THE REPUBLIC OF UGANDA

THE ZERO TOLERANCE TO CORRUPTION POLICY, 2019

JULY 2019

THE REPUBLIC OF UGANDA

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By

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PRESIDENT OF THE REPUBLIC OF UGANDA

FOREWORD

The Government of Uganda has been implementing Zero Tolerance to Corruption through the Sector Wide approach. Zero Tolerance to corruption is one of the cornerstones of good governance. Evaluating the on-going effectiveness of public officials ensures that they are performing to their full potential, providing value for money in the provision of public services, instilling confidence in the Government and being responsive to the community they are meant to be serving.

This is the first ever Policy on Zero Tolerance to Corruption for the Anti-Corruption Agencies, which aims at ensuring a transparent, accountable, efficient and effective use of public resources, and maps out each Agency's contribution to the attainment of the Policy and ultimately the National Development Plan (NDP) Outcome.

Now more than ever before, the Zero Tolerance to Corruption Policy will play a crucial role in the public sector by building links across partnerships, contributing to the democratic process and helping to save money by making recommendations to make public services more efficient. The Government's commitment and determination is anchored in ensuring effective public service delivery.

I am very certain that the Zero Tolerance to Corruption Policy not only addresses the key bottlenecks affecting the Anti- Corruption agenda but also sets priorities and key result areas on which to focus investment, in order to optimally contribute to the realization of both the Anti- Corruption Agencies' goals and National goals as outlined in the NDP. The implementation of the Policy will be through a joint effort as elaborated in the Implementation Plan, and guided by both the principles as set out in the Policy, legal and regulatory framework.

I wish to express my gratitude to persons who worked tirelessly to develop the Policy, and to all Institutions which made contributions during the development of this Policy. I look forward to the implementation of the Policy interventions, towards the attainment of the zero tolerance to corruption and contribution to the attainment of the overall NDP outcomes. It is my sincere conviction that the implementation of the Policy will go a long way in improving accountability systems in the country.

For God and my Country.

Rev. Fr. Simon Lokodo (MP)
MINISTER OF STATE FOR ETHICS AND INTEGRITY
OFFICE OF THE PRESIDENT

LIST OF ACRONYMS AND ABBREVIATIONS

ACCU	Anti-Corruption Coalition Uganda
ACPPP	Anti Corruption Public Private Partnership
ACS	Anti-Corruption Strategy
AG	Attorney General/ Auditor General
APRM	African Peer Review Mechanism
AS	Accountability Sector
ATIA	Access to Information Act
AU	African Union
BMAU	Budget Monitoring and Accountability Unit
CID	Criminal Investigation Directorate
COSASE	Committee on Commission Statutory Authorities and State Enterprises
CPI	Corruption Perception Index
CSO(s)	Civil Society Organization(s)
DEI	Directorate for Ethics and Integrity
DIPFs	District Integrity Promotion Forums
DPP	Director of Public Prosecutions
DPs	Development Partners
DTM	Data Tracking Mechanism
ESC	Education Service Commission
RFBOs	Religious and Faith Based / Organisations
FY	Financial Year/Fiscal Year
GoU	Government of Uganda
HSC	Health Service Commission
IAF	Inter Agency Forum
IAG	Internal Auditor General
ICT	Information Communication and Technology
IEC	Information Education and Communication
IG	Inspectorate of Government
IGA	Inspectorate of Government Act
IGG	Inspector General of Government
JAF	Joint Assessment Framework
JBSF	Joint Budget Support Framework
JLOS	Justice Law and Order Sector
JSC	Judicial Service Commission
KCCA	Kampala Capital City Authority
LCA	Local Governments Act
LGCs	Local Government Councils
LGFC	Local Government Finance Commission
LGs	Local Governments
LLGs	Lower Local Governments

M&E	Monitoring and Evaluation
MDAs	Ministries Departments and Agencies
MIA	Ministry of Internal Affairs
MLG-I	Ministry of Local Government— Inspectorate
MOFPED	Ministry of Finance Planning and Economic Development
MOLG	Ministry of Local Government
MOPS	Ministry of Public Service
MOU	Memorandum of Understanding
MTEF	Medium Term Expenditure Framework
NACS	National Anti-corruption Strategy
NDP II	Second National Development Plan
NDP	National Development Plan
NEPAD	New Partnership for African Development
NEVS	National Ethical Values Policy
NGO	Non-Governmental Organization
NIMES	National Integrated Monitoring and Evaluation Systems
NRM	National Resistance Movement
NSDS	National Service Delivery Survey
OAG	Office of Auditor General
ODPP	Office of the Director of Public Prosecutions
OPM	Office of the Prime Minister
PAC	Public Accounts Committee
PEAP	Poverty Eradication Action Plan
PEMCOM	Public Expenditure Management Committee
PFM	Public Finance Management
PPDA	Public Procurement and Disposal of Public Assets Authority
PPP	Public Private Partnership
PSC	Public Service Commission
PSFU	Private Sector Foundation of Uganda
PSIU	Public Service Inspection Unit
SWAP	Sector Wide Approach
UBOS	Uganda Bureau of Statistics
UN	United Nations
UNCAC	United Nations Anti corruption Convention
URA	Uganda Revenue Authority
ZTCP	Zero Tolerance to Corruption Policy

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1.0   INTRODUCTION

Corruption in Uganda is evident and deep-rooted, occurring in all sectors— public and private, and in a number of forms. Corruption has continued unabated, despite the numerous anti-corruption efforts and commitments the State and non State actors have undertaken. Evidence abounds that Uganda still has high incidences of corruption, adversely affecting public service delivery, the efforts against poverty and ultimately impeding national development aspirations.

The annual reports of the Inspectorate of Government (IG) on Tracking Corruption Trends using the Data Tacking Mechanism (DTM), published since 2010, the Auditor General's annual Audit Reports and reports of Commissions of Inquiries have shown wide spread and increasing incidence of corruption in Uganda. Regional and Global agencies such as the Human Rights Watch and the Transparency International have equally found corruption a growing cancer that has become a binding constraint to the achievement of socio-economic development in Uganda. There is therefore a need for more holistic strategic policy interventions to strengthen the existing legal and institutional framework for combating corruption.

The Zero Tolerance to Corruption Policy (ZTCP), 2018, is an effort to:-
  (i)   refresh and realign the discourse, commitments, and strategic approaches for fighting corruption in the country;
  (ii) guarantee the prompt decisive response mechanisms for abhorring and dealing with corruption practices and tendencies;
  (iii) promote ethical conduct, societal moral values and strengthen the social fabric;
  (iv) prevent and respond to occurrences and incidences of corruption at all levels of society.

The ZTCP is intended to provide policy direction to eliminate corruption and to guide anti corruption agencies, MDAs, LGs and other stakeholders to effectively handle corruption.

1.1   BACKGROUND

Uganda has registered considerable progress in addressing the development challenges. A number of interventions have been initiated to promote good governance, strengthen integrity, transparency and accountability both in the public and private sectors.

Since the NRM Government acceded to power in 1986, it has consistently taken a zero tolerance to corruption stance. This has been reflected in, among others, the

various policy, legal, regulatory and strategy documents, including the NRM Manifestos, Uganda Vision documents, National and Local Government Development and Poverty Eradication Plans and Strategies. The fight against corruption in Uganda has however been constrained by among others, the absence of a comprehensive, cohesive and galvanizing policy framework. Additionally, there are incoherent and uncoordinated institutional operations, limited institutional capacity of anti-corruption agencies, plus weak linkages among the Government, Private Sector and Civil Society actors.

There is evident erosion of societal values, increasing public acceptance or resigned attitude towards corruption.

1.1.1 Understanding Corruption

The World Bank has defined Corruption as "the abuse of public office for private gain". This definition limits corruption to the public sector. The UN Convention Against Corruption and the African Union Convention Against Corruption broaden the scope of corruption to include the public and private sectors. Corruption occurs where public and private sectors meet; where public officials have direct responsibility for the provision of goods and services to be delivered by the private sector. Further, private individuals and organizations connected with the public sector such as in the procurement process, may take advantage of the opportunity to 'make money' through corrupt means.

The Uganda Anti Corruption Act, 2009, has defined the scope of corruption in terms of its various manifestations such as solicitation, offering, giving and acceptance of any goods of monetary value or other benefit for personal enrichment, embezzlement, bribery, nepotism, influence peddling, fraud, forgery, causing financial or property loss, false accounting, neglect of duty, corruptly procuring tenders, diversion of public resources, conflict of interest, impersonation and illicit enrichment among others.[1]

Clearly, corruption occurs in both the public and private sectors. It evolves, often changing and taking new trends. Contemporary corruption has increasingly become complex in form, nature and manifestation, often practiced in syndicates and systematic collusions, with a high level of concealment to beat even the most prudent anticorruption systems. Corruption has also become trans-boundary, abated by cross-border cyber crime cartels and syndicates. The corrupt have increasingly become extremely organised, often amassing wealth and power around themselves, and building powerful cartels to win over, intimidate, neutralise and in some instances, disempower those tasked to fight the malaise.

