THE REPUBLIC OF UGANDA

NATIONAL STRATEGY

TO FIGHT CORRUPTION AND REBUILD ETHICS AND INTEGRITY IN UGANDA
2008-2013

Directorate for Ethics and Integrity
OFFICE OF THE PRESIDENT
UGANDA
NATIONAL STRATEGY

TO FIGHT CORRUPTION AND REBUILD ETHICS AND INTEGRITY IN PUBLIC OFFICE
2008-2013

Vision
A society that demands quality service, and has a zero tolerance for corruption and a public service with integrity that delivers value for money, accountability, transparency

Options:
A society with integrity that demands zero tolerance for corruption
A society that cherishes integrity and demands zero tolerance for corruption
A society that demands quality service, has zero tolerance for corruption and cherishes accountability, transparency and integrity

Strategic Objectives
1. Effective political leadership in the fight against corruption;
2. Increased public demand for accountability and rejection of corruption;
3. Effective enforcement of anti-corruption measures;
4. Enhanced compliance and accountability by public service organisations;
5. Strengthened implementation of NACS
Executive Summary

The National Anti Corruption Strategy (NACS) is a five year planning framework designed to make a significant impact on building the quality of accountability and reducing the levels of corruption in Uganda. It focuses on people, systems, and organizations and on building a culture where integrity is valued and corruption is rejected. It seeks to support national development that will for the future be able to sustain; a better quality of life for people; a strong competitive economy; effective and efficient public services.

The NACS addresses anti-corruption policy within a national framework so as to guide policies, and programmes. It is strategic as it offers a broad, medium-term, comprehensive approach to achieve more effective accountability and reduced corruption. It is systematic as it seeks to ensure that systems of accountability work for the benefit of people and organizations and to ensure that different systems properly relate to each other.

The NACS sets an ambitious agenda to achieve a public service that appreciates and embraces integrity; accepts the need for transparency and accountability; ensures full compliance with regulatory and legal requirements. It seeks to achieve a well informed public that demands high standards from public officials and a private sector that operates on a level playing field and acts as a partner in the fight against corruption. It seeks the active support of the Legislature to set a national example, deliver legislation and lead the fight against corruption.

The NACS is set within the overall policy framework of Zero Tolerance and national planning and seeks to support the implementation of government policies in the area of good governance. It is set with the institutional framework provided by the Sector Wide arrangements and under the umbrella of the Inter Agency Forum (IAF) that provides a key coordination mechanism for all anti-corruption agencies and institutions with a role in furthering the aims of the NACS. The legal framework is provided by a wide range of legal instruments listed within the document and this framework continues to grow and deepen.

In developing the context for the NACS a brief situation analysis is provided that highlights the international and global reality of widespread corruption. It recognises that corruption in Uganda is institutionalised and the consequences are substantial for the social and economic fabric of Ugandan society, with the burden resting most heavily on the poorest people. It suggests the enormous benefit to be gained for Uganda if this heavy burden of corruption can be removed.

In developing the analysis further the NACS identifies key aspects of society that enable corruption to exist and flourish. These include:

- Public beliefs and attitudes;
- Ineffective accountability systems;
- Lack of political leadership and accountability;
- Moral decay in public service;
- Limited capacity of anti-corruption agencies and the judicial system;
- Delays in the legislative framework;
These issues are addressed as part of the overall strategy.

The Vision for the NACS is set as

**A society that cherishes integrity and demands zero tolerance for corruption**

This represents an important statement of intent to address corruption as being an issue for every citizen of Uganda and requiring a wide national approach and commitment to address the fundamental changes that are needed if society is to effectively defeat the scourge of corruption.

The strategic objectives identified are:

- **Effective political leadership in the fight against corruption**;
- **Increased public demand for accountability and rejection of corruption**;
- **Effective enforcement of anti-corruption measures**;
- **Enhanced compliance and accountability by public service organisations**;
- **Strengthened implementation of NACS**

Collectively these objectives aim to build the necessary leadership, public demand, enforcement and accountability systems as well as the capacity of anti-corruption agencies to undertake their business more effectively.

The NACS recognises the independent role of all participating agencies and supports all members of the Inter Agency Forum in implementing their respective mandates. However, a high level of interdependence exists between all anti-corruption agencies and the need for mutual support and active cooperation is emphasised.

A great deal of emphasis is placed on the need to ensure effective implementation of the NACS and so a strong monitoring and evaluation structure is put in place. In addition the strategy seeks an active dialogue with all stakeholders and promotes the introduction of anti-corruption actions plans throughout public service organisations and sectoral groups. Developing strategic alliances to achieve this will be essential.

The National Anti-Corruption Strategy is an over-arching policy and approach that is intended to address key issues that are central to moving the anti-corruption agenda forward over the next five years.
Section 1: Background to the National Anti Corruption Strategy (NACS)

1.1 The Purpose of the NACS

This National Anti Corruption Strategy (NACS) is a five year planning framework designed to make a significant impact on building the quality of accountability and reducing the levels of corruption in Uganda. Its focus is on people, on systems, on organisations and on building a culture where integrity is valued and corruption is rejected. It seeks to support national development that will for the future be able to guarantee and sustain:

- A better quality of life for people
- A strong, competitive economy
- Effective and efficient public services

This Strategy is

- **national** – it provides a national framework to guide policies and programmes
- **strategic** – it offers a broad, medium-term, comprehensive approach to achieve more effective accountability and reduced corruption.
- **systematic** – it seeks to ensure that systems of accountability work for the benefit of people and organisations and to ensure that different systems properly relate to each other.

The NACS sets an ambitious agenda to achieve a public service that: appreciates and embraces integrity; accepts the need for transparency and accountability; ensures full compliance with regulatory and legal requirements. It seeks a well informed public that demands high standards from public officials and a private sector that operates on a level playing field and acts as a partner in the fight against corruption. It seeks the active support of the Executive and Legislature to set a national example, deliver legislation and lead the fight against corruption.

In addressing these issues The National Anti Corruption Strategy will:

- Guide Government Ministries, Departments and Agencies (MDAs) and local governments in formulating anti-corruption policies and action plans
- Promote an active and open engagement with the public and with stakeholder groups to improve access to information and the public demand for accountability
- Identify key linkages between policies and successful anti-corruption action
- Provide a framework for the capacity development of anti-corruption agencies
- Inform national strategic policy planning and decision making.
1.2 The Policy, Institutional, and Legal Framework

1.2.1 Policy Framework

Zero Tolerance: This Strategy spells out the Government’s approach to tackle corruption and details priority actions and targets over the next five years. This is the expression of the Government 2006 election manifesto\(^1\) where it declared, “**NRM shall implement a zero-tolerance policy on corruption.**” In this context, zero tolerance has been defined as:

“Taking prompt and decisive action to respond to all incidences of corruption; actively promoting ethical conduct; effectively implementing measures to prevent occurrences of corruption in society; widely disseminating the results of the actions taken”\(^2\).

The implications of this policy are substantial and will require a major change in the way Ugandan society operates if a culture is to be created where all forms of corruption are confronted and rejected. Devising and delivering such a policy will be a significant challenge.

