



THE FINANCIAL INTELLIGENCE AUTHORITY STRATEGIC PLAN 2020/2021 – 2024/2025

Vision

The Authority strives to become a centre of excellence in combating money laundering and terrorism financing.

Theme

POSITIONING THE FINANCIAL INTELLIGENCE
AUTHORITY TO EXECUTE ITS MANDATE
EFFECTIVELY AND EFFICIENTLY.

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List of Acronyms

AML	Anti-Money Laundering
AMLA	Anti-Money Laundering Act
ASSIP	Accountability Sector Strategic Investment Plan
BNI	Bearer Negotiable Instruments
CFT	Countering Financing of Terrorism
CNDPF	Comprehensive National Development Framework.
CPF	Countering Proliferation Financing
DFID	Department for International Development
DNFBP	Designated Non-Financial Businesses and Professions
ESAAMLG	Eastern and Southern Africa Anti-Money Laundering Group
FATF	Financial Action Task Force
FDD	Financial Due Diligence
FIA	Financial Intelligence Authority
FIC	Financial Intelligence Centre
FIU	Financial Intelligence Unit
GoU	Government of Uganda
ICRG	International Co-operation Review Group
LEA	Law Enforcement Agencies
MDAs	Ministries, Department and Agencies
MER	Mutual Evaluation Report
ML	Money Laundering
MOU	Memorandum of Understanding
NDP	National Development Plan
NRA	National Risk Assessment
PESTEL	Political, Economic, Social, Technological, Environmental, Legal
PF	Proliferation financing
STRs	Suspicious Transaction Reports
SUGAR	Strengthening Uganda's Anti-Corruption and Accountability Regime
SWOT	Strength, Weaknesses, Opportunities and Threats
TF	Terrorism Financing
UN	United Nations
UNODC	United Nations Office on Drugs and Crime

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Preamble

The Financial Intelligence Authority established by mandate of the Anti-Money Laundering Act, 2013 and with authority from the Ministry of Finance, Planning and Economic Development, hereby communicates its Strategic Plan in support of Uganda's Third National Development Plan (NDPIII), for the period of 2020/21 to 2024/25. The strategic plan is in line with the Authority's guiding vision, mission and core values.



Mission

The Authority's core mission is to foster the integrity of the financial system through effective detection and prevention of financial crimes.



Vission

The Authority strives to become a centre of excellence in combating money laundering and terrorism financing.



Core values

The Authority commits its staff to uphold the following values:

- i) Integrity - aspiring to the highest ethical standards of honesty, reliability and dependability.
- ii) Professionalism - meeting high standards in execution of our mandate, while working together with accountable persons, partner agencies and others in a practical, diligent, timely, and rigorous result driven-manner.
- iii) Accountability -taking responsibility and explaining our actions to all our stakeholders.
- iv) Teamwork - working together within the Authority and with other stakeholders.
- v) Confidentiality - respecting the value and ownership of information which we receive, and taking measures not to disclose any information without the permission of the appropriate Authority.
- vi) Transparency – conducting ourselves with openness and honesty in all aspects of our work.

Foreword



I am glad to present the Financial Intelligence Authority (FIA) strategic plan for the period FY 2020/2021-2024/2025.

This is the second strategic plan since the establishment of FIA in 2014. The strategic plan focuses on positioning the FIA as a centre of excellence in combating Money Laundering, Terrorism Financing and other financial crimes in Uganda.

The plan is a renewed effort by the government through FIA to combat the threats of Money Laundering, Terrorism Financing and Proliferation Financing (ML/TF/PF), for the smooth functioning of Uganda's economy.

The plan is anchored on seven strategic objectives designed to ensure that the Ugandan economy is not exploited by criminals seeking to launder proceeds of crime.

I appreciate the FIA Board, Management and Staff for this achievement and the continued commitment in the fight against financial crime.

A handwritten signature in black ink, appearing to read 'Matia Kasaija'.

Hon. Matia Kasaija

Minister of Finance, Planning and Economic Development

Message from Chairman, Board of Directors



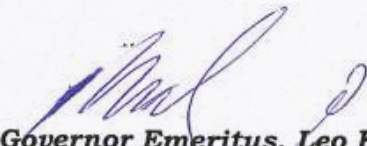
The FIA five-year Strategic Plan FY 2020/2021-2024/2025 presents a road map for achieving the set goals over this period. The plan was developed taking into consideration the challenges and achievements of the previous strategic plan ending FY 2019/2020.

The Strategic Plan is a result of a consultative process involving the National Planning Authority, Equal Opportunities commission, Ministry of Finance, Planning and Economic Development, the Office of the Prime Minister and other stakeholders. The plan is aligned to the National Development Plan (NDP III),

the Governance and security Programme implementation Action Plans and the National AML/CFT/CPF strategy.

The implementation of the plan requires the support of various stakeholders, including; the Law Enforcement Agencies, Accountable Persons, Regulatory and Supervisory bodies, and international partners engaged in the fight against ML/TF/PF. The effective implementation of this plan will depend on the allocation of sufficient resources to the various agencies responsible for combating ML/TF/PF to be able to put in place robust systems to detect and deter the evolving methods and intensity of financial crime.

I would like to thank Government, my colleagues on the Board and Management of FIA for the achievements registered since inception and to appeal to the people of Uganda to cooperate fully with FIA to produce a conducive environment for carrying out business and thereby improve the standard of living of our people.



Governor Emeritus, Leo Kibirango
Chairperson of the Board.

Acknowledgement by Executive Director Financial Intelligence Authority



I appreciate the FIA team and stakeholders who have contributed in the development of this Strategic Plan. The plan has benefited from the knowledge and hard work of the entire team.

I am grateful to the FIA Board of Directors; the Ministry of Finance, Planning and Economic Development; the National Planning Authority; the Equal Opportunities Commission; and other MDAs who are involved in the fight against ML/TF; for their support in the development of this plan.

The strategic plan has articulated strategies which will guide management and staff of FIA in their efforts to combat ML/TF/PF and other financial crimes. We commit all our efforts to implementing the plan.

Sydney Asubo

Executive Director

Executive Summary

The FY 2020/21–2024/25 Strategic Plan is a deliberate effort to position the Financial Intelligence Authority as Centre for excellence in combating Money Laundering, financing of Terrorism and proliferation of weapons of mass destruction in Uganda. It is anchored on the progress made, challenges encountered and lessons learnt from implementation of the previous plan. It defines the strategic direction for the organization and sets out key objectives designed to help effectively mitigate Uganda's exposure to the threat of Money laundering and terrorism financing which according to the National Risk Assessment for 2017 have been growing largely fueled by fraud, corruption, abuse of public resources, smuggling of wildlife products and tax related crimes. The FIA is now better positioned to address the remaining bottlenecks to meet the AML/CFT international standards.

The strategic plan has been aligned to Uganda's National Development Plan III, The National AML/CFT/CPF strategy, ASSIP II, National Risk Assessment (NRA) 2017, Mutual Evaluation Report (MER) 2016, Financial Action Task Force (FATF) Recommendations, National AML/CFT/CPF strategy, ESAAMLG and Egmont agreed upon actions plans. The strategy also takes into account current and emerging trends associated with AML/CFT/CPF issues.

The Uganda vision 2040 is: "A Transformed Ugandan Society from a Peasant to a Modern and Prosperous Country within 30 years". The attainment of National Development goals requires good governance and a stable financial system among other things.

This five-year plan has therefore been prepared against the background of the need to implement AML/CFT/CPF standards as set out in the Anti-Money Laundering Act, 2013, the FATF 40 Recommendations and UN Conventions. The goal of the plan is to ensure that the Anti-Money Laundering and Countering the Financing of Terrorism framework is effective to fight financial crime and protect the integrity and ensure stability of Uganda's financial system.

This plan has been developed to guide the FIA in focusing its resources and personnel to address the significant challenges which continue to make Uganda vulnerable to the threats of Money Laundering, Terrorism Financing and Proliferation Financing. The strategic plan draws heavily on the results of the National Risk Assessment to identify the binding constraints to the AML/CFT regime, which must be addressed over the next five years. The challenges facing Uganda's AML/CFT regime are broadly divided into two categories namely, the risks that exist at the national level over which FIA has no direct control and FIA specific challenges including; the large informal sector; inadequate resources to recruit key staff to carry out its mandate; ineffective AML/CFT/CPF supervision of accountable persons by some regulatory bodies; limited awareness about AML/CFT/CPF; and the lag in implementation of the declaration of cross-border movement of currency and Bearer Negotiable Instruments (BNIs) as required within the AMLA.

The Plan has also been designed with the regional and global development perspective, taking account of key regional and global standards and obligations which have informed the plan. These include; the FATF 40 recommendations, obligations under Egmont group of Financial Intelligence Units, and the ESAAMLG Action Plan.

The strategic plan has seven strategic objectives that will deliver the overall vision of the Authority upon successful implementation with clear annual performance targets for each of the strategic objectives. These include;

- (i) Enhancing the identification of proceeds of crime;
- (ii) Increasing compliance with the AML/CFT laws;
- (iii) Improving collection and dissemination of information to competent Authorities;
- (iv) Strengthening international cooperation;
- (v) Increasing public awareness and understanding of matters related to money laundering and terrorism financing;
- (vi) Strengthening the capacity of FIA to conduct financial due diligence; and
- (vii) Enhancing the efficiency and effectiveness of FIA to execute its mandate.

The preparation of the plan was conducted through a consultative process that involved key stakeholders, both internally and externally. The broad consultations presented an opportunity to incorporate a wide spectrum of ideas, thus providing high-level expectations from the Authority for the next 5 years.

Institutional framework for implementing the plan.

FIA is governed by a Board of Directors appointed by the Minister of Finance, Planning and Economic Development in accordance with section 25(2) of the Anti-money Laundering Act 2013 and approved by Parliament. The Board comprises of 6 members, including the Executive Director as an Ex-Officio. Membership of the board is drawn from persons with diverse and relevant experiences in the legal, financial and law enforcement fields. The Board serves for a period of 3 years and may be reappointed for one more term. The reporting hierarchy comprises of the Board of Directors, Office of the Executive Director, Office of the Deputy Executive Director, Directorates and Departments.

The Top management of the Authority consists of the Executive Director, who is also the accounting officer of the Authority (also the ex-officio member of the Board), Deputy Executive Director and six directors. Top management is supported by Managers who are heads of respective departments/directorates.

Financing

The Plan will mainly use MTEF provisions and lobbying for more funds to meet the financing requirements over the next five (5) years. The cost of financing the plan is estimated at UGX 192 Billion whereby MTEF for 5 years is estimated at 83 Billion leaving a funding gap of Ugx 109 Billion.

Monitoring and Evaluation (M&E)

The Monitoring and Evaluation Framework will entail the preparation of quarterly performance reports and annual reports to track progress of implementation of the Strategic Plan undertakings and the progress made towards achieving the Strategic objectives. A mid-term review and a terminal review of the Strategic Plan will be conducted to evaluate the progress of implementation of the Plan.

Key results to be achieved

The FIA strategic plan FY 2020/21- 2024/25 intends to achieve a number of results key of which include;

- i) 100% analysis of all financial reports received in order to generate and disseminate financial intelligence to LEA and competent authorities.
- ii) Conduct at least 10 risk assessments and 10 typology studies on ML/TF/PF to support formulation of appropriate AML/CFT/CPF policies.
- iii) On boarding at least 80% of reporting entities on goAML to increase electronic reporting.
- iv) Increase compliance with AML/CFT laws through;
 - Conducting at least 30 AML/CFT onsite and offsite inspections using a risk based approach
 - Building capacity of at least 150 accountable persons to comply with obligations of under AMLA.
 - Review atleast 30 AML/CFT/CPF independent Audit reports periodically.
 - Registration of at least 20,000 accountable persons.
- v) Coordinate the implementation of 19 FATF recommendations where Uganda is rated Partially Compliant (PC) and Non Compliant (NC) to ensure that Uganda comply's with all the 40 FATF recommendations.
- vi) Atleast 40 AML/CFT/CPF public campaigns conducted across the regions of the country to increase public understanding of matters related to ML/TF.
- vii) Improved capacity and capability of FIA to effectively and efficiently address emerging ML/TF/PF trends, techniques and methods through; recruitment of additional staff within the approved structure and providing training to FIA staff.

1.0 Background

The formulation of the Financial Intelligence Authority (FIA) Strategic Plan FY2020/21-2024/25 is based on the comprehensive National Development Planning framework where each agency is obliged to produce a plan every after 5 years that is aligned to the National Development Plan (NDP). The plan implements FIA mandate derived from the AMLA, 2013 as amended.

This is FIA's second strategic plan and covers the period 2020/21 – 2024/25. It constitutes a deliberate effort to position the Authority as the centre of excellence in combating money laundering, terrorism financing and proliferation financing through setting a strategic direction for its operations.

1.1 Legal framework of FIA

The Financial Intelligence Authority (FIA) as established by Section 18 of the Anti-Money Laundering Act 2013, under Section 18 is responsible for, among other functions, to detect and deter money laundering by collecting, analyzing and disseminating information related to financial transactions to support investigations and prosecutions of money laundering and terrorist financing offences. FIA performs the following functions;

- i) Receive, process, analyze and interpret information disclosed to it and obtained by it in terms of the Act;
- ii) Refer any matter or information derived from any report or information it receives to the appropriate law enforcement agency, if on the basis of its analysis and assessment, it has reasonable grounds to suspect that the transaction would be relevant to the investigation or prosecution ML/TF offences or any serious offence;
- iii) Inform, advise and cooperate with other competent authorities;
- iv) Give guidance to accountable persons, competent authorities, and other persons regarding compliance with the Act;
- v) Retain the information disclosed and/or obtained by it in a prescribed manner for a period of at least ten years;
- vi) Impose administrative sanctions on accountable persons who fail to comply with directives, guidelines or requests issued by the Authority.
- vii) Collect fines adjudicated under the Act;
- viii) Issue guidelines to accountable persons not under the jurisdiction of supervisory authorities, in relation to customer identification, record keeping, reporting obligations and the identification of suspicious transactions;
- ix) May provide training programs for accountable institutions in relations to customer identification, record keeping, reporting obligations and the identification of suspicious transactions, and;

x) Register, and keep a register of all accountable persons.

The AML/CFT framework is supported by other legislations and their respective regulations, which address specific crimes. These include; (i) Penal Code Act, 1950 (amended 2007); (ii) Anti-Terrorism Act, 2002 (amended 2017); (iii) Financial Institutions Act, 2004 (amended 2016); (iv) Capital Markets Authority Act, 2011 (amended 2016); (v) Uganda Revenue Authority Act, 1991 (amended 2007); (vi) Insurance Act, 1996 (amended 2017); (vii) Inspectorate of Government Act, 2002; (viii) Lotteries and Gaming Act, 2016 (amended 2017); (ix) Companies Act, 2012; (x) Anti-Corruption Act, 2009; (xi) Microfinance Deposit-Taking Institutions Act, 2003; (xii) Advocates Act, 1970 (amended 2002); (xiii) Accountants Act, 2013; (xiv) Prevention of Trafficking in Persons Act, 2009; and (xv) Narcotics and Psychotropic Substances (Control) Act, 2019.

The legal and institutional framework surrounding the AMLA is implemented within the overall context of the National Development Plan (NDP) which requires all public institutions to develop strategic plans in support of their mandates and programme outcomes. The responsibility for addressing key threats relating to economic management is assigned to the governance and security programme, where the Financial Intelligence Authority is positioned. Specifically, there are 3 applicable outcome areas which include economic management, financial services, and audit.

1.2 Governance and Organizational structure

FIA is governed by a Board of Directors appointed by the Minister of Finance, Planning and Economic Development in accordance with section 25(2) of the Anti-money Laundering Act 2013 and approved by Parliament. The Board comprises of 6 members, including the Executive Director as an Ex-Officio. Membership of the board is drawn from persons with diverse and relevant experiences in the legal, financial and law enforcement fields. The Board serves for a period of 3 years and may be reappointed for one more term.

Functions of the Board.

- i) Policy making for the Authority.
- ii) Give direction to the Executive Director in connection with the management, performance, operational policies and implementation of the policies of the Authority.
- iii) On the recommendation of the Executive Director approve organizational structures, terms and conditions of service.
- iv) Prescribe administrative measures as may be required to safe guard the revenues of the Authority.
- v) Subject to sections 28, 30 and 32 of the AMLA, 2013, the Board appoints, removes and suspends the members of staff of the Authority.

The Board has established two committees in accordance with S.27 (b) (iii) of AMLA. The Committees established are; Audit and Risk Committee; and Finance & Administration Committee.

The reporting hierarchy comprises of the Board of Directors, Office of the Executive Director, Office of the Deputy Executive Director, Directorates and Departments. FIA currently has a staff establishment of 41 staff that represents 49% of the approved staff structure.

The Top management of the Authority consists of the Executive Director, who is also the accounting officer of the Authority (also the ex-officio member of the Board), Deputy Executive Director and six directors. Top management is supported by Managers who are heads of respective departments/directorates.

The relationship between the Executive Director's Office and the respective Directorates and Departments is illustrated in Annex IV (Organogram)

1.3 The national, legal and policy context

The link between the Strategic Plan and the National Development Planning Framework

This plan is developed in line with the existing Comprehensive National Development Framework (CNDPF). The strategy ensures concerted response to policy issues aligned to NDP III, ASSIP II, the National AML/CFT/CPF strategy, National Risk Assessment (NRA), Mutual Evaluation Report (MER), Sustainable Development Goals, Financial Action Task Force (FATF) Recommendations, ESAAMLG and the agreed upon Egmont actions. The strategy also considered current trends associated with emerging issues on AML/CFT/CPF. In addition, the strategic plan has been developed basing on the lessons learnt from the review of the previous strategic plan.