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[1] Section 2 of the Anti Corruption Act, 2009

Corruption in Uganda is characterized by grand-scale theft of public funds and petty corruption involving public and private officials at all levels of society. Corruption manifests in diverse forms, including but not limited to— bribery, embezzlement, nepotism, influence peddling, fraud, forgery, causing financial or property loss, corruptly procuring tenders, diversion of public resources, conflict of interest, illicit enrichment, false accounting, false assumption of authority and political patronage.

1.1.2 Magnitude of the problem of corruption in Uganda

Over the years, Uganda has been ranked as increasingly corrupt, at both the Regional and International level. Uganda's global rankings as well as the local corruption surveys have shown a persistent poor performance of the country's anti-corruption drives, with most Ugandans perceiving corruption as increasing. In 2015, the Corruption Perceptions Index (CPI) published by the Transparency International ranked Uganda 139th out of 167 countries, scoring a paltry 25 points on the scale of 0 to 100 for highly corrupt to very clean countries respectively. This score reflects a below average rank, and placing Uganda among the highly corrupt countries. It should be noted that the country's ranking has almost stayed the same since 2012, with 29 points in 2012, 26 points in 2013 and 26 in 2014. By implication, this trend shows a minimal impact of Uganda's anti-corruption efforts, demonstrated by the range of the legal regime and institutional strategic actions.

The 2015-2016 Global Competitiveness report published by the World Economic Forum (WEF) ranked Uganda 115 out of 144 countries, on the global economic competitiveness scale, with a core of 3.7 points, a marginal improvement from the 3.6 points scored in 2014-2015. Corruption was found the most problematic factor for doing business, followed by tax rates, access to financing and inadequate supply of infrastructure, among other factors.

The reports of the East African Bribery Index, a governance tool developed by Transparency International to measure bribery levels in the private and public sectors in the region, have shown a persistent increase of Ugandans that perceive corruption in Uganda as high and on the increase. While 48 per cent of the Ugandan respondents perceived corruption as high in 2010, the perception level rose to 51 per cent in 2011, stayed at 51 per cent in 2012, and dramatically shot to 86 per cent in 2013. There was a slight reduction in the perception level to 82 per cent in 2014. This trend in the public's perception of the level of corruption shows an indication of loss of people's trust in the Government commitment to fight corruption.

In 2014, the East African Bribery Index, showed a remarkable improvement on the likelihood of bribery from the second position in 2010 at 33 per cent after Burundi (36.7 per cent), second position in 2011 at 33.9 per cent after Burundi (37.9 per cent),

first position in 2012 with 40.7 per cent, first position in 2013 with 26.8 per cent and third position in 2014 with 17.9 per cent, after Burundi in first position (19.4 per cent) and Tanzania in second position (19 per cent).[2] While the trend on the possibility of bribery shows that bribery is still an impediment to access to public service, the trend also reveals a notable and significant improvement over the years in Uganda, and across all the countries in the East African region, an indicator that the incidence of bribery is reducing. Consistently, Rwanda was the least bribery prone country over the same years. The Police was the most corrupt institution in terms of bribery in Uganda over the four consecutive years, 2011, 2012, 2013 and 2014, having overtaken URA in 2010. The Judiciary and Lands are the other institutions which have come in the picture of notable prevalence of bribery in Uganda.

The Global and Regional picture of corruption in Uganda is similarly correlated by the local surveys on the prevalence of corruption in the country. The National Service Delivery Survey (NSDS) conducted by UBOS in 2015 showed that 83 per cent of Ugandans believed that corruption had increased.[3] The survey further indicated that about three in every four respondents (75 per cent) reported bribery as the most common form of corruption existing in the public sector, followed by embezzlement/diversion of funds (65 per cent), the absenteeism/failure to undertake duties (61 per cent) and nepotism (59 per cent). The report also showed that the police at 75 per cent was ranked highest as far as bribery, fraud and extortion were concerned.

A majority of the Ugandan respondents (75 percent) still ranked the police as the most corrupt government institution overall, followed by Local Governments (50 per cent) and Hospitals/Health Facilities (38 per cent). The Judiciary was ranked fourth at 19 per cent.

In other surveys, the first position ranking on the corruption index in Uganda has been interchangeably shared between the Police and Judiciary.

A survey of Corruption trends in Uganda done by the Inspectorate of Government in 2014 revealed that corruption is wide spread and was a major constraint to economic development and poverty reduction efforts in the country. There is a high level of collusion to conceal both grand and petty corruption practices.

1.1.3 Causes of corruption

In all countries, corruption is a malaise and a symptom of moral decadence that has permeated spheres of societies. It has led to diversion of scarce public resources to

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[2] Transparency International Kenya, 2015, The East African Bribery Index, Trends Analysis 2010-2014.
[3] UBOS, National Service Delivery Survey 2015 Report

personal projects at the expense of the much-needed public services such as schools, hospitals, roads and supply of clean water.

From a general point of view, the drivers of corruption vary. They can be categorized into two: (a) institutional and (b) societal norms and attitudes.

The **institutional causes** of corruption include: authority by public officers with limited or ineffective checks and balances; limited or no accountability; disparity in incentives and remuneration arising out of corrupt practices; limited possibility of detection and punishment; limited job security; declined professionalism; conflict and insecurity; inadequate or limited strict anti-corruption laws and programmes.

The **societal norms and attitudes** include socially embedded incentives to participate or withstand corruption, such as: patronage systems which lead to disregard of formalised channels to access any forms of services; dominance by political parties or specific categories of people over political and economic processes; marginalization of certain groups of people; unorganized and disempowered citizens; social recognition accorded to the wealthy or rich irrespective of how they amassed wealth; moral decadence due to deterioration of ethical values and principles; tolerance towards corruption in the communities; lack of civic awareness which promotes a culture of silence among citizens even at times when peoples' rights are violated – apathy; greed and consumption social behaviors that are not backed by sound economic status and a higher degree of poverty and powerlessness among the citizenry.

1.1.4 Uganda's Context

The National Service Delivery Survey (NSDS) conducted by UBOS in 2015 indicated that greed was the biggest cause of corruption followed by low salaries, weak laws, poor supervision of workers, lack of knowledge by the public about their role in fighting corruption, lack of political will to fight corruption, lack of stringent punishment for corrupt people, lack of transparency and accountability, lack of job security, dysfunctional systems, and other factors in that order.

There is a high public acceptance and normalization of corruption in the country, so much so that the corrupt are held by communities in high esteem as hard working. While most people know that corruption is bad and are aware of its dangers, many have kept silent and profess a resigned attitude. As earlier noted, such an environment has encouraged corruption to thrive.

1.1.5 Effects of Corruption

The effect of corruption has many dimensions related to economic, social, political, cultural and environmental spheres. The preamble of the United Nations Convention against Corruption (UNCAC) underlines that corruption threatens the

stability and security of societies, it undermines the institutions and values of democracy, ethical values and justice and it jeopardizes sustainable development and the rule of law. It also robs citizens, the poor and vulnerable of the services that are due to them from Government.

Goal 16 of the Sustainable Development Goals (SDGs) is dedicated to the promotion of peaceful and inclusive societies for sustainable development, the provision of access to justice for all, and building effective, accountable institutions at all levels. The Goal underlines that corruption, bribery, theft and tax evasion cost some US $1.26 trillion for developing countries per year, an amount that could be used to lift the entire world's population of those who are living on less than $1.25 a day to above $1.25 for at least six years. Accordingly, the UN fraternity makes outright commitments to: substantially reduce corruption and bribery in all their forms; develop effective, accountable and transparent institutions at all levels; ensure responsive, inclusive, participatory and representative decision-making at all levels; significantly reduce illicit financial flows; as well as strengthen the recovery and return of stolen assets and all forms of organized crime.

In the political sphere, corruption impedes democracy and the rule of law. In a democratic system, public institutions and offices may lose their legitimacy when they misuse their power for private interest. Corruption results in negative consequences such as fostering cynicism and reducing interest in political participation, political instability, and reducing political competition, reducing the transparency of political decision making, distorting political development and sustaining political activity based on patronage, clientelism and money.

Corruption is also seen to be a major factor in the down fall of governments by way of undermining the legitimacy of the government and weakening its structures, reducing productivity, hindering development, worsening poverty, marginalizing the poor, creating social and political unrest and eventual downfall.