National Planning Framework: The NACS supports the achievement of key national priorities. National planning emphasises the drive to modernise the economy and eradicate poverty. The planning framework provides the context and focus for the NACS. Tackling corruption and realising improvement in the quality of accountability will enable better decision making and the more effective use of resources. Removing corruption would have the effect of improving the quality and consistency of service delivery to the people of Uganda and the potential to have a major impact on the quality of life.

1.2.2 Institutional Framework

Anti-Corruption Agencies: Anti corruption policy and action is managed by a range of agencies. The primary anti-corruption agency is the Inspectorate of Government (IG) which is constitutionally independent and carries a wide mandate in the fight against corruption as well as the Ombudsman function. A number of other bodies have functions closely related to anti-corruption action but hold mandates where corruption is but one element. These include the Directorate of Public Prosecution (DPP), Criminal Investigation Directorate (CID) and the Public Procurement and Disposal of Public Assets Authority (PPDA). The Directorate of Ethics and Integrity (DEI) coordinates anti-corruption policy and provides political leadership. All these bodies are in membership of the Inter Agency Forum (IAF) which provides a coordinating mechanism (Annex I).

Sectors: The NACS will be most closely work with the Accountability and Justice, Law and Order Sectors. However a major challenge for the NACS is to reach out to all sectors and to ensure that pro-active anti-corruption policies become the norm in every sector and in all public sector bodies.

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\(^1\) PROSPERITY FOR ALL, TRANSFORMATION AND PEACE; NRM Election Manifesto 2006

\(^2\) Directorate of Ethics and Integrity January 2008
1.2.3 **Legal Framework**

The anti-corruption policy is governed by the following legal provisions:

**Legal framework:**
- The Constitution of Uganda;
- The Penal Code Act (until the Anti-Corruption Bill in enacted);
- The Public Finance and Accountability Act, 2003;
- Budget Act, 2001
- The Local Governments Act, 1997;
- Leadership Code Act, 2002;
- Inspectorate of Government Act, 2002;
- The Public Procurement and Disposal of Public Assets Act, 2003;
- The Prevention of Corruption Act, 1970;
- Access to Information Act, 2005
- Public Service Standing Orders
- The Audit Act, 2008;

**Pending legislation includes:**
- Anti-Money Laundering Bill, 2005
- The Anti-Corruption Bill, 2008;
- Whistle Blower Bill, 2008

**International Treaty Obligations**

Uganda has subscribed to a number of international treaties and regional organisations whose operation has direct relevance for the manner in which accountability issues are addressed:
- United Nations Convention on the suppression of the financing of terrorism (1999);
- United Nations Convention (the Vienna Convention) against illicit traffic in narcotic drugs and psychotropic substances (1998);
- United Nations Security Council Resolution 1373;
- East African Community and East African Customs Union
- New Partnership for African Development (NEPAD)
- East and Southern African Anti-Money Laundering Group (ESAAMLG)
1.3 Situation Analysis

Corruption as a global issue: Corruption exists in all countries. It has become a global as well as a national problem. Large-scale corruption frequently involves international transactions and players. A globalised banking system has enabled the easy movement of financial resources across international boundaries. The World Bank has estimated that the world-wide cost of bribery alone amounts to $1 trillion. This does not take account of the misuse of public resources or embezzlement. A study by the International Monetary Fund indicates that corruption can reduce a country’s GDP by more than 0.5 percent.

For Uganda while most corruption is associated with localised events there is every reason to believe that corruption is becoming more sophisticated and utilising the international banking system in order to minimise the risk of detection and repatriation of assets.

Corruption in Uganda: The conclusion of the African Peer Review Mechanism (APRM) on the reach of corruption in Uganda is that “all informants including political leaders and appointed officials agreed that corruption is now institutionalised.”3 This view is supported by a wide range of inquiries, investigations, assessments and reports, both national and international. It is also supported by public opinion that consistently perceives high levels of corruption in political and public service institutions and believes that corruption impacts on every aspect of life in Uganda.

It is the consequences of institutionalised corruption that must concern us and in particular the actions that are needed to bring about fundamental change. The consequences for Uganda are substantial. The most visible signs are the collapsing roads and crumbling infrastructure, inadequate facilities and poor quality services, despite investment. The burden of this capture of public resources by vested interests weighs most heavily on the poor and on small business and locks people into an ever ending cycle of poverty.

What is not so obvious is the potential that is wasted through this misuse of scarce public funds. For example, the World Bank research suggests that there is a '300% governance dividend'4 where countries improve on control of corruption and rule of law. This would represent a four-fold increase in incomes per capita and potentially move Uganda to being categorised as a middle income country. Similarly the quality and effectiveness of services could dramatically alter. A reduction in child mortality by two-thirds would not be unattainable as it seems now if corruption was effectively tackled.

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1.4 What is driving corruption today

There are many aspects of Ugandan society that enable corruption to exist and flourish.

Public beliefs and attitudes: The public continue to admire and support those who accumulate wealth through corruption. People do not question the source of such wealth or the loss of public services that result. In addition very deeply ingrained beliefs such as that corrupt people are intelligent or that corruption is an entitlement of political or tribal support are a serious barrier to building corruption resistance. While the demand for accountability is increasing due to the work of civil society organisations (CSOs) and anti-corruption agencies there is still a long way to go bring about a situation where the public actively demand effective service delivery and proper accountability. Bringing about change in this area must be an important priority for the NACS.

Ineffective accountability systems: Considerable progress has been made in Uganda in developing core skills in accountancy, auditing, economics and computer technology. The issue of accountability in Uganda now is focused primarily on:

- adherence to established regulations and legal requirements;
- inadequate political and administrative oversight;
- political decisions that fail to take account of available resources;
- willingness to hold those who are responsible for loss of public funds fully accountable;
- corrupt practices that adjust to and manipulate new accountability systems as they arise.

It is a challenge to ensure that laws and regulations are adhered to and the NACS must seek ways to enhance compliance.

Lack of political leadership and accountability: Corruption and limited accountability is evident at all levels of the political establishment e.g. in matters of public procurement; interference in recruitment and promotions; exercising undue influence; bribery; misuse of funds; buying votes; forging academic papers etc. This has an impact way beyond the individual event and creates a public acquiescence to corruption as being a part of normal or accepted behaviour and to be copied. The overlapping roles, misunderstandings and direct interference that too often characterises the relationship between Accounting Officers and their political masters is an area that requires clarification. This reality of “low standards in high places” in Uganda is a fundamental issue to be addressed, primarily by the political system.

Moral decay in public service: Issues of low pay and poor conditions have a direct relevance to corruption. Low paid public servants who are in a position to withhold a service or extract bribes will often do so to gain additional income. Indeed the National Integrity Survey of 2003 recorded that the public displayed understanding and acceptance of this situation. At the same time, it is also clear that increasing salaries, however justified, will not of itself remove corruption. It is in this context that the overall reform of the public service systems, including pay reform, reorientation towards greater productivity, providing quality services and ensuring accountability and value for
Money are central in ensuring a more effective public service and reducing opportunities for corruption.

