THE REPUBLIC OF UGANDA

NATIONAL ANTI CORRUPTION STRATEGY (NACS)

2019/20 - 2023/24

Delivering the Zero Tolerance to Corruption Policy: Five - Year Action Plan

CORRUPTION
Your NO counts

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2019

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Zero Tolerance to Corruption for effective Service Delivery

FOREWORD

Corruption in Uganda is deep-rooted, occurring in all sectors— public and private, and in a number of forms. It has continued abetted, despite the numerous anti-corruption efforts and commitments the State and Non-State actors have undertaken. There are still high incidences of corruption, adversely affecting service delivery, and ultimately impeding National Development and increasing public mistrust.

The Anti -Corruption Act, 2009, defines corruption in terms of its various manifestations such as solicitation, offering, giving and acceptance of any goods of monetary value or other benefit for personal enrichment, embezzlement, bribery, nepotism, influence peddling, fraud, forgery, causing financial or property loss, false accounting, neglect of duty, corruptly procuring tenders, diversion of public resources, conflict of interest, impersonation and illicit enrichment among others.

Contemporary corruption has increasingly become complex in form, nature and manifestation, often practiced in syndicates and systematic collusions, with a high level of concealment to beat even the most prudent anti-corruption systems. Corruption has also become trans-boundary, aggravated by cross-border crimes and syndicates. The corrupt have increasingly become extremely organized, often amassing wealth and power around themselves, and building powerful cartels to win over, intimidate, neutralize and in some instances, disempower those tasked to fight the malaise.

Government therefore, passed the Zero Tolerance to Corruption Policy 2019 to effectively curb corruption in its various facets. This Policy envisioned a *"Developed, Corrupt Free Society"* with the following anticipated outcomes;

    i.   Effective prevention and enforcement of anti-corruption measures
    ii.   Strong anti-corruption institutions
    iii.   Enhanced coordination of the anti-corruption agenda
    iv.   Invigorated public participation in accountability and anti-corruption work
    v.   A renewed culture of integrity, transparency and accountability inculcated at all levels in society especially the youth.
    vi.   Strong personal and individual commitment at all levels to attain and sustain zero tolerance to corruption promoted.

To effectively deliver these outcomes of Zero Tolerance to Corruption Policy, a comprehensive five-year plan of action, the National Anti-Corruption Strategy (NACS) has been developed. This Sixth cycle of the NACS covering the period 2019/2020 - 2023/24 will provide programme direction and guide to anti-corruption agencies, Ministries, Departments, Agencies and Local Governments (MDALGs), Private Sector and other stakeholders to effectively respond to incidences of corruption within their sectors.

The development of this NACS, was a result of a wide-ranging consultative process which has necessitated a re-design of new directions, harmonizing NACS with the Accountability Sector Strategic Investment Plan and the Zero Tolerance to Corruption

policy which comes into force in 2019. This policy, will be implemented through periodic National Anti-Corruption Strategies (NACS) and Action Plans developed by the state and non-state actors across the country.

NACS 2019/2020-2023/24 therefore, builds on the previous cycles and the considerable work already being taken across government, through the Inter Agency Forum (IAF) against corruption, the Accountability Sector, the MDAs/LGs and other sector interventions. More focus, however, will be on tackling the new corruption trends which include syndicate corruption, cyber facilitated crimes and inadequate coordination amongst anti-corruption stakeholders.

I wish to thank all stakeholders for your invaluable contributions towards the development of this strategy. Special thanks goes to United Nations Development Programme (UNDP) for supporting the entire consultations and development of this National plan of action.

I now call upon all stakeholders; Ministries, Departments, Agencies and Local Governments, Civil Society Organisations, Private Sector, Religious and Faith Organisations, Academia, Development Partners and the General Public to renew their commitments towards the effective implementation of this strategy to deliver Zero Tolerance to Corruption Policy.

For God and My Country

Alex B. Okello
PERMANENT SECRETARY

ABBREVIATIONS

BMAU	Budget Monitoring and Accountability Unit
CIID	Criminal Intelligence and Investigation Directorate
CCS	Commitment Control System
CSOs	Civil Society Organizations
COSASE	Committee on Commissions, Statutory Authorities and State Enterprises
DEI	Directorate for Ethics and Integrity
DPP	Directorate of Public Prosecution
DTM	Data Tracking Mechanism
EFT	Electronic Funds Transfer
EPRC	Economic Policy Research Centre
FDS	Fiscal Decentralization Strategy
IAF	Inter-Agency Forum
ICT	Information Communication Technology
IGG	Inspector General of Government
IFMS	Integrated Financial Management System
JLOS	Justice Law and Order Sector
LG	Local Government
MOPS	Ministry of Public Service
MOFPED	Ministry of Finance, Planning and Economic Development
MDAs	Ministries Departments and Agencies
MALGs	Ministries Agencies and Local Governments
MOES	Ministry of Education and Sports
NITA	National Information Technology Authority
OAG	Office of the Auditor General
OPM	Office of the Prime Minister
OBT	Output Based Budgeting Tool
OP	Office of the President
PFM	Public Financial Management
PAC	Public Accounts Committee
PFAA	Public Finance and Accountability Act
PPDPA	Public Procurement and Disposal of Public Assets Authority
PSRP	Public Service Reform Programme
ROM	Results Oriented Management
UNCaC	United Nations Convention Against Corruption
UCC	Uganda Communications Commission
UGX	Uganda Shillings
URA	Uganda Revenue Authority

CHAPTER ONE

1.0 BACKGROUND TO THE NATIONAL ANTI CORRUPTION STRATEGY (NACS)

The Government has in the last 20 years developed and implemented five National Anti- Corruption Strategy (NACS) cycles. The National Anti-corruption Strategy (NACS) is the overarching national framework to guide Ministries, Departments, Agencies and Local Governments in formulating and implementing their respective anti-corruption action plans. These cycles focused on different anti-corruption themes and the following provides a snapshot of the previous different cycles.