According to the NDP II, the fight against corruption is particularly important for the reduction of poverty and inequality. Corruption affects the poorest sections of society disproportionately, and generally benefits those already in positions of power and authority. Without reducing corruption and improving accountability, all other development goals could be severely compromised, including the economic growth and infrastructure aspects of the NDP, the attainment of the country's vision and the realisation of the global sustainable development goals.

The economic effects of corruption can be categorized as minor and major. However, both, in one way or the other, have serious impacts on the individual community and the country. First and foremost, corruption leads to the depletion of national

wealth. It is often responsible for inflated costs of goods and services, the funnelling of scarce public resources to uneconomic high profile projects at the expense of the much needed projects such as schools, hospitals and roads, or the supply of potable water, diversion and misallocation of resources, conversion of public wealth to private and personal property, inflation, imbalanced economic development, weak work ethics and professionalism, hindrance of the development of fair market structures and unhealthy competition thereby deterring competition.[4] Large scale corruption hurts the economy and impoverishes the entire population.

Corruption is both a consequence and cause of eroded social, economic, cultural and political values, and the breakdown of the moral fabric and value system of a society.

The fight against the scourge of corruption therefore requires a systematic, comprehensive, inclusive and coordinated approach that strives to instill and entrench the core principles of transparency and accountability. Sustainable anti-corruption approach should as well emphasize the promotion of ethical and moral values across society.

The Zero Tolerance to Corruption Policy (ZTCP) seeks to realign, streamline and harmonize the national anti-corruption framework by defining the strategies and commitments for fighting corruption. The policy rallies actors in the public and private sectors to redefine and pursue renewed paths and determination to confront corruption in all its forms.

The successful implementation of this policy will translate in having a corruption free, efficient, effective and accountable government, as well as the overall improvement in public service delivery.

1.2   SITUATIONAL ANALYSIS

In Uganda, the public perception is that corruption is heavily entrenched in society. At least eight of every ten Ugandans believe that corruption is a serious problem in the country.[5] Since the National Resistance Movement (NRM) came to power in 1986, Uganda has undertaken a set of robust economic and political reforms. These reforms have led to the establishment of a solid legal, administrative and institutional framework to fight corruption. In spite of the notable success of this framework as recognized both locally and internationally, corruption has remained widespread at all levels of society and public administration.

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[4] Global Network For Peace And Anti-Corruption Initiative. Effects of corruption.

[5] Inspectorate of Government (2014): *Tracking Corruption Trends in Uganda: Using the Data Tracking Mechanism*, Annual Report, 2014.

1.2.1 The Policy, Legal and Institutional Framework for Fighting Corruption in Uganda

Uganda has a remarkably strong anti-corruption legal and institutional framework, which would ideally promote good governance, transparency, accountability and transformative public service delivery to spur national development. Many interventions for promoting good governance, ethics, integrity, accountability and fighting corruption in both the public and private sectors have been formulated and implemented. The Global Integrity Report 2011 rated the country's anti-corruption legal framework as very strong, at 98 per cent; albeit with a moderate overall score of 72 percent for the national anti-corruption front. The country scored 51 percent for the actual implementation of the anti-corruption legal framework, rated as very weak on the global scale. Despite the country's existing strong anti-corruption legal and institutional framework, ethics, integrity and accountability across the public and private sectors remain a critical challenge, ultimately breeding a fertile ground for corruption to thrive.

1.2.2 Anti-Corruption Policy Framework

Uganda's anti-corruption framework is supported by the various existing national policies, directly or indirectly hinging on the policy objectives of promoting equity, justice, socio-economic and political transformation. In particular, The Uganda Vision 2040 aspires for "*A transformed Ugandan Society from a peasant to a modern and prosperous country within 30 years*". The vision and the development frameworks for Uganda have recognized that one of the major challenges to attaining this vision is corruption which "increases the cost of doing business and negatively affects efficient and effective service delivery".

The Ten Point Programme of the NRM (1986) provided the initial policy direction, with Point number Seven (7) underlining the historical political will and commitment by the NRM to the *elimination of corruption and misuse of power*. This stance has consistently been followed up by the Government through the formulation of the policy, legal, institutional and operational framework for anti-corruption, including the termly political Manifestos. The ten points have since 1998 been expanded to 15, to accommodated the contemporary emerging priorities for holistic national transformation and development.

The overarching national development frameworks have been the main policies driving the anti-corruption fight. These include the previously implemented Poverty Eradication Action Plans (PEAP) later succeeded by the National Development Plans (NDPs) which are currently being implemented. All the national and institutional strategic development and investment plans have, altogether, echoed various strategies, mechanisms and measures for promoting accountability, transparency, value for money and curbing corruption in the delivery of public services and

achieving national development goals. However, the actual and practical commitments and impact have been dismal.

The Uganda Vision 2040 provides for the strengthening of the legal and regulatory framework to support transparency and accountability with the aim of putting in place appropriate measures to ensure strong implementation and monitoring mechanisms for effective service delivery. The Vision also provides for the development of a value system that socially and institutionally promotes "zero tolerance to corruption". This policy and development framework sets the foundation for encouraging all institutions to embrace the Zero Tolerance to Corruption culture and practice, in order to promote efficient and effective public service delivery.

The theme of the second National Development Plan (NDP II) 2015/16 – 2019/20 is "*Strengthening Uganda's Competitiveness for Sustainable Wealth Creation, Employment and Inclusive Growth*". To achieve this goal, the NDP II considers a number of strategies to achieve the desired transformation. Entrenched in the NDP II objectives is the commitment to strengthening good governance, a component that has a direct bearing on national values, and particularly curbing corruption to ensure that it does not become a stumbling block to the achievement of the desired national goals and objectives.

The NDP II further articulates the guiding principles that are aimed at promoting good governance, which include citizen's participation in fighting corruption, and respect for the rule of law as prerequisites for achieving growth and poverty reduction. The NDP II identifies negative attitudes and practices among the population as a binding constraint that influences the use and appreciation of natural resources and the country's potential for socio-economic and political development.

The Plan notes that matters to do with accountability go far beyond just financial accounting to include transparency and integrity in the delivery of public good which promotes zero tolerance to corruption. Some of the key constraints to the performance of the national development strategies and particularly relating to corruption issues is the lack of integrity in the use of government resources.

Through the NDP II, Government commits itself to enhancing transparency and accountability of public institutions and promoting social responsibility in the public and private sector. It further commits itself to the development and enforcement of corporate governance, code of conduct, standards and guidelines, training and creating awareness in corporate governance responsibility, in addition to sensitizing public workers and the public on integrity issues and creating public awareness about corruption and roles in fighting the scourge.

It is notable that the two overarching policy and planning frameworks, that is NDP II and Vision 2040 provide a firm foundation for the implementation of the Policy of Zero Tolerance to Corruption as a basis for strengthening, harmonizing and rallying anti-corruption efforts of Government, the private sector, the civil society, the citizens and the Development Partners.

The Government of Uganda developed the National Ethical Values (NEVS) Policy to promote and preserve the rich cultural identity and values of Uganda in order to enhance National Development within a harmonious environment. The NEVS presents the aspirations of Ugandans to uphold basic values that ought to guide and direct the attitudes and conduct of all Ugandans. The policy also aims at curbing the escalating moral decadence, and is part of the springboard for the anti-corruption fight.

However, despite the existence of an elaborate anti-corruption legal framework, there has not been a holistic policy to guide the anti-corruption interventions in the country. The Zero Tolerance to Corruption Policy is intended to provide holistic policy direction to eliminate corruption and to guide anti-corruption Agencies, MDAs, LGs and other stakeholders to effectively fight corruption. The policy galvanizes the existing legal and institutional framework and seeks to address the endemic structural and systemic gaps in the national anti-corruption fight.

1.2.3 The Anti-Corruption Legal Framework for Uganda

A number of anti-corruption laws exist, with many of them developed under the NRM Government, to ensure a strong legal regime for fighting corruption in Uganda. These laws include:

(i)   The Constitution of the Republic of Uganda (1995),
(ii)   The Penal Code Act, Cap. 120,
(iii)   The Anti-Corruption Act, 2009,
(iv)   The Whistle-blowers Protection Act, 2010,
(v)   The Inspectorate of Government Act, 2002,
(vi)   The Leadership Code Act, 2002,
(vii)   The Leadership Code(Amendment) Act, 2018,
(viii) The Public Finance Management Act, 2015
(ix)   The National Audit Act, 2008,
(x)   The Computer Misuse Act, 2011,
(xi)   The Anti-Money Laundering Act, 2013,
(xii)   The Police Act, 1994 (as amended in 2006),
(xiii) The Local Government Act, 1997,

(xiv) The Access to Information Act, 2005,

(xv) The Public Procurement and Disposal of Public Assets Act, 2003 (as amended).

(xvi) The Regulations to operationalise many of the above laws have also been formulated.