**Limited capacity of anti-corruption agencies and the judicial system:** The anti-corruption agencies face significant issues of capacity and resources. In all cases the limited financial and human resources and organisational capacity pose major challenges for the agencies in tackling complex corruption cases. Gathering of evidence and securing the cooperation of witnesses presents technical as well as resource constraints and challenges. The situation is made considerably more difficult by the weakness in the operation of the judicial system which means that cases are delayed for prolonged periods and regularly postponed. Overall the impact of this situation is to convey a message that corruption is a low-risk activity.

**Delays in the legislative framework:** There are delays in passing key legislation to modernise and update the legal framework. This very slow pace of change means that punishments do not reflect the crime and therefore cannot act as a deterrent to corruption.

NACS will specifically address all of these issues in the following sections.

From this analysis it is clear that a sustained effort on the part of all elements of society will be necessary to control and reduce corruption. It is important that policies and actions drive the anti-corruption agenda forward at an altogether faster pace than has been achieved to date if corruption is to be made a high-risk activity. Consistent and committed political action to tackle corruption and win the trust of the people on this key issue will be essential to making real progress. It is important that the NACS seeks to achieve a focus on impact and ensuring effective implementation of anti-corruption policy.
Section 2: National Anti Corruption Strategy (NACS)

2.1 Introduction - National Effort to fight corruption

Anti-corruption action cannot succeed if it is isolated within the anti-corruption agencies. It must also be the responsibility of all of society including public agencies and the political leadership to ensure that accountability is a primary concern and corruption prevented and tackled wherever it arises. The strategy that follows places the emphasis on a broad national effort while identifying specific institutional responsibilities as they apply.

2.2 Public Service Accountability

The Government has decided that arising from this strategy and zero tolerance policy, all public agencies will devise corruption risk assessments and anti-corruption action plans for their institutions and will provide a published annual report to fully account for all actions taken to prevent and eliminate corruption. It will be the responsibility of the Directorate of Ethics and Integrity (DEI) under this strategy to coordinate the implementation of these efforts and to report annually to Cabinet on progress achieved. It is the intention of Government that this strategy acts as an over-arching national policy to guide our common efforts. What follows are the specific objectives, activities and responsibility centres. It is essential that all public agencies fully support the aims of this strategy and take responsibility for the implementation of the activities contained in this strategy.
2.3 Strategic Objectives

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Strategic Objectives

1. Effective political leadership in the fight against corruption;

2. Increased public demand for accountability and rejection of corruption;

3. Effective enforcement of anti-corruption measures;

4. Enhanced compliance and accountability by public service organisations;

5. Strengthened implementation of NACS
Objective 1: Effective political leadership in the fight against corruption
This objective seeks to achieve an environment in which public belief and trust in government’s commitment to zero tolerance is enhanced by clear and consistent policies, decisions and actions.

Strategies:
- Demonstrate political commitment to zero tolerance
- Increased efficiency and effectiveness of oversight institutions

<table>
<thead>
<tr>
<th>Expected Outcomes:</th>
<th>Key Outputs:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Political corruption reduced</td>
<td>Consistent and visible political action against corruption</td>
</tr>
<tr>
<td>Increased public support for political action against corruption</td>
<td>Political integrity codes of conduct implemented</td>
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<tr>
<td>Significant increases in quality and consistency of public service accountability</td>
<td>Programme of legislation passed into law</td>
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</tbody>
</table>

Critical Success Factors:
- Political commitment to drive the agenda
- Consistent adherence to rule of law and regulation
- Adequate resources to ensure effective oversight function

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Key Activity</th>
<th>Output</th>
<th>Timelines</th>
<th>Resp. Centre (P) = Primary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demonstrate political commitment to zero tolerance</td>
<td>Cabinet publicly endorses NACS</td>
<td>Political endorsement of NACS</td>
<td>August 2008</td>
<td>Cabinet Secretariat (P)</td>
</tr>
<tr>
<td></td>
<td>Cabinet considers annual reports on NACS implementation</td>
<td>Annual NACS implementation review</td>
<td>August 2009 + annual</td>
<td>Cabinet Secretariat (P) DEI</td>
</tr>
<tr>
<td></td>
<td>Integrity Code of Conduct adopted by Cabinet</td>
<td>Cabinet Integrity Code of Conduct</td>
<td>Jan 2009</td>
<td>Prime Minister (P) DEI</td>
</tr>
<tr>
<td>Increased efficiency and effectiveness of oversight institutions</td>
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<tr>
<td>Regulate political party funding</td>
<td>Political Parties Funding Bill 2008 enacted</td>
<td>June 2009</td>
<td>Speaker of Parliament</td>
<td></td>
</tr>
<tr>
<td>Monitor use of and impact of Code of Conduct for Local Governments</td>
<td>Local Governments Integrity Code of Conduct</td>
<td>Dec 2009</td>
<td>MoLG (P)</td>
<td></td>
</tr>
<tr>
<td>Implement the Local Government Good Governance and Anti Corruption Strategy</td>
<td>Strategy implemented in all Districts in Uganda</td>
<td>2011</td>
<td>MoLG</td>
<td></td>
</tr>
<tr>
<td>Undertake a review of the relationship between Ministers and Permanent Secretaries / Accounting Officers</td>
<td>Codification of relationship completed</td>
<td>Dec 2010</td>
<td>Cabinet Secretariat (P) MoPS / DEI</td>
<td></td>
</tr>
<tr>
<td>Increase support for Parliamentary Committees to effectively undertake oversight activities</td>
<td>Reports of Parliamentary Committees completed in a timely and effective manner</td>
<td>July 2009</td>
<td>MoFPED (P) / Speaker of Parliament</td>
<td></td>
</tr>
<tr>
<td>Issuance of Treasury Memoranda is brought up to date</td>
<td>Accountability cycle is completed annually</td>
<td>Dec 2010</td>
<td>PAC (P) LGPAC (P)</td>
<td></td>
</tr>
<tr>
<td>Timely passage of NACS legislation</td>
<td>Programme of NACS legislation completed</td>
<td>Dec 2009</td>
<td>Speaker of Parliament (P) / DEI</td>
<td></td>
</tr>
<tr>
<td>Reports of IG are considered by Parliament on a half-yearly basis</td>
<td>Parliamentary Reports</td>
<td>December 2009</td>
<td>Speaker of Parliament (P) Committee on Legal and Parliamentary Affairs / IG</td>
<td></td>
</tr>
<tr>
<td>Improve Local Government institutional oversight and enforcement</td>
<td>Local Government management functions enhanced Institutional oversight and enforcement of Local Government enhanced</td>
<td>December 2011</td>
<td>MoLG LGPAC</td>
<td></td>
</tr>
</tbody>
</table>
## Indicators:
- Consistent anti-corruption political statements and actions
- Compliance by Cabinet with public procurement legislation and regulations
- Code of Conduct adopted by Parliament
- Code of Conduct adopted by 50% of Local Governments by December 2009
- Public awareness of GOU anti-corruption commitment and action
- Public confidence levels in Government and Parliament in addressing corruption
- PACs with resources and capacity to conduct oversight function
- Issuance of Treasury Memoranda up to date and issued annually
- Passage of anti-corruption legislation
- Action taken by Parliament on reports of IG
- Passage of political party funding legislation

## Objective 2: Increased public demand for accountability and rejection of corruption

It is a challenge for the NACS to address issues of empowerment and winning the support of the public for the fight against corruption. This intervention seeks to encourage public confidence to demand accountability.