1.1 NACS- (1998 -2001)

This was the first cycle of NACs and it focused on creating public awareness on corruption, developing strong policy, legal and institutional framework. During this period, various laws were reviewed and formulated, including; the decentralization of Tender Board into Contracts Committee, The Local Government Act and various enabling Regulations. A number of public sector reforms were undertaken. The institutions strengthened included; The Inspectorate of Government (IG), The Auditor General (OAG), and the Criminal Investigations Directorate (CID) among others.

However, the institutional capacity for anti-corruption agencies remained inadequate, ineffective and inefficient. Furthermore, the laws did not provide for deterrent sanctions against corruption. The coordination of these agencies was weak and ineffective. This was the first NACS driven by the Directorate for Ethics and Integrity after its establishment in 1998 as the core anti-corruption coordination center.

1.1.2 NACS - (2001 – 2003)

The second cycle of NACS focused on strengthening the preventive and the reactive approaches to fighting corruption. Emphasis was laid on improved standards, supervision and monitoring as well as amendment and implementation of various enabling laws, regulations and commissions of inquiry recommendations. There was deliberate engagement with non-state actors (Civil Society Organizations).

During this period, strides were made regarding strengthening the institutional and the anti-corruption regulatory frameworks. For example, some of the following key legislations were dully enacted and/or amended. These include; The Public Procurement and Disposal of Assets Act (2003, The Leadership Code Act, (2002), and various enabling Regulations. DEI's coordination role was augmented by the creation of the Inter-Agency Forum which brings together all MDAs involved in the fight against corruption. There was also more public awareness which created civic competence.

The achievements notwithstanding, Uganda continued to be perceived as a corrupt country and its performance remained poor in the regional and international corruption perception indices. Furthermore, the public perceived the state as corrupt hence did not actively participate in the fight against corruption.

1.1.3 NACS - (2004 – 2007)

This cycle built on the achievements of the previous NACS especially regarding the review, formulation and enactment of the legal and institutional framework. The goal of this particular cycle was to minimize levels of corruption and increase transparency and integrity in public office. The core focus of this cycle was;

i) **Strengthening enforcement**

The Government of Uganda (GoU) strengthened the combative institutions in terms of technical and human resource capacity, and many actions against the corrupt took place. Investigations of high profile cases for example the Common Wealth Head of Government Meeting (CHOGM) scandal were investigated, completed and prosecuted in this period. Corruption became part of the political agenda and electoral financing became an issue especially in the elections held in 2006. Procurement was on high agenda to improve service delivery and promote a competitive business environment hence the creation and facilitation of PPDA.

ii) **Strengthening coordination**

The coordinating center of IAF has been DEI. In this period, at the forefront of collaborative framework was the Political head and Executive wing of DEI. Many cases were discussed and handled at IAF level. This level of coordination facilitated formulation and formation of the Anti-Corruption Court. Many other achievements were made that helped the CSOs to establish collaborations with IAF. Furthermore, a key piece of legislation regarding access to information was passed after such coordination efforts.

iii) **Ensuring public involvement in the fight against corruption**

In order to increase participatory approach, various programs were formulated to involve the public in the fight against corruption. Barazas were initiated, District Integrity Promotion Fora (DIPF) were strengthened and massive public awareness through media was conducted.

iv) **Enhancing and sustaining political support at all levels in the fight against corruption.**

In the period under review, corruption continued to be part of the political agenda and all manifestos of NRM and other political parties reflected an anti- corruption agenda. Accountability and service delivery were key issues that prominently featured in the political agenda.

Despite the above, enforcement of the anti-corruption laws remained weak. The public participation as well as demand for transparency and accountability remained very low. Furthermore, the international corruption perception indices continued to reflect a dismal performance of the country.

1.1.4 NACS-(2009 – 2013)

This cycle made a commitment to ensure zero tolerance to corruption by all public agencies. All MDAs and LGs were required to devise ways and means of making corruption risky. The NACS focused on;

- Effective political leadership in the fight against corruption
  Emphasis was put on the political leaders at all levels to demonstrate the will and champion the fight against corruption in their areas of influence.

- Increase in public demand for accountability and upholding national values
  Concentration was put on empowering the public through sensitization and civic education on their roles in the fight against corruption so as to increase the demand for accountability and upholding national values at all levels.

- Effective enforcement of anti-corruption measures
  Effort was made to increase coordination among combative institutions in the implementation of anti- corruption measures.

- Increase in compliance and accountability by public service organizations.

- Strengthening institutional capacity for the fight against corruption.

The NACS period however did not reflect increased political leadership and coordination against corruption. There was political interference, at times in investigations of corruption cases which hindered smooth progress in combating corruption. Furthermore, there was increased public apathy arising mainly from numerous anti-corruption scandals and protracted investigations and prosecutions.

1.1.5 NACS- 2014-19

Like the previous cycle, the purpose of this NACS was to enforce zero tolerance to corruption in the Ugandan society and enhance good governance.

The goal was to increase the corruption index of Uganda from 140 in 2013 to 135 by 2019. The objectives of this NACS were to;

- Strengthen the leadership and coordination of anti-corruption efforts in all public offices at all levels in Uganda

- Empower citizens to participate in ant-corruption measures at National and Local Government level.

- Strengthen anti-corruption institutions for effective enforcement of the legal and regulatory framework

- Improve compliance with national and international accountability standards among public and private sector institutions.

The general perception and experience of corruption in Uganda has remained largely undesirable. The available legal and institutional frameworks have not translated into tangible achievements towards reduction of corruption. This therefore requires the next cycle to focus on strengthening implementation of the various anti-corruption interventions to harness good governance in Uganda.