While some of the above laws are not directly, anti-corruption laws, they are important in shaping, backing up and enabling the legal environment for fighting corruption. The laws support the processes for detection, investigation and prosecution of corruption crimes.

The Constitution of the Republic of Uganda, 1995, provides foundational legal framework for accountability under the National Objectives and Directives of State Policy XXVI thus;

XXVI. Accountability.
(i) All public offices shall be held in trust for the people.
(ii) All persons placed in positions of leadership and responsibility shall, in their work, be answerable to the people.
(iii) All lawful measures shall be taken to expose, combat and eradicate corruption and abuse or misuse of power by those holding political and other public offices.

Article 3(4) of the Constitution mandates all citizens at all times to defend the Constitution; and Article 17(1)(i) makes it a duty of every citizen of Uganda to combat corruption and misuse or wastage of public property.

Uganda has been commended for its anti-corruption legal framework, with a score of 98% by the UN Anti-corruption Review Commission. This legal framework has laid the strong ground for the set up of several institutions that play a fundamental role in fighting corruption. If adequately enforced, the array of the various anti-corruption and other supportive laws is largely sufficient to deter corruption in the country.

1.2.4 Regional and International Anti-corruption framework

At the international and regional levels, the key frameworks that the Anti-corruption Policy should be consistent with are:

(i) The United Nations Convention Against Corruption, 2003

(ii) The United Convention Against Transnational Crime, 2000

(iii) African Union (AU) Convention on Preventing and Combating Corruption, 2003;

(iv) The New Partnership for African Development (NEPAD) / African Peer Review Mechanism (APRM);

(v)   The East African Community Treaty, 1999;

(vi)   The East African Community Protocol on Combating Corruption;

(vii)   The East African Anti Money Laundering Group, MOU signed on 27/08/1999.

Uganda is signatory to, and has ratified the UN and AU Anti-Corruption Conventions. It signed the UN convention on December 12, 2003, and ratified it on September 9, 2004 and it signed the AU convention on December 12, 2003, ratifying it on October 29, 2004.

The International and Regional Conventions and/or Protocols underline good governance as a fundamental aspect, entailing adherence to the principles of democracy, the rule of law, accountability, transparency, social justice, equal opportunities, gender equality, as well as the recognition, promotion and protection of human and people's rights. The frameworks thus seek to promote and strengthen the development, by each of the Partner States, of mechanisms needed to prevent, and combat corruption; promote, facilitate and regulate cooperation among the Partner States to ensure the efficiency and effectiveness of measures for preventing and combating corruption; and to develop and harmonize laws, policies and strategies relating to prevention of, and combating corruption.

There are numerous countries Uganda can learn from, which have scored a dramatic success in the anticorruption fight. Hong Kong, Kosovo, Liberia and Malaysia are some of such countries which have demonstrated that having a strong legal regime and building institutions that fight corruption is crucial, and further that combating public corruption requires political will, shared responsibility, and hard work among the democratically elected and political party leaders, political opposition, civil society, and citizens. Anti-corruption initiatives are more likely to succeed if they bring a broad range of stakeholders on board.

1.2.5   The Anti-corruption Institutional framework

The Government of Uganda has established a number of Institutions to ensure efficient and effective utilisation of public resources and promote transparency and accountability. Many of these institutions belong to the Inter Agency Forum (IAF) for effective collaboration and coordination, while others fall under the Accountability Sector in line with the Sector Wide Approach. The anti corruption Agencies include both proactive and reactive Agencies, mandated to promote and enhance transparency and accountability in the delivery of public services and to combat corruption.

The proactive agencies in the anti-corruption forum are expected to ensure the proper operation of systems and controls as well as a conducive environment that protects people from errant public and private officials. The successful and sustainable elimination of corruption from this country will, in a major way, depend on how effectively the proactive Agencies assert themselves and execute their mandated roles.

The proactive Anti-corruption Institutions include:
- (i) Directorate for Ethics and Integrity (DEI) in the Office of the President;
- (ii) The Inspectorate of Government (IG)
- (iii) State House Anti-Corruption Unit (ACU)
- (iv) The Internal Auditor General (IAG);
- (v) The Public Service Inspection Unit (PSIU);
- (vi) The Public Procurement and Disposal of Public Assets Authority (PPDA);
- (vii) The Office of the Auditor General (OAG);
- (viii) The Uganda Revenue Authority (URA);
- (ix) The Financial Intelligence Authority (FIA).
- (x) Internal Security Organisation (ISO) - Office of the President

The reactive anticorruption Agencies come into play post facto, that is, after an act of corruption has taken place or is suspected to have occurred. These Agencies undertake investigation, prosecution and punishment in the anti-corruption processes. They include:
- (i) The Uganda Police, particularly the Criminal Investigations Directorate (CID);
- (ii) The Office of the Director of Public Prosecutions (ODPP);
- (iii) The Inspectorate of Government (IG);
- (iv) The Judiciary— the Anti Corruption Court Division and the Inspectorate of Courts

A number of other Institutions were established and mandated to play the oversight role. These include:
- (i) Parliament through its Standing and Sessional Committees
- (ii) Office of the Prime Minister (OPM)
- (iii) Local Government Councils (LGCs).
- (iv) Ministry of Finance, Planning and Economic Development (MFPED)
- (v) The Ministry of Public Service (MOPS)
- (vi) The Ministry of Local Government— Inspectorate (MLG-I)
- (vii) Ministry of Internal Affairs (MIA)
- (viii) Local Government Finance Commission
- (ix) Public Service Commission (PSC)

(x)   Education Service Commission (ESC)
(xi)   Health Service Commission (HSC)
(xii)   Judicial Service Commission (JSC)
(xiii)   Budget Monitoring and Accountability Unit (BMAU)
(xiv)   The Accountant General

1.2.5.1 The Inter Agency Forum (IAF)

The Inter Agency Forum (IAF) was established as a coordination mechanism of anti-corruption Agencies. The composition of the IAF is based on the respective institutional contributions to the anticorruption chain as mandated by the relevant legislations, and a shared commitment among the member Institutions to a more coordinated approach to fighting corruption for improved service delivery. In executing their mandates, the Institutions are expected to work in collaboration with others to implement complementary accountability programmes and anti-corruption actions to achieve national development goals.

1.2.5.2 The Accountability Sector

The Sector Wide Approach (SWAp) was introduced in the 1990s, in which same-sector MDAs and other stakeholders are brought together to plan, budget, resource, implement, monitor and regularly evaluate interventions, programmes and actions. This was intended to enhance coordinated and coherent development planning and rationalization of public resources for deepened and more impactful outcomes.

Upon the SWAp background, the Accountability Sector (AS) was born in 1998, mainly to ensure coherent and more efficient planning, allocation and utilization of resources.[6] At the present, the AS is comprised of ten member Institutions, many of which belong to the IAF.

1.3   Anti-Corruption Strategic Action Plans and Operations

The NRM Government has demonstrated a consistent commitment to fight corruption since the historical times to-date. A number of interventions have been initiated in the area of good governance to build a society that espouses integrity and accountability in both the public and private sectors.

Initial reforms were grounded in the Ten Point Programme of the National Resistance Movement (NRM) which provided the initial policy direction by which the country was to be governed. Elimination of corruption and the misuse of power was emphasized as point number seven in the programme, thus underlining the historical political willingness and commitment by the new regime to fighting

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[6] Accountability Sector Strategic Investment Plan 2014/15-2019/20.

corruption which had been cited as one of the reasons for the downfall of previous regimes in Uganda.

Over the time, the Government has articulated various strategic action plans geared towards promoting good governance, and specifically those that seek to enhance ethics, integrity as well as transparency and accountability. These have been dully pursued through the collective national planning and development frameworks as well as the institution-specific strategic plans and programmes.

In 1986, a Commission of Inquiry into the Local Governments system was instituted resulting into the introduction of the Decentralization Policy for local governance in order to give powers to the people to manage their affairs and to demand accountability. This was a remarkable path to strengthening democracy and more accountable and transparent governance. In 1986, for the first time in the history of Uganda, the Office of the Inspector General of Government (IGG) was established specifically to fight corruption and abuse of power in public office. In 1987, the government adopted the Structural Adjustment Programme (SAP) whose components included privatization and liberalization of the economy. These sought to implement the concept of a lean public service as one of the ways of rationalizing public expenditure and minimizing possibilities of corruption.

As far back as 1989, the Uganda Government embarked on the Civil Service Reform Programme (CSRP) now called Public Service Reform Programme (PSRP) among other reforms, to revamp the functioning of the Public Service as a precondition for sustainability and irreversible post-conflict rehabilitation and reconstruction. This was as a response to the problems of the Public Service that was characterized by inefficiency. The resultant inappropriate administrative structures destroyed every mechanism of political, financial and technical accountability thus stifling efficient and effective management, monitoring and control.