### Strategies:
- **Strengthen civic competence to demand for performance and accountability**
- **Strengthen capacity of the public to resist and prevent corruption**
- **Strengthen the framework for participation of non-state actors**

### Expected Outcomes:

<table>
<thead>
<tr>
<th>Expected Outcomes</th>
<th>Key Outputs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increased public awareness of anti-corruption actions</td>
<td>Systematic public reporting of anti-corruption actions</td>
</tr>
<tr>
<td>Increased public demand for information</td>
<td>Client Charters in place for all MDAs</td>
</tr>
<tr>
<td></td>
<td>Community expenditure tracking programmes in place and working in all Districts</td>
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<td></td>
<td>Regular and systematic analysis of public opinion</td>
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<td></td>
<td>Annual reporting on implementation of the Access to Information Act</td>
</tr>
<tr>
<td></td>
<td>Systematic enforcement of information storage standards</td>
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<tr>
<td></td>
<td>Public awareness and education programmes operating</td>
</tr>
</tbody>
</table>

### Critical Success Factors:
- Public trust and confidence in Government action on corruption
- Public willingness to engage in anti-corruption campaigns
- Capacity of CSOs to engage with Government at a policy level
<table>
<thead>
<tr>
<th>Strategy</th>
<th>Key Activity</th>
<th>Output</th>
<th>Timelines</th>
<th>Responsibility Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enhance information on accountability and anti-corruption action</td>
<td>Six monthly publication of anti-corruption progress reports</td>
<td>December 2008 + six monthly intervals</td>
<td>DEI (P) / IAF / ACPPP Steering Committee</td>
<td></td>
</tr>
<tr>
<td>Implement and monitor Client Charters for all Ministries, Departments and Agencies (MDAs) and monitor impact</td>
<td>Publicly available client information and client rights Impact reports</td>
<td>December 2010</td>
<td>MoPS (P) / DEI</td>
<td></td>
</tr>
<tr>
<td>Research and establish experimental social accountability projects</td>
<td>Community reporting on public service performance</td>
<td>July 2009</td>
<td>Accountability Sector (P) IAF / ACPPP</td>
<td></td>
</tr>
<tr>
<td>Initiate experimental community expenditure tracking programmes</td>
<td>Expenditure plans translated into local priorities</td>
<td>July 2009</td>
<td>Accountability Sector (P)</td>
<td></td>
</tr>
<tr>
<td>Conduct regular public opinion research</td>
<td>Annual public opinion poll NIS every two years</td>
<td>July 2009 + annual NIS?</td>
<td>DEI (P) IG (P)</td>
<td></td>
</tr>
<tr>
<td>Provide annual reporting on implementation as specified in Access to Information Act, 2005</td>
<td>Annual Ministerial Statements report on implementation of the Act Annual report on the implementation of the Act</td>
<td>First reports no later than 2010 cycle</td>
<td>Head of the Public Service / MoFPED (P) OPM (P)</td>
<td></td>
</tr>
<tr>
<td>Implement information storage and archive standards</td>
<td>Established standards of record keeping disseminated and enforced</td>
<td>Dec 2009</td>
<td>MoPS (P)</td>
<td></td>
</tr>
<tr>
<td>Initiate an annual anti-corruption IEC campaign to promote public participation, awareness and ownership</td>
<td>Increased public engagement with corruption issues</td>
<td>Dec 2009</td>
<td>IAF / ACPPP (P)</td>
<td></td>
</tr>
<tr>
<td>Identify and promote national values as core values for society</td>
<td>Increased national consensus on integrity based values</td>
<td>Dec 2009</td>
<td>DEI (P)</td>
<td></td>
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</tbody>
</table>
| Initiative                                                                 | Outcome                                                                 | Timeline  | Responsible
|---------------------------------------------------------------------------|-------------------------------------------------------------------------|-----------|----------------
| Initiate a national awards scheme to recognise integrity and exemplary service | National recognition of individuals who have served the nation          | Dec 2010  | DEI (P)
| Devise and promote integrity forming programmes aimed at young people     | Increased integrity awareness among young people                        | Dec 2011  | DEI / ACPPP MoES (P)
| Promote the development and implementation of codes of conduct among all professional groups and associations | Increased adherence by professionals and their associations to established standards and codes | Dec 2012  | DEI / ACPPP (P)
| Operationalise the Anti-Corruption Public Private Partnership (ACPPP) framework | ACPPP detailed workplan                                                 | Dec 2008  | ACPPP Steering Committee (P)
| Implement three year ACPPP Action Plan                                    | Three year Actions Plan operational. Joint activities undertaken in areas of Capacity Building, Research, Policy and advocacy | Dec 2009  | ACPPP Steering Committee (P) + annual
| Engage the private sector and media as key non-state actors in anti-corruption action | Increased cross-community support                                         | Dec 2010  | IAF / DEI (P)
| Pursue the development of the concept and operation of public private partnerships to increase effective service delivery and accountability | Increased collaboration between state and non-state actors               | Dec 2011  | ACPPP Steering Committee (P) MoPS
| Conduct annual consultative forum to review ACPPP and implementation of NACS | Annual assessment on implementation of NACS and ACPPP joint action       | Dec 2009  | ACPPP Steering Committee (P) + annual

**Indicators:**
- ✓ Public awareness of GOU anti-corruption actions
- ✓ Ministerial reporting on Access to Information Act, 2005, incl:
  - o Number of information requests received
  - o Number of information requests refused
- ✓ Implementation of ACPPP action plan on all key areas
- ✓ Joint actions undertaken with all Key non-state actors
- ✓ Annual review completed
Objective 3: Effective enforcement of anti-corruption measures

Making legal and administrative sanctions effective is a core requirement of anti-corruption policy. Currently sanctions are seen to be weak and ineffective. This situation must be redressed. Corruption does not stand still. It evolves to open new avenues when the authorities improve old systems. It is therefore essential that the judicial and legislative framework continuously evolves to meet the new challenges posed by corruption.

Strategies:
- Strengthen the legislative, judicial and investigative framework to combat corruption
- Increase public confidence in the quality and effectiveness of anti-corruption actions
- Strengthen compliance with international standards and obligations

Expected Outcomes:
- Public trust in Government anti-corruption actions increased
- Successful prosecutions increased
- Increased regional cooperation against corruption
- Anti-Corruption Court fully operational
- Efficiency of corruption case disposal increased
- Improved public information
- Regular legislative review undertaken
- Impact of legislation assessed
- Compliance with UNCAC
- EAC anti-corruption cooperation established and working
- Mutual legal assistance arrangements operating

Critical Success Factors:
- Resources for implementation
- Active stakeholder cooperation and assistance
- Parliamentary support