The strategy is directly linked to NDP III strategic objectives 2 and 5 i.e. strengthen the private sector to create jobs; and strengthen the role of the state in guiding and facilitating development respectively. This will require incorporating NDP III development strategies 6, 17 and 20 i.e. provide a suitable fiscal, monetary and regulatory environment to enable the private sector invest; increase government participation in strategic sectors; and enhance partnerships with non-state actors for effective service delivery. FIA's participation will contribute to specific programme of governance and security (Annex III: Strategy alignment matrix).

The strategy recognizes the role played by the Governance and security programme where FIA is expected to protect the economy from the threats of ML/TF/PF. The strategic plan has also considered other existing strategies being implemented to combat ML/FT/PF transnational crimes. Therefore, the FIA strategies have been reinforced by other corresponding national MDA's strategies and development plans.

The link between the Strategic Plan, Global and regional initiatives and commitments

ML/TF/PF have evolved into a trans-national crime characterized by perpetrators who seek to exploit weaknesses within the different legislative frameworks to escalate financial and other serious crimes. FIA will continue to strengthen existing strategies in combating the global threat posed by financial crimes through establishing close working relationships with Financial Intelligence Units in different countries, increased international cooperation with organizations like ESAAMLG, World Bank, DFID, UN, EGMONT group and the African Union.

ESAAMLG and FATF

In February 2020, Uganda made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Since the completion of its MER in 2016, Uganda has made progress on a number of MER recommended actions to improve technical compliance and effectiveness. These actions include; conducting its first national ML/TF risk assessment; and amending the relevant legal frameworks to address the technical deficiencies in its ML and TF offences. Uganda will work to implement its action plan, including; (i) adopting a national AML/CFT strategy; (ii) seeking international cooperation in line with the country's risk profile; (iii) developing and implementing risk-based supervision to FIs and DNFBPs; (iv) ensuring that competent authorities have timely access to accurate basic and beneficial ownership information for legal entities; (v) ensuring that LEAs and judicial authorities apply the ML penalties commensurate with the gravity of the offences (vi) establishing and implementing policies and procedures for identifying, tracing, seizing and confiscating proceeds and instrumentalities of crime; (vii) demonstrating that LEAs conduct TF investigations and pursue prosecutions commensurate with Uganda's TF risk profile; (viii) addressing the technical deficiencies in the legal framework to implement PF-related TFS and implementing a risk based approach for supervision of the NPO sector to prevent abuse for TF.

EGMONT Group

FIA-Uganda was admitted to EGMONT Group of FIUs in July 2019. It is now able to access and share information with other FIUs through a secure web after it met the international standards required by Egmont. The sponsors of FIA Uganda included FIC South Africa, FIU Malawi and FIU Egypt to who we pay special tribute.

1.4 Purpose of the plan

The purpose of this strategic plan is to set a roadmap for FIA to achieve its objectives of enhancing the identification of the proceeds of crime; increasing compliance with the AML Act; increasing public awareness and understanding matters related to Money Laundering and Terrorism Financing; improving collection and dissemination of information to competent Authorities; strengthening international cooperation; and enhancing efficiency and effectiveness of FIA to execute its mandate.

The strategic plan will be used to communicate the organization's goals, the actions needed to achieve those goals and how performance against the goals will be measured. The Plan will be used to set priorities, focus energy and resources, strengthen operations, ensure that employees and other stakeholders are working toward common goals, establish agreement around intended outcomes/results, and assess and adjust the organization's direction in response to a changing environment. It will also provide a basis for preparation of annual work plans, budgets and coordination of interventions.

AMLA 2013 section 24 stipulates that the Board is the policy-making organ of the Authority and amongst others, gives direction to the Executive Director in connection with the management, performance, operational policies and implementation of the policies of the Authority. The plan is therefore an instrument through which the Board is to provide strategic direction to FIA.

Parliament of Uganda requires every MDA to have a strategic plan aligned to NDPIII, and which is used as a basis to appropriate respective budgets.

Finally, ML, TF and PF activities encompass many sectors which, are very complex. Accordingly, a comprehensive Strategic Plan is needed to allow proper AML/CFT policy coordination and cooperation. The plan also facilitates crime prevention, detection and reporting, disruption, prosecution and sanction. It also includes strategies to expedite both domestic and cross-border confiscation of assets.

1.5 The process of developing the FIA strategic plan

The Strategic Plan was prepared through a participatory and consultative process involving internal and external stakeholders. The development of this plan has been guided by the analysis of Strength, Weaknesses, Opportunities and Threats (SWOT); Political, Economic, Social, Technological, Environmental and Legal (PESTEL); achievements, lessons learnt, and emerging issues arising from the review of the previous Strategic Plan; stakeholder consultations and literature reviews. It also involved the analysis of the current development challenges and the needs of the country as well as regional and international initiatives and commitments. The strategic Plan has been internally developed and subjected to reviews by the National Planning Authority that issued it a Certificate of Approval confirming satisfaction with the plan.

The Guiding Principles of the plan

Development of this strategic plan was guided by the following principles;

i). Partnerships and collaboration. The implementation of the plan will require creating (where non-existent) and strengthening partnerships, networks and collaboration with stakeholders at various levels including local, national, sub regional, regional and global levels.

ii). Participatory and consultative. Plan formulation and implementation was and will continue to be anchored on free exchange and sharing of ideas by different stakeholders and jointly agreeing on appropriate courses of action.

iii). Inclusiveness. The implementation of the strategic plan requires a balanced focus on economic, social and environmental issues so as to maximizing linkages and synergies within the sectors.

iv). Comprehensive and integrated development planning. The plan takes a holistic approach to ensure balanced focus on economic linkages and resultant synergies.

1.6 Structure of the Strategic Plan

This Plan is organized into nine chapters, namely:

- i) Chapter one: Introduction and Background.
- ii) Chapter two: Situation analysis, performance under previous plans and PESTEL and SWOT analysis.
- iii) Chapter three: The strategic Direction for the Medium-Term including vision, mission, core

values, strategic objectives and strategies.

iv) Chapter four: Financing Framework for the Strategic Plan.

v) Chapter five: Institutional arrangements for implementing the Plan.

vi) Chapter six: Communication and feedback strategy.

vii) Chapter seven: Risk management.

viii) Chapter eight: Monitoring and Evaluation Framework.

ix) Chapter 9: Project profiles.

CHAPTER TWO:

SITUATION ANALYSIS

This chapter presents performance of the previous FIA Strategic Plan, including key achievements and challenges. It also includes the status of the institutional capacity with respect to financial resources, human capital development and management in terms of staff establishment, availability of relevant technical and specialized competencies, monitoring and evaluation capacity with respect to existence and functionality of the vote M&E, coordination structure and functional MIS to support M&E. In addition, the Strengths, Weaknesses, Opportunities and Threats (SWOT) and stakeholder analysis are also presented.

2.1 Performance of the Previous Plan

The Financial Intelligence Authority had 2 main programs during the previous strategic plan. These were General administration and support services; and Prevention of ML/TF and financial information management.

General Administration and support services. The main objective of this program was to strengthen the capacity of the Authority to effectively and efficiently deliver its mandate. Various activities were earmarked to achieve this objective. These included; developing and implementation of Internal Control requirements to ensure value for money; recruitment of qualified staff, capacity building and adequate compensation to maximize productivity of the staff; and modernize business systems to maximize efficiency in all FIA operations. Two of these activities were implemented i.e. the Auditor General successfully conducted the annual external audits and provided an unqualified opinion, three annual comprehensive external audits by OAG were conducted and reports produced with an unqualified opinion. This good performance is attributed to the strict adherence to the financial management processes and procedures as per the PFMA, 2015. However, the Authority was unable to meet its staffing capacity due inadequate funding. This Strategic Plan will focus on re-engineering FIA's business processes leveraging on technology to improve efficiency and effectiveness in its operations while delivering its mandate.

Prevention of ML/TF and financial information management

Under this program, FIA covered six key impact areas/strategic objectives. The six objectives included; enhancing the identification of the proceeds of crime; increasing compliance with the AML Act; increasing public awareness and understanding of matters related to ML/TF; improving collection and dissemination of information to competent Authorities; strengthening international cooperation; and strengthening the capacity of the Authority to effectively and efficiently deliver its mandate.

Based on the implementation of the strategies to achieve the objectives as indicated above, the objective of enhancing identification of proceeds of crime was largely achieved and it was recommended that FIA continues to employ dynamic and innovative approaches in the identification of proceeds of crime.

On compliance, the Authority was unable to established a Risk-based AML compliance program

for sectors where there are no regulators. In addition, there was a delay in implementing the sanctions regime arising from the delay by the MoFPED to clear the proposed sanctions.

A number of public awareness activities and training of different stakeholders were done to increase AML/CFT understanding. A communication strategy was developed and implementation was on-track. Website for FIA was developed; however, it is being revamped to make it responsive with up-to-date content.

Collection and dissemination of information to competent Authorities. It was noted that the operational analysis unit was able to maintain 5 databases against a target of 3 which were set out for the plan period. i.e. STRs, LCTRs, Cross Border declarations of cash and bearer negotiable instruments. However, FIA was given additional responsibility of conducting financial due diligences on investors. In addition, FIA joined Egmont which necessitated additional databases of due diligence and exchange of information. Nonetheless, there is need to integrate and enhance accessibility of the various databases. Development and installation of a data warehouse solution, which can be configured to interface with data bases of key stakeholders to enhance capacity of data analysis was postponed due to inadequate funding. In addition, the ongoing inter-agency initiative spearheaded by NITA-U to integrate all government MDAs data bases to promote information sharing has not progressed fast enough to allow FIA draw benefits from it.

Implementation of MER Recommendations relating to international cooperation to comply with FATF standards. The Mutual Evaluation was based on the Proportion of FATF 40 Recommendations where Uganda was assessed and found to be compliant on 11 Recommendations, largely compliant on 1, partially compliant on 18, and not compliant on 10 Recommendations. Good progress has been made and FIA has applied for a re-rating of the 13 Recommendations which are currently rated as partially compliant. There is need for increased domestic cooperation and strengthening of the UAMLC taskforce. FIA-Uganda was admitted to Egmont on July 3, 2019. We ought to ensure that FIA continues to meet Uganda's membership obligations.

On strengthening the capacity of the Authority to effectively and efficiently deliver its mandate, a number of strategies were put in place and most of these were achieved. These included; development and implementation of internal control requirements in accordance with the provisions of the Public Finance Management Act, recruitment of qualified staff and training them to increase productivity; financial management and procurement systems to ensure transparency and accountability for all resources availed to the Authority; and modernization of Business Systems to maximize efficiency in all FIA operations.

Generally, the FIA registered significant progress towards achieving all the 6 objectives in the previous strategic plan as evidenced from its strategic plan 2017/18-2019/20 review report which, established that an overall performance of 74% on the strategic objectives was registered.

Cross cutting issues

During the implementation of the previous strategic plan, the Authority considered various cross cutting issues that affected the implementation of the set-out strategies. The Authority was cognizant of these cross-cutting issues and consciously aligned them with in the implementation of the previous Strategic Plan. These include;

HIV/AIDS

During the implementation of the previous plan, the Authority was aware of the HIV/AIDS scourge and how it negatively affects its staff productivity. Therefore, the Authority ensured that staff are regularly updated with HIV/AIDS preventive information as well as ensuring that appropriate support was provided to all staff living with HIV and AIDS. The Authority's HIV/AIDS policy was regularly reviewed to cover workplace actions relating to advocacy and enabling environment, coordination and management of the HIV and AIDS, mitigation of social, cultural, legal and economic impacts as well as prevention and behavioural change communication in line with the National HIV and AIDS Strategic Framework.

Gender.

FIA has been an equal opportunity employer and has ensured equal access to opportunities and resources by all employees following the principle of equity to ensure that staff are adequately and appropriately supported to excel in their respective lines of duty. Gender and equity have also been incorporated in planning and budgeting instruments of FIA during the years of implementation of the plan. This has led to FIA qualifying for a certificate of compliance for Ministerial Policy Statements and Budget Framework Papers issued by Equal Opportunities Commission for all the years of implementation.

Environment

During the implementation of the previous plan, the Authority considered promotion of environmental conservation practices with regard to natural resources, socio-cultural, economic and institutional considerations. In light of this, it advocated for digital transformation and innovation intended to minimize the use of hard paper printing and artificial air conditioning systems by opening office windows, encourage staff to use natural light in offices during day.

Anti-Corruption

During the implementation of the previous plan, the Authority maintained a policy of zero tolerance to corruption. This was promoted throughout the implementation of the previous strategic plan through encouraging transparency in all its operations, regular vetting of staff, promoting high levels of integrity, encouraging staff to declare all their assets and collaborating with other Anti-corruption agencies

2.2 Institutional capacity of the FIA

2.2.1 Financial Performance of the previous Plan

The implementation of the FY 2017/18-2019/20 Strategic Plan was projected to cost UGX 9,773,810,000 in the first year, UGX 16,527,862,000 in the second year and UGX 16,732,221,000 in the third year. These funds constituted GoU appropriations and EU funding from the Joint Action Review – Sector Reform Contract (JAR-SRC). The funds were allocated against each strategic objective and the respective line activities.

The funds received by FIA from government for the period amounted to Ugx 34,116,516,000 representing 79.3% of the Ugx 43,033,893,000 projected. The inadequate funding to FIA greatly affected the full implementation of the Strategic Plan.

2.2.2 Human Resource Development and management

The Human Resource function at FIA is structured in a way to offer a supportive role with the aim of attracting, developing and retaining competent and motivated human resources to enable FIA achieve her objectives. This is through development and implementation of human resource management policies and procedures, planning, recruitment and selection, learning and development, performance management, employee relations and many more.

The staff capacity at FIA in the FY 2019/20 stood at 40 staff (53%). This was however short of the 75 staff in the approved staff structure. Nonetheless, with the current establishment, the relevant technical and specialized competencies were available to implement the plan.

Table 1 Number of staff during the Plan implementation period

	FY 2017/18	FY 2018/19	FY 2019/20
No of staff	21	38	40

2.2.3 Monitoring and Evaluation

FIA has a monitoring and evaluation function that monitored the implementation of the strategic plan throughout its period. This function is established in the Planning and budgeting department under Finance and Administration Directorate.

During the implementation of the plan, quarterly, biannual and annual evaluation of the Strategic Plan implementation were produced. The terminal review of the Strategic Plan was also produced to evaluate the extent of achievement of the strategic objectives and to get lessons learnt that were carried forward to the formulation of the new plan.

There also existed Management information systems like goAML that supported the M&E system to gather statistics from various accountable persons.

2.3 Key achievements and challenges

2.3.1 Key achievements

The following were the key achievements during the implementation of the previous strategic plan.

- (i) Installation of goAML electronic system to automate receipt and enhance analysis of information from reporting entities. The goAML reporting system, and Local Area Network (LAN) were also reviewed and upgraded.
- (ii) Successfully Implemented 4 ML/TF typology studies which have informed policy.
- (iii) Undertook AML/CFT onsite inspection to enforce compliance with the AMLA.
- (iv) The FIA website was revamped and made more responsive with up-to-date content.
- (v) FIA disseminated 200 financial intelligence reports to LEAs and competent authorities for further management.
- (vi) Uganda was admitted to Egmont on July 3, 2019. Uganda maintained her membership in ESAAMLG and Egmont.
- (vii) Three annual comprehensive external audits by OAG were conducted and reports produced with an unqualified opinion.

2.3.2 Challenges during the previous strategy implementation

A number of challenges were experienced during the previous strategic period. These include;

- (i) Limited domestic cooperation that inhibited effective implementation of the AML/CFT framework
- (ii) Inadequate funding of FIA greatly impacted on the implementation of activities in the strategic plan. Only 79% of the projected funds were released.
- (iii) Inadequate staffing as per the FIA established structure – in the FY 2019/20 FIA was operating at staff 53% capacity.
- (iv) The absence of a framework to provide AML/CFT guidelines to supervise unregulated sectors like the real estate which attract launderers as indicated in the National Risk Assessment Report.
- (v) Slow pace at which accountable persons transitioned from manual to the goAML electronic reporting system rolled out by FIA.
- (vi) Slow pace by competent authorities in concluding investigations of the cases resulting from financial intelligence reports disseminated by FIA. It is stipulated in the AML/CFT standards that Law Enforcement Agencies should conduct parallel financial investigations on ML/FT alongside predicate offences.
- (vii) Uganda's economy is predominantly cash-based and the informal sector is large. Several transactions are not captured in the formal financial system and therefore cannot be traced or analyzed for AML/CFT. This affects FIA's ability to follow the proceeds of crime arising from cash-based transactions.
- (viii) The emergence of new technological innovations like virtual assets that are not yet regulated in many jurisdictions which creates significant challenges to enforce compliance to the AML/CFT requirements
- (ix) Delay in implementing declarations of currency and bearer negotiable instruments at the border entry points, due to inadequate support-infrastructure (scanners, cash counting machines, cash safes), and limited inter-agency cooperation.

2.4 SWOT and PESTEL analysis

FIA used PESTEL tool to analyse the external factors which impact on its operations. The opportunities which may provide a competitive advantage and the threats which could adversely affect FIA operations were examined. Analysis of political situation included considering; existing government policies, political climate, pending legislation, bureaucracy, corruption and political stability. Under Economic situation, levels of economic growth, unemployment, exchange rate, incomes, inflation and interest rates were examined. The Social situation looked at the demographics, education levels, age, lifestyle changes, workplace, gender, culture and immigration. Technology explored emerging technology, automation, big data management, mobile technologies and infrastructure, research and development incentives while Environment looked at; Climate change, natural disasters and environmental policies. The Legal factors included; protection laws (data, labour), tax laws, employment laws, international and trade laws.

The SWOT analysis illustrates the Strengths, Weaknesses, Opportunities and Threats of the Uganda's Anti-Money Laundering /CFT framework. The Strengths are the factors internal to FIA which may be helpful in exploiting the opportunities identified in the global and domestic environment. On the other hand, Weaknesses are treated as those factors internal to FIA which are likely to expose the Authority to the various threats identified in the domestic and external environment.

Table 2 below summarizes the results of the diagnostic assessment of FIA's strengths, weaknesses, opportunities and threats.