Over the time, the country has implemented a number of Strategic Development and Investment Plans (SDIPs) both over the medium and long term. The implementation has been through the Medium Term Planning and Expenditure Framework. Such SDIPs include the Poverty Eradication Action Plans (PEAPs) previously implemented, which have been succeeded by the five-year National Development Plans (NDPs) currently being implemented.

Besides the National Development Plans, there are institution-specific SDIPs which, in spite of their being anchored into the National Development Plans, are customized to pursue institutional mandates that collectively contribute to national development. At both national and institutional level, the development and investment plans have emphasized strategies, mechanisms and measures for promoting accountability, transparency, value for money and curbing corruption in the delivery of public services and achieving national development goals.

The Government has also put in place administrative systems and control measures to enhance public finance management, quality of service delivery, and generally, strengthen public accountability and transparency. Such measures include:

(i) The introduction and rollout of the Integrated Financial Management System (IFMS) to strengthen financial management;

(ii) Integrated Personnel and Payroll System (IPPS) for regularizing the management of the Payroll;

(iii) Implementation of Straight Through Processing (STP) of moneys to spending entities to increase efficiency in payment, spending and accountability for public funds;

(iv) Implementation of the Results Oriented Management (ROM), Output Oriented Budgeting (OOB) and Output Budgeting Tool (OBT) to strengthen links between inputs and results;

(v) Implementation of the Treasury Single Account as a modern and efficient cash management practice;

(vi) Decentralization of the payroll which has led to timely payments of salaries as well as savings;

(vii) Increased monitoring and supervision of service delivery through special units such as the Health Monitoring Unit, Budget Monitoring and Accountability Unit and the Roads Monitoring Unit;

(viii) Centralizing the purchasing and delivery of human drugs and medicines by the National Medical Stores;

(ix) Computerization of the national registries for curbing bribery and other forms of corruption involved in registration of businesses and properties.

These reforms undertaken over time have seen a gradual improvement of public service delivery across the Government.

The Accountability Sector has developed and implemented Accountability Sector Strategic Investment Plans (ASSIP) in a series of five years. The current ASSIP runs from 2014/15 to 2018/19, and focuses on:
(a) Strengthening coordination and collaboration among Sector Institutions;
(b) Enhancing planning, monitoring and allocation of Government resources;
(c) Improving compliance with accountability rules and regulations;
(d) Strengthening public demand for accountability; and
(e) Enhancing prevention, detection and elimination of corruption.

The Anti-corruption Inter Agency Forum (IAF) is part of the institutional arrangement that was put in place to ensure that the National Anti Corruption Strategy (NACS) is effectively implemented to promote the fight against corruption and related malpractices.

Uganda has implemented the NACS since 1998 and is currently implementing the Fifth Cycle of the National Anti-Corruption Strategy (NACS), which runs from FYs 2014/15 to 2018/19. The various cycles of the NACS have been anchored on specific milestones including creating public awareness on corruption (1998-2001); building coalition with stakeholders (2001-2003); laying the legal and institutional framework to fight corruption (2004-2008); increasing public participation and enforcement of anti corruption measures (2009-2013) and strengthening the leadership and coordination of anti corruption efforts in all public offices at all levels of Government (2014-2019).

The current NACS (2014-2019) focuses on:
   (a) Strengthening the leadership and coordination of anti-corruption efforts in all public offices at all levels of Government;
   (b) Empowering citizens to participate in anti-corruption measures at national and at local governments;
   (c) Strengthening the anti-corruption Institutions for effective enforcement of the legal and regulatory anti-corruption measures;
   (d) Improve compliance with international and national accountability standards among public and private Institutions.

Over the years, the NACS has driven commendable strides in the anti corruption, providing a holistic strategy for strengthening public accountability and combating corruption. The national anti-corruption strategies have, in remarkable measure, emphasized both the prevention and combative approaches.

More fundamental is that efforts have been taken to harmonize the NACS with the ASSIP and the NDP II to effectively guide the harmonized implementation of the two Strategic Plans.

The ZTCP now forms the basis for harmonizing all the previous and existing anticorruption interventions as articulated in the Uganda Vision 2040, the NACS, the ASSIP and the NDP II.

1.4   Problem Statement

Corruption in Uganda has become endemic, destructive to service delivery and productivity of the nation. Corruption stands out as the prime enemy to all efforts towards the realization of the national objectives and mission of delivering Ugandans to a prosperous people and developed nation. It is entrenched into society to the extent that corrupt individuals with ill-gotten wealth are cherished and recognized as hard working and successful persons in society. The Ugandan public has largely neglected their duty of demanding for public accountability and value for money. It cannot be over-emphasized that most Ugandans are still ignorant of the evil that stands out as the main hindrance to development and which in

particular, has exacerbated impoverishment, promoted regional, tribal and family cleavages in the area of resources sharing and distribution as well as slowed national transformation.

Corruption has largely been a result of greed and unethical behaviour by public servants, private individuals and politicians. The social fabric and moral values have been so compromised that individuals want to be wealthy without working hard and then resort to illicit means of accumulating wealth.

The effects of corruption have been evidenced by the continued loss of funds through misallocation, misappropriation and collusion between public officers and private sector players, as well as the wider public in financial malpractices such as in the cases of tax administration, procurement processes, and abuse of office and public resources. This has led to financial losses, directly disadvantaging public service delivery, increasing levels of poverty, instigating social descent, frustration, injustice, abuse of human rights, as well as undermining of democratic principles and good governance.

Despite the reputably strong anti-corruption laws and programmes Uganda is credited with, the efforts to fight corruption have largely been limited by the weak enforcement of the existing legal regimes. The anti-corruption fight also remains uncoordinated to deliver one terminal result. In some cases, the provisions of some of the laws have not been fully implemented while in other instances, there has been selective prosecution of the corrupt. The sanctions and punishments handed to the corrupt fall short of deterring corruption, as they do not adequately match the loss occasioned by corruption.

Whereas there has been a remarkable historical and sustained political will to fight corruption demonstrated in the commitment to formulate and establish the policy, legal and institutional anti-corruption framework, this resolve has often fallen short of total political back up for the implementation of the recommendations of anti-corruption agencies and civil society actors; adequate financing of the institutions and full operationalization of the existing policies and laws.

The anti-corruption Institutions have not effectively and sustainably coordinated, networked and communicated on the enforceability of the legal instruments and operational strategies already in place, a loophole that has been exploited by the corrupt, and further enhanced corruption.

The anti-corruption fight has also been challenged by the inadequate human and financial capacity of the anti-corruption Institutions. This, in some instances, has been compounded by the inability of the Agencies to use the available resources

appropriately to identify, recruit, nurture, motivate and empower the requisite human resource to execute anticorruption work.

It is notable that there is need to refocus and enhance the existing approaches that have worked, as well as introduce new, more effective strategies, mechanisms and measures to renew, reinvigorate or even redirect the anti-corruption agenda and efforts to combat all forms of corruption in the country. The underlying causes of corruption, its evolving and complex nature, as well as compounding factors and limitations within the institutions, society and external environment require that the best approaches are designed to drive a more successful anti-corruption agenda, without losing attention and benefit of the existing and previously successful strategies. This is the thrust for the development of this Zero Tolerance to Corruption Policy.

1.5   Rationale for the Policy

The formulation of the Zero Tolerance to Corruption Policy is a bold move by Government to firmly renew the fight against corruption. The Policy comes to renew and guide Uganda's struggle against all the forms, causes and adverse effects of corruption. The policy underlines the Government commitment to fight corruption in public office and guides the efforts and commitments of Government and non government actors to ensure effective complementarities in fighting corruption for improved, more efficient and effective public service delivery.

The development ZTCP is both a retrospective and forward-looking action by Government to harmonise the existing legal, regulatory and institutional frameworks for strengthening accountability in the country and fighting corruption. The policy recognises the existing plans, strategies and actions for anti-corruption at the national and sub national level, and as such, provides a holistic foundation and progressive back up framework for the leadership, coordination, funding, implementation, monitoring, evaluation and reporting for such plans, strategies and actions.

This ZTPC recognizes that fighting corruption requires measures beyond legislation, sanctions and formal institutional arrangements against corruption. The measures must extend to restoring public sector ethics, creating behavioural change and strengthening the social and moral fabric right from the young to the aged populations. It has been noted for example that the magnitude of corruption in Uganda is high, despite the fact that Uganda has very good laws and a strong institutional framework. This Policy seeks to address the implementation gaps and a number of systemic, socio-cultural, political and economic inadequacies that have continuously rendered Uganda one of the most corrupt Nations in the world.