1.2 Overview of performance of NACS

A general review of the five previous cycles of NACS (1998-2019) has been undertaken. The achievements and challenges over the 20 years are highlighted as below;

1.21 Achievements

i.   **Coordination:** In the review period there has been increased level of coordination. Joint IAF monitoring of the implementation of Government programs and service delivery has increased the level of awareness and citizen participation in the fight against corruption. Establishment of the District Integrity Promotion Foras, integration of ethical values in school curriculum, dissemination of anti-corruption laws and the establishment of ACPPP has enhanced collaboration and coordination with CSOs.

ii. **Increased complaints and conviction rate**. Over the years there has been increase in the numbers of complaints registered by the Anti-Corruption agencies. The establishment of Anti-Corruption Court (AC) Court also witnessed speedy disposal of corruption cases leading to high conviction rates. The cases of NAADS, CHOGM, Pension and the Kazinda prosecutions are a manifestation of this increment. The DPP has maintained a higher average conviction rate of over 64% at the anti-corruption court compared to other criminal cases. Efforts to ensure recovery of stolen Funds are under way. By way of refund, settlement, compensation orders, and fines, anti-corruption enforcement agencies have recovered substantial amounts of misappropriated public funds like in the cases of CHOGM, National Agricultural Advisory and Delivery Service (NAADS) and Global Fund that led to the recovery of over 4.3 billion shillings.

iii. **The enactment of enabling anti- corruption legal framework**. In early 2000s, The Public Procurement and Disposal of Assets Act, The Leadership Code Act, The Public Finance Act, The Local Government Act and various enabling Regulations are some key legislation. Later in 2010s the Anti-Corruption Act 2009, The Whistle blowers Protection Act 2010 and The Anti-Money Laundering Act 2013 were enacted. Improvement in terms of legislation and policies like the leadership code, Money Laundering Act, as well as the formation of the PPDA and Financial Intelligence Authority represent improved strides in this area.

iv. **Improved Public Financial Management Systems.** Introduction of the IFMS which aims at effective financial management, IPPS for regularizing the management of the Payroll and the computerization of the registries for curbing bribery, had great impact in improvement of financial management in the public sector.

v.   **Public Dialogues;** The Anti-Corruption Agencies interacted with the public, through Barazas, media and workshops and this has increased information sharing among agencies, including referrals of cases to members i.e IGG, PPDA, OAG. Collaboration between AC Agencies for example facilitated by GIZ in aspects like benchmarking, trainings, network engagements has been achieved.

vi. Training of community monitors: Many Anti-corruption agencies engaged communities in monitoring public service delivery. For example in NUSAF project areas there has been improved implementation of projects. More than 8000 groups formed and over 10000 projects have been inspected by joint IG and community groups which were trained and this has improved service delivery and transparent operations. Through training of media houses on issues of audit/ anti-corruption , there has been improved reporting in the media on matters regarding corruption and audit. Deliberate training of youths has taken place in the reporting period in order to inculcate morals and ethics in the young generation by the DEI.

1.3 Key Challenges

The above successes however were below the expected performance targets due to the following challenges:

i. **Weak enforcement of Anti- corruption Policy and Legislation.** Across the Board and in all Anti-Corroption, MDALGs there is weak enforcement of laws. This is due to understaffing, a large number do not have the required skills due to the complexity of cases; inadequate data and information as well as inadequate standards and ignorance modern trends of corruption like cyber-crime. Further, lack of Equipment examples forensic laboratories/ forensic investigative equipment, Anti- spy ware, Automated Finger Print Identification System (AFIS), Document and Signature Analyzer. There is lack of a strong commitment to punish the corrupt. This should be at the core of framing of new NACS to focus on ensuring that corruption is risky.

ii. **Poor facilitation and inadequate capacity** of the institutions charged with fighting corruption like the Police, Office of the Auditor General, DPP, Judiciary and IG. They lack training on the new systems by the government like on IFMS. This has hampered the investigative and prosecution of high level cases. There are very few trained personnel in anti-corruption agencies like handwriting experts, and cybercrime investigators. Further, evidence of incapacity to handle the volume of cases due to understaffing as a result, cases take long to be settled. While for others, because of the time lag, evidence is hard to get therefore suspects go scot-free. This in some instances demoralizes people who would have reported corruption cases.

iii. **Technological advancement**. Most of economic offenses today accompany international transfer payments (cross border corruption) and there are also occurrences of cybercrime, which require very advanced technological equipment and skills to detect and redress. There is generally slow rate of development in technological infrastructure and this opens an opportunity for technologically facilitated corruption to increase abatted.

iv. **Poor terms of service in the Public Service**. The low salaries and disparities in funding of various government institutions has demoralized Public Servants. Further, there are disparities in tooling and retooling in IAF institutions for instance there are weak Monitoring and Evaluation and internal audit controls.

v. **Civic education** which is very crucial in sensitizing and mobilizing the public to participate in anti-corruption activities is still lacking in the country. There appears to be a consensus that this should be scaled up across the board and that DEI must move out of the Centre to reach out to local communities. This activity should target a larger proportion in a coordinated longer-term way or deepened both at the national and local level).

vi. **Moral degeneration in the country**. This has made the fight against corruption very hard because of the glorification of the corrupt and corruption practices at all levels in the society. There is need for a moral revolution that focuses on cultivating virtue especially among children. Rebuilding ethics should be embedded in the school curricular.

vii. **Poor service delivery in Local Governments.** This has increased the propensity to bribe by the citizens to access services as some of these services appear to be a priority for the majority of the people. Local Government must strengthen service delivery systems to ensure that what comes out of the center reaches the intended beneficiaries.

viii. **Weak coordination role.** This was felt to be missing across the lower LGs. DEI must move beyond Kampala and ensure that strategies for fighting corruption such as the NACS are mainstreamed in all activities of LGs. Facilitation for NACS and DIPFs was observed to have been relegated to the sidelines. There should be increased role of DEI in terms of coordination at local levels. Printing of popular versions and translating these documents in local languages should be done to increase access and ownership of the strategy.