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Key Activity</th>
<th>Output</th>
<th>Timelines</th>
<th>Resp. Centre (P) = Primary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strengthen the legislative and judicial framework to combat corruption</td>
<td>Initiate the Special Anti-Corruption Court</td>
<td>Special Anti-corruption Court operational</td>
<td>Dec 2008</td>
<td>Judiciary (P) MoJCA (P) IG / DPP / DEI</td>
</tr>
<tr>
<td></td>
<td>Strengthen cooperation with JLOS to improve the handling of corruption cases</td>
<td>Improved disposal of corruption cases</td>
<td>Dec 2009</td>
<td>DEI (P)</td>
</tr>
<tr>
<td></td>
<td>Strengthen the IAF legal</td>
<td>Regular review and</td>
<td>July 2009</td>
<td>DEI (P)</td>
</tr>
<tr>
<td>Task</td>
<td>Goal</td>
<td>Time</td>
<td>Responsible Party</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Working Group to undertake effective development, harmonisation and monitoring of anti-corruption legislation</td>
<td>updating of anti-corruption legislation and regulation</td>
<td></td>
<td>IAF</td>
<td></td>
</tr>
<tr>
<td>Initiate inter-sectoral consultations to ensure effective coordination of legislative developments</td>
<td>Harmonisation of legislation</td>
<td>July 2009</td>
<td>IAF Legal Taskforce (P) Accountability Sector</td>
<td></td>
</tr>
<tr>
<td>Monitor the impact of anti-corruption legislation on enforcement</td>
<td>Analysis of all corruption prosecutions taken. Analysis of the effectiveness of anti-corruption legislation</td>
<td>July 2009 + annual</td>
<td>DEI (P)</td>
<td></td>
</tr>
<tr>
<td>Prepare a framework to strengthen the confiscation of assets</td>
<td>New instrument / mechanism to enable confiscation of assets</td>
<td></td>
<td>IAF Legal Taskforce (P)</td>
<td></td>
</tr>
<tr>
<td>Identify and implement measures to improve corruption technical investigations</td>
<td>Preparation and presentation of corruption cases improved</td>
<td>July 2011</td>
<td>IG / CID / DPP / JLOS (P) DEI</td>
<td></td>
</tr>
<tr>
<td>Strengthen the use of administrative action as an important mechanism enhance the combination of prevention and sanction</td>
<td>More effective use of administrative sanction Reduced pressure on judicial system</td>
<td>December 2010</td>
<td>DEI / MoPS (P) JLOS IAF</td>
<td></td>
</tr>
<tr>
<td>Increase public confidence in the quality and effectiveness of anti-corruption actions</td>
<td>Develop systematic improvements in the management and support of witnesses</td>
<td>Quality of evidence improved</td>
<td>July 2010</td>
<td>IG/CID/ DPP /JLOS (P) DEI</td>
</tr>
<tr>
<td>Provide regular public information briefings on case management and the delivery of justice (administrative and criminal)</td>
<td>Improved information for the public</td>
<td>Jan 2010</td>
<td>IAF / DEI (P)</td>
<td></td>
</tr>
<tr>
<td>Develop user friendly information on anti-corruption legislation and regulation for public</td>
<td>Public Information documents</td>
<td>July 2009</td>
<td>IAF Legal Taskforce (P)</td>
<td></td>
</tr>
<tr>
<td>Distribution</td>
<td>Task</td>
<td>Date</td>
<td>Responsible Party</td>
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<td>----------------------------------------------------------------------------</td>
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</tr>
<tr>
<td><strong>Strengthen compliance with international standards and obligations</strong></td>
<td>Monitor Uganda’s compliance with UNCAC and take steps close gaps</td>
<td>Gap analysis / Completed self-assessment Annual benchmarking assessment</td>
<td>Dec 2008</td>
<td>DEI (P)</td>
</tr>
<tr>
<td></td>
<td>Initiate mutual legal assistance arrangements with relevant partner countries. To target UK; South Africa; EAC</td>
<td>Mutual legal assistance arrangements in place</td>
<td>Dec 2009</td>
<td>MoFA (P)/ MoJCA (P) DEI/ IG</td>
</tr>
<tr>
<td></td>
<td>Actively participate in the work of ESAAMLG and support the work of the Financial Action Task force</td>
<td>Increased harmonisation of anti-money laundering provisions</td>
<td>Ongoing</td>
<td>BOU (P) MoFPED (P) Accountability Sector (?)</td>
</tr>
<tr>
<td></td>
<td>Pursue the EAC anti-corruption framework arrangements</td>
<td>Harmonised EAC anti-corruption provisions</td>
<td>Dec 2010</td>
<td>OPM MoFA MoJCA</td>
</tr>
</tbody>
</table>

**Indicators:**
- Passage of legislation
- Uganda fully compliant with UNCAC within NACS period
- Mutual legal assistance programme in place with six countries
- Case backlog of corruption cases removed by end 2009
- Time taken to dispose of corruption cases reduced by 50% (baseline required)
Objective 4: Enhanced compliance and accountability by public service organisations

Public service reform remains a central issue in anti-corruption policy because the way public management is conducted creates the environment in which corruption is facilitated. The MoPS has developed a comprehensive Public Service Reform Programme (PSRP) which contains many of the key elements that if addressed could remove those drivers that feed corruption. This intervention seeks to support reform by pursuing anti-corruption action across all sectors.

Key Strategies:
- Strengthen compliance with the legal and regulatory framework
- Review and update systems, procedures and institutional behaviour that impede compliance and accountability
- Monitor compliance with established standards of accountability
- Enhance the professional standards in public service organisations

Expected Outcomes:
- Enhanced accountability in all MDAs
- Improved compliance with legal and regulatory systems and requirements
- Improved public confidence in anti-corruption action
- Annual accountability cycle completed

Key Outputs:
- Corruption risk assessments and annual reporting from all sectoral areas including Local Governments
- Targeted training for key middle-management personnel in all sectors
- Consistent implementation of anti-corruption report recommendations
- Improved information storage standards
- Annual accountability reporting by all MDAs and Local Governments
- Annual accountability status assessment

Critical Success Factors:
- Political and administrative commitment to drive improved accountability
- Improved standards of accountability actively pursued
- Public Service reform taken seriously