1.6   The Policy Development Process

The development of this Policy has been led by the Directorate for Ethics and Integrity in the Office of the President, with the full backing and participation of Cabinet, and the IAF member Institutions. The Policy development process followed wide consultations of and input by key stakeholders in the Government, Civil and Private sectors as well as the Development Partners (DPs). Consultative meetings were held at National level and at Regional level in the four Regions of Central, Eastern, Northern and Western. The Regional meetings were attended by representatives of the District Local Governments (DLGs), Civil Society Organisations (CSOs), and Private Sector actors from the various Districts.

An extensive review of the relevant secondary documentation including the existing legislations, policies, institutional operations, national development plans framework, reports on corruption prevalence and perception indices, among others, was carried out. Significantly, the Policy benefited from the provisions of the Uganda Vision 2040, NDP II, the NRM Manifesto for the 2016-2021 political term, and the NRM Directives and Resolutions adopted at the National Leadership Institute, Kyankwanzi.

The anti-corruption governance and measures of other countries were also reviewed and the insights drawn significantly enriched this policy.

A series of consultative and policy review meetings were held among the IAF member Institutions which hold the frontline torch for the anti-corruption fight to elicit insights into the Policy. These Institutions were also very crucial during the Policy drafting process, with regular review meetings held to get inputs into the draft.

2.0 KEY POLICY ISSUES

The following issues are underlined as salient for this Policy. These issues have been generated from the various consultative processes, as well as the anti-corruption trends and experiences in the country and elsewhere, as has been presented in the background and situational analysis to this policy.

2.1 The anti-corruption legal and policy reforms

It is necessary that emphasis is laid on the continuous strengthening of the anti corruption legal and regulatory framework through the review of the existing laws and enactment of other new laws based on the realized need in the progress of the anti corruption fight.

2.2 Enforcement of the Laws and Regulations

More efforts should be dedicated to the enforcement of the full provisions of anti corruption Laws and Regulations, to ensure increased conviction rate and other more deterrent measures such as disqualification of corruption convicts from holding public office for some time, recovery of stolen public funds by way of refund, settlement, compensation orders and fines; punishment of tax payers involved in the acts of corruption and tax evasion through prosecution and name and shame initiatives. Efforts are also needed to ensure the more expeditious disposal of corruption cases.

2.3 Institutional reforms, development and coordination mechanisms

Institutional reforms are necessary to reorient public sector Institutions to enhance transparency and accountability mechanisms. More efforts are needed to enhance the institutional capacity of anti-corruption Agencies in terms of human, financial and operational capacity. This should be in the form of increased staffing levels and acquisition of more specialized skills and technology through training programs within and outside the country in areas such as investigative techniques, property rights, digital investigations, cyber-crimes, asset tracking and recovery, among others so as to enhance their capacity to detect, investigate, prosecute and adjudicate cases of corruption. Motivational reforms such as better remuneration and facilitation for anti-corruption Agencies are also key.

Institutional coordination among the anti-corruption Agencies needs to be streamlined and strengthened, and more specialized Departments such as the Professional Standards Unit (PSU) of the Police created to handle special investigations and check corruption within the institutions.

2.4 Preventive, combative and enforcement of anti corruption measures

The measures geared towards preventing and combating corruption should be reoriented, refocused, redirected and enhanced to effectively deal with cases and

scenarios of corruption. Such measures include regular institutional audits, special value for money and inventory/asset audits; improved tax revenue collection, improved financial management and control systems; enhanced payroll management; computerization of the national registries to curb bribery and other forms of corruption involved in registration of businesses and properties; institutional inspections, monitoring and evaluation of MDAs and LGs; enhanced result-oriented management systems, improved investigations, among others.

It is vital to strengthen the public demand for quality and value for money service delivery and accountability. All public institutions and sectors should improve information sharing as well as develop, disseminate and utilize service delivery standards across sectors; as well as empower the citizens to demand transparency and accountability from duty bearer institutions and individuals as well as perform their role of fighting corruption. Public mobilization, education and sensitization for awareness raising and increased public participation in the fight against corruption are very paramount.

2.5 Ethics, integrity and the moral fabric

As a more sustainable anti-corruption measure, it is important to focus on rebuilding and re-invigorating the social, cultural, economic and political moral values and fabric among Ugandans as an important foundation to proactively deal with and prevent the fundamental root causes of corruption. Such causes include the decay of morals and the breakdown of the social, informal and formal systems for ethics, integrity and professionalism. There is need to reverse the challenge of public apathy and abdication of their role in the fight against corruption, as well as prescribe solutions to all dimensions of corruption in form of political, social and economic perspectives.

2.6 Political will and commitment to fight corruption

The political fight against corruption needs to be renewed and all-round, demonstrated in ensuring the existence of strong laws, policy and strategic operational actions, regulations and institutions to fight corruption, adequate funding of the institutions and efforts, and back up in the implementation of the recommendations of anti corruption Agencies and other relevant actors. Political will is also necessary in dealing with the underlying political forms of corruption such as voter bribery, politically misusing public property e.g. high political offices awarding contracts, appointing unqualified persons in offices, sectarianism, nepotism, tribalism, religious bigotry, appointing family members, selective prosecution etc. There is need for a comprehensive review of the public service remuneration structure with a view to rationalizing the pay across the board and increasing the remuneration of public servants to overcome the corruption induced by inadequate salaries and other forms of remuneration. At the best, the backing and

action by the President as Head of State should be visibly seen to champion and spearhead the fight against corruption in the same way and measure as seen in the previous successful fights against HIV/AIDS and serious crimes that have at various times threatened the security and development of the country.

2.7 Strategic synergies and collaboration with Non State actors and Citizens

Corruption is everybody's problem, and must be seen as a universal concern. At the present, the formal arrangements for fighting corruption have mostly concentrated at Government level, while linkages with non-state actors have remained weak and ineffective. There is need to strengthen formal coordination, synergies and collaboration mechanisms with the civil society, religious and faith based organisations, cultural and private sector and media institutions to improve information sharing and joint action against corruption. It is important to clarify roles, expectations and operational principles of all stakeholders in the holistic institutional arrangement for fighting corruption. The formal Government anti-corruption institutional set up must cascade from the national up to the community level, recognizing the important roles and relationships lower local governments and citizens should play in exacting transparency and accountability.

2.8 Research and knowledge management

Regular research and knowledge management mechanisms are necessary to provide locally generated evidence and information on corruption and anti-corruption issues. There is need to support and improve the corruption data tracking mechanisms initiated by the IG, as well as carry out extensive, regular and quality research on the prevalence of actual and perceived corruption, as well as the level of success of anticorruption measures in the country. This will help provide empirical evidence on the trends in corruption and anti-corruption efforts in Uganda, inform and further the appreciation of the problem of corruption, and enable the design of more effective measures.

3.0   THE POLICY FRAMEWORK

3.1   Guiding Principles

The successful implementation of the Zero Tolerance to Corruption Policy is guided by the following principles.

3.1.1   Leadership

There must be committed leadership at all levels, right from the top leadership to the lowest level, to ensure the anti-corruption aspirations are realized.

3.1.2   A sector wide approach

All MDAs, Local Governments, the Private Sector, Civil Society, citizens and Development Partners should be involved in the fight against corruption based on deliberate and formalized operational arrangements, systems, procedures and processes. Institutional coordination and joint action within the IAF and other key stakeholders should be initiated and/or strengthened.

3.1.3   Inter-Agency collaboration and strategic partnerships

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

3.1.4   Equity and fairness

All citizens and people of Uganda must be treated justly and fairly in the implementation of this policy.

3.1.5   Collective responsibility

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

3.1.6   Transparency and accountability

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

3.1.7 Institution capacity development

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

3.2 Policy Vision

The Vision of this Policy is "*A Developed, Corrupt Free Society*".

3.3 Policy Goal

The goal of this Policy is to "*To eradicate corruption and its effect on Uganda's Society*".

3.4 Policy Mission

The mission of this Policy is "*To provide, guide and support a holistic framework for fighting corruption in Uganda for national transformation and development*".

3.5 Policy Outcomes

The expected outcomes of this Policy are:
- (i) Strengthened preventive and enforcement anti-corruption measures
- (ii) Strengthened anti-corruption Institutions
- (iii) Enhanced and effective institutional coordination for anticorruption
- (iv) Enhanced and visible public participation in accountability and anti corruption work
- (v) A culture of integrity, transparency and accountability inculcated at all levels in society especially the youth.
- (vi) Political commitment at all levels to attain zero tolerance to corruption promoted.

3.6 Policy Objectives

The objectives of the Zero Tolerance to Corruption Policy (ZTCP) are:

1. To institute and effectively enforce anti-corruption measures.
2. To strengthen partnerships among all stakeholders for the effective implementation of the anti-corruption measures.
3. To inculcate a culture of integrity, accountability and patriotism at all levels especially among the youth.
4. To promote political commitment demonstrated by leaders at all levels.