1.4 Key emerging issues

Based on the above challenges that faced the implementation of the various cycles of NACS; and analysis of issues emanating from the review and consultations, The Sixth cycle of NACS 2019-2024 will focus on the following strategic issues;

i) Further reform on the anti-corruption legal and policy framework
ii) Strengthening the enforcement of the laws and regulations
iii) *Strengthening coordination mechanisms and institutional reforms*
iv) Focusing on fighting Cross border crimes
v) Refocusing the prevention, combative and enforcement efforts of fighting corruption
vi) Enhance information sharing
vii) Refocus efforts of rebuilding of ethics and integrity to restore the moral fabric
viii) Re-energize the will and commitment by leaders to fight corruption
ix) Renew collaboration efforts with Non State actors and Citizens
x) Research and knowledge management
xi) Widely roll - out application of information and communication technology (ICT) in the fight against corruption

CHAPTER TWO

2.0 STRATEGIC INTERVENTIONS 2019/20 – 2023/24

The Sixth Cycle of NACS will continue to be the overarching national framework to guide Ministries, Departments, Agencies and Local Governments in formulating and implementing their anti-corruption action plans. This NACS offers broad strategic interventions to achieve the desired outcomes of the Zero Tolerance to Corruption Policy structured under six (6) strategic interventions emanating from priority areas as outlined below;

2.1 Strategic Intervention one: Enhance anti-corruption policy reforms.

It is necessary that emphasis is laid on the continuous strengthening of the anti-corruption legal and regulatory framework through the review of the existing laws and enactment of other new laws based on the realized need in the progress of the anti-corruption fight. Priority shall focus on asset recovery and plea bargaining in the new NACS.

Key actions

(i)   Establish research and knowledge management functions to guide and support evidence based policy reforms.

(ii) Undertake review of the anti-corruption laws.

(iii) Formulate laws to deal with new and emerging issues in the fight against corruption such as Asset Recovery laws, mutual legal assistance laws, establish autonomy of anti-corruption agencies; concurrent criminal l and civil prosecution of corruption cases etc.

(iv) Adopt and implement regional, international laws, conventions, resolutions, measures, and practices for preventing and combating corruption

2.2 Strategic Intervention Two: Strengthen the capacity of the anti-corruption institutions to effectively enforce anti-corruption measures.

More efforts should be dedicated to the enforcement of the full provisions of anti-corruption laws and regulations, to ensure increased detection, investigation pre and post audit and conviction rates. Recovery of stolen public funds by way of refund, settlement, compensation orders and fines; punishment of tax payers involved in the acts of corruption and tax evasion through prosecution and name and shame initiatives will be the focus of the new NACS. Further, efforts are also needed to ensure the more expeditious disposal of corruption cases.

This will be done in the form of increased staffing levels and acquisition of more specialized skills and technology through training programs within and outside the country in areas such as investigative techniques, property rights, digital investigations, cyber-crimes, asset tracking and recovery, among others so as to enhance their capacity to detect, investigate, prosecute and adjudicate cases of corruption. Cases of cybercrime require very advanced technological equipment and skills to detect and redress, there is need for forensic laboratories/ forensic investigative equipment, anti- spy

ware, Automated Finger Print Identification System so as to enhance capacity to curb sophisticated corruption tendencies.

Key actions

(i)   Increase the level of funding of the anti-corruption institutions to enable them operate effectively.

(ii)   Provide specialized trainings to equip staff of the anti-corruption institutions with modern skills.

(iii)   Provide the anti-corruption institutions with modern and specialized equipment for fighting corruption.

(iv)   Strengthen the implementation of existing anti-corruption policies, laws, rules, regulations, codes and procedures

(v)   Strengthen internal audit function through ensuring functional independence to report to Permanent Secretary and Secretary to the Treasury (PS/ST) as a means to prevent compromise.

2.3 Strategic Intervention Three: Strengthen coordination and partnerships among all stakeholders for the effective implementation of anti-corruption measures

Institutional reforms and proper coordination are necessary to reorient public sector institutions to enhance transparency and accountability mechanisms. Corruption is everybody's problem, and must be seen as a universal concern. At the present, the formal arrangement for fighting corruption has mostly concentrated at Government level, while linkages with non-state actors have remained weak and ineffective. The new NACS shall strengthen formal coordination, synergies and collaboration mechanisms with the Civil Society, Religious and Faith based Organizations, Cultural and Private Sector and media institutions to improve information sharing and joint action against corruption.

Key actions

(i)   Develop and share institutionally customized Anti-corruption Strategies among all MDAs.

(ii)   Develop and sustain institutional coordination, networking and cooperation framework with clear roles, mandates, expectations and operational principles

(iii)   Strengthen coordination and networking framework with the non-State actors including civil society, religious, and faith based cultural, private sector and media institutions.

(iv)   Develop, implement and sustain intra and inter-institutional communications mechanism

(v)   Establish District, Sub-county, Parish and Community Integrity and Accountability Structures

(i)   Strengthen information generation, management and sharing within the anti-corruption arena

2.4 Strategic Intervention Four: Deepen the efforts for the prevention of corruption

As a more sustainable anti-corruption measure, it is important to focus on rebuilding and reinvigorating the social, cultural, economic and political moral values and fabric among the young people. There is need to reverse the challenge of public apathy and abdication of their role in the fight against corruption, as well as prescribe solutions to all dimensions of corruption in form of political, social and economic perspectives. Children and Youth shall be the focus of the new NACS.

There will be a deliberate intervention to create a strong social base that will help the country to get out of the profound social crisis of eroded principles, values and morals which is the main cause of corruption. Leadership should cultivate a culture of transparency and citizens should operate within the boundaries of morality and integrity governed by principles of the rule of law.

Within the education sector, children should be taught to respect the law and develop their moral conscience at an early age. This education should be delivered through schools, families and the general spiritual, political and cultural environment. Families play pivotal role in laying foundation for understanding, which determine attitudes and character of individuals in the social environment. Development of moral personality must also be done in schools as to grow a society that puts collective responsibility over personal interests.

Key actions

(i) Make Ethics and Integrity a cross cutting issues to be mainstreamed in all MDAs and Local Governments to ensure compliance.

(ii) Introduce and strengthen moral/character education in the formal school system.

(iii) Enhance ownership and sharing of anti-corruption agenda by IAF, Accountability Sector Agencies, all MDAs, Private and Civil Society sectors.

(iv) Increase citizen participation in the fight against corruption

(v) Promote public education and awareness on national Anti-corruption laws and policies and roles and responsibilities of the public to ensure fulfillment of citizens' civic responsibilities.