Table 2 SWOT Analysis

Strengths	Opportunities
(i) Strong FIA Board (ii) Competent staff (iii) Good working relations with stakeholders (iv) Good public image and high ethical standards among staff (v) Good track record on adherence to international good practices in corporate governance and financial reporting (vi) Independence and autonomy in the execution of Authority's mandate (vii) Relatively competitive remuneration (viii) Existence of enabling laws	(i) Political commitment by Government (ii) Strong legal and institutional framework (iii) Existence of risks and vulnerabilities of AML/CFT identified under the NRA (iv) Existence of many reliable regulators/ supervisory entities (v) Existence of National Identification and Registration Authority and planned increase in coverage of registration services of the entire population (vi) Enforcement of registration of mobile phone users/owners (vii) Membership to regional and international bodies including ESAAMLG, FATF and EGMONT (viii) Technological advancement
Weaknesses	Threats
(i) Over dependence on government rather than own sources for funding operations (ii) Low staffing levels (iii) Insufficient IT systems to carry out AML/CFT detection activities (iv) Dependency on rented premises (v) Limited equipment to support inspection and supervision of accountable persons (vi) Absence of instruments of cooperation with some stakeholders i.e. MoUs (vii) Limitations in implementing cross-border movement of cash and bearer instruments as required by the AMLA 2013	(i) Inadequate awareness of stakeholders on AML/CFT programme (ii) Large informal sector and low levels of financial literacy (iii) Cash and parallel economy (iv) Porous borders (v) Emergence of Terrorist groups in the region associated with conflicts in neighboring States (vi) Inadequate funding from Government (vii) Inadequate security to key staff and Board members (viii) Law suits (ix) Complex emerging technologies e.g. block chain technology which supports the Virtual Assets Service Providers (VASPs) (x) Slow legislative process

2.5 Stakeholders and Institutional Arrangements

During the formulation of the strategic plan, FIA identified key stakeholders, partners and institutional arrangements that will support the execution of its mandate. The role to be played by each stakeholder is indicated in chapter 5.

2.6 Emerging issues

Lessons learned from the previous strategy

A couple of lessons were learnt from implementation of the previous strategic plan and these include the following;

- (i) Indicators should be; Specific, Measurable, Achievable, Realistic & Time Bound (SMART).
- (ii) Work plans, budgets and funding of the Authority should be aligned and consistent with the Strategic Plan to enable seamless implementation of activities.
- (iii) There is a general public perception that is relating the role of FIA to security and intelligence operations which, deters many from volunteering key information in the fight against ML/TF. This calls for increased public awareness.
- (iv) Limited domestic cooperation which inhibits effective implementation of the AML/CFT framework and which, calls for FIA to sign MoUs with more stakeholders in the strategic AML/CFT value-chains to increase effectiveness.

Way forward under Strategic Plan for 2020/21 to 2024/25

This strategic plan therefore will focus on;

- (i) Increasing stakeholder engagement aimed at meeting the AML/CFT international standards;
- (ii) Aligning the budget with the strategic plan to ensure that all the strategic objectives are adequately implemented;
- (iii) Engaging MoFPED to provide adequate resources in line with the strategic plan; and
- (iv) Ensuring that competent staff are employed, retained and well equipped.

This chapter describes the strategic direction of the Authority in the next 5 years of its operations. It was informed by National development frameworks (NDP III, Vision 2040), obligations under the international commitments, lessons learned, and the review of the previous strategic plan, SWOT, PESTEL analysis and cross cutting issues.

3.1 Vision, mission and strategic objectives

3.1.1 Vision:

The Authority strives to become a centre of excellence in combating money laundering and terrorism financing.

3.1.2 Mission

The Authority's core mission is to foster the integrity of the financial system through effective detection and prevention of financial crimes.

3.1.3 Core values

The Authority commits its staff to uphold the following values:

- (i) Integrity - aspiring to the highest ethical standards of honesty, reliability and dependability.
- (ii) Professionalism - meeting high standards in execution of our mandate, while working together with accountable persons, partner agencies and others in a practical, diligent, timely, and rigorous result driven- manner.
- (iii) Accountability -taking responsibility and explaining our actions to all our stakeholders.
- (iv) Teamwork - working together within the Authority and with other stakeholders.
- (v) Confidentiality - respecting the value and ownership of information which we receive, and taking measures not to disclose any information without the permission of the appropriate Authority.
- (vi) Transparency – conducting ourselves with openness and honesty in all aspects of our work.

3.1.4 Goal

To ensure that the Anti-Money Laundering and Countering the Financing of Terrorism framework is effective to fight financial crime and Protect the integrity and ensure stability of Uganda's financial system.

3.2 Strategic Objectives for implementing the plan

The FIA has set out 7 strategic objectives to inform the next planning period. These are indicated in the table below;

Table 3 Strategic objectives

No	Strategic objective	Outcome
1	Enhancing the identification of proceeds of crime	Increased identification of proceeds of crime
2	Increasing compliance with the AML/CFT laws	Increased level of Compliance to AMLA.
3	Improving collection and dissemination of information to competent Authorities	Increased usage of financial intelligence disseminated to LEAs and other relevant government agencies
4	Strengthening international cooperation	Uganda rated technically Compliant with 40 FATF Recommendations
5	Increasing public awareness and understanding of matters related to money laundering and terrorism financing	Increased level of public awareness on ML/TF matters.
6	Strengthening the capacity of FIA to conduct financial due diligence	Increased number of due diligence requests handled
7	Enhancing the efficiency and effectiveness of FIA to execute its mandate	Increased efficiency in the provision of services

Once effectively implemented, the objectives will facilitate achieving the overall vision of the Authority. The strategic plan will focus on; prevention of ML/TF/PF and financial intelligence information management which constitutes; legislative, institutional, operational, prevention, detection, enforcement and capacity building to address specific risks and identified vulnerabilities.

3.3 Strategic interventions.

3.3.1 Prevention of ML/TF/PF and Financial Intelligence Information Management;

The strategies listed below are to enhance and improve the effectiveness of Uganda's AML/CFT regime and further ensure that Uganda's financial system and the broader economy is protected from the threats of ML/TF/PF. Once these strategies are implemented, it will strengthen the financial sector integrity and contribute to safety and security. The actions to these corresponding strategic interventions are detailed in the results framework in annex 1.

Strategic objective 1: Enhance the identification of the proceeds of crime

The following interventions will be undertaken to enhance the identification of the proceeds of crime;

- (i) Enhance financial intelligence gathering ability.
- (ii) Enhance efficiency by leveraging on technology.
- (iii) Strengthen domestic cooperation and partnerships with law enforcement agencies, competent authorities and other relevant government agencies.
- (iv) Promote an effective feedback mechanism on financial intelligence disseminated to LEAs and other relevant government agencies.
- (v) Promote Integration of the various FIA databases.
- (vi) Increase coordination with accountable persons to improve the quality of reports filed.
- (vii) Undertake Typologies/trends analysis to understand the risk exposures and undertake

mitigation measures to address the risks.

(viii) Enhance a framework for coordination of reforms in management of ML/TF as identified in the NRA.

(ix) Enhance the performance of the goAML electronic system.

(x) Enhance data sharing through secure data links.

Strategic objective 2: Increase compliance with the AML Act

The following interventions will be undertaken to Increase compliance with the AML Act

(i) Improve AML/CFT Regulation and Supervision Framework.

(ii) Enforce measures to address threats of ML/TF/PF identified in the NRA and MER in Supervised Financial Institutions and Designated Non-Financial Businesses and Professions.

(iii) Establish procedures to enforce administrative sanctions against reporting entities that fail to comply with AMLA, 2013 (as amended).

(iv) Establish a framework under which joint AML/CFT/CPF supervision will be conducted.

(v) Establish a framework to conduct AML/CFT off-site and on-site examination of DNFPBs operations using a risk- based approach.

(vi) Establish a mechanism to address AML/CFT/CPF deficiencies identified during onsite and offsite inspection.

(vii) Develop specific guidelines on AML/CFT/CPF for DNFPBs.

(viii) Enhance registration of accountable persons in line with AMLA, 2013 (as amended).

(ix) Develop a framework to bring onboard non-regulated sectors in matters of AML/CFT/CPF.

(x) Enhance the AML/CFT/CPF legal framework in Uganda.

Strategic objective 3: Improve collection and dissemination of information to competent Authorities

The following interventions will be undertaken to improve collection and dissemination of information to competent Authorities.

(i) Establish mechanisms to acquire vital information to support analysis.

(ii) Establish a framework to effectively disseminate intelligence reports to LEAs.

(iii) Establish an effective data management system.

(iv) Establish a mechanism to access various databases held by other government agencies.

(v) Enhance the capacity of inspection teams to identify information gaps/deficiencies.

Strategic objective 4: Strengthen international cooperation

The following interventions will be undertaken to strengthen international cooperation.

(i) Strengthen partnerships with other International bodies to ensure that FIA meets AML/CFT/CPF FATF requisite standards.

(ii) Exchange Information with other jurisdictions to support global efforts in combating ML/TF.

(iii) Establish a framework to coordinate implementation of FATF – ICRG recommendation on Uganda.

Strategic objective 5: Increase public awareness and understanding of matters related to Money Laundering and Terrorism Financing

The following interventions will be undertaken to Increase public awareness and understanding of matters related to Money Laundering and Terrorism Financing

- (i) Establish a framework for conducting public awareness programs to deepen AML/CFT understanding.
- (ii) Review the Communication strategy to deepen AML/CFT/CPF public awareness.
- (iii) Design AML/CFT/CPF outreach programmes to target Accountable Persons/Reporting entities and LEAs.

Strategic objective 6: Strengthen the capacity of FIA to conduct financial due diligence (FDD).

The following interventions will be undertaken to Increase public awareness and understanding of matters related to Money Laundering and Terrorism Financing

- (i) Establish a legal and operational framework for conducting FDD.
- (ii) Establish a mechanism to acquire vital information to support FDD.
- (iii) Promote staff capacity to effectively conduct FDD.

Strategic objective 7: Efficiency and effectiveness of FIA to execute the mandate.

The following interventions will be undertaken to ensure Efficiency and effectiveness of FIA to execute the mandate.

- (i) Ensure a safe and secure working environment.
- (ii) Establish a mechanism to recruit and retain competent staff.
- (iii) Strengthen governance structures to promote checks and balances.
- (iv) Establish a mechanism to safeguard ICT infrastructure against evolving National and International threats.
- (v) Strengthen capacity for staff to fulfil FIA's mandate through training.
- (vi) Modernize ICT platforms and Business systems to maximize efficiency in all FIA operations.
- (vii) Establish framework for effective financial reporting and procurement processes.
- (viii) Improve business tools to facilitate Authority operations.
- (ix) Incorporate cross cutting issues in FIA operations.

CHAPTER FOUR:

FINANCING FRAMEWORK AND STRATEGY.

This chapter provides cost estimates required to implement the five-year strategic plan.

4.1 Summary of Strategic Plan Budget

The total cost of implementing the plan will be UGX 192.484 Billion. The detailed breakdown for the budget is provided in the table 4. The estimated costing was made against each of the inputs required. Therefore, the preparation of the financing framework identified all the types of inputs and quantities for each activity and an estimated unit price was applied.

Table 4 Summary of Strategic Plan Budget, (Ugx Billions)

CLASSIFICATION	2020/21	2021/22	2022/23	2023/24	2024/25	Total
Wage	3.744	4.57	4.57	4.57	4.824	22.278
Non-Wage Recurrent	24.441	26.851	28.271	30.428	32.281	142.272
Total Recurrent	28.185	31.421	32.841	34.998	37.105	164.550
Total Development	5.615	5.727	5.458	5.450	5.685	27.934
Total Funding	33.800	37.147	38.299	40.448	42.790	192.484

Major cost drivers over the planning period.

The major cost drivers during implementation of the strategic plan include Acquiring relevant IT tools to facilitate collection and analysis of information consistent with technological innovations, conducting ML/TF/PF risk assessment of sectors, developing specific guidelines and guidance notes to enable respective entities comply with AML/CTF/CPF framework, coordinate with other supervisory/regulatory bodies on AML/CTF compliance, reviewing AML/CTF/CPF laws, wage and maintaining classified information assets to acquire vital information to support analysis among others.

4.2 MTEF Projections and Implications for Strategic Plan Financing

Government of Uganda through the National development plan provided the MTEF ceiling for the period of implementation of the strategic plan. The ceiling provided includes wage, non-wage and development expenditure as indicated in the table below.

Table 5 FIA MTEF Projections for 2020/21 – 2024/25 (UGX Billions)

Budget Item	2020/21	2021/22	2022/23	2023/24	2024/25
Wage	3.744	4.57	4.57	4.57	4.57
Non-Wage	11.752	12.34	11.92	11.92	11.92
Development	0.215	0.22	0.22	0.22	0.22
Total	15.711	17.13	16.71	16.71	16.71

The ceiling provided by Government of Uganda throughout the period of implementation of the strategic plan is however short of the required UGX 192 Billion to implement the Plan fully. This leaves a funding gap of UGX 109.5 Billion that is expected to be covered through continuous engagement of government through the Ministry of Finance Planning and economic development to increase the funding for FIA. The entire strategic plan is therefore expected to be funded by GOU. The table below shows the funding gap arising from the difference in MTEF provisions and the actual cost of the plan.

Table 6 Funding Gap (UGX Billions)

CLASSIFICATION	2020/21	2021/22	2022/23	2023/24	2024/25
Wage	0	0	0	0	0.254
Non-Wage Recurrent Gap	12.689	14.510	16.350	18.508	20.360
Total Recurrent Gap	12.689	14.510	16.350	18.508	20.614
Total Development Gap	5.400	5.507	5.238	5.230	5.465
Total Funding Gap	18.089	20.017	21.589	23.738	26.080

4.3 Resource Mobilization Strategy

The following strategies will be employed by FIA to finance the plan;

- i). Continued engagement with the Government of Uganda and other Stakeholders
- ii). Presentation of proposals to MOFPED Development Committee for funding of Development projects

4.4 Detailed Cost Implementation Matrix

The detailed costed implementation matrix is presented in Annex II.

CHAPTER FIVE:

INSTITUTIONAL ARRANGEMENT FOR IMPLEMENTING THE PLAN

This chapter describes the implementation and coordination arrangements to the 5-year Strategic Plan. It articulates measures put in place to ensure effective execution of the strategies by the various stakeholders.

5.1 Coordination of the implementation process

5.1.1 Roles and responsibilities of the stakeholders within FIA

Table 7 summarizes the roles and assignments for the major players within FIA including critical FIA committees.

Table 7 Roles and responsibilities of the stakeholders within FIA

Responsible Person	Roles and Responsibilities
Board	- Lobbying for funding - Supervision of implementation of the plan
Top Management	- Lobbying for funding - Implementation of the plan
Finance and Planning committee	Allocate funds for implementing the plan
FIA staff	Execution of the plan

5.1.2 Roles and Responsibilities of Other Stakeholders

FIA will work closely with key stakeholders or partners that support the execution of its mandate. The role played by each stakeholder is indicated below;

Table 8 Roles and responsibilities of other stakeholders.

Sn	Institution	Role/Responsibility
1	Ministry of Finance, Planning and Economic Development	Sets AML/CFT Policy and regulatory framework
2	Bank of Uganda	Financial Sector Regulator and supervisor of AML/CFT compliance.
3	Ministry of Lands, Housing and Urban Development	Policy on land and Real Estate. (This is where some laundered funds are invested).
4	National Lotteries & Gaming Board	Regulator of Lotteries and gaming and supervisor of AML/CFT compliance
5	Ministry of Justice and Constitutional Affairs	Drafting laws and regulations on AML/CFT
6	Institute of Chartered Public Accountants Uganda	Regulating and Supervising Accountants on their compliance with AML/CFT
7	Insurance Regulatory Authority	Regulating and supervising Insurance sector on AML/CFT.
8	External Security Organization	Gather intelligence information on possible launders and financiers of terrorism.

9	Internal Security Organization	Gather intelligence information on possible launders and financiers of terrorism.
10	Uganda Wildlife Authority	Regulatory Authority for wildlife crimes
11	Uganda Revenue Authority	Competent Authority for receiving intelligence reports from FIA on tax related crimes
12	Uganda Registration Services Bureau	Licensing all companies operating in Uganda which FIA confirms operations of some businesses.
13	Directorate of Public prosecutions	Prosecutes money laundering cases
14	Capital Markets Authority	Regulates and supervises Securities Market sector against ML/TF
15	Ministry of Foreign Affairs	Policy and enforcement of United Nations Security Council Resolutions.
16	Uganda Police Force	Investigates ML/TF cases
17	Inspectorate of Government	Investigates corruption cases which generates proceeds which are laundered
18	Ministry of Internal Affairs	Enforces control of cross border movement of funds and other crimes
19	Non-Government Organizations Bureau	Regulates and supervises NGOs against ML/TF
20	All accountable Persons as mentioned in the Second schedule of the AMLA 2013	Roles and responsibilities of each are indicated in the AML Regulations 2015 and guidelines and guidance notes for each category.

5.2 Sustainability Arrangements

a) Institutional Sustainability Arrangements;

According to the mandate of the institution, there is no threat to its existence within the implementation period of the strategic plan.

b) Financial Sustainability Arrangements;

The Government of Uganda has provided MTEF for the plan implementation period. Additionally, FIA will keep engaging the relevant stakeholders in GoU to increase its funding to fully implement the strategic plan.

c) Partnerships and Collaborations;

FATF standards on AML/CFT require unfettered exchange of information between FIUs, both upon request and spontaneously. Countries are also required to have in place effective and efficient processes for provision and request of mutual legal assistance and extradition of suspected criminals. International cooperation forms a bedrock for global AML/CFT framework. To this effect, FIA is a member of Egmont group, a platform for secure exchange of expertise and financial intelligence to combat money laundering, terrorist and proliferation financing, ESAAMLG to help strengthen AML/CTF regimes through robust monitoring process. All these platforms will be crucial for implementing the strategic plan. In addition, FIA exchanges information with other foreign FIUs through Egmont secure web.