3.7   Strategies and actions to achieve the Policy Objectives

Objective 1: To institute and effectively enforce anti-corruption measures.
       Strategies:

   (i)   Undertake a review of the anticorruption Laws and Regulations to identify and address the gaps.
   (ii)   Strengthen the implementation of existing anticorruption Policies, Laws, Regulations, rules, codes and procedures.
   (iii)   Design and implement systems for prevention of corruption.
   (iv)   Enhance the capacity of anticorruption Institutions to detect, pre-empt, investigate, prosecute and adjudicate cases of corruption.
   (v)   Formulate laws to deal with new and emerging issues in the fight against corruption such as Asset Recovery laws, Mutual Legal Assistance laws, establish autonomy of anti-corruption Agencies; concurrent criminal and civil prosecution of corruption cases; and carrying out lifestyle audits.
   (vi)   Adopt and implement Regional, International laws, conventions, resolutions, measures, and practices for preventing and combating corruption.
   (vii)   Institute mechanisms that promptly detect, investigate and report possible incidences of corruption.
   (viii)   Institute systems for detection of syndicate corruption.
   (ix)   Enhance monitoring, follow-up and reporting on compliance/ implementation of existing institutions, policies, laws, regulations and procedures.
   (x)   Establish internal inspection units in all MDAs.
   (xi)   Strengthen Internal Audit function through ensuring functional independence to report to the Permanent Secretary/ Secretary to the Treasury (PS/ST) MOFPED, as a means of preventing compromise.
   (xii)   Join and actively participate in activities of regional, international organisations for best practices, information sharing, networking and technical assistance in fighting corruption.

Objective 2: To strengthen partnerships among all stakeholders for the effective implementation of anti-corruption measures.
       Strategies:

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

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

(iii) Strengthen coordination and networking framework with the non State actors including Civil Society, Religious, Faith-based, Cultural, Private Sector and Media Institutions by reviewing and strengthening the existing Anticorruption Public-Private-Partnership (ACPPP).

(iv) Develop, implement and sustain intra and inter-institutional reporting arrangements

(v) Establish and operationalise Local Government Anticorruption Structures (LGACS)

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

(vii) Establish a national research, resource and knowledge management hub on corruption related issues

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

(ix) Strengthen the e-governance to enhance skills, checks to ensure integrity of the system and personnel.

Objective 3: To inculcate a culture of integrity, accountability and patriotism at all levels.
  Strategies:

(i) Establish ethics and integrity function in all MDAs and local governments to be monitored and verified by DEI to ensure compliance.

(ii) Introduce integrity recruitment system

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

(iv) Increase citizen participation in the fight against corruption

(v) Empower citizens to demand accountability in both private and public sectors and to report corruption

(vi) Continuously engage pillars of social change— family, religious, cultural, government and education institutions for values reorientation especially integrity at all levels of society

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

(viii) Developing a law on instruments for lifestyle audits.

(ix) Promote mainstreaming of National Ethical Values of Uganda in all sectors.

(x) Strengthen performance, management and accountability standards, systems and controls.

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

Objective 4: To promote political commitment demonstrated by leaders at all levels.

Strategies:

(i) Develop and implement the National Anti-corruption Strategy (NACS).

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

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

(iv) Increase funding for Anti-Corruption Institutions

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

(vi) Rationalize public remuneration and motivation

(vii) Ensure follow up and implementation of recommendations of anticorruption and oversight institutions and Commissions of Inquiry.

4.0 INSTITUTIONAL AND COORDINATION ARRANGEMENTS FOR THE IMPLEMENTATION OF THE POLICY

The Government of Uganda has established a number of Institutions to ensure efficient and effective utilisation of public resources and promote equity, transparency and accountability. The ZTCP recognises that the current institutional set up and arrangements to broadly promote equity, integrity, transparency, accountability, value for money; and specifically fight against corruption is remarkable. However, there should be further improvement to ensure more effective coordination, enhance cohesion, collaboration and effectiveness amongst the institutions for a renewed, stronger and more effective anti corruption fight.

4.1 Institutional Coordination Framework and Mechanisms

At the present, the accountability and anticorruption Institutions are organised at three broader levels: the Accountability Sector (AS), the Inter Agency Forum (IAF) and the Justice Law and Order Sector (JLOS).

4.1.1 The Accountability Sector (AS)

At the sectoral level, the Accountability Sector seeks to provide a conducive environment for promoting efficient (technically correct), transparent and accountable planning, budgeting, and utilization of public resources by public institutions. The AS was constituted to spearhead the promotion, supervision and implementation of accountability systems across government in a coordinated, more efficient and effective manner. In the implementation of this Policy, the AS will continue to play its role at the sectoral level.

4.1.2 The Anti Corruption Inter Agency Forum (IAF)

The Anti-corruption Inter Agency Forum (IAF) is, rightly, part of the Accountability Sector, and therefore the broader institutional arrangement for promoting and ensuring equitable, transparent, accountable and value for money in delivery of public services. The IAF is an institutional arrangement that was put in place to ensure that the National Anti Corruption Strategy (NACS) is effectively implemented to promote the fight against corruption and related malpractices. As presented earlier, the IAF is comprised of proactive and reactive anti-corruption institutions, as well as a range of other oversight agencies which support the work of the anti-corruption institutions. The Government will continue to strengthen the IAF institutions as the lead implementing agencies of the policy.

The three platforms have been significantly important in driving and sustaining the accountability and anti-corruption efforts.

This Policy recognizes the respective roles of the different Sectors and Institutions in the anti-corruption chain.

The essence of the Policy is to promote and drive a shared, coordinated and cohesive accountability agenda for the country among all the institutions in charge of anti-corruption.

4.1.3 Stakeholders roles in the implementation of the Policy

The composition and membership to the Accountability Sector, JLOS and IAF are based on the respective institutional mandates and contributions to the accountability and anti-corruption chain. In executing their mandates, the Institutions are expected to work in collaboration to implement complementary accountability and anti corruption programmes to achieve the policy objectives. In the anti-corruption chain, these Institutions play specific roles as legally mandated, and as assigned through the Inter Agency coordination arrangements. Beyond the IAF and AS arrangements, other MDAs, the Civil Society, Religious and Faith Based Organisations (RFBOs), Private Sector, Academia, the Media as well as traditional and Cultural Institutions play significant roles in the fight against corruption. Through this policy, the Government will ensure that these multi-stakeholder roles are leveraged.

Stakeholders will play varied roles in the accountability and anticorruption chain as tabulated below;

	Institution	Role / Mandate
(i)	Directorate for Ethics and Integrity in the Office of the President	• Coordinate national efforts to fight corruption and empower the Ugandan society to uphold moral values and principles • Develop standards for the mainstreaming of ethics and integrity in public and core private institutions • Develop and promote an effective anti-corruption legal framework • Raise awareness and increase the level of participation of public and core state institutions in anti-corruption anti-immorality activities.
(ii)	Ministry of Finance, Planning and Economic Development	• Set and enforce policy and operational guidelines on planning, budget allocation, utilisation and accountability of public finances • Regulates the expenditure and allocation of public resources • Identify measures to increase the national resource envelope.

(iii)	Inspectorate of Government	• Promote good governance in the Republic of Uganda through three cardinal roles of: the Ombudsman function; Anti-corruption function; Enforcement of the Leadership Code of Conduct • Stimulate public awareness about the values of constitutionalism and activities of the Inspectorate of Government • Implement strategies comprising of both proactive/preventive measures and reactive/enforcement measures against corruption.
(iv)	State House Anti-Corruption Unit	• Receive corruption information from Ugandan citizens over a confidential and secure online platform. • Gather information on corruption occurring in Government and the private sector. • Cause investigation and prosecution, if need be, of persons involved in corruption within the public sector.
(v)	Office of the Auditor General	• Audit and report on the public accounts of Uganda and of all public offices and/or organizations established by an Act of Parliament. • Carry our Value for Money Audits.
(vi)	Internal Auditor General	• Develop internal audit strategy and supervise its implementation; • Develop internal audit policies, rules, standards, manuals, circulars and guidelines; • Review and consolidate audit reports from the votes and externally financed projects; • Liaise with the Auditor General, Accountant General, Accounting Officers and internal auditors on audit matters; • Consolidate the reports of all the audit committees on the respective votes; • Provide evidence to the relevant parliamentary oversight committees when requested to do so.
(vii)	Uganda Bureau of Statistics	• Provision of accurate, reliable, complete and timely statistics to guide the strategic planning process. • Review and make proposals for policy changes and formulation arising from research based anticorruption monitoring
(viii)	Uganda Revenue Authority	• Administer and give effect to the Ugandan tax laws, assess, collect and account for the tax revenue collected
(ix)	Public Procurement	• Regulate all public procurement and disposal of public assets