(vi) Promote the mainstreaming of National Ethical Values of Uganda in all Sectors.

(vii) Strengthen performance, management and accountability standards, systems and controls

(viii) Institute a mechanism for identification and recognition of institutions and persons of integrity

2.5 Strategic Intervention Five: Renew Political commitment by leaders at all levels to fight corruption.

The political commitment in fight against corruption needs to be renewed and all-round, demonstrated in ensuring the existence of strong laws, policy and strategic operational actions, regulations and institutions to fight corruption, adequate

funding of the institutions and efforts, and back up in the implementation of the recommendations of anti-corruption agencies and other relevant actors. The new NACS will target leadership at all levels to ensure that they adequately commit to support anti-corruption initiatives.

Key actions

(i) Develop and enforce Code of Conduct for political leaders

(ii) Enhance political compliance with and adhere to the Political Parties and Organizations Code of Conduct to promote exemplary leadership

(iii) Increase funding for Anti-Corruption Institutions

(iv) Sensitize political leaders at all levels in the vitality of demonstrating exemplary practice for transparency, equity, integrity, transparency and accountability

(v) Improve, rationalize and harmonize remuneration of Public Servant as a tool for motivation

(vi) Ensure follow up and implementation of recommendations of anticorruption agencies, oversight institutions and Commissions of Inquiry.

2.6 Strategic Intervention Six: Scale up the application of Information Technology (IT) in the fight against corruption

Key actions

(i) Entrench e-governance in MDALGs to enhance transparency, accountability, effectiveness and efficiency in public service delivery.

(ii) Widely roll out the application of Information applications such IFMS, Electronic Case Management Systems, E-recruitment, E- procurement and E-tax administrations in the public sector.

CHAPTER THREE

3.0 IMPLEMENTATION FRAMEWORK

3.1 Guiding Principles

The successful implementation of NACS will be guided by the following underlying Principles:

a. Leadership

There shall be committed leadership at all levels, right from the top leadership (Cabinet) to the lowest level (in this respect the Village Councils), to ensure the anti-corruption aspirations are realized.

b. A Sector Wide Approach

All MDAs, Local Governments, Private Sector, Civil Society, Citizens and Development Partners shall in implementation of this NACS be involved in the fight against corruption. This shall be based on deliberate and formalized operational arrangements, systems, procedures and processes.

c. Inter-agency collaboration and strategic partnerships

The formation of strategic partnerships and alliances among the anticorruption stakeholders is important to facilitate coordination of activities of all stakeholders. Public-Private Partnership (PPP) should be strengthened to leverage mutual complementarities and comparative advantages.

d. Collective responsibility

It is the duty and responsibility of all citizens as bestowed by the constitution of Uganda to fight corruption and abuse of authority. The participation of the public and all stakeholders is important.

e. Transparency and accountability

Information sharing, openness and access to information are fundamental in efforts and activities that seek to fulfill and enhance transparency and accountability. It is important that information which enables stakeholders to fully participate and fulfill their roles in the fight against corruption is disclosed. This NACs just like the ZTCP recognizes the important roles different stakeholders have to play in order to achieve transparency and accountability in the delivery of public services.

f. Institution capacity development

This NACS shall prioritizes institutional development for anti-corruption institutions within the sector-wide framework through a range of capacity building mechanisms to ensure that the institutions are better prepared, adequately equipped and well positioned to drive and sustain the anti-corruption fight.

3.2. Ownership of NACS

The effective implementation of NACS requires support from a wide range of individuals, organizations and stakeholder groups. It is important that wide dissemination of NACS will be made to stakeholders to realize a sense of ownership and commitment.

3.3 Linkages with other institutions and sectors

The effectiveness of the NACS is highly dependent on the goodwill and participation of a wide range of sectors and MDALGS. This places great focus now on coordination and in particular, reaching out to and influencing many areas of the Public Service. In this case, it would be important to coordinate closely with all Sectors and Local Governments.

3.4 Key stakeholders and roles

a) **Local Governments**

Given the important role that the districts play, the District Integrity Promotion Forum (DIPFs) at Local Governments will be strengthened to impact on accountability.

b) **The Civil Society**

The role of Civil Society is more visible on matters of accountability and elimination of corruption, there is more demand and monitoring of service delivery at lower administrative units. To execute this task, the IAF will work closely with the Anti-Corruption Public Private partnership (ACPPP) to cause the much needed change.

c) **The Private Sector**

The private sector is a key service provider and of course consumer of government service. Under the liberalization policy it is required that most government service delivery be contracted out to the private sector. Government is also encouraging partnerships with the private sector through initiation of the Public Private Partnerships (PPP) policy. The private sector will deliberately be engaged in the implementation of NACS

d) **The General Public**

The general public is the key recipient of services and the provision of quality and timely services is the primary objective of accountability. The public will be engaged to increase the public demand for transparency and accountability. It is imperative to build a strong societal will to support the different Government agencies in the anti-corruption chain.

e) **Development Partners**

The development partners provide financial assistance to government in form of budget and program support. They additionally undertake

performance assessment/reviews and provide technical assistance to improve accountability and service delivery. There is need to strengthen the role of the Development partners in the joint Assessment Framework (JAF) under which DPs and GoU agree on common performance indicators for tracking progress within a given period.

3.5 Coordination of the implementation of NACS

The Directorate for Ethics and Integrity (DEI) shall be the coordinating centre for the implementation of NACS activities and programmes. The specific roles of the Secretariat shall include;

(i) Coordination of activities and programmes under NACs

(ii) Carry out M&E on all NACS programmes in the different MDAs

(iii) Preparation of the Inter Agency Forum annual performance reports

(iv) Promote synergy framework and close co-operation in the implementation of the NACS and Technical working groups to achieve a roll out of high standards of accountability in public service institutions

(v) To publicize and advocate the work of the Inter Agency Forum

(vi) Provide necessary advice to the IAF

(vii) Assist in the mobilization of funding for implementation of NACS programmes and ensure efficient and effective utilization of the funds.

