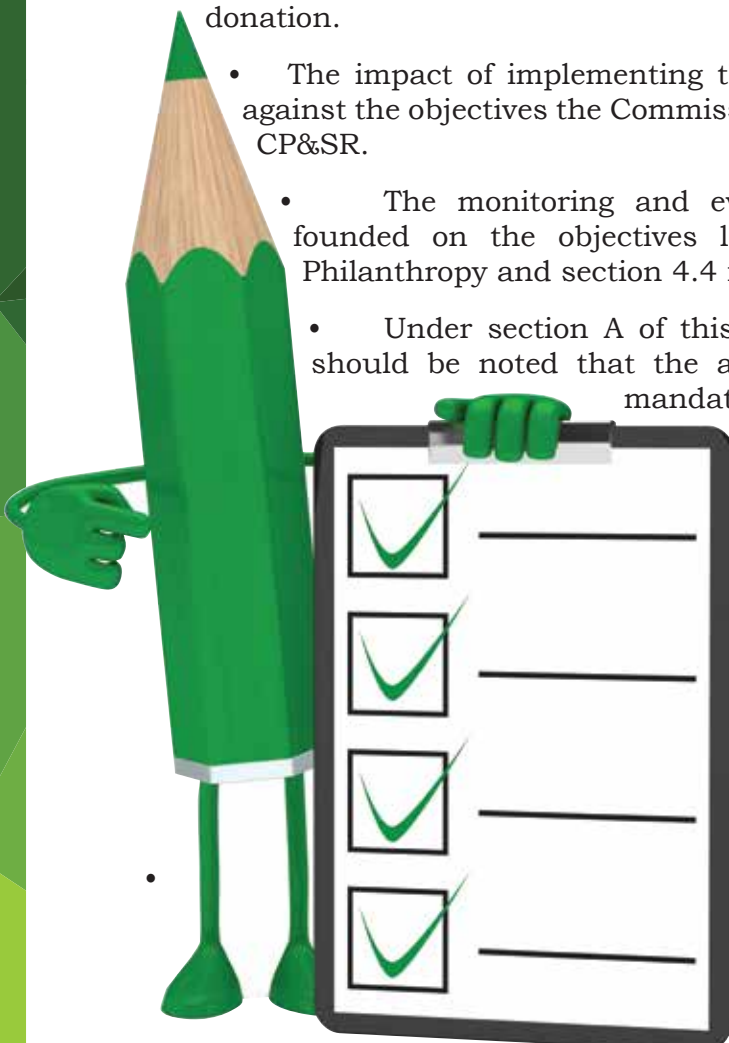
- The impact of implementing this policy will however be evaluated against the objectives the Commission seeks to achieve in implementing CP&SR.

- The monitoring and evaluation framework shall thus be founded on the objectives listed in section 3.1 for Corporate Philanthropy and section 4.4 for Social Responsibility.

- Under section A of this policy – Corporate Philanthropy, it should be noted that the areas of intervention are out of the mandate of the Commission and with vast needs for intervention. As such

evaluation of social impact of the philanthropy will not be attainable compared to the need. This informs the recommendation to formulate the monitoring and evaluation framework of Section A of this policy on the intended objectives of undertaking corporate philanthropy, as listed in section 3.1.

Under Section B of this Policy – Corporate Social Responsibility,







CORPORATE  
PHILANTHROPY &  
SOCIAL RESPONSIBILITY  
(CP&SR) POLICY  
**2022**