FIA also partners with other government agencies in combating money laundering and terrorism financing in Uganda that include; BOU, MoFPED, Inspectorate of Government, URA, URSB, Office of the director of public prosecution, UWA, NIRA and Uganda Police among others.

5.3 Human Resource Plan

The Human Resource plan provides for training, staff welfare among others and performance monitoring. FIA also seeks to recruit a number of staff under her functions to strengthen the human resource capacity and productivity for implementing the plan.

FIA successfully concluded its restructuring process that seeks to have 83 staff. These will be appropriate for implementing the plan. The current staff numbers stand at 41. Additionally, the strategic plan FY 2020/21-2024/25 will be implemented with a human resource structure indicated in Annex IV

CHAPTER SIX:

COMMUNICATION AND FEEDBACK STRATEGY

To effectively deliver the required services, FIA shall involve the key stakeholders at various levels in the implementation of the planned activities. The key stakeholders among others include the Public, MDAs and the media. The stakeholder engagement will entail collaboration through MOUs.

Table 9 Stakeholder Engagement Plan

	Audience	Level of Engagement	Frequency	Primary Channels
1.	FIA Board, Top Management and Staff	Collaborate	Quarterly/ as required	Meetings and Reports
2.	Governance and security secretariat	Collaborate	Quarterly/ as required	Quarterly and Annual Reports Special Presentations, PWG review
3.	Government Institutions • Ministries • Departments/ Agencies • Regulatory agencies • Parliament	Collaborate	Quarterly/ as required	Annual SDPR-PWG Review meetings Quarterly and Annual Reports Special Presentations
4.	NGO actors	Collaborate	Quarterly/ as required	Meetings Special Presentations Targeted workshops and conferences
5.	Bank actors	Collaborate	Quarterly/ as required	Meetings Special Presentations Targeted workshops and conferences
6.	Civil Society	Consult	Bi-annual	Annual SDPR-PWG Review Meetings and Workshops
7.	The mass media	Collaborate	Quarterly/ as required	Media briefs and Press releases Digital Media

8.	International organizations fighting against ML/TF/PF	Consult	As required	workshops and seminars and meetings
9.	General Public (All Ugandans): Youth, Women Groups and other special interest groups	Inform	Quarterly/ as required	Media briefs and Press releases Digital Media Radio and Television talks shows and Informercials

7.1 General

During the implementation of the Strategic Plan FY 2020/21 – FY 2024/25, the risk issues listed below shall be taken into consideration for the organization to achieve growth in that cycle.

- System/Technological risk issues likely to affect FIA growth opportunities.
- Financial risk issues FIA faces that may affect the validity of its strategy for pursuing growth opportunities.
- Operational risk issues that might affect key operations of the organization in executing its strategy.

No	Risk Category	Risk Identification		Risk Assessment			Mitigation strategy
		Risk Name	Description	Impact (a)	Likelihood (b)	Risk Score (a×b)	
1	System / Technological	Non-alignment of ICT service delivery to FIA business	ICT service provision is not aligned to FIA's business requirements due to inadequate engagement amongst Directorates and ICT service Department especially during budgets and strategic plan development leading to failure to achieve expected business and financial value from ICT services	3	3	9	IT strategies, work plans and budgets developed and mapped with FIA's prioritised business objectives and projects
		Failure to achieve efficiency in delivery of ICT projects and services	Efficiencies achievable in goAML and other ICT projects may not be fully identified and exploited due to; Poor decision making at Executive and committee levels, Poor project planning, Failure to embrace organisational changes resulting into delays, Slippage in project delivery, Budget inadequacy, FIA's underperformance at ministerial, policy/sector level	4	3	12	Projects shall be planned using a structured approach. Ensure intensive project monitoring with emphasis on periodical progress reports to the Board and management

The risk of attack on the IT infrastructure to compromise information security	Computer viruses attacking ICT infrastructure due to; Failure to protect the confidentiality integrity and availability of FIA data; Failure of Weaknesses with protection mechanisms for identifying and fighting the viruses; Failure to observe ICT policies and prescribed working practices resulting into infection, destruction or corruption of data, exposure of sensitive data, performance failures and degradation of ICT services	5	2	10	i). Ensure the critical infrastructure components have been protected by zoning the LAN into demilitarized zones and a safe LAN to ensure business systems cannot be reached by intruders. ii). Install up to date anti-virus on ICT infrastructure to stop computer viruses attacking the infrastructure
Insufficient technology capacity to build a resilient infrastructure	The lack of sufficient technology equipment (hardware, software and bandwidth on network links) to manage and store data and for voice traffic. This results into; i). Degradation or loss of ICT services required by FIA to perform its mandate; ii). Failure to achieve the expected value and financial savings from ICT services; iii). ICT external suppliers with whom	4	4	16	i). Upgrade and segregate the network according to functionality where by different business functions access separate information on secure virtual LANS ii). Adequate budget allocated to ICT Directorate to acquire IT equipment and software. FIA to procure framework contracts for provision of preventive and corrective maintenance

	FIA has a relationship will fail to deliver the required services within the required contractually agreed service standards due to; a). Unsuitable service level agreements; b). Poorly enforced existing service level agreements resulting into delays in implementation of ICT projects, c). Interruption or loss of ICT services to FIA and /or, distorted planned performance reporting of FIA				
Incompetent and ill-trained IT staff	The risk that IT staff lack technical skills to handle particular IT infrastructure. The IT staff may not sufficiently build capacities for end-causing operational performance challenges, Failure to achieve the expected value and financial savings from ICT Service	3	2	6	i). ICT staff to be trained with the required skills to administer goAML; ii). Training in network administration and computer forensic investigations. iii). Adequate budget and work plan for capacity development of ICT staff.
Inability to provide ICT resources after a break down	Failure to work normally inabilities able to recover the affected system following a disaster happens or to continuously avail	5	4	20	i). Install a secured Critical Information infrastructure (CII) to prevent attacks behind fire walls; ii). Install power backups for CII;

Communication risks	shared resources to all users after incidents due to cyber-attacks, fire break, data breach, unplanned IT and telecom outages, acts of terrorism, interruption to utility, supply chain disruption resulting into service breakdown, damaged reputation, loss of sensitive data, legal litigation.			iii). Install stand by offsite disaster recovery site (DRS) in Government data centre where critical information can be accessed to resume; iv). Receive instant security updates and fixes from Uganda National Computer Emergency Response Team (CERT); v). Install a fire suppression system in the server room in case of a fire breakdown. vi). Receive technical support to advise on the best course of action should breakdowns occur. vii). Install and ensure a well-maintained air conditioner system to keep the server room to a recommended temperature.
	The risk of leakage of information from members of staff to outsiders. The risk that reports and information may be disclosed, stolen, misused or lost when disseminated due to lack of sharing controls such as sharing agreements and sharing schedules resulting into breaches that could result into significant harm to the Authority.	4	3	12
				Enforcing Secrecy of Oath taken by members of staff. Sharing information on a need to know basis

ICT budget	The risk that the allocated budget to support ICT operational and transformation services will be insufficient caused by an increase in the scale of ICT transformation required to achieve the desired support services resulting into Inability to deliver all required operational and transformation services to the required standard and time scales	3	3	9	Provide adequate budget for ICT development to be provided during the financial years that is sufficient to support implementation and maintenance of FIA infrastructure for the financial year. Put in place a framework contract for provision on preventive and corrective maintenance of ICT services.
External ICT supplies fails to deliver the agreed services	The risk that external suppliers with whom FIA has a relationship will fail to deliver required services within contractually agreed Service Level Agreements caused by; Unsuitable service level agreements and poorly enforced existing SLA's resulting into; i. Delays in implementing ICT projects ii. Interruption or loss of ICT services to FIA iii. Distorted planned performance reporting for FIA	4	5	20	i). Timely communication to procurement office on intended procurements; ii) Strict adherence to procurement plans; iii) Procurement plans for subsequent financial years in place before submission of ministerial policy statements; iv) Internal contracts manager with specific responsibilities being appointed on all new contracts; v). Internal audit examines all element of procurement on a regular basis. vi). Ensure all commitments are done on IFMS to allow a robust commitment control system.

2	Financial Risks	Procurement risks	i). Risks that procurement office is not informed of procurements in a timely manner; ii). Risks that procurements made are outside the procurement plans; iii). Risks that procurement plans are not prepared in time by the Heads of Directorates/ Departments; iii). Risks that the Authority will incur significant fines through breaches of contracts; iv). Risks that responsibility for monitoring of contacts is not clearly identified and implemented in the Authority. v). Risks that procurement office do not have the necessary skills necessary to support various types of procurements resulting in mis procurements vi) The risk that commitments for the supply of goods and services is done outside IFMS that may result into arrears	3	5	15
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3	Operational Risks	Fraud and misappropriation risks	i). Risks that employees either alone or in collaboration between two or more employees use the Authority resources for personal gain; ii). The risk that an external party targets the Authority resources for personal gain	5	3	15	i). Institute systems of internal controls and procedures, ii). Clear management structures, iii). A robust Internal audit program, iv). Systematic expenditure reviews.
		Delayed payments to suppliers for services and works provided	Delay to pay for services provided to the Authority as a result of budget cuts resulting into accumulation of domestic arrears	3	5	15	i). Ensure availability of funds before a commitment for supply is done. ii). Use of commitment control system in procurement.
		Reduced funding due to COVID-19	The risk that the operations of the Authority are not funded fully by GoU as per the Authority budget that will impact on the achievement of its mandate	3	3	9	Seek for budget support from donors to finance underfunded activities
		Insufficient staffing levels	The risk that that not all vacancies are filed resulting into non-achievement of the strategic objectives of the Authority and other work pressures resulting from workloads.	3	5	15	i). A clear recruitment plan to fill vacant posts available. ii). Management with the help of the Board of Directors to lobby MoFPED for resource allocation to recruit and fill vital positions as per the organization structure.
		The risk of physical attack by terrorists	The risk to physical attack by terrorists because of the nature of the operations of the	5	4	20	i). Ensure housing in a strategic building with other secure offices to add to security limit. ii). Limit access to the Authority

	Authority which may result into loss of life, property, data.					offices to authority staff only; iii) Subjecting all staff and visitors to physical check-up. iv). Installing metal detectors. v). Install cameras in and around the offices. vi) Institute a spirit of vigilance amongst staff
The risk of conflict within the staff of FIA	Issues arising or that can create a perception of a conflict of interest such as misuse of Authority facilities, financial and economic interests, public duties, family and personal relationships	5	3	15		i). Mitigate by putting in place reliable dispute resolution mechanisms; ii). Standard Operating Procedures, iii). Memorandum of understanding with other Financial Intelligence Units and Law Enforcement Agencies
The risk of being merged with a Ministry or an Agency	There is a risk that the Authority shall be merged with a Ministry under Accountability Sector or under another Agency resulting into anxiety by staff about their employment prospects and hence performance demotivation.	2	5	10		
The lack of regulations in some sectors of Government such as real estate.	The risk that there are no regulations in some sectors of the economy increasing the chances of money laundering in those sectors	3	3	9		The Authority in liaison with Ministry of Land to come up with a regulatory frame work on how the real estate sector shall be regulated.
The risk of political interference	The risk that during execution of the FIA mandate, undue	3	5	15		

	pressure from political forces may be exerted that may impact on the decisions of the Authority.				
Being on FATF black list	The risk for increased monitoring by FATF that may impact on the economic performance of the economy	5	5	25	Commitment to work with the FATF to develop action plans that will address the AML/CFT deficiencies
Failure to deliver on results	The risk that the Authority does not meet the requirements of its mandate	5	5	25	i). A robust and a more consultative work plan that ensures delivery of strategic objectives following the strategic plan. ii). Expenditure should be aligned with the expected outputs in the strategic plan
Risks relating to fire explosion	Risks of injury to staff, damage to property and vital assets due to fire explosion.	4	1	4	i). Clearly documented and communicated safety policy in place; ii). Gas detection systems in place and well maintained; iii). Fire extinguishers in place and well maintained. iii). Functional fire alarms; iv). Training of staff in firefighting. v). Clearly demarcated fire exit routes for all staff including the disabled. vi). Backup vital FIA assets e.g. computer files
Insufficient funding by Government	The risk that the budget allocation to the Authority is insufficient resulting into inability	5	3	15	i). Management to lobby MoFPED for protection of the Authority budget. ii). Continuous stakeholder

	to achieve strategic and operational deliverables within the Authority strategic plan.						engagement.
Undue influence or pressure from external forces.	The risk of Government intervention to request blocking of bank accounts for political individuals or organizations (political abuse).	4	4	16	i). Streamlining and strengthening the law on freezing of accounts. ii). Putting in place policies and procedures for blocking and unblocking bank accounts.		
Litigation from people / organisations whose accounts have been frozen by the Authority.	The risk that individuals or organisations whose bank accounts have been frozen may sue FIA as a corporate entity and staff in personal capacity.	3	5	15	i). Putting in place robust policies and procedures for blocking and unblocking bank accounts. ii). Putting in place an arbitration process when such risks are faced. iii). Strengthening the Legal Department to ensure professional defense of FIA and staff iii). Involving the Directorate of Legal at FIA in all transaction's meetings from time to time whenever there is a susceptibility that a bank account for an individual or organization is likely to be temporarily frozen for a legal opinion.		

4	Compliance Risks	Contract risks	Failure to comply with terms and conditions in the contract.	3	3	9	Schedule defining how frequently contracts should be reviewed for both. Performance and risk management issues. A requirement that all contracts be reviewed for risk management considerations prior
		Legal and regulatory risks	Legal and regulatory risks	3	3	9	Clear understanding of the legal framework of the Government. Reliable dispute resolution mechanisms

7.2 Risk Criteria

Risk Evaluation

Risks are ranked as Extreme, high, Medium or low as detailed in the risk matrix below:

Likelihood	Consequences				
	Negligible	Minor (2)	Moderate (3)	Major (4)	Significant (5)
Almost Certain (5)	Medium (5)	Medium (10)	High (15)	High (20)	High (25)
Likely (4)	low (4)	Medium (8)	Medium (12)	High (16)	High (20)
Possible (3)	Low (3)	Medium (6)	Medium (9)	Medium (12)	High (15)
Unlikely (2)	Low (2)	Low (4)	Medium (6)	Medium (8)	Medium (10)
Rare (1)	Low (1)	Low (2)	Low (3)	Low (4)	Medium (5)

CHAPTER EIGHT:

MONITORING AND EVALUATION FRAMEWORK

The Monitoring and Evaluation (M&E) framework will support FIA to assess progress of the plan with regard to the agreed objectives and outcomes and enable its stakeholders to regularly and systematically track the implementation of selected priorities. The M&E framework is developed in line with NDP III Framework.

8.1 Performance measurement

The performance of the strategic plan will be measured using the high-level Outcome indicators and the output indicators which have been designed to track key performance areas of the activities. FIA will ensure that its annual performance is in line with the Public Finance and Management Act (PFMA), 2015 while National Planning Authority will issue a Certificate of Compliance (CoC) for each financial year.

8.2 Reporting arrangements

8.2.1 Progress reporting

At the Corporate level, the M&E framework will entail preparation of the quarterly (budget and physical performance reports) and annual reports to track progress implementation of the Strategic Plan undertakings and the progress made towards achieving the specific objectives. The reports shall be presented to the board on a regular basis for review and corrective measures will be implemented to address any gaps to ensure effective and efficient implementation of the plan.

At the functional level, monthly meetings shall be held to track progress in implementation of key strategic plan deliverables in the Departmental Annual work plans.

To ensure effective implementation of Departmental work plans, annual management retreat shall be held to assess the performance of various areas in line with Key Performance Indicators (KPIs).

8.2.2 Progress performance annual review

There will be an annual review of the strategic plan implementation. This will be presented through a report prepared by the Planning and budgeting officer and will be presented to Management and subsequently to the board to review the progress of implementation. The regular assessments at various levels of FIA will ensure that timely corrective measures are implemented to address any gaps that may arise during the implementation of the plan.

8.2.3 Midterm review

A midterm review report of the status of implementation of the strategic plan will be done and presented through a midterm review. This will be done during the third year of implementation of the plan (FY 2022/23). This will entail the progress of implementation, challenges experienced and measures to improve performance in the remaining period. This will be done by the Planning and budgeting department and presented to management and subsequently to the board.

8.2.4 Terminal evaluation

A terminal evaluation of the strategic plan will be undertaken and presented through the Terminal review report. This will focus on achievements, successes and failures, challenges and lessons learnt that will inform the next planning period. The terminal review will also provide baselines for the next strategic plan.

8.3. Capacity building for M&E

One of the functions established at FIA is the Monitoring and evaluation that resides in the Planning and Budgeting department. To track progress and ensure effective implementation of the Strategic Plan FY 2020/21 – FY 2024/25, FIA shall strengthen her Monitoring and Evaluation (M&E) Framework progressive reporting at both Corporate and Functional level. The capacity building will include trainings, mentorship by NPA M&E function, and benchmarking with other institutions in a similar role to strengthen the already existing abilities.

8.4 Results framework

The table below illustrates the Financial Intelligence Authority results framework, outcome level.