3.6 Communication Plan

3.6.1 Purpose

There is need to adopt a proactive and coordinated approach to rolling out Zero Tolerance to Corruption Policy, NACS, its policies and programmes in a strategic and effective way that engages and galvanizes citizens for the struggle against corruption.

The strategy, therefore, sets a road map that will guide the government in building the Communication function as well as promoting the understanding and uptake of new policies and programs to advance rebuilding of integrity and ethical behavior among the citizens.

The desire is to effectively engage the public, media and all key stakeholders to participate in the popularization of NACs that will result into social transformation and improved service delivery. Despite the many Government legal and institutional frameworks relating to corruption as well as policies and initiatives to reduce corruption through combative and preventive means, the trend of corruption and apathy among the population remains a major challenge and a hindrance to the achievement of National Development Objectives.

3.6.2 Goal of the Communication Plan

The overall Goal of the Communication Strategy is to establish an effective, well-coordinated and proactive Communication system across the public that will meet their needs to fight corruption. This is intended:

(i)   To roll out NACs appropriately

(ii) To meet anti- corruption information needs of the stakeholders

(iii) To promote a positive image of the Anti - Corruption agencies and government at large.

3.6.3 Strategic Communication

a) Communication Planning

The strategy is intended to build across the public a systematic and coordinated approach to providing the public with information that will positively guide and promote ethics in the country as well as provide AC media leadership. The Communication Plan is flexible and designed to adapt to changes in the priorities and Communication environment hence, the strategy will be reviewed periodically to keep it relevant to the Communication needs of the public.

To ensure that Communication is integrated with the strategy, establishes a process requiring all MDALGs activities to in build a systematic way that will guide the dissemination of information to the public and the wider, regional and international audience in a targeted and coherent approach is established.

b) Key Priorities and Core Messages

The Communication Plan identifies and clarifies key NACS priorities, programs and issues for communication. The Plan wide establish the core messages for each of the Key priority areas to facilitate clear and consistent communication of messages to the public and stakeholders, when and how this message will be communicated.

c) Institutional structures for the communication function

The successful implementation of the Communication Strategy depends on the establishment of a clearly defined Communication function, structure and reporting lines across IAF. Taking into account the findings of reviews of cycles of NACS undertaken during the twenty-year period when NACs was first formulated; this Strategy proposes the realignment of the hierarchy of the Communication function, key responsibilities, strengthening of the DEI and the establishment of Communication Officers Forum for IAF and Accountability Sector. The following interventions should be undertaken;

(i)   Implement policies on media and information dissemination with a view of making NACS visible. Furthermore, strengthen the co-ordination of the Communication function across LGs and MDAs on NACS

(ii)   Develop long term strategic objectives, planning and budgeting for the Communication function and appropriate roll out of NACS should be undertaken.

(iii)   Design an effective feedback management mechanism to capture public views as a means of ensuring enhanced public participation in the Communication process.

(iv)   Strengthen the information department at DEI in order to deal with all emerging issues regarding corruption and misuse of public office throughout the world.

CHAPTER FOUR

4.0 MONITORING AND EVALUATION (M&E)

The monitoring and evaluation framework will assess progress on the extent and quality/efficiency and effectiveness of implementation of the NACS. This will also ensure that the policy is integrated into the institutional programmes, processes, systems and activities of all the implementing agencies. M&E is critical in monitoring, measuring and assessing the efficacy of the programmes, strategies and outcomes for the implementation of the strategy, and inform any possible reviews, improvements or changes in strategy and approach.

4.1   Monitoring and Evaluation Mechanisms

The DEI will develop mutually agreed methods of monitoring and evaluation, benchmarks and indicators to be used. The M&E framework and processes shall be open and participatory so that the M&E process is fully supported by all stakeholders.

Leadership, coordination, management and involvement of both internal and external stakeholders will be engaged for the successful implementation of the M&E system for the strategy.

It is essential that all MDAs become aware of and respond to this strategy and take respective responsibility for its implementation. To be effective, a high degree of coordination is required to ensure that tasks are undertaken across all MDAs in a complimentary way and that progress is adequately monitored, evaluated and reported.

4.2   The M&E System for the Strategy

An M&E system will be developed to guide periodic M&E, and thus provide details of the plans, involvement, roles and responsibilities, data source, information management and reporting for M&E implementation.

4.3   M&E Roles, Responsibilities and Reporting

At the commencement of the NACs, the DEI will map out the institutional roles and responsibilities for M&E. As well, the information needs and standards, availability and adequacy of information required; the frequency, flow and format for reporting plus feedback to realign, will be clarified. The DEI will coordinate the development of a detailed M&E system for implementation of this strategy, capturing and guiding the respective institutional and sectoral roles and commitments for M&E. The DEI will prepare, produce and share periodic assessment reports against the agreed indicators and targets for both outcome and output level of each strategic objective. This will be in addition to the production, on an annual basis, of a report on the prevalence of corruption and national anti-corruption efforts.

At the civil society level, the anti-corruption networks and forums will conduct regular monitoring, evaluation and reporting of their activities and undertake annual assessments which will feed into the national anti-corruption report to be presented at the national anti-corruption conventions.

The private sector through an agreed mechanism will conduct periodic monitoring on agreed action areas and also conduct annual assessment and report to the DEI as the coordinating agency, to incorporate their findings into the national report.

The Development Partners will also be responsible for monitoring of agreed actions in their operations with Government and undertake an assessment of the annual performance and report to the national coordinating agency to feed into the national report.

At the district level, mechanisms will be established to monitoring corruption tendencies and the anticorruption efforts and responses, at their level and the results shall feed into the national report.

An independent assessment of public perception and performance of Government in combating corruption will also be undertaken by the DEI and will feed into the national report.

4.4   Key Data Sources

Existing data sources including institutional reports, administrative data, national and international reports shall be utilized to enhance the M&E functions under this policy. In addition, effort shall be made to establish and operationalize research, data and information generation initiatives to ensure a locally available and credible depository of knowledge and information on corruption, accountability and anti-corruption mechanisms.