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Key Activity</th>
<th>Output</th>
<th>Timelines</th>
<th>Responsibility Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strengthen compliance with the legal and regulatory framework</strong></td>
<td>Initiate anti-corruption action planning in all sectors, MDAs and Local Governments</td>
<td>Annual reporting on anti-corruption action plans in all sectoral areas</td>
<td>Dec 2008</td>
<td>Accountability Sector (P) MoFPED (P) MoPS/MoLG/DEI</td>
</tr>
<tr>
<td></td>
<td>Devise corruption risk assessment and reporting</td>
<td>Institution (incl. Local Govt) specific corruption</td>
<td>July 2009</td>
<td>DEI (P) IG (P)</td>
</tr>
<tr>
<td>Review and update systems, procedures and institutional behaviour that impede compliance and accountability</td>
<td>Conduct assessments of MDA and Local Government compliance with statutory requirements</td>
<td>Annual compliance performance reports</td>
<td>Dec 2009</td>
<td>Accountability Sector / MoLG (P)</td>
</tr>
<tr>
<td>---</td>
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</tr>
<tr>
<td>Monitor compliance with established standards of accountability</td>
<td>Monitor annual reports to Parliament by the Appointing Authorities on actions taken on foot of IG reports</td>
<td>Annual report of actions taken by President and local authorities on corruption cases</td>
<td>Dec 2009</td>
<td>Appointing Authorities</td>
</tr>
<tr>
<td></td>
<td>Prepare annual status report on accountability and anti-corruption issues</td>
<td>Annual status assessment report</td>
<td>July 2009 + annual</td>
<td>Accountability Sector (P)</td>
</tr>
<tr>
<td></td>
<td>Research and make proposals for the incorporation of Integrity/Accountability Statements into Budget Cycle requirements and Ministerial Statements</td>
<td>Increased annual accountability reporting</td>
<td>Dec 2010</td>
<td>Accountability Sector (P)</td>
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<tr>
<td>frameworks for use in the development of institutional anti-corruption policies and action plans</td>
<td>risk assessments completed</td>
<td>MoPS/MoLG</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Make available anti-corruption information and training for key middle-management groups and individuals in MDAs and Local Governments</td>
<td>Core of anti-corruption champions / focal points developed</td>
<td>Dec 2008</td>
<td>DEI/IG/MoPS (P)</td>
<td></td>
</tr>
<tr>
<td>Investigate the reasons for a lack of implementation of recommendations of anti-corruption agencies and make recommendations for resolution of the situation</td>
<td>Legal and regulatory changes to ensure enforcement of findings of anti-corruption reports</td>
<td>Dec 2010</td>
<td>DEI / IG / PPDA (P) IAF</td>
<td></td>
</tr>
<tr>
<td>Strengthen the maintenance of records by MDAs and Local Governments as a key barrier to accountability</td>
<td>Enforcement of regulations</td>
<td>July 2011</td>
<td>MoPS/ MoLG (P) DEI Accountability Sector</td>
<td></td>
</tr>
<tr>
<td><strong>Enhance the professional standards in public service organisations</strong></td>
<td>Systematically monitor the implementation of recommendations of Commissions of Inquiry and other special investigations</td>
<td>Increased compliance</td>
<td>2011</td>
<td>DEI (P)</td>
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<td>---</td>
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</tr>
<tr>
<td><strong>Address performance and accountability in the public service through the implementation of the Public Service Reform Programme</strong></td>
<td>Monitor public attitudes to accountability issues and service delivery</td>
<td>A more affordable, efficient and accountable public service</td>
<td>Dec 2010</td>
<td>MoPS (P)</td>
</tr>
<tr>
<td><strong>Indicators:</strong></td>
<td>✔ Incidences of corruption reported upon by MDAs</td>
<td>Increased knowledge of the impact of professionalization on service delivery</td>
<td>Dec 2011</td>
<td>UBOS (P) MoPS / MoLG</td>
</tr>
<tr>
<td>✔ Anti-corruption actions taken at Sector and MDA level</td>
<td>✔ High risk corruption areas addressed</td>
<td>✔ Annual reporting on integrity / accountability issues</td>
<td>✔ Integrity ratings of public bodies (National Integrity Survey)</td>
<td>✔ Implementation of public service reform</td>
</tr>
</tbody>
</table>
Objective 5: Strengthened implementation of NACS

This objective seeks to support the development of the overall capacity to address strategic implementation and to build the capability of organisation to plan and manage their operations in a way that enables more effective performance.

**Key Strategies:**
- Enhance institutional capacity, standards and programmes
- Strengthen anti-corruption planning, coordination and implementation
- Initiate anti-corruption monitoring and evaluation system

<table>
<thead>
<tr>
<th>Expected Outcomes:</th>
<th>Key Outputs:</th>
</tr>
</thead>
<tbody>
<tr>
<td>➢ Increased strategic and operational effectiveness</td>
<td>➢ Agreed anti-corruption agency policies agreed on information management,</td>
</tr>
<tr>
<td>of anti-corruption agencies</td>
<td>training, resources and accommodation</td>
</tr>
<tr>
<td>➢ Enhanced public confidence in the operation of</td>
<td>➢ Anti-corruption research programme undertaken</td>
</tr>
<tr>
<td>anti-corruption agencies</td>
<td>➢ Coordination arrangements for anti-corruption policy agreed</td>
</tr>
<tr>
<td></td>
<td>➢ Systems of M&amp;E agreed and operational</td>
</tr>
</tbody>
</table>

**Critical Success Factors:**
- Willingness of anti-corruption agencies to actively cooperate and provide time and resources
- Available resources

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Activity</th>
<th>Output</th>
<th>Timelines</th>
<th>Responsibility Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enhance institutional capacity standards and</td>
<td>Develop a Training Policy to service the needs of anti-corruption agencies</td>
<td>Common training policy to support long-term anti-corruption strategic</td>
<td>Dec 2010</td>
<td>DEI (P)</td>
</tr>
<tr>
<td>programmes</td>
<td></td>
<td>planning and capacity development</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Coordinated training programmes</td>
<td>August 2008</td>
<td>DEI/IAF (P)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Resource needs</td>
<td>Dec 2009</td>
<td>DEI /</td>
</tr>
<tr>
<td>Strengthen anti-corruption planning, coordination and implementation</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>---</td>
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</tr>
<tr>
<td>resource, equipment and logistical study of anti-corruption agencies to establish the sector needs and assist with future planning</td>
<td>identified / planning exercise undertaken</td>
<td>IAF (P)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide support for the improvement of financial and resource planning and capacity</td>
<td>Improved capacity to plan and manage financial, physical and human resources</td>
<td>Dec 2010</td>
<td>DEI/IAF / Acc Sect (P)</td>
<td></td>
</tr>
<tr>
<td>Strengthen records and information management within all anti-corruption agencies including reviewing and improving Management Information Systems, Case Management Systems, data bases and physical records</td>
<td>Information management improved</td>
<td>June 2011</td>
<td>DEI / IAF (P)</td>
<td></td>
</tr>
<tr>
<td>Review the operation of the IAF to achieve a more effective mechanism for coordination</td>
<td>Reengineered IAF</td>
<td>Dec 2008</td>
<td>DEI / IAF (P)</td>
<td></td>
</tr>
<tr>
<td>Develop internal and external coordination mechanisms to support the work of the IAF and NACS implementation</td>
<td>Active and mutually supportive coordination</td>
<td>Dec 2009</td>
<td>IAF/DEI (P)</td>
<td></td>
</tr>
<tr>
<td>Identify the key information needs of the anti-corruption agencies and devise information gathering systems that will support policy development and implementation</td>
<td>Information systems established</td>
<td>June 2009</td>
<td>DEI / IAF (P)</td>
<td></td>
</tr>
<tr>
<td>Implement IAF Information Sharing Policy</td>
<td>Structured approach to information sharing applied</td>
<td>Dec 2008</td>
<td>IAF / DEI (P)</td>
<td></td>
</tr>
<tr>
<td>Establish research programme to support policy development and implementation in conjunction with key stakeholders</td>
<td>Research programme undertaken</td>
<td>Dec 2008</td>
<td>DEI / IAF (P) Accountability Sector ACPPP</td>
<td></td>
</tr>
<tr>
<td>Initiate joint annual planning with the Accountability Sector</td>
<td>Coordinated planning mechanism achieved</td>
<td>Oct 2008</td>
<td>IAF / Account</td>
<td></td>
</tr>
<tr>
<td>Initiate anti-corruption monitoring and evaluation system</td>
<td>Devise and implement an IAF agreed Monitoring and Evaluation policy and practice for the NACS</td>
<td>Coordinated and agreed approach to M&amp;E</td>
<td>Dec 2008</td>
<td>DEI (P) IAF/DEI (P) ACPPP</td>
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</tr>
<tr>
<td>Implement M&amp;E policy to ensure regular feedback and performance assessment of anti-corruption action</td>
<td>Quantitative and qualitative assessment of effectiveness of anti-corruption action</td>
<td>Oct 2009 + annual</td>
<td>DEI (P) ACPPP</td>
<td></td>
</tr>
<tr>
<td>Undertake a Joint Annual Review of NACS activities and performance with key stakeholders</td>
<td>Joint annual review reports completed</td>
<td>October 2009 + annual</td>
<td>DEI (P) IAF ACPPP</td>
<td></td>
</tr>
</tbody>
</table>