Table 10 FIA results framework, outcome level

	OBJECTIVE	outcome	Indicator	Target					
				2018/19 Baseline	2020/21	2021/22	2022/23	2023/24	2024/25
	Goal: To ensure that the Anti-Money Laundering and Countering the Financing of Terrorism framework is effective to fight financial crime and Protect the integrity and ensure stability of Uganda's financial system.		Proportion of financial reports received that are analyzed and results disseminated to stakeholders.		100%	100%	100%	100%	100%
1	Strengthening international cooperation	Uganda rated technically Compliant with 40 FATF key and core recommendations on AML/CFT/CPF framework	No. of FATF Technical Compliance recommendations re-rated from Partially compliant/Non-compliant to compliant/Largely compliant.	5	2	6	5	5	3
2	Increasing compliance with the AML/CFT laws	Increased level of Accountable/Reporting entities compliant through submission of Annual compliance reports as per AMLA 2013 as amended across Uganda	Proportion of Accountable/Reporting entities submitting Annual AML/CFT/CPF Compliance reports	10%	30%	50%	60%	70%	80%
3	Increasing public awareness and understanding of matters related to money laundering and terrorism financing	Increased level of public awareness on ML/TF matters for 20 targeted entities across regions of Uganda per year. Making cumulatively 100 for 5 years	Proportion of targeted Entities sensitized on AML/CFT/CPF	100%	100%	100%	100%	100%	100%
4	Improving collection and dissemination of information to competent Authorities	Increased usage of financial intelligence disseminated to LEAs and other relevant government agencies	Number of Financial intelligence reports disseminated to LEAs	100	75	80	85	90	95

5	Enhancing the identification of proceeds of crime	Increased identification of proceeds of crime	Number of typology studies/risk assessments conducted	2	4	4	4	4	4
6	Strengthening the capacity of FIA to conduct financial due diligence	Increased number of due diligence requests handled	Number of due diligence requests handled	21	25	30	35	40	45
7	Enhancing the efficiency and effectiveness of FIA to execute its mandate	Increased efficiency in the provision of services	Level of implementation of the strategic plan	74%	20%	40%	60%	80%	100%

The results framework at output level is indicated in annex I

During the implementation of the strategic plan, FIA is planning to implement 1 project i.e. Retooling FIA.

This will be aimed at providing FIA staff with tools that will help them implement the Strategic plan. The tools required include ICT equipment, Furniture and Field vehicles. The details are illustrated in Annex V

Annex I: Financial Intelligence Authority Results framework

Objective	Intervention	Output	Action	Indicator	Means of Verification	Baseline 2018/19	Targets					Responsibility Department / programme
							2020/21	2021/22	2022/23	2023/24	2024/25	
objective 1: Enhance the identification of the proceeds of crime	Intervention 1.1: Enhance financial intelligence gathering ability	Financial intelligence gathering ability enhanced	Action 1.1.1: Recruit 10 additional officers to boost the staff strength	Number of staff recruited	Pay roll	7	3	3	4	-	-	Operational Analysis / Human Resource
			Action 1.1.2: Provide adequate training to 17 staff in intelligence gathering techniques	Number of staff trained in Intelligence gathering techniques	Capacity building register	7	3	4	4	3	3	Operational Analysis
			Action 1.1.3: Engage key persons to acquire vital information from different sectors/ institutions of the economy	Number of financial intelligence reports received from the key persons	Incoming Financial Intelligence reports register	10	15	20	25	30	35	Operational Analysis

Intervention 1.2: Enhance efficiency in identification of proceeds of crime by leveraging on technology	Efficiency enhanced in identification of proceeds of crime	Action 1.2.1: Acquire 5 relevant IT tools to facilitate collection and analysis of information consistent with technological innovations	Number of relevant IT tools acquired	ICT tools register	1	1	1	1	1	1	1	Operational Analysis/ Systems Administration and Security
		Action 1.2.2: Design appropriate e-platforms to facilitate access of databases of 10 MDAs through secure data links (e.g. KCCA, URA, NIRA, URSB, Immigration, Lands, NWSC, UMEME, IGG, USE) and other relevant institutions.	Number of databases accessed by FIA	MDAs access database register	0	2	2	2	2	2	2	Operational Analysis/ Security and Systems Administration
		Action 1.3.1: Conduct 20 meetings/ awareness workshops/ engagements with the relevant LEAs to discuss financial intelligence usage of financial intelligence i.e. 4 per year - 1/ quarter	Number of meetings/ awareness workshops with the relevant LEAs to share financial intelligence information	Minutes of the meetings	2	4	4	4	4	4	4	Operational Analysis
Intervention 1.3: Strengthen domestic cooperation and partnerships with law enforcement agencies, competent authorities and other relevant government agencies	Domestic cooperation and partnerships with law enforcement agencies strengthened	Action 1.4.1: Design a feedback mechanism to share information with key stakeholders involved in the financial intelligence value chain	Functional system for sharing feedback	Quarterly report	0	1	1	1	1	1	1	Operational Analysis
Intervention 1.4: Promote an effective feedback mechanism on financial intelligence disseminated to LEAs and other relevant government agencies	Effective feedback mechanism on financial intelligence disseminated to LEAs promoted											

Intervention 1.5: Promote Integration of the various FIA databases	Integration of the various FIA databases promoted	Action 1.5.1: Design a mechanism to integrate the various databases held by FIA	Number of databases integrated	Database register	1	1	1	1	1	1	1	1	Operational Analysis/ Systems Administration and Security
		Action 1.5.2: Quarterly update of databases	Frequency of database updated	Database register	1	1	1	1	1	1	1	1	Operational Analysis/ Systems Administration and Security
Intervention 1.6: Increase coordination with accountable persons to improve the quality of reports filed	Increased coordination with accountable persons to improve the quality of reports filed	Action 1.6.1: Conduct 20 meetings/ awareness workshops/ engagements with the accountable persons i.e. 4 per year - 1/quarter to discuss and improve reporting of AML/CFT/CPF	Number of meetings/ awareness workshops with the accountable persons	Minutes of the meetings	2	4	4	4	4	4	4	4	Operational Analysis
		Action 1.7.1: Conduct 10 ML/TF/PF risk assessment of sectors as informed by the NRA report and strategic analysis	Number of risk assessments conducted	ML/TF/PF risk assessment report	0	2	2	2	2	2	2	2	International Relations and Strategic Analysis
Intervention 1.7: Undertake AML/CFT/CPF risk, trends and methods analysis to understand the ML/TF/PF exposures and propose mitigation measures to address the risks	AML/CFT/CPF risk, trends and methods analysis to understand the ML/TF/PF exposures and propose mitigation measures to address the risks	Action 1.7.2: Dissemination of 8 reports with findings of the risk assessment	Number of Dissemination workshops held	Dissemination report	1	2	2	2	2	2	2	-	International Relations and Strategic Analysis
		Action 1.7.3: conduct ML/TF/PF typology studies with in Uganda	Number of ML/TF/PF typology studies	ML/TF/PF typology reports	2	-	2	2	2	2	2	2	International Relations and Strategic Analysis

	Intervention 1.8: Enhance a framework for coordination of reforms and review implementation of AML/CFT activities as provided in the NRA/MER	AML/CFT/CPF risk, trends and methods analysis undertaken to understand the ML/TF/PF exposures and propose mitigation measures to address the risks	Action 1.8.1: Hold meetings with different stakeholders to track the implementation progress of NRA/MER action plan/recommendations.	16 meetings held within the first 2 years (1 meeting per quarter)	Quarterly progress reports on implementation of NRA/MER recommendations received	0	4	4	0	4	1	IR & SA
			Action 1.8.2: Train stakeholders on their role in the implementation of NRA/MER recommendations	5 trainings conducted	Quarterly progress reports on implementation of NRA/MER recommendations received	0	1	1	1	1	1	IR & SA
	Intervention 1.9: Enhance goAML electronic system	goAML electronic system enhanced	Action 1.9.1: Increased number of reporting entities on boarded on goAML and number of financial intelligence products for use by AML/CFT/CPF stakeholders through conducting Improvement activities on goAML to meet Uganda's specific needs. (Enrollment of High Risk FI. Integration of watchlists; OPAC, UN, etc)	Proportion of reporting entities on boarded (80%)	Quarterly report	30%	40%	50%	60%	70%	80%	Systems Security and Administration
			Action 1.9.2: Provide Technical assistance for maintenance and update to ensure a Secure and stable goAML platform	Frequency of technical assistance to achieve system uptime of 99% and allowable tolerable window downtime	Quarterly report	3 days	48 hours	32 hours	24 hours	12 hours	3 hours	Systems Security and Administration

			Action 1.9.7: Building a mirror system to goAML (FIMS) as a bespoke & dedicated FIA System to reflect specific process flows	1. FIMS built 2. Development of the proposed FIMS. 3. Deployment of the proposed FIMS including approved process flows and hardware. 4. Utilization by FIA	Quarterly report	0	10%	15%	20%	25%	30%	Systems Security and Administration
			Action 1.9.8: goAML Trainings and workshops for supervisory bodies and Accountable persons on Quality reports received and intelligence products disseminated	Number of goAML trainings conducted	Quarterly report	0	1	1	1	1	1	Systems Security and Administration
objective 2: Increase compliance with the AML Act	Intervention 2.1: Improve AML/CFT Regulation and Supervision Framework for regulated and non-regulated entities	AML/CFT Regulation and Supervision Framework for regulated and non-regulated entities improved	Action 2.1.1: Develop and update 5 AML/CFT sector specific Supervision manuals	Number of sector specific Supervision manuals developed	Quarterly reports	1	2	2	2	2	2	Inspection and Compliance
			Action 2.1.2: Develop and/or review 10 sector specific guidelines and guidance notes to enable respective entities comply with AML/CFT/CPF frame work on a risk based approach	Number of sector specific guidelines developed on a risk-based approach	Sector specific guidelines Register							
			Action 2.1.3: Coordinate with other supervisory/regulatory bodies on AML/CFT compliance	Number of AML/CFT reports received from regulatory bodies	Quarterly reports	0	4	4	4	4	4	Inspection and Compliance

	Action 2.1.4: Establish a framework to conduct 30 AML/CFT off-site and on-site examination using a risk-based approach	Number of inspections conducted	Inspection reports	4	6	6	6	6	6	6	Inspection and Compliance
	Action 2.1.5: Undertake analysis of 25 AML/CFT/CPF compliance reports submitted by accountable persons	Number of compliance reports analyzed	AML/CFT/CPF compliance reports data base	2	5	5	5	5	5	5	Compliance and Inspection
	Action 2.1.6: Review 30 AML/CFT/CPF independent Audit reports periodically	Proportion of AML/CFT/CPF independent Audit reports reviewed	AML/CFT/CPF independent Audits database and review reports	1	2	4	6	8	10	10	Compliance and Inspection
	Action 2.1.7: Build capacity of the supervisory staff to conduct AML/CFT/CPF risk based supervision	Number of staff trained in AML/CFT/CPF risk based supervision	Staff training database and reports	2	2	1	1	1	1	1	Compliance and Inspection
	Action 2.1.8: Build capacity of 150 accountable persons to comply with their obligations under the AMLA and regulations	Proportion of accountable persons trained to comply with their obligations under the AMLA and regulations	Accountable persons training database and reports	20	20	25	30	35	40	40	Compliance and Inspection
	Action 2.1.9: Registration drive to Register 20,000 accountable persons	Number of accountable persons registered	Accountable persons database	881	2500	2500	2500	2500	2500	2500	Inspection and compliance

Intervention 2.4: Ensure effective legal representation and litigation	effective legal representation and litigation ensured	Action 2.4.1: Preparation and filing court documents	Number of court documents filed in court (including filing fees)	Report on court documents prepared and filed in court	10	10	10	10	15	20	25	Legal
		Action 2.4.2: Establish and equip the law library with 100 law books	Number of Law books bought	Library stock register	0	20	20	20	20	20	20	Legal
		Action 2.4.3: Subscription to professional bodies	Number of ULS Subscriptions paid	Annual Subscriptions register	4	4	4	4	4	4	20	Legal
		a) ULS	Number of EALS Subscriptions		4	4	4	4	4	4	20	
		b) EALS	Number of IBA Subscriptions paid		4	4	4	4	4	4	20	
		c) IBA	Number of ACAMS Subscriptions paid		4	4	4	4	4	4	20	
		d) ACAMS	Number of lawyers issued with practicing certificates	Practicing certificates	4	4	4	4	4	4	4	Legal
		Action 2.4.4: Ensure all lawyers are issued with the annual practicing certificate	Number of legal staff trained	Staff Training reports	3	4	4	4	4	4	9	Legal
		Action 2.4.5: Build capacity of the legal staff to effectively represent FIA										
		Action 2.4.6: Procure of 2 motor vehicles for field operations										

	Intervention 3.4: Establish a mechanism to access various databases held by other government agencies	A mechanism to access various databases held by other government agencies established	Action 3.4.1: Engage 5 MDAs i.e. Lands, NIRA, URA, DCIC, URSB holding the relevant databases to facilitate access to those databases.	Number databases FIA has access to	Quarterly reports	0	1	2	3	4	5	Operational Analysis
	Intervention 3.5: Strengthen staff capacity to analyze information received from Accountable persons/ Reporting entities	Staff capacity strengthened to analyze information received from Accountable persons/ Reporting entities	Action 3.5.1: Recruit 10 officers to boost the staff strength	Number of reports generated and disseminated	Quarterly reports	79	100	110	120	130	140	Operational Analysis
			Action 3.5.2: Train all staff in the Directorate	Number of reports generated and disseminated	Quarterly reports	79	100	110	120	130	140	Operational Analysis
			Action 3.5.3: Undertake 5 experiential learning missions to more developed FIUs	Number of experiential learning missions to more developed FIUs	Quarterly reports	0	1	1	1	1	1	Operational Analysis
			Action 3.5.4: Increased financial intelligence reports analyzed, generated and disseminated	Percentage financial reports analyzed, generated and disseminated	Quarterly reports	100%	100%	100%	100%	100%	100%	Operational Analysis
objective 4: Strengthen domestic and international cooperation	Intervention 4.1: Strengthen International cooperation with AML/CFT/CPF stakeholders to meet AML/ CFT/CPF FATF standards	Staff capacity strengthened to analyze information received from Accountable persons/ Reporting entities	Action 4.1.1: Establish a mechanism to ensure that FIA maintains the membership standards of EGMONT Group of FIUs	Number of initiatives put in place to ensure that FIA maintains the membership standards of EGMONT Group of FIUs	Quarterly Egmont membership reports	1	1	1	1	1	1	Legal

objective 5: Increase public awareness and understanding of matters related to ML/TF	Intervention 4.4: Increase compliance with AML/CFT /CPF international standards	Increased compliance with AML/CFT /CPF international standards	Action 4.4.1: Regular review of AML/CFT laws	Number of AML/CFT/CPF laws reviewed	Reports on laws reviewed	1	3	3	3	3	3	3	Legal
	Intervention 5.1: Establish a framework for conducting public awareness programs to deepen AML/CFT understanding	A framework for conducting public awareness programs to deepen AML/CFT understanding established	Action 4.4.2: Stake holder meetings and workshops	Number of stake holder engagements held	Reports on stakeholder engagements	0	3	3	3	3	3	3	Legal
			Action 5.1.1: 20 AML/CFT/CPF articles published in different newspapers and magazines	Number of articles published in the different newspapers and magazines	Quarterly progress reports	4	4	4	4	4	4	4	IR & SA
			Action 5.1.2: 40 AML/CFT/CPF public campaigns conducted across the regions of the country	Number of public campaigns conducted	Quarterly progress reports	8	8	8	8	8	8	8	IR & SA
	Intervention 5.2: Review the Communication strategy to inform AML/CFT/CPF public awareness	Communication strategy to inform AML/CFT/CPF public awareness reviewed	Action 5.1.3: 15 TV/Radio talk shows conducted using different stations on AML/CFT/CPF	Number TV and Radio talk shows held on different stations	Quarterly progress reports	3	3	3	3	3	3	3	IR & SA
Intervention 5.3: Build capacity of accountable persons and LEAs in AML/CFT/CPF	Capacity of accountable persons and LEAs in AML/CFT/CPF built	Capacity of accountable persons and LEAs in AML/CFT/CPF built	Action 5.2.1: Review and update the communication strategy	Approved communication strategy	Printed communication strategy	0	1	0	0	0	0	0	IR & SA
			Action 5.3.1: Develop AML/CFT/CPF outreach programmes targeting Accountable person/Reporting entities and LEAs	Approved AML/CFT/CPF outreach programme	Quarterly report	8	10	10	10	10	10	10	IR & SA

								Quarterly reports	0	2	2	2	2	2	2	Operational Analysis
								Number of trainings undertaken by staff								
Objective 7: Efficiency and effectiveness of FIA to execute the mandate	Intervention 7.1: Ensure a safe and secure working environment	A safe and secure working environment established	Action 7.1.1: Enhanced security at office premises	Number of security initiatives put in place	Quarterly reports	4	5	5	5	5	5	5	5	5	5	Human Resource
			Action 7.1.2: strengthened security for eligible staff	Number of eligible staff provided with security	Quarterly reports	3	5	5	5	5	5	5	5	5	5	Human Resource
			Action 7.1.3: Secured working environment by promptly paying for office accommodation, utilities, cleaning services and security cameras	Proportion of budget allocated to securing working environment	Quarterly reports	20%	30%	30%	30%	30%	30%	30%	30%	30%	30%	Human Resource
			Action 7.2.1: Qualified staff recruited, trained, adequately compensated and facilitated	percentage of approved FIA structure filled	Management Reports	60%	80%	100%	100%	100%	100%	100%	100%	100%	100%	Human Resource
	Intervention 7.2: Establish a mechanism to recruit and retain competent staff	A mechanism to recruit and retain competent staff established	Action 7.2.2: Salaries and Wages of staff processed and paid by the 30th day of every month.	Proportion of staff paid by the 30th day of every month	Pay roll	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	Human Resource
			Action 7.2.3: Medical Insurance	Proportion of staff accessing medical insurance	Medical insurance report	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	Human Resource
			Action 7.2.4: Bereavement support (Next of Kin)	Proportion of affected staff paid bereavement support within one day of incident	Monthly reports	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	Human Resource

										Quarterly report	0	6	6	6	6	6	6	Internal Audit
										Risk matrix developed								
										Action 7.3.2: Risks identified and a risk matrix developed for mitigation purposes								
										Action 7.3.3: Review of the internal Audit Charter, Internal Audit Manual for effective Internal Audit Activity	0	1	1	1	1	1	1	Internal Audit
										Action 7.3.4: Training of Risk Champions in risk assessment	0	2	2	2	2	2	2	Internal Audit
										Action 7.3.5: Internal Audit Quality assurance and improvement program conducted to support FIA operations on a quarterly basis	4	4	4	4	4	4	4	Internal Audit
										Action 7.3.6: Strengthened Internal Controls within the Authority	4	4	4	4	4	4	4	Internal Audit
										Action 7.3.7: Enhanced skills in the Management of Internal Audit activity	1	1	1	1	1	1	1	Internal Audit