Periodically, the baseline information on the indicators will be established in order to review monitoring indicators. The Inter Agency Forum will use the existing monitoring and evaluation mechanisms within the member institutions, such as the Corruption Data Tracking Mechanism (DTM), National Service Delivery Survey, the Uganda Poverty Participatory Assessment, the National Integrity Survey, and the National Integrated Monitoring and Evaluation Systems (NIMES) to monitor the progress of implementation of the strategy.

CHAPTER FIVE

5.0 FINANCING THE STRATEGY

For the successful implementation of the strategy, Ministries, Departments and Agencies and Local Governments will be financed under the Medium Term Expenditure Framework (MTEF) and MDALGs ceilings as appropriated by Ministry of Finance, Planning and Economic Development. These institutions will mainstream the anti-corruption measures into their existing or new programmes, and within their budgets. Each Ministry, Department and Agency and Local Government will be responsible for the agreed actions that fall within their mandate with guidance from the DEI. Additional funding will be sourced under the various actors.

The DEI through the IAF will use the resources that have been made available to strengthen leadership and coordination of all anti-corruption measures, provide policy guidance and support the MDALGs to mainstream anti-corruption into their plans and budget as well as monitor their performance.

Development Partners (DPs) are critical partners in the financing of this strategy. The sector will continuously engage the DPs for increased funding to ensure the successful implementation of this strategy.

Zero Tolerance to Corruption for effective Service Delivery

THE IMPLEMENTATION MATRIX

STRATEGIES	OUTPUTS	OUTPUT INDICATORS	ACTORS / RESPONSIBILITY CENTRE	MEANS OF VERIFICATION /DATA SOURCES
Strategic Intervention One: Enhance anti-corruption policy reforms.				
1.1 Establish research and knowledge management functions to guide and support evidence based policy reforms.	• Anti-corruption research conducted. National resource center established	• National Resource Center operational. • Number of corruption related research undertakings.	• DEI • IAF • AS • UBOS • JLOS • CSOs • OPM	• Resource Center in place • Research reports
1.2 undertake review of the anti-corruption laws	• Enforcement of anti-corruption legislation strengthened.	• Number of laws and regulations reviewed • Number of audits undertaken	DEI/IAF in consultation with other stakeholders CID IG ODPP ACD OAG PPDA CSOs Private Sector	• Reviewed laws and Regulations • Cabinet Memoranda for the reviewed Laws & Regulations • Process Reports for the Review processes • Institutional reports • Corruption Perceptions & Integrity Survey reports
1.3 Formulate laws to deal with new and emerging issues in the fight against corruption such as Asset Recovery laws, mutual legal assistance laws, establish autonomy of anti-corruption agencies; concurrent criminal and civil prosecution of corruption cases etc.	• Systems for prevention of corruption developed and implemented	• Number of new anti-corruption laws and regulations formulated. • Number of corruption prevention mechanisms/action plans • Percentage of corruption prevention mechanisms implemented	DEI IAF and MDALGs JLOS Health sector Education sector Energy sector Works & Construction sector	• Institutional reports • Sector performance reports
1.4 Adopt and implement regional, international laws, conventions, resolutions, measures, and practices for preventing and combating corruption.	• Regional and International legal instruments on anti-corruption domesticated and implemented	• Number of legal instruments domesticated • Percentage of implementation of legal instruments on anti-corruption provisions • Number of regional and international programs leveraged • Number of good practices adopted • Number of measures for prompt management of money laundering incidences and cases • Number of anti-money laundering mechanisms	• DEI (in collaboration with IAF Institutions) • FIA • Parliament	• Self- Assessment Reports • Country Review reports • National enacted legislation • Annual institutional reports

Zero Tolerance to Corruption for effective Service Delivery

Strategic Intervention Two: Strengthen the capacity of anti-corruption institutions to effectively enforce anti-corruption measures

Output	Indicators	Responsible actors	Means of verification
2.3 Strengthen Internal Audit function through ensuring functional independence to report to PS/ST as a means to prevent compromise.	• Harmonized and effective monitoring and reporting mechanisms developed and implemented • Functional Inspection units established in all MDA/LGs • Internal audit function in MDA/LGs strengthened	• Number of audit reports. • Percentage increment in budget allocation. • Number of functional Inspection Units	• DEI • IAF • IAG • OAG • MDALGs • JLOS • Parliament	•

Strategic Intervention Three: Strengthen coordination and partnerships among all stakeholders for the effective implementation of anticorruption measures

Output	Indicators	Responsible actors	Means of verification
3.1 Strengthen coordination and networking framework between the state and non-State actors including civil society, religious, and faith based cultural, private sector and media institutions	• Coordination and partnerships among all stakeholders strengthened	• Number of MDA-Non State actors cooperation arrangements • Anti-corruption Public-Private-Partnership (ACPPP) • Functional IAF framework with clear roles, mandates, expectations and operational principles	• DEI • State House Anti-Corruption Unit • IAF • Accountability Sector • JLOS • CSOs • Private Sector • Faith Based and Religious Organizations • Cultural Institutions • Educational Institutions	• ACPPP MOUs • Annual and bi-annual review reports • Performance reports of non-state actors • NACS Annual reports • IAF Communication strategy. • High-profile case management system • Inter-agency reports
3.2 Strengthen information generation, management and sharing within the anti-corruption arena		• Functional Communications Strategy for anti-corruption efforts	• DEI • State House Anti-Corruption Unit • IAF • AS • JLOS • CSOs • Private Sector • Faith Based and Religious Organizations • Cultural Institutions • Educational Institutions	• ACPPP MOUs • Annual and bi-annual review reports • Performance reports of non-state actors • NACS Annual reports

3.3 Establish and operationalize District, Sub-county, Parish and Community Integrity and Accountability Structures	• Number of LG and Community based AC and accountability structures established. • Number of DIPFs functional. • Number of Barazas operational.	• OPM • MOLG • MOPS • DEI • LGFC • IAF • JLOS • LGs • Community based anti-corruption structures	• Institutional reports • Sector reports • LG AC reports