**Indicators:**
- ✓ Information gathering systems in place and operating
- ✓ Strategic decisions taken on the operation of the IAF
- ✓ anti-corruption research programme undertaken
- ✓ Detailed reports and workplans submitted to annual joint review
- ✓ M&E policy operationalised
- ✓ Common training policy and programme utilising shared resources operationalised
- ✓ Information management systems
- ✓ Resource and accommodation planning
Section 3: Implementation, Monitoring and Evaluation

3.1 Implementation

The NACS gives a strategic direction to anti-corruption policy and actions. It also seeks to support anti-corruption agencies in implementing their important mandates while at the same time recognising and valuing their legal and constitutional independence. Effective implementation, monitoring and evaluation are essential elements in making the process work.

It is clear from the evaluation of the last NACS that implementation was inconsistent and at times weak. It is important that this lesson be taken on board and arrangements put in place to drive implementation throughout the period of the NACS. Critical to this will be effective leadership, coordination, management and involvement of external stakeholders and technical expertise. A real ownership of the process by all responsible agencies and external stakeholders is necessary to ensure effectiveness.

It is essential that all public bodies respond to this strategy and take responsibility for its implementation. To be effective a high degree of coordination is required to ensure that tasks are undertaken across all public service agencies and that progress is adequately monitored and evaluated. It is a challenge for the DEI to ensure that this coordination is conducted in a manner that recognises and supports the independent nature of the organisations involved. At the same time NACS can only work if the participant agencies are mutually supportive and facilitate the process.

The overall integration of the implementation and monitoring system is represented below:
3.2 Implementation Principles

Ownership of NACS: The implementation of the NACS requires support from a wide range of individuals, organisations and stakeholder groups. It is important that there is a real sense of ownership and commitment to the NACS. The IAF and its constituent organisations have been closely involved in the development of the NACS and a much wider group consulted and given an opportunity to comment on the proposed content. It will be important that the NACS is seen by the IAF organisations as being their strategy and built into their own strategic and management planning.

Linking with institutions and reforms: The effectiveness of the NACS is highly dependent of the goodwill and participation of a wide range of Sectors and MDAs. This places a responsibility on the NACS and in particular on the DEI to be active in reaching out to and influencing many areas of the public service. In this, it will be important to coordinate closely with the Accountability Sector and to maximise the synergies to increase the impact. Promoting best practice towards accountability and anti corruption policy will require not only education and sensitisation but also triggers to cause action and alter behaviours. Where institutions are not responsive to the requirements of NACS, it will be necessary to take action to ensure compliance.

Leadership: The NACS is an expression of a zero tolerance policy of the Government. It is well recognised that technical advances in minimizing corruption can only be really effective if the political and administrative leadership are fully committed. The Government must take political responsibility and present the decisive leadership that is required to bring about change. The management of the public service must also lead by example and ensure that the quality of accountability is significantly improved and the opportunities for corruption removed. Anything less than full commitment will make it very difficult for this strategy to succeed and would give the green light to increased corruption and deteriorating public attitudes.

3.3 Institutional Arrangements

The key elements of the NACS management arrangements are the following:

- Political and technical leadership and secretariat undertaken by the DEI
- Coordination, research and cross-sectoral links through the Accountability Sector
- Monitoring
- Evaluation
- Regular Updating of the NACS
- External oversight through ACPPP and Annual Joint Review
• Quarterly consultations with the International Development Partners
• Annual high level Forum with prominent leaders of the community
• Research, Information and Data

3.3.1 Political and technical leadership and secretariat undertaken by the DEI,

The DEI has been designated as the central point of political and technical leadership for the implementation of the NACS. It is essential that the DEI provides this leadership in a way that is public and credible and is able to represent the NACS as a key national strategy. It is also essential that this leadership is inclusive and supportive of all anti-corruption agencies. This will require close consultation and mutual support on the part of all anti-corruption agencies.

The DEI also provides the secretariat for the NACS. The DEI has limited resources and it will be important that the NACS receives appropriate priority within the DEI in terms of management and resources such as staff and finances. Additional resources will be required to undertake the extensive follow up required for effective implementation.

As the central point of coordination for the NACS, the DEI will play the key role in monitoring its implementation. The IAF remains a necessary gathering of anti corruption agencies and other MDAs involved in the fight against corruption. It will continue to play an advisory and supportive role in the implementation of the NACS.

3.3.2 Coordination, research and cross-sectoral links through the Accountability Sector

The Accountability Sector has been renewed and has an active Working Group and Steering Committee. There are close connections between the priorities identified in the Accountability Sector Strategic and Investment Plan (ASSIP) and the NACS. The secretariat for both is housed in the DEI. There are considerable benefits to be gained from building a close working relationship between the Sector and the NACS. The Accountability Sector has the mandate and capacity to take a broad service-wide approach to the promotion of accountability and as such considerable synergies exist and need to be exploited. To enhance operational efficiency, it is proposed that the Accountability Sector will provide a working group to the NACS and provide technical support and cross-sectoral out reach. Detailed arrangements will need to be considered and put in place to give effect to this proposal.

3.3.3 Monitoring

The DEI will act as a clearing house for the monitoring and evaluation function. All anti-corruption agencies and IAF member organisations will be responsible for monitoring the activities
of their own organisations and providing timely reports for the IAF on an agreed basis. The agreed system will recognise and support the independence of each organisation while contributing to the overall assessment of the impact of NACS.

The M&E of the NACS will serve the following purposes:

- Identify and tabulate areas and extent of progress in implementation and communicate where the NACS is likely to reach its objectives
- Address in a timely fashion areas where progress is lacking and propose solutions to move issues forward
- Inform and support management decision making
- Promote accountability and anti-corruption best practice
- Ensure that successes are documented and replication sought and failings identified and addressed
- Act to inform and communicate to internal and external stakeholders and provide feedback

Monitoring will take place at a number of levels.

1. At the level of the anti-corruption agency, monitoring will be undertaken by the individual agency and fed back to the NACS secretariat. It is important that the specific information to be gathered is agreed between the DEI and the agencies, in consultation with the IAF, including the content, format, manner of data collection and frequency. This data will provide a basis for the systematic analysis of case handling (not individual cases histories), effectiveness of investigation and prosecution, bottleneck issues, use of legislation, quality of training, gaps in resources and logistics, implementation of recommendations.