Intervention 7.4: Establish a mechanism to safeguard ICT infrastructure against evolving National and International threats	A mechanism established to safeguard ICT infrastructure against evolving National and International threats	Action 7.4.1: 25 Cyber Security Audits "Security Operating Center (SOC) conducted by: 1. Cyber Security Monitoring and Analytics (covered by Maltego) 2. Network Monitoring 3. Traffic Management 4. Penetration Testing 5. Intrusion detection & prevention 6. Sandboxing 7. Data integrity checks & Data Loss Prevention	Number of Internal System Security Audits conducted	Quarterly reports	4	5	5	5	5	5	Security and System Admin
		Action 7.4.2: Improved access control to the FIA through Deployment and Management of modern biometric access control System (RFID - Contactless)	Number of access logs reports	Quarterly reports	4	4	4	4	4	4	Security and System Admin
		Action 7.4.3: FIA CCTV remotely accessed through securing Internet access to allow IP CCTV	Secured Internet access to allow IP CCTV	Quarterly reports	1	1	1	1	1	1	Security and System Admin
		Action 7.4.4: Enhanced security of FIA Mobile Assets through Implementation of FIA Mobile Assets tracking	Proportion of FIA mobile assets secured.	Asset management register	40%	50%	60%	70%	90%	100%	Security and System Admin

Intervention 7.5: Modernize ICT platforms and Business systems to maximize efficiency in all FIA operations	ICT platforms and Business systems modernised to maximize efficiency in all FIA operations	Action 7.5.1: Re- design, manage and continually update FIA website using Content Management Systems (CMS) to make it more interactive with development and deployment of web portals to achieve Website Optimization; 1. Amount of traffic to the website. 2.Frequency of updates to the website	Number of people visiting FIA website	Quarterly reports	50%	55%	60%	65%	70%	80%	Systems Security and Administration
					0%	10%	20%	30%	50%	60%	
		Action 7.5.2: Develop Data Warehouse and Mining tools like licensed Oracle 12C for Business Intelligence (BI) to conduct research and advanced analytics on information collected from reporting entities (GIS Tools) to support Big Data Analysis	Percentage of statistical data derived from the data warehouse	Quarterly report							Systems Security and Administration

Action 7.7.2: Finance committee to support allocation of resources constituted	Number of finance committee meetings held per quarter	Quarterly report	1	1	1	1	1	1	1	1	1	Accounts
Action 7.7.3: Finance committee members trained in PFM	Number of trainings conducted for finance committee members	Quarterly report	1	1	1	1	1	1	1	1	1	Accounts
Action 7.7.4: Cash management principles are adhered to by conducting 3 on spot cash counts safes	Number of on spot cash counts conducted	Quarterly report	3	3	3	3	3	3	3	3	3	Accounts
Action 7.7.5: Books of accounts and other appropriate documents are promptly prepared for audit purposes	Adherence to the time frame set by PFMA and FIA financial policy in preparation of the books of accounts	Quarterly report	By 15th of the month after every quarter	By 15th of the month after every quarter	By 15th of the month after every quarter	By 15th of the month after every quarter	By 15th of the month after every quarter	By 15th of the month after every quarter	By 15th of the month after every quarter	By 15th of the month after every quarter	By 15th of the month after every quarter	Accounts
Action 7.7.6: Books of accounts and other appropriate documents relating to operations of the authority are made ready for auditor purposes	Number of audits undertaken	Audit reports	6	6	6	6	6	6	6	6	6	Accounts
Action 7.7.8: Adherence to PFM procedures	Number of audit queries	Audit reports	0	0	0	0	0	0	0	0	0	Accounts
Action 7.7.9: Finance manual reviewed	Review report of the finance manual	Quarterly report	0	1	1	1	1	1	1	1	1	Accounts
Action 7.7.10: Staff trained in Public Finance management	Training report	Quarterly report	1	1	1	1	1	1	1	1	1	Accounts

	Action 7.8.2: Evaluation committees constituted to undertake various procurements	Proportion of procurements processed with evaluation committees	Quarterly report	100%	100%	100%	100%	100%	100%	100%	Procurement
	Action 7.8.3: Fully constituted contracts committee to undertake Authority's procurements	Number of members on contracts committee	Quarterly report	100%	5	5	5	5	5	5	Procurement
	Action 7.8.4: Contracts committee members trained on PPDA rules and regulations	Number of trainings organised for committee members	Quarterly report	0	-	1	-	-	-	-	Procurement
	Action 7.8.5: Users departments trained on PPDA rules and regulations	Number of trainings organised for users	Training report	0	-	1	-	-	-	-	Procurement
	Action 7.8.6: Directorates supported to develop procurement plans	Number of procurement plans submitted to PDU	Authority procurement plan	6	6	6	6	6	6	6	Procurement
	Action 7.8.7: International and domestic Procurement conferences and workshops attended to increase knowledge and skills	Number of International and local Procurement conferences or workshops attended	Training reports	1	2	2	2	2	2	2	Procurement
	Action 7.8.8: supplier payments initiated upon receipt of goods and/or services	Number of suppliers paid with 30 days after receipt of goods and/or services	Quarterly reports	10 days	2 days	2 days	2 days	2 days	2 days	2 days	Procurement

Intervention 7.9: Strengthen governance structures to promote checks and balances	Governance structures strengthened to promote checks and balances	Action 7.9.1: 240 Top management meetings facilitated	Number of top management meetings facilitated	Performance reports	48	48	48	48	48	48	48	Accounts
		Action 7.9.2: 60 Contracts Committee meetings facilitated	Number of contracts committee meetings facilitated	Procurement reports	48	48	48	48	48	48	48	Accounts
		Action 7.9.3: 40 Training Committee Meetings facilitated	Number of training committee meetings facilitated	Training committee minutes	3	8	8	8	8	8	8	Accounts
		Action 7.9.4: 20 Sectoral committees facilitated	Number of sectoral committees facilitated	Sectoral committee minutes	2	4	4	4	4	4	4	Accounts
		Action 7.9.5: Monthly Payment of Board Retainer	Board retainer paid on time	Bank statement	12	12	12	12	12	12	12	Accounts
		Action 7.9.6: 60 board meetings facilitated	Number of board meetings facilitated	Attendance register	12	12	12	12	12	12	12	Accounts
		Action 7.9.7: 5 corporate social responsibility events facilitated	Number of CSRs facilitated	Performance report	1	1	1	1	1	1	1	Accounts
		Action 7.9.8: 5 Bench markings by the board facilitated	Number of board benchmarkings facilitated	Performance report	1	1	1	1	1	1	1	Accounts
		Action 7.9.9: 5 Board members trained in corporate governance once every year	Number of board members trained each year	Performance report	0	1	1	1	1	1	1	Accounts
		Action 7.9.10: 5 Retreats for Board members facilitated	Number of board member meetings facilitated	Performance report	0	1	1	1	1	1	1	Accounts

			Action 7.9.1.1: 5 internal policies reviewed and Updated	Number of Internal policies reviewed and Updated	Performance report	0	1	1	1	1	1	1	1	Accounts
	Incorporate cross cutting issues in FIA operations		Providing 5 facilities for expectant mothers and their newborns	Number of facilities provided for expectant mothers and their newborns	Quarterly reports	0	1	1	1	1	1	1	1	Human Resource
			Conducting 5 awareness sessions on HIV/AIDS for staff	Number of awareness sessions conducted	Quarterly reports	0	1	1	1	1	1	1	1	Human Resource
			Providing staff with protective gears such as condoms (male & female) on a monthly basis	Frequency of refilling protective gears dispensers	Quarterly reports	0	1	1	1	1	1	1	1	Human Resource
			Drafting a policy on gender and equity	Drafted policy on gender and equity	Quarterly reports	0	1	1	1	1	1	1	1	Human Resource

Annex II: Cost implementation Matrix

Objective	Intervention	Output	Action	Budget Estimate in UGX					
				2020/21	2021/22	2022/23	2023/24	2024/25	Total
Objective 1: Enhance the identification of the proceeds of crime	Intervention 1.1: Enhance financial intelligence gathering ability	Financial intelligence gathering ability enhanced	Action 1.1.1: Recruit 10 additional officers to boost the staff strength	0.198	0.414	0.726	0.726	0.726	2.790
			Action 1.1.2: Provide adequate training to 17 staff in intelligence gathering techniques	0.114	0.154	0.160	0.122	0.123	0.673
			Action 1.1.3: Engage key persons to acquire vital information from different sectors/institutions of the economy	5.250	6.000	6.750	7.500	8.250	33.750
	Intervention 1.2: Enhance efficiency in identification of proceeds of crime by leveraging on technology	Efficiency enhanced in identification of proceeds of crime	Action 1.2.1: Acquire 5 relevant IT tools to facilitate collection and analysis of information consistent with technological innovations	5.000	5.000	5.000	5.000	5.000	25.000
			Action 1.2.2: Design appropriate e-platforms to facilitate access of databases of 10 MDAs through secure data links (e.g. KCCA, URA, NIRA, URSB, Immigration, Lands, NWSC, UMEME, IGG, USE) and other relevant institutions.	0.100	0.100	0.100	0.100	0.100	0.500
	Intervention 1.3: Strengthen domestic cooperation and partnerships with law enforcement agencies, competent authorities and other relevant government agencies	Domestic cooperation and partnerships with law enforcement agencies strengthened	Action 1.3.1: Conduct 20 meetings/ awareness workshops/ engagements with the relevant LEAs to discuss and harmonize usage of financial intelligence information i.e. 4 per year - 1/quarter	0.201	0.201	0.201	0.201	0.201	1.004
	Intervention 1.4: Promote an effective feedback mechanism on financial intelligence disseminated to LEAs and other relevant government agencies	Effective feedback mechanism on financial intelligence disseminated to LEAs promoted	Action 1.4.1: Design a feedback mechanism to share information with key stakeholders involved in the financial intelligence value chain	0.201	0.201	0.201	0.201	0.201	1.004
	Intervention 1.5: Promote Integration of the various FIA databases	Integration of the various FIA databases promoted	Action 1.5.1: Design a mechanism to integrate the various databases held by FIA	0.020	0.020	0.020	0.020	0.020	0.100
			Action 1.5.2: Quarterly update of databases	0.000	0.000	0.000	0.000	0.000	0.000

	Intervention 1.6: Increase coordination with accountable persons to improve the quality of reports filed	Increased coordination with accountable persons to improve the quality of reports filed	Action 1.6.1: Conduct 20 meetings/ awareness workshops/engagements with the accountable persons i.e. 4 per year - 1/ quarter to discuss and improve reporting of AML/CFT/CPF	0.389	0.389	0.389	0.389	0.389	0.389	1.943
	Intervention 1.7: Undertake AML/CFT/ CPF risk, trends and methods analysis to understand the ML/ TF/ PF exposures and propose mitigation measures to address the risks	AML/CFT/CPF risk, trends and methods analysis undertaken to understand the ML/ TF/ PF exposures and propose mitigation measures to address the risks	Action 1.7.1: Conduct 10 ML/TF/PF risk assessment of sectors as informed by the NRA report and strategic analysis	1.004	1.004	1.004	1.004	1.004	1.004	5.020
			Action 1.7.2: Dissemination of 10 reports with findings of the risk assessment	0.097	0.097	0.097	0.097	0.097	0.486	
			Action 1.7.3: conduct ML/TF/ PF typology studies with in Uganda	0.502	0.502	0.502	0.502	0.502	2.510	
			Action 1.8.1: Hold meetings with different stakeholders to track the implementation progress of NRA/MER action plan/ recommendations.	0.194	0.194	0.194	0.194	0.049	0.631	
	Intervention 1.8: Enhance a framework for coordination of reforms and review implementation of AML/CFT activities as provided in the NRA/ MER	A framework for coordination of reforms and review implementation of AML/CFT activities as provided in the NRA/ MER enhanced	Action 1.8.2: Train stakeholders on their role in the implementation of NRA/MER recommendations	0.097	0.097	0.097	0.097	0.097	0.486	
			Action 1.9.1: Increased number of reporting entities on boarded on goAML and number of financial intelligence products for use by AML/CFT/CPF stakeholders through conducting Improvement activities on goAML to meet Uganda's specific needs. (Enrollment of High Risk FI. Integration of watchlists; OFAC, UN, etc)	0.389	0.389	0.389	0.389	0.389	1.943	
	Intervention 1.9: Enhance goAML electronic system	goAML electronic system enhanced	Action 1.9.2: Provide Technical assistance for maintenance and update to ensure a Secure and stable goAML platform	0.051	0.052	0.054	0.055	0.055	0.267	
			Action 1.9.3: Scalability to support the agile reporting requirements. Customize the system to support new report types to increase percentage of Quality intelligence products for Law Enforcement Authorities.	0.076	0.077	0.080	0.081	0.082	0.396	
			Action 1.9.4: Capacity building for training & knowledge transfer for stakeholders system utilization	0.243	0.291	0.291	0.340	0.389	1.554	
			Action 1.9.5: Participate in10 goAML, Egmont and ESAAMLG technical working groups	0.078	0.079	0.083	0.084	0.085	0.409	

Objective 2: Increase compliance with the AML Act	Intervention 2.1: Improve AML/CFT Regulation and Supervision Framework for regulated and non-regulated entities	AML/CFT Regulation and Supervision Framework for regulated and non-regulated entities improved	Action 1.9.6: Develop Application Programming Interfaces (APIs) to establish linkages between targeted MDA's with strategic Databases to provide for Integrated Data Sharing capabilities. Enriched intelligence reports disseminated to Law Enforcement Agencies	0.020	0.020	0.020	0.020	0.020	0.020	0.100
			Action 1.9.7: Building a mirror system to goAML (FIMS) as a bespoke & dedicated FIA System to reflect specific process flows	0.100	0.100	0.100	0.100	0.100	0.100	0.500
			Action 1.9.8: goAML Trainings and workshops for supervisory bodies and Accountable persons on Quality reports received and intelligence products disseminated	0.049	0.049	0.049	0.049	0.049	0.049	0.243
			Action 2.1.1: Develop and update 5 AML/CFT sector specific Supervision manuals	0.243	0.243	0.243	0.243	0.243	0.243	1.214
			Action 2.1.2: Develop and/or review 10 sector specific guidelines and guidance notes to enable respective entities comply with AML/CFT/CPF frame work on a risk based approach	0.486	0.486	0.486	0.486	0.486	0.486	2.429
			Action 2.1.3: Coordinate with other supervisory/regulatory bodies on AML/CFT compliance	0.389	0.389	0.389	0.389	0.389	0.389	1.943
			Action 2.1.4: Establish a framework to conduct 30 AML/CFT off-site and on-site examination using a risk- based approach	0.134	0.134	0.134	0.134	0.134	0.134	0.672
			Action 2.1.5: Undertake analysis of 25 AML/CFT/CPF compliance reports submitted by accountable persons	0.026	0.026	0.026	0.026	0.026	0.026	0.130
			Action 2.1.7: Build capacity of the supervisory staff to conduct AML/CFT/CPF risk based supervision	0.076	0.039	0.040	0.041	0.041	0.041	0.236
			Action 2.1.8: Build capacity of 150 accountable persons to comply with their obligations under the AMLA and regulations	0.146	0.146	0.146	0.146	0.146	0.146	0.729
			Action 2.1.9: Registration drive to register 25,000 accountable persons	0.159	0.159	0.159	0.159	0.159	0.159	0.797

Intervention 2.2: Enforce AML/CFT compliance in non-regulated sectors	Intervention 2.2: Enforce AML/CFT compliance in non-regulated sectors	AML/CFT compliance in non-regulated sectors enforced	Action 2.1.10: Recruit 10 more staff members in the inspection and compliance department	0.066	0.132	0.396	0.528	0.660	1.782
			Action 2.1.11: Build capacity of 17 inspection and compliance team members in risk based supervision	0.114	0.154	0.160	0.122	0.123	0.673
			Action 2.1.12: Build capacity of the supervisory bodies to conduct AML/CFT/CPF risk based supervision	0.076	0.039	0.040	0.041	0.041	0.236
			Action 2.1.12: Acquire a compliance monitoring IT Tool to facilitate effective and efficient management of compliance activities consistent with technological innovations.	0.000	1.100	0.100	0.050	0.050	1.300
			Action 2.2.1: Develop and regularly review the AML/CFT/CPF sanction regime and issue guidelines and procedures to enforce non-compliance by non-regulated accountable persons	0.146	0.146	0.146	0.146	0.146	0.729
			Action 2.2.2: Develop specific guidelines to enable respective entities comply with AML/CFT/CPF frame work	0.005	0.010	0.016	0.016	0.016	0.062
			Action 2.2.3: Develop, review and apply a proportionate and dissuasive sanctions regime for AML/CFT/CPF non compliance	0.005	0.005	0.005	0.005	0.005	0.026
			Action 2.3.1: Review 15 AML/CFT/CPF laws to address operational challenges and gaps identified by MER and NRA	0.400	0.400	0.400	0.400	0.400	2.000
			Action 2.3.2: Undertake reviews of 15 laws under AML/CFT legal framework to be in line with evolving FATF Standards	0.400	0.400	0.400	0.400	0.400	2.000
			Action 2.3.3: Coordinate 15 engagements of stakeholders to identify areas of amendment	0.097	0.097	0.097	0.097	0.097	0.486
			Action 2.3.4: Draft 15 amendments of laws and submit to MOPED for approval	0.200	0.200	0.200	0.200	0.200	1.000
			Action 2.3.5: Printing and gazetting 15 bills once approved by cabinet	0.025	0.025	0.025	0.025	0.025	0.125
			Objective 2.4: Ensure effective legal representation and litigation	0.000	0.000	0.000	0.000	0.000	0.000
Intervention 2.3: Ensure that Uganda's legal framework on AML/CFT/CPF meets international standards	Intervention 2.3: Ensure that Uganda's legal framework on AML/CFT/CPF meets international standards	Uganda's legal framework on AML/CFT/CPF meeting international standards	Action 2.4.1: Preparation and filing court documents	0.050	0.050	0.075	0.100	0.125	0.400