Strategic Intervention Four: Deepen the prevention of corruption efforts

4.1 Establish ethics and integrity function as a cross cutting issues to be mainstreamed in all MDAs and Local Governments	• Institutional structures and programmes for promotion of ethics and integrity established. • Ethics and integrity embraced in all MDALGs	• Number of institutional structures established • No. of program in place. • No of MDAs embracing ethics and Integrity/LGs. • No. of LGs embracing ethics and Integrity/LGs.	• DEI • MDA/LGs • NPA • Educational Institutions • Religion and Faith organisations • Private Sector	• DEI reports • MDA reports • Sector reports
4.2 Introduce integrity and performance- based recruitment &promotion system.	• Integrity and performance- based recruitment & promotion system developed and implemented. • Accountable performance and service delivery enhanced.	• No. of functional systems in place • % reduction in complaints relating to recruitment • % reduction in complaints relating to promotion. • % improvement in performance • Feedback mechanism in place.	• DEI • MOPS • Service Commissions (JSC, HSC, ESC, PSC, DSC) • NPA • Parliament	• Reports of recruitment Commissions • MOPS reports • Institutional reports on promotions and staff performance
4.3 Empower citizens to demand for accountability and to report corruption	• Social accountability and empowerment strengthened at all levels. • Demand-driven accountability promoted. • Public education and awareness on national anti-corruption laws and policies promoted. • Reporting mechanisms strengthened	• Number of public empowerment interventions. • Percentage increase in reported cases. • Percentage increase in demand for accountability.	• DEI • State House Anti-Corruption Unit • IG • IAF • AS • JLOS • MDALGs • All sectors of government • CSOS • Religion and Faith organisations	• Institutional reports • Inter-agency and Sector reports

Strategy	Output	Indicator	Lead Institutions	Means of Verification
4.4 Promote mainstreaming of National Ethical Values of Uganda in all sectors.	• National Ethical Values (NEVS) Policy disseminated. • Ethics and integrity mainstreamed at all levels. • Social values restored.	No of dissemination activities on NEVS conducted by Region	• DEI • MDALGs • NPA • All sectors of government • CSOS • Religion and Faith organisations	• Institutional reports • Inter-agency and sector reports • National integrity survey reports
4.5 Strengthen performance management and accountability systems and controls.	• Public performance management and accountability systems strengthened. • Integrity in public affairs management promoted • E-governance system strengthened.	• Public management systems implemented. • e-governance system operational	• MOICT • MOPS • MOFPED • MDALGs	• DEI Coordination reports • Sector reports • Institutional reports • National, regional, and international integrity and corruption survey reports
4.6 Institute a mechanism for identification and recognition of institutions and persons of integrity	• Personal integrity promoted. • Institutional -centered integrity enhanced. • Individual-centered integrity enhanced	• Institutional recognition reward system in place • Individual recognition reward system in place • % reduction in number of disciplinary cases.	• DEI • MoPS • IAF/MDALGs • JLOS • CSOs • Religious and Faith Organizations	• Institutional reports • Sector reports
Strategic Intervention Five: Renew political commitment by leaders at all levels to fight corruption.				
5.1 Develop and enforce Code of Conduct for political leaders	• Code of conduct developed • Exemplary leadership promoted.	• Code of Conduct in place • Number of political leaders recognized	• DEI • Electoral Commission • Political Parties • CSOS • Parliament	• DEI Coordination reports • Code of Conduct for political leaders
5.2 Enhance compliance with the Political Parties and Organizations Code of Conduct	• Compliance enhanced • Political party accountability enhanced. • Financial regulations on campaigns and activities of political parties followed.	• Number of political parties complying. • Number of political parties subscribed to the Political Parties' Code of Conduct. • Number of regulations on financing of campaigns and activities of political parties in place.	• DEI • Electoral Commission • Uganda Police Force • Political parties	• Activity Reports Regulation on financing of campaigns and activities of political parties

Strategic Intervention	Activities	Output indicators	Responsible institutions	Means of verification
5.3 Increase funding for Anti-Corruption Institutions	• Coordinated planning and budgeting • Inter institutional budget reviews	• %age of increase in funding of AC institutions	• MOFPED • MoPS • Parliament • Cabinet • IAF	• Institutional reports • Inter-agency reports • Sector reports
5.4 Sensitize political leaders at all levels in the vitality of demonstrating exemplary practice of integrity.	• Political leaders sensitized on transparency, and accountability	• Number of political leaders sensitized	• DEI • IAF • CSOS • Media	• DEI performance reports • IG performance reports
5.5: Rationalize public remuneration and motivation	• Public officials well remunerated • Public officials well motivated. • Salary Review Commission established. • Minimum- wage implemented.	• % increase of public officers with Competitive remuneration • Operational Salary Review Commission. • Minimum- wage in place.	• MOPS • MOFPED • DEI • EOC	• Revised salary scales • Reviewed Uganda Public Service Standing Order
5.6 Ensure follow up and implementation of recommendations of anti-corruption and oversight institutions and Commissions of Inquiry.	• Recommendations of anti-corruption and oversight institutions and commissions of inquiry implemented	• Number of recommendations implemented	• DEI • State House Anti-Corruption Unit • IAF • Parliament and Cabinet	• Progress reports • Inter-agency reports
Strategic Intervention Six: Scale up the application of Information Technology (IT) in the various anti-corruption measures				
6.1 Entrance e-governance in MDA & LGs to enhance transparency, accountability, effectiveness and efficiency in public service delivery.	ICT integrated in the operation and management process of MDALGs	Functional IFMS, Electronic Case Management Systems, E-recruitment, E- procurement and E-tax administration systems	• DEI • MoICT • NITA-U • MOFPED • MoPS • URA • URSBS • MDALGs	• Ministerial Policy Statements • Sector Annual Review Reports • Institutional Annual reports • GAPR reports

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Directorate for Ethics and Integrity, Office of the President
Social Security House, 2nd Floor Northern Wing
Plot 4, Jinja Road. P.O Box 7142, Kampala, Uganda. Tel: +256(0) 414 301 600
www.dei.go.ug/info@dei.go.ug