2. At the level of the MDAs, monitoring will be in relation to the introduction and implementation of anti-corruption and accountability policies at institution level. In addition, the overall reporting of the institution in Ministerial Statements and Budget Framework Papers (BFPs) will be required to formalise the reporting of actions. This reporting will also include the responses of institutions to cases of corruption and how institutions respond to and implement recommendations of the IG and the PPDA.

3. At the level of the Sectors monitoring will track the introduction of sector-wide anti-corruption action plans and policies and seek to assess overall sectoral approaches to anti-corruption actions.

4. Monitoring the activities of non-state actors will be conducted through the ACPPP and with the media and business representatives as this level of engagement expands.
3.3.4 Evaluation

The NACS will be evaluated at the end of each year following its official launch. After year 1 and 2, an independent review will be undertaken to document progress against all Strategic Objectives and highlight areas that need particular attention. The end of year 1 will be treated as being a key assessment of the implementation and leadership arrangements. It will be important to establish early lessons at this stage and to take any corrective actions necessary to ensure effective implementation for the remaining NACS period.

Between year 2 and 3, a substantive independent mid-term review will be undertaken to judge overall progress and to establish the extent to which the NACS and Zero Tolerance Policy have been implemented. Years 3 and 4 will similarly be evaluated and progress assessed. At the end of the NACS period a formal post programme evaluation will be undertaken. This evaluation will address the extent and quality of implementation of the NACS in terms of outcomes achieved, impact, sustainability, factors influencing implementation and will document lessons to be learnt for the next phase.

3.3.5 Regular Updating of the NACS

The NACS is not a static document and must take account of developments that will take place in the future. There are various parallel processes currently underway that will potentially impact upon the operation of the NACS. As such it is important to retain flexibility to adjust the content and activities of the NACS so as to take account of the important developments. For example the National Integrity Survey is currently being conducted and will be published before the end of 2008. It is important that findings and recommendations are considered for incorporation in due course into the NACS. Similarly the African Peer Review Mechanism (APRM) and the new National Development Plan are both under consideration and it will be important to take account of the final results of these exercises. Developments in the Justice Law and Order Sector and other sectoral developments can also impact on the content of the NACS and will need consideration. The NACS will be review to take account of external developments on a regular basis.

3.3.6 External oversight through ACPPP and Annual Joint Review

It is proposed to open up the review of the NACS implementation to civil society and external stakeholders. It is the intention that increased public ownership is key to ensuring effective pressure for implementation. It is proposed that the ACPPP as being central to the involvement of civil society will be tasked to undertake an annual review of the NACS and to bring forward their views as to the quality and scope of implementation. These views will be presented to an annual review of the NACS at a Joint Annual Review. It is important that this review is planned well in advance.
and that a structured process of review takes place so that adequate feedback can be provided. It will also be important to link this review with the independent evaluations that are planned to support the overall implementation process.

3.3.7 Regular consultations with the International Development Partners

The International Development Partners are key supporters and stakeholders in the fight against corruption. They provide financial support to many activities but also and just as importantly moral and technical support that are so crucial in moving forward the overall anti-corruption agenda. It is proposed to hold regular briefing and updating meetings between the IAF and the International Development Partners as a means to further our common understanding and to ensure up to date information on progress is shared. Such meetings will be planned to occur quarterly or as required by circumstances.

3.3.8 Annual high level Forum with prominent leaders of the community

Public information and ownership remain key elements in the overall implementation strategy. To further this approach it is proposed to identify and group of leading figures in society from business, academia, the arts and civil society who will be invited to meet from time to time to discuss at a high strategic level societal issues pertaining to integrity, ethics, values so as to encourage a wider national debate on these critical issues for society.

3.4 Research, Information and Data

There is a considerable store of information on the experience of corruption in Uganda but little research to support the development of policy. It is an important function of the NACS to promote and where necessary undertake quality research that will inform future policy responses and actions. Priority areas for research will be identified and pursued.

Accurate information gathering will be important in the process of monitoring progress. The information and data gathering activity under NACS will provide in the first instance a planning mechanism for the management of information. A detailed information plan will be developed and agreed under NACS to identify the key information needed, the sources and the frequency. This information will be used to support the implementation of the NACS.

The NACS information and data gathering project will link with the National Integrated Monitoring and Evaluation Strategy (NIMES) and feed into improved national coordination of information. Working closely with NIMES and MoPS will be necessary to feed into the developments under
Results Oriented Management (ROM) and Output Oriented Budgeting (OOB). It is intended that the NACS will be utilised to support the development of the National Plan and to influence national policies and priorities in addressing governance issues.

Uganda Bureau of Statistics (UBOS) has a central role in gathering information on a systematic basis. UBOS is recognised as a key link into the acquisition and analysis of accurate and systematic information that will support improved evidence based policy making.

3.5 **Funding of the NACS**

It will be important that issues of funding for the overall implementation of NACS and for the activities of individual institutions is addressed. A detailed planning and budgeting exercise will be undertaken to evaluate the costs and detailed action plans. All funding plans will be updated on an annual basis to take account of changes and revision of costs and activities.

3.6 **Roll out of NACS**

It is proposed that this strategy is rolled out in three key phases.

**Inception Phase:** During this phase a range of selected key activities intended to operationalise the strategy will be implemented. The inception phase will focus on:

- Printing, launch and initial dissemination of the NACS;
- Establishment of implementation structures and reporting arrangements;
- Developing a comprehensive action plan and corresponding budgets across all activity areas;

This phase to be completed before the end of 2008.

**Initial Implementation Phase:** Year 1 will be treated as both an implementation and testing phase. Firstly to ensure implementation of all actions committed to but also to test the viability of implementation approaches and to learn early lessons so as to be in a position to take corrective action if needed.

**Full Implementation Phase:** In this phase full implementation will be undertaken with a detailed annual action plan linked to the financial year and with detailed costing of all activities to be undertaken. It will be the responsibility of all public agencies to address NACS as part of their annual management and strategic planning. It will be important that the anti-corruption agencies are active in planning all activities and as far as possible offer supportive arrangements to public agencies may need assistance.
Annex 1

**Inter-Agency Forum**
The IAF oversees the development of the National Anti Corruption Strategy and monitors its implementation. Membership and attendance at the IAF is based on a shared commitment to a more coordinated approach to their work. The membership of the IAF is comprised of public organisations with primary responsibility for implementing anti-corruption policy and public organisations with responsibility for managing and overseeing the core functions of Government in the context of anti-corruption policy. They are:

- Directorate of Ethics & Integrity
- Inspectorate of Government
- Office of the President
- Directorate of Public Prosecutions
- Office of the Auditor General
- Ministry of Internal Affairs
- Inspectorate of Courts
- Local Government Finance Commission
- Uganda Revenue Authority
- Criminal Investigations Directorate
- Public Procurement & Disposal of Public Assets Authority
- Public Service Commission
- Ministry of Public Service
- Ministry of Finance, Planning and Economic Development
- Ministry of Public Service
- Ministry of Local Government
- Education Service Commission
- Health Service Commission
- Judicial Services Commission