Objective 3: improve collection, analysis and dissemination of information to competent Authorities	Intervention 3.1: Establish a mechanisms to acquire vital information to support analysis	A mechanism to acquire vital information to support analysis established.	Action 2.4.2: Establish and equip the law library with 100 law books	0.100	0.100	0.100	0.100	0.100	0.100	0.100	0.500
			Action 2.4.3: Subscription to professional bodies	0.010	0.010	0.010	0.010	0.010	0.010	0.010	0.050
			a) ULS								
			b) EALS								
			c) IBA								
			d) ACAMS								
			Action 2.4.4: Ensure all lawyers are issued with the annual practicing certificate	0.002	0.002	0.002	0.002	0.002	0.002	0.002	0.010
			Action 2.4.5: Build capacity of the legal staff to effectively represent FIA	0.152	0.154	0.160	0.162	0.164	0.162	0.164	0.792
			Action 2.4.6: Procure of 2 motor vehicles for field operations	-	0.250	-	-	0.250	-	0.250	0.500
			Action 2.4.7: Recruit 5 staff to support operations of the department	0.198	0.144	0.228	0.228	0.228	0.228	0.228	1.026
			Action 3.1.1: 25 Engagements with foreign FIU(s) to acquire vital information to support analysis	0.010	0.010	0.010	0.010	0.010	0.010	0.010	0.050
			Action 3.1.2: Maintain 12 classified information assets to acquire vital information to support analysis	0.600	0.600	0.600	0.600	0.600	0.600	0.600	3.000
			Action 3.1.3: Develop and review a mechanism to receive ML/TF/PF related information from members of the public	0.050	0.050	0.050	0.050	0.050	0.050	0.050	0.250
			Objective 3.2: Establish a framework to effectively disseminate intelligence reports to LEAs	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
			Action 3.2.1: Engage 5 LEAs i.e. UPF, IG, URA, UWA and DPP to enroll on the FIA's information exchange system (goAML) to effectively receive FIA intelligence reports	0.243	0.243	0.243	0.243	0.243	0.243	0.243	1.214
			Objective 3.3: Establish an effective data management system								0.000
Objective 3: improve collection, analysis and dissemination of information to competent Authorities	Intervention 3.1: Establish a mechanisms to acquire vital information to support analysis	A mechanism to acquire vital information to support analysis established.	Action 3.3.1: Acquire an IT solution to integrate all databases of information received	0.300	0.150	0.120	0.100	0.080	0.100	0.080	0.750
			Action 3.3.2: Maintain 6 up to date databases of all information received	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.075

Objective 4: Strengthen domestic and international cooperation	Intervention 3.4: Establish a mechanism to access various databases held by other government agencies	A mechanism to access various databases held by other government agencies established	Action 3.4.1: Engage 5 MDAs i.e. Lands, NIRA, URA, DCIC, URSB holding the relevant databases to facilitate access to those databases.	0.049	0.097	0.146	0.194	0.243	0.729
			Objective 3.5: Strengthen staff capacity to analyse information received from Accountable persons/ Reporting entities	0.000	0.000	0.000	0.000	0.000	0.000
			Action 3.5.1: Recruit 10 officers to boost the staff strength	0.396	0.972	0.972	0.972	0.972	4.284
			Action 3.5.2: Train all staff in the Directorate	0.076	0.077	0.080	0.081	0.082	0.396
			Action 3.5.3: Undertake 5 experiential learning missions to more developed FIUs	0.038	0.039	0.040	0.041	0.041	0.198
			Action 3.5.4: Increased financial intelligence reports analysed, generated and disseminated	0.010	0.010	0.010	0.010	0.010	0.050
			Action 4.1.1: Establish a mechanism to ensure that FIA maintains the membership standards of EGMONT Group of FIUs	0.005	0.005	0.005	0.005	0.005	0.026
			Action 4.1.2: Enhance the exchange of information with other jurisdictions to support global efforts in combatting AML/CFT	0.003	0.003	0.003	0.003	0.003	0.015
			Action 4.1.3: Strengthen partnerships with other international bodies to meet AML/CFT/CPF obligations (ESAAMLG activities, EGMONT activities, and FATF)	0.150	0.150	0.150	0.150	0.150	0.750
			Objective 4.2: Establish a framework to coordinate implementation of FATF – ICRG recommendation on Uganda	0.021	0.021	0.021	0.021	0.021	0.104
Intervention 4.3: Strengthen domestic cooperation with AML/CFT/CPF stakeholders	Intervention 4.1: Strengthen International cooperation with AML/CFT/CPF standards to meet AML/CFT/CPF standards strengthened	a framework to coordinate implementation of FATF – ICRG recommendation on Uganda established	Action 4.2.1: Implementation of 24 recommendations in the FATF-ICRG action plan for Uganda to address identified deficiencies and exit the watch list.	0.041	0.021	0.021	0.021	0.021	0.124
			Action 4.3.1: Enter into 6 MOUs to allow access to databases of key stakeholders	0.010	0.010	0.010	0.010	0.010	0.052
			Action 4.3.2: Coordinate 20 activities of the national AML/CFT/CPF taskforce	0.021	0.021	0.021	0.021	0.021	0.104
			Action 4.3.3: Coordinate 8 meetings towards the Implementation of ICRG action plan (2 years)	0.021	0.021	-	-	-	0.041

Objective 5: Increase public awareness and understanding of matters related to ML/TF	Intervention 4.4: Increase compliance with AML/CFT / CPF international standards	Increased compliance with AML/CFT /CPF international standards	Action 4.3.4: Attend 8 ICRG face to face meetings	0.026	0.016	-	-	-	0.041
				0.010	0.010	0.010	0.010	0.010	0.052
				0.005	0.005	0.005	0.005	0.005	0.026
				0.010	0.010	0.010	0.010	0.010	0.052
	Intervention 5.1.: Establish a framework for conducting public awareness programs to deepen AML/CFT understanding	A framework for conducting public awareness programs to deepen AML/CFT understanding established	Action 4.3.8: Coordinate 10 stakeholder meetings towards the implementation of FATF activities	0.010	0.010	0.010	0.010	0.010	0.052
				0.010	0.010	0.010	0.010	0.010	0.052
				0.016	0.016	0.016	0.016	0.016	0.078
				0.016	0.016	0.016	0.016	0.016	0.078
	Intervention 5.2.: Review the Communication strategy to inform AML/CFT/CPF public awareness	Communication strategy to inform AML/CFT/CPF public awareness reviewed	Action 4.4.1: Regular review of AML/CFT laws	0.040	0.040	0.040	0.040	0.040	0.200
				0.240	0.240	0.240	0.240	0.240	1.200
				0.018	0.018	0.018	0.018	0.018	0.090
				0.050	0.100	-	-	-	0.150
Objective 5: Build capacity of accountable persons and LEAs in AML/CPF	Intervention 5.3.: Build capacity of accountable persons and LEAs in AML/CPF	Capacity of accountable persons and LEAs in AML/CFT/CPF built	Action 5.1.1: 20 AML/CFT/CPF articles published in different newspapers and magazines	0.291	0.340	0.389	0.437	0.486	1.943
				0.049	0.049	0.049	0.049	0.049	0.243

Objective 6: Strengthen the capacity of FIA to conduct financial due diligence	Intervention 6.1: Establish a framework for conducting FDD	Intervention 6.2: Establish a mechanisms to acquire vital information to support FDD	Intervention 6.3: Promote staff capacity to effectively conduct FDD	A framework for conducting FDD established	A mechanisms to acquire vital information to support FDD established	Action 5.3.2: Conduct 150 AML/CFT Training sessions Train FIIs and DNFPs on proper implementation of the AML/CFT obligations especially in respect of ML/TF risk assessment, CDD, TFS, and STRs	0.030	0.030	0.030	0.030	0.030	0.150
							0.058	0.046	0.044	0.041	0.041	0.231
							0.050	0.050	0.050	0.050	0.050	0.250
	Intervention 7.1: Ensure a safe and secure working environment	Intervention 7.2: Ensure a safe and secure working environment	Intervention 7.3: Ensure a safe and secure working environment	A safe and secure working environment established	A safe and secure working environment established	Action 6.2.1: Subscription to closed information databases. Action 6.2.2: Engagement of individuals/entities that have ability to collect secret information on subjects of FDD	0.960	1.280	1.600	2.000	2.400	8.240
							0.132	0.420	0.612	0.612	0.612	2.388
							0.076	0.077	0.080	0.081	0.082	0.396
Objective 7: Efficiency and effectiveness of FIA to execute the mandate	Intervention 7.1: Ensure a safe and secure working environment	Intervention 7.2: Ensure a safe and secure working environment	Intervention 7.3: Ensure a safe and secure working environment	A safe and secure working environment established	A safe and secure working environment established	Action 6.3.1: Recruitment of staff	0.048	0.053	0.058	0.064	0.070	0.293
						Action 6.3.2: Training of staff to equip with the requisite FDD skills	0.150	0.165	0.182	0.200	0.220	0.916
						Action 7.1.1: Enhanced security at office premises	1.197	1.316	1.448	1.593	1.752	7.306
						Action 7.1.2: Strengthened security for eligible staff	0.000	0.000	0.000	0.000	0.000	0.000
						Action 7.1.3: Secured working environment by promptly paying for office accommodation, utilities, cleaning services and security cameras	0.132	0.132	0.132	0.132	0.132	0.660
						Objective 7.2: Establish a mechanism to recruit and retain competent staff	3.744	4.014	4.284	4.554	4.824	21.420
						Action 7.2.1: Qualified staff recruited, trained, adequately compensated and facilitated (One officer in procurement and one in HR)	0.288	0.317	0.346	0.374	0.403	1.728
						Action 7.2.2: Wage bill	0.014	0.014	0.014	0.014	0.014	0.070
						Action 7.2.3: Medical Insurance	0.317	0.396	0.428	0.475	0.507	2.123
						Action 7.2.4: Bereavement support (Next of Kin)	0.114	0.116	0.120	0.122	0.123	0.594

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			1. Cyber Security Monitoring and Analytics (covered by Maltego)	0.600	0.100	0.100	0.100	0.100	0.100	1.000
			2. Network Monitoring							
			3. Traffic Management							
			4. Penetration Testing							
			5. Intrusion detection & prevention							
			6. Sandboxing							
			7. Data integrity checks & Data Loss Prevention							
			Action 7.4.2: Improved access control to the FIA through Deployment and Management of modern biometric access control System (RFID - Contactless)	0.050	0.050	0.050	0.050	0.050	0.050	0.250
			Action 7.4.3: FIA CCTV remotely accessed through securing Internet access to allow IP CCTV	0.050	0.055	0.060	0.065	0.068	0.068	0.298
			Action 7.4.4: Enhanced security of FIA Mobile Assets through Implementation of FIA Mobile Assets tracking	0.020	0.022	0.024	0.026	0.027	0.027	0.119
			Action 7.4.5: Enhanced security of FIA Information and Staff by Upgrading FIA entrance security scanner	0.020	0.022	0.024	0.026	0.027	0.027	0.119
			Action 7.4.6: Ensure Internet business continuity and availability through Procurement of a fail over Data Link for connectivity	0.030	0.033	0.036	0.039	0.041	0.041	0.179
			Action 7.4.7: IT security Business Impact Assessment (BIA) conducted to predict consequences of security incidents including third party risk assessment and criticality classification	0.100	-	-	0.100	-	-	0.200
			Action 7.4.8: Disaster Recovery Site established to ensure business continuity and business resumption as a fail over;							
			1. Establishment of a DR Site	0.550	0.150	0.100	0.100	0.100	0.100	1.000
			2. Establishment of a business resumption site (warm site)							
			3. Data restoration tests.							

Action 7.4.9: FIA mail servers upgraded to provide for an Autonomous FIA mail exchange, storage and management;	2. Percentage of user accounts created.	0.100	0.110	0.120	0.130	0.135	0.595
	3.Amount of storage utilized						
	Action 7.4.10: Renew Software Server Licenses to maintain functionalities and support of all FIA software	0.150	0.150	0.150	0.150	0.150	0.750
Action 7.4.11: Secure Security certificates for servers e.g Netwrix Auditor to Secure FIA network environment.		0.025	0.028	0.030	0.033	0.034	0.149
	Action 7.4.12: Build ICT staff capacity through knowledge transfer, training and benchmarking to enhance their competence	0.133	0.135	0.140	0.142	0.144	0.693
	Action 7.4.13: Review & Update ICT Governance documents in line with the National IT Standards;						
1. Approved draft of the ICT Strategy.		-	-	-	-	-	
	2. Approved draft ICT Policy						
Action 7.4.14: Recruitment of IT staff; in areas of Application support, Network Support, Service Desk, Software development, Information Security and Call center management		-	0.132	0.132	0.132	0.132	0.528
	Action 7.4.15: Accountable persons and supervisory bodies supported by IT by procuring 2 Vehicles to conduct IT outreach activities	-	-	0.005	0.005	-	0.010
	Action 7.4.16: IT staff subscribe to professional bodies to allow IT officers benefit from Continuous Professional Development (CPD) for example gain continuous professional IT knowledge, skills and sharing of existing IT challenges	0.025	0.025	0.025	0.025	0.025	0.125
Objective 7.5: Modernize ICT platforms and Business systems to maximize efficiency in all FIA operations							

			Action 7.5.1: Re-design, manage and continually update FIA website using Content Management Systems (CMS) to make it more interactive with development and deployment of web portals to achieve Website Optimization;	0.100	0.110	0.120	0.130	0.135	0.595
				1. Amount of traffic to the website.					
				2.Frequency of updates to the website					
				0.010	0.010	0.010	0.010	0.010	0.050
				Action 7.5.2: Develop Data Warehouse and Mining tools like licensed Oracle 12C for Business Intelligence (BI) to conduct research and advanced analytics on information collected from reporting entities (GIS Tools) to support Big Data Analysis					
				Action 7.5.3: Establishment of a Call Center for registration and Compliance queries. (Call Center Management System) to ensure better helpline management & response to queries / feedback Recruitment of 3 staff to man the call center)					
				0.150	0.055	0.060	0.065	0.068	0.398
				1. Percentage of calls registered.					
				2. Percentage of open call tickets.					
				3. Percentage of closed tickets.					
				4. Percentage of queries resolved within SLA timelines					
				0.200	0.220	0.240	0.260	0.280	1.200
				Action 7.5.4: Maintain, replace equipment that has reached it's end of life					
				0.025	0.028	0.030	0.033	0.034	0.149
				Action 7.5.5: Critical software Vulnerability Checks Software updates and patches including change requests conducted;					
				0.000	0.000	0.000	0.000	0.000	0.000
				1. Percentage of Software upgrades and patches carried out. 2. Percentage of software threats detected and resolved.					
				0.005	0.006	0.006	0.007	0.007	0.030
				Action 7.5.6: 95% of change requests implemented					
				0.150	0.051	0.051	0.051	0.051	0.354
				Action 7.5.7: Enterprise Resource Planner installed for departmental business process automation (HR & Stores) Appointment Management to ensure Business process Automation					

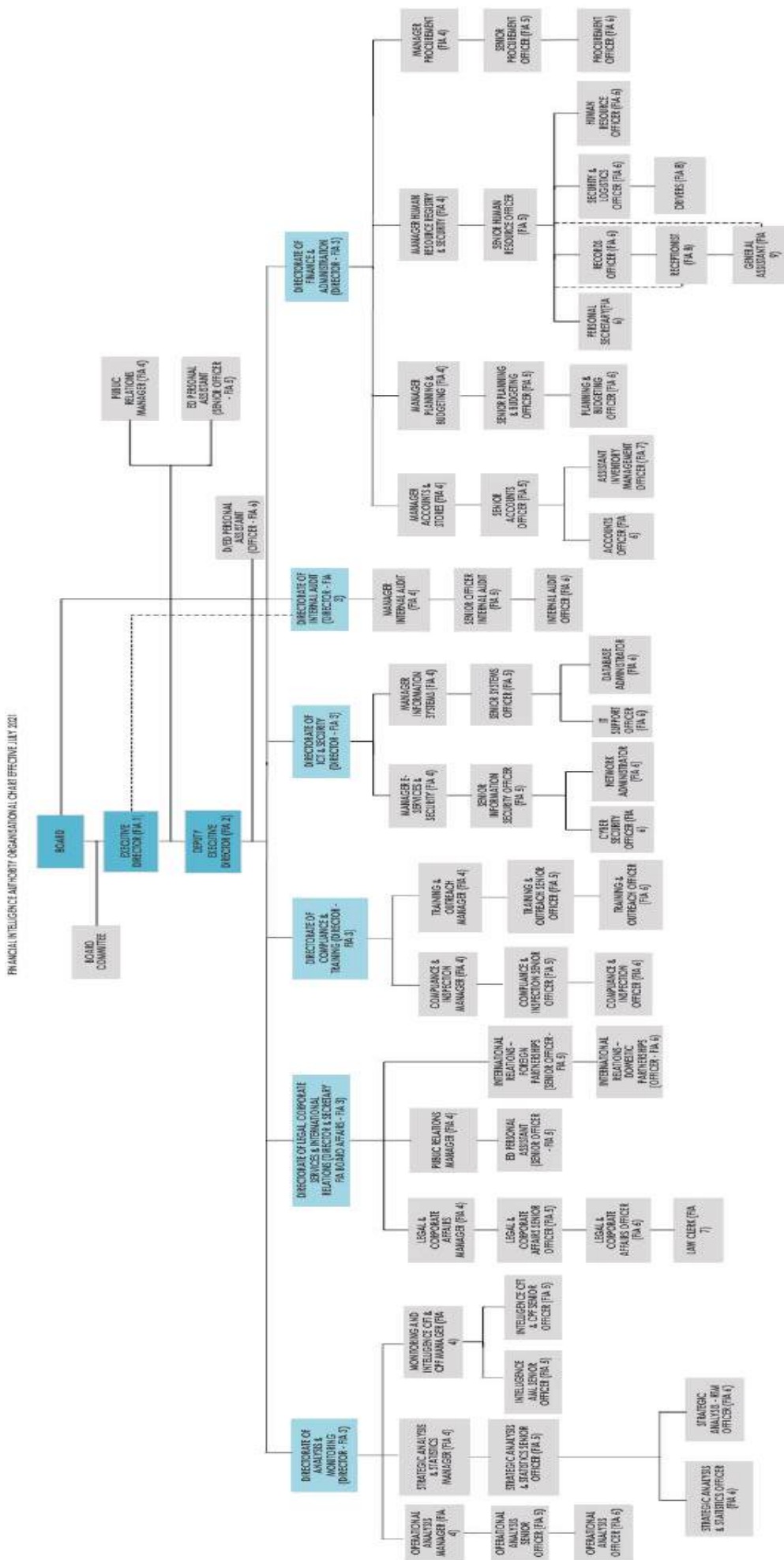
	Action 7.5.8: BRMS Collaborative Boardroom Management Solution for remote access and share points deployed and functional	0.203	0.075	0.045	0.030	0.015	0.368
	Action 7.5.9: Increased SEO potential for FIA website & instant Mobile Interactions through Mobile Application and Push Notifications and instant updates providing Interactive Engagement.	-	-	-	-	-	
	Action 7.5.10: Power stability maintained across the FIA during power cuts through installation and maintenance of a functional centralized UPS for electric power stability and cross over during power cuts;	0.270	0.050	0.050	0.050	0.050	0.470
	Availability of services during power surge across all FIA operations.						
	Objective 7.6.: Establish framework for effective budgeting and planning processes as per the PFMA						
	Action 7.6.1: Ensure Budget Framework Paper (BFP), Ministerial Policy Statement (MPS) produced and submitted as per PFMA timelines	0.074	0.143	0.213	0.290	0.386	1.106
	Action 7.6.2: Quarterly performance budget reports produced	0.009	0.009	0.009	0.009	0.009	0.045
	Action 7.6.3 Staff trained in budgeting and planning as per Public Finance management Act	0.095	0.104	0.109	0.114	0.123	0.545
	Objective 7.7: Establish framework for effective financial reporting processes (Accounts)						0.000
	Action 7.7.1: Process all approved payment requests within 2 days	0	0	0	0	0	0.000
	Action 7.7.2: Finance committee to support allocation of resources constituted	0.004	0.005	0.006	0.007	0.008	0.030
	Action 7.7.3: Finance committee members trained in PFM	0.010	0.015	0.020	0.025	0.030	0.100
	Action 7.7.4: Cash management principles are adhered to by conducting 3 on spot cash counts safes	0	0	0	0	0	0.000
	Action 7.7.5: Books of accounts and other appropriate documents are promptly prepared for audit purposes	0	0	0	0	0	0.000

Action 7.7.6: Books of accounts and other appropriate documents relating to operations of the authority are made ready for auditor purposes	0	0	0	0	0	0	0	0	0.000
Action 7.7.8: Adherence to PFM procedures	0	0	0	0	0	0	0	0	0.000
Action 7.7.9: Finance manual reviewed	0.100	-	0.150	0.039	0.039	0.039	0.039	0.200	0.450
Action 7.7.10: Staff trained in Public Finance management	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.039	0.194
Action 7.7.11: Financial statements prepared and submitted January for half annual and in July for full FY	0.020	0.022	0.022	0.022	0.022	0.022	0.022	0.022	0.109
Action 7.7.12: Financial reports provided once every quarter by 5th day of month after the end of the quarter	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.025
Action 7.7.13: International and domestic financial management conferences and workshops attended to cope with the changing accounting reforms	0.039	0.047	0.052	0.058	0.065	0.065	0.065	0.065	0.262
Action 7.7.14: Safety of Accounts documents(Partition of Accounts Offices) Purchase of Safe, Filing cabinets	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.125
Action 7.7.15: Fleet of Authority Vehicles	0.000	0.500	0.500	0.500	0.500	0.500	0.500	0.500	2.000
Objective 7.8: Establish framework for effective procurement processes in line with PPDA Act and regulations									0.000
Action 7.8.1: User department procurement requests approved by the accounting officer processed on time	0	0	0	0	0	0	0	0	0.000
Action 7.8.2: Evaluation committees constituted and facilitated to undertake various procurements	0.041	0.041	0.041	0.041	0.041	0.041	0.041	0.041	0.207
Action 7.8.3: Contracts committee constituted and facilitated to undertake Authority's procurements	0.026	0.026	0.026	0.026	0.026	0.026	0.026	0.026	0.130
Action 7.8.4: Contracts committee members trained on PPDA rules and regulations	0.010	0.010	0.010	0.010	0.010	0.010	0.010	0.010	0.049
Action 7.8.5: Users departments trained on PPDA rules and regulations	-	0.039	-	-	-	-	-	-	0.039

Annex III: Matrix linking FIA Strategic Plan to NDPIII Framework

NDPIII GOAL	NDPIII theme	NDP III STRATEGIC OBJECTIVES	NDP III DEVELOPMENT STRATEGY	NDP III Programme objectives: Governance and Security	NDP III Programme: Governance and Security programme interventions	Current Development challenges to be addressed	FIA's strategic interventions
To Increase Household Incomes and Improve Quality of Life of Ugandans (Ref: NDP III, page xviii)	Sustainable Industrialization for inclusive growth, employment and sustainable wealth creation. (Ref: NDP III, page xviii)	1. Strengthen the private sector to create jobs. (Ref NDP III key objective 2, Page xviii)	Provide a suitable fiscal, monetary and regulatory environment for the private (Ref: NDP III strategy 6, Page 45)	1. Strengthen policy, legal, regulatory and institutional frameworks for effective governance and security	1. Review and enact appropriate legislation; Domesticating international and regional treaties 2. Review, and develop appropriate policies for effective governance and security 3. Simplify, translate and disseminate laws, policies and standards	Government will continue to support and strengthen the private sector as the main engine for growth, job creation and increased household income to address the various challenges constraining private sector growth including; - slow bureaucratic decision making by the public service, - corruption, case backlog in the judiciary, and - inadequate access to patient capital. In addition, government will continue to provide an enabling environment for private sector growth through; - maintaining macroeconomic stability, provision of long-term finance at affordable rates, - reduction in the amount of domestic arrears and putting in place mechanisms to ensure these are kept low as well as strengthening the use of PPP arrangements. By so doing, both domestic and foreign investors will be incentivized to increase investment in agro-processing, manufacturing, mineral mining and beneficiation and tourism. Insurance will be leveraged to enhance productivity by deepening the insurance industry to increase risk management. (Ref: NDP II, page 45)	Enhance the identification of proceeds of crime and combating of Money Laundering in order to protect the integrity of the financial system and protect the economy from the dangers of money laundering and financing of terrorism. Ensure compliance with the AMLA to strengthen the regulatory environment of the financial system and ensure that all accountable persons comply with AML/CFT obligations Enhance public awareness and understanding of matters related to ML/TF in order to empower the public to take preventive measures, detect and promptly report ML/TF suspicions. Disseminate financial intelligence reports to competent authorities to support administration of justice through prosecution, and tracing and freezing of assets generated from crime. Exchange, spontaneously or upon request any information with similar bodies of other countries that may be relevant for the processing or analyzing of information relating to ML/TF and other transnational crimes

Annex IV: FIA Organogram



Annex V: Retooling Project profile

THE NATIONAL SUMMARIZED STRUCTURE FOR IDENTIFIED PUBLIC PROJECTS	
PROJECT SUMMARY	
Project Title	Retooling of Financial Intelligence Authority
Vote	129
Vote Function	Combating money laundering and countering terrorism financing
Vote Function Code	14
Implementing Agency	FIA
NDP PIP Code	
MFPED PIP Code	00001-129-14
NDPIII Programme	Governance and security
Project Title	Retooling of Financial Intelligence Authority
Location	FIA Head office
Estimated Project Cost	18,062,500,000 UGX
Total expenditure on project related interventions up to start of the next NDP	0
Current stage of project implementation at commencement of the next NDP	Execution
Funding gap at commencement of the NDP	0
Project Duration/Life span (Financial Years)	Date when the project started FY2020/21
	Date when the project is planned to end FY2024/25
Officer Responsible	Executive Director
Already existing in the NDPI	No

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The NDPI	
Already existing in the NDPII	No
Already existing in the MFPED PIP	Yes
PROJECT INTRODUCTION	
Problem Statement	The emerging global, regional and national ML and TF trends have directly placed additional responsibilities on the oversight role of the FIA resulting into an ever expanding scope of Anti Money Laundering (AML) and Countering the Financing of Terrorism (CFT). The FIA is also in the midst of several new development initiatives with an aim of enhancing its physical and operational capacity. Notable of such initiatives is the goAML system project. Coping with the dynamic environment, requires sustained support to FIA operations through equipping the office with ICT, Transport equipment and furniture to create a conducive work environment. The current FIA retooling project, Project 1423: Support to Financial Intelligence Authority expires in June 2020 in line with the conclusion of the NDP II. Therefore, the FIA seeks to build on the benefits that have accrued to the Authority in the current strategic period through requesting for a new re-tooling project for inclusion in the next Project Investment Plan (PIP) for the period 2020 – 2025 in accordance with the NDP III planning guidelines.
	Problem Causes - Limited operational capacity - Emerging new technologies for example Virtue Assets Service Providers (VASPs)

Situation Analysis	In 2013, Uganda enacted the Anti-Money Laundering Act which criminalizes money laundering and also establishes the Financial Intelligence Authority (FIA) as a dedicated institution to combat money laundering activities. The Act imposes certain duties on institutions and other persons, businesses and professions who might be used for money laundering purposes; makes orders in relation to proceeds of crime and properties of offenders; provides for international cooperation in investigations, prosecution and other legal processes of prohibiting and preventing money laundering; designates money laundering as an extraditable offence; and provides for other related matters. In June 2015 Parliament of Uganda passed amendments to the Anti-Terrorism Act 2002 criminalizing and making it compliant with international standards on combating Terrorism Financing. Under the amendment the role to freeze, seize and confiscate assets of suspected terrorists was given to FIA. With the support received under the current retooling project, FIA was able to procure 6 motor vehicles, 40 computers, other assorted ICT infrastructure comprising of 2 photocopiers and 2 software packages and 17 office work stations, chairs and partitioning of office premises. These tools supported FIA operations in terms of conducting some AML/CFT onsite inspections of accountable persons on a risk based approach and conducting AML/CFT public awareness through sensitisation of public in various regions of the country. However, the Project has suffered several budgetary cuts in the previous year. The project was estimated to spend UGX 6,405,000,000. However, at the end of the project UGX 1,985, 000,000 was disbursed representing 30.9 % which is far below the development plans of the Authority. The Authority was not able to accomplish a number of activities which were critical in meeting its mandate of fighting against Money Laundering and Terrorism Financing
Relevance of the project idea	Being a new Authority established in 2013, FIA needs to increase its asset base to be able to undertake the mandate of fighting money laundering and terrorist financing. The Authority requires transport equipment, computers, office furniture and software for specialized analytical packages, capacity development and office equipment procurements.
Stakeholders	Direct beneficiaries I) FIA Staff II) All votes under Governance and security programme. This is because, FIA is expected to disseminate information vital for the administration of enforcement of law and order. Therefore, it plays a critical link between crimes investigation Agencies and the prosecution Authorities. In particular, the stakeholders include but not limited to the following; Uganda Police Force - Criminal Investigation Unit and Counter Terrorism Unit, Uganda Revenue Authority, Director of Public Prosecution, Inspectorate of Government, Internal Security Organisation, Chieftancy of Military Intelligence, Uganda Registration Services Bureau, NGO Bureau
	Indirect beneficiaries I) General public
	Likely project affected persons None

Project objectives/outcomes	The goal of the project is to acquire sufficient operational tools for use in minimizing the Money Laundering, Terrorist Financing and Proliferation Financing national risk profile of Uganda's financial system
	Outcome : Increased integrity of financial system to support economic growth and development
Project inputs/activities/interventions	Inputs: Transport equipment, office furniture, ICT equipment
	Activities: Procurement of 6 vehicles for Directors , Procure 6 vehicles for Managers, Procure 8 Pool Vehicles for field operations, Procure 2 Motorcycles, Procurement of 65 Hardware (Computers – laptops and desktop computers), Procure 7 Software packages and Implementation of information Security solutions such as Commvault solution, Data loss prevention solution, Check point solution, Device tracking solution, Network monitoring solution, Cisco firepower full suite, Procure period licenses to support the computer software packages and running applications , Acquire Enterprise Resource Planning (ERP) System, Upgrade goAML system to enterprise version with improved Business processes and implementation of the goAML integration API (Application Programming Interface), Acquire 65 Cisco IP phone solution and hardware, Procure Forensic analysis equipment, Procure 65 set of Furniture Chairs desks, tables and other assorted

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	items, Procure 65 pieces of filing cabinets, office shelves, safe and other accessories, Acquire 8 scanners to be deployed at Border points for detection of undeclared cash and bearer negotiation instruments
STRATEGIC OPTIONS	
Strategic options	Alternative means of solving the problem stating the advantage and disadvantages of each Do minimum/Business as usual Constant breakdown of vehicles which will lead to inefficiencies in delivering services, the cost of constant repair is also high. Additional Staff would have no tools of work like computers and furniture Implement the project Efficiency in service delivery
	Alternative means of financing stating the advantages and disadvantages of each Traditional Public Sector Funding Option This ensures timely availability of funds to execute the project although resources are limited PPP Funding Option Private Public Partnership. Retooling is not a project that brings returns and therefore would not be of interest to the private sector
	Selected approach, highlight reasons for the superiority of the proposed approach/project Traditional Public Sector Funding Option to be adopted because private sector is interested in high return projects
Coordination with government agencies	FIA coordinates with law enforcement agencies through dissemination of financial intelligence. These include Uganda Police, DPP, IGG, URA, UWA etc

PROJECT ANNUALISED TARGETS (OUTPUTS)

Project annualized targets

Indicate how success will be measured (use format presented in appendix 1)

Output 1: Accumulated asset base of transport equipment for the Authority

Item	Item Description	Qty	Unit Cost	GoU contribution in UGX
Transport Equipment	Procurement of vehicles, for Directors	6	300000000	1800000000
	Procurement of vehicles for Managers	8	250000000	2000000000
	Pool Vehicles for field operations	8	250000000	2000000000
	Motorcycles	2	200000000	400000000
	Sub Total		820000000	5840000000

Output 2: Modern ICT infrastructure for both hardware and software acquired

Item	Item Description	Qty	Unit Cost	GoU contribution in UGX
ICT Infrastructure	Hardware(Computers – laptops and desktop computers)	65	3500000	227500000
	Software packages and licenses (information security tools)	7	250000000	1750000000
	Licenses	25%		437,500,000
	Enterprise Resource Planning System	1	1000000000	1000000000
	Upgrade GoAML and procurement of Application Programming Interface (API)	1	1070000000	1070000000
	Office IP phones with calling soft ware	65	7500000	487500000
	Procurement of Forensic analysis equipment	1		4000000000
	Sub Total		2338000000	8972500000

Output 3: Accumulated office equipment and furniture

Item	Item Description	Qty	Unit Cost	GoU contribution in UGX
Office furniture	Furniture Chairs desks (work stations) 65, chairs – 65 and other assorted items		Assorted	1000000000
Office Equipment	filling cabinets, office shelves, safe and other assorted items for the 65 staff			650000000
Scanners	Acquire scanners to be deployed at Border points for detection of undeclared cash and bearer negotiation instruments		200000000	1600000000
	Sub Total			3250000000

ESTIMATED PROJECT COST AND FUNDING SOURCES

Project annualized cost	Year 1	Year 2	Year 3	Year 4	Year 5	Total cost
Cost (UGX mill)	7,542,500,000	3,772,500,000	5,952,500,000	397,500,000	397,500,000	18,062,500,000

RESULTS MATRIX

Results matrix

Project Goal	Indicator	Performance Indicators						Means of Verification	Assumptions	Risks
		Baseline FY2018/19 (SMART)	Target FY2020/21 (SMART)	Target FY2021/22 (SMART)	Target FY2022/23 (SMART)	Target FY2023/24 (SMART)	Target FY2024/25 (SMART)			
Project Goal: The goal of the project is to acquire sufficient operational tools for use in minimizing the Money Laundering, Terrorist Financing and Proliferation financial risk profile of Uganda's financial system	Indicator 1: Number of assets acquire to support operational efficiency and effectiveness of Financial Intelligence Authority (FIA)	Number (67)	47	39	35	21	21	Assets Register		
Outcomes										
Outcome 1: Increased integrity of financial system to support economic growth and development	Indicator 1: Proportion of Suspicious Transactions reports where ML/Tf/Pf cases are confirmed after analysis	16%	20%	25%	30%	35%	40%	Suspicious Transactions Reports Register, financial intelligence reports dissemination register	The equipment requested for shall be provided as per plan. Increased effectiveness in analysis of STRs	Ever evolving technology and technology tools
Outputs										
Output 1: Accumulated asset base of transport equipment for the Authority	Indicator 1: Number of transport equipment procured	6	11	7	4	2	0	Assets register	Funds shall be availed as projected, Price changes shall be within the estimated ranges	Change in policy on procurement of transport equipment

Activity 7: Procure Forensic analysis equipment						
Output 3: Accumulated office equipment and furniture						
Activity 1: Procure 65 set of Furniture Chairs desks, tables and other assorted items						
Activity 2: Procure 65 pieces of filing cabinets, office shelves, safe and other accessories						
Activity 3: Acquire 8 scanners to be deployed at Border points for detection of undeclared cash and bearer negotiation instruments						