	and Disposal of Assets Authority	processes in Uganda, • Ensure application of fair, competitive, transparent, non-discriminatory and value for money procurement and disposal standards and practices • Set standards for the public procurement and disposal systems and monitor their compliance by the procuring and disposing entities
(x)	Ministry of Public Service— Inspection	• Promote and enforces public service standards, ethics and values • Address inefficiency, ineffectiveness and non responsiveness in the Public Service • Inspect the entire Public Service to attain set targets and to monitor closely the performance of Public Officers.
(xi)	Kampala Capital City Authority	• Collect revenue and administer laws related to public revenue. • Identify measures to increase the revenue collection • Ensure compliance to the internal controls by conducting regular quarterly inspection.
(xii)	Ministry of Local Government— Inspection	• Monitoring and enforcing mechanisms for compliance to LG performance standards and professionalism • Prevention, detection and punishment of LGs for non for compliance.
(xiii)	Uganda Police Force— the Criminal Investigations Directorate (CID)	• Detect, prevent and investigate crime • Investigate fraud related cases country wide • Handle corruption in both public and private sectors
(xiv)	Office of the Director of Public Prosecutions (ODPP)	• Provide legal advice to CID during all criminal investigations • Institute and conduct criminal proceedings against any person or authority in any court with competent jurisdiction except the Court Martial • Handle miscellaneous applications, revisions, appeals and Constitutional Petitions arising out of criminal cases, including corruption cases.
(xv)	Judiciary— the Anti-corruption Court Division and Inspectorate of Courts	• Adjudicate corruption related offences in a logical, expeditious and cost effective manner • Undertake inspections of courts
(xvi)	Parliament through its Standing and	• Play oversight and accountability function over all Government Institutions and non government Agencies which come to

Sessional committees	transact business with Government • Monitor and promote efficiency and effectiveness of Government programmes
(xvii) Office of the Prime Minister (OPM)	Overall coordination and monitoring of Government programmes to ensure economy, efficiency and effectiveness (value for money)
(xviii) Ministry of Internal Affairs (MIA)	• Provide peaceful and secure environment for exacting accountability • Assist Oversight Institutions in carrying out their functions • Conduct investigations on any misconduct by public officers and take disciplinary actions through the Police.
(xix) Local Government Finance Commission (LGFC)	Mainstream the LG financial policies into their administration and put mechanisms for prevention, detection and punishment of the culprits.
(xx) Public Service Commission (PSC)	Recruit Public Officers and enforce discipline and adherence to set standards
(xxi) Education Service Commission (ESC)	Recruit education officers and enforce discipline and compliance to set standards
(xxii) Health Service Commission (HSC)	Recruit health workers and enforce discipline and compliance to set standards
(xxiii) Judicial Service Commission (JSC)	• Recruit, monitor and discipline Judicial Officers and non judicial staff of the Judiciary • Ensure compliance to ethical, professional and judicial service delivery standards
(xxiv) Budget Monitoring and Accountability Unit (BMAU)	Specialised unit in MOFED to monitor budget performance; and value for money
(xxv) Accountant General	• Review, appraise and report on extent to which government assets and interests are accounted for and safeguarded in the operations of the spending agencies and identify weaknesses and make suggestions for their elimination; • Review, appraise and report on soundness, adequacy and application of internal controls to realize value for money. • Undertake special investigations on financial and operational anomalies of spending agencies.
(xxvi) Accountability Sector Secretariat	Coordinate the Accountability Sector Institutions in the planning, budgeting, execution, reporting, monitoring and evaluation of Anti-corruption strategies, policies, programmes and projects.

(xxvii) Equal Opportunities Commission	• Redress imbalances and promote equal opportunities for all; • Link corruption to service delivery and equal opportunities (relate proper application of resources to redressing imbalances).
(xxviii) The Uganda Human Rights Commission	• Relate corruption to denial of public services and thus violation of human rights • Promote proper use of public resources as a human rights issue.
(xxix) Local Governments	Ensure effective devolution of anti-corruption efforts and roles
(xxx) Civil Society	• Strengthen citizens demand and monitoring of service delivery at lower administrative units and community levels • Promote spiritual, emotional and cultural values which are fundamental pillars of building a moral ethical and value system in society
(xxxi) Private Sector	• Develop and/or adoption Business Codes of Conduct already championed by the Private Sector Foundation of Uganda (PSFU) • Partnerships with the Government to implement joint programmes for strengthening accountability
(xxxii) Academia	Advance research and knowledge development in the accountability and anti-corruption fields.
(xxxiii) Cultural & Religious Institutions	Promote cultural values for building and rebuilding a moral ethical and value system in society
(xxxiv) The General Public	• Demand for accountability and transparency from duty bearers • Proactively participate in anti-corruption programmes • Monitor delivery of public services and public expenditure
(xxxv) Media	• Play the watchdog of the public to ensure transparent and accountable delivery of quality services • Information dissemination and awareness raising • Publicity for anti-corruption interventions • Partnerships with the Government to implement joint programmes for strengthening accountability
(xxxvi) Development Partners	• Provide financial support for transparency, accountability and anticorruption programmes / interventions • Provide technical assistance in performance assessment/reviews and improving accountability and service delivery interventions • Strengthen measures such the Joint Budget Support Framework (JBSF), and Joint Assessment Framework (JAF) mechanisms already ongoing

4.1.4 Institutional commitments to implementation of the Policy

To realize effective response and compliance to implementation of the ZTCP, clear roles, responsibilities, commitments and targets for policy implementation will be articulated and assigned to the cooperating agencies in Government and outside.

4.2 Linkages with other Institutions and Sectors

The effectiveness of the ZTCP is highly dependent on the goodwill and participation of a wide range of sectors and MDAs/LGs. The other sectors including the Justice Law and Order, Public Sector Management, Education, Health, Works, Security, Agriculture are among the key players in service delivery. These supplement on the accountability agenda. This places great focus now on coordination and in particular, reaching out to and influencing many areas of the public service. In this case, it would be important to coordinate closely with the other sectors across Government to maximize synergies, support and greater impact. The current arrangements and operations of the IAF will be maintained and strengthened. The IAF will further discuss the framework and processes of working with the other sectors across Government.

4.3 Sectoral and Institutional coordination and cohesion

The Anti-Corruption sub sector is mandated to promote, enhance transparency and accountability in delivery of public services and to combat corruption. The coordination of the ZTCP shall be led by the Directorate for Ethics and Integrity (DEI). Based on the emerging trends and needs, the IAF will vary its membership to incorporate additional Agencies that are relevant to its focus.

DEI will be the coordinating centre for the implementation of the ZTCP programmes and activities.

4.3.1 Institutional Level Coordination

At the institutional level, all stakeholders shall designate focal point contact officers to coordinate the implementation of the ZTCP at institutional level. Such officers will, on representation of their respective institutions, track the activities of the implementation of the ZTCP for their Institutions, represent their Institutions in the IAF and serve as immediate contacts for information, updates and effective participation of their institutions.

4.4 The Communication Strategy

In the implementation of the Policy, it will be crucial for all partners and stakeholders to promote active communication among the implementers of programmes and to the public

All stakeholders will seek to improve systematic information flow through:

a) Development and implementation of an appropriate Information, Education and Communication (IEC) strategy;

b) Strengthening and enhancing inter-agency information sharing and communication;

c) Development of innovative ways of facilitating communication with, as well as education and sensitization of the public to enable the various constituencies of the public understand and participate in the anti-corruption efforts. Such ways will seek to leverage the opportunities presented by ICT and other technological innovations to enable the public to access information through the current telecommunication and internet coverage; optimize possibilities of the country-wide coverage; and provide information to the sector

d) Ensure dissemination of simplified versions of information and legislations on accountability, and as much as possible, translate them into languages better understandable by the users.

e) Obtaining feedback, reports and recommendation from various stakeholders on the anti corruption efforts.

The Communication strategies will pay attention to the sensitivities and complexity of the corruption and anti corruption measures at the global, regional and national level, especially during crucial stages of investigation, tracking and detection.

Results of research and knowledge development undertakings of the various anti-corruption actors will be widely disseminated to publicize the negative impacts that corruption has on the national economy, development efforts and increasing the incidence and impact of poverty.

Combating corruption, malpractices and abuse of office requires the participation of all concerned, and this will be constrained if sufficient information and knowledge is withheld from the actors and from the public. It is also important that feedback is elicited from the public, including whistles blowers who must be protected from possible rebuttal and victimization. Government will therefore continue to disseminate information to a range of stakeholders including MDAs, civil society and private sector actors, DIPFs, professionals, schools and institutions of higher learning as well as the public. The communication strategy will ensure adequate communication of the policy including the laws and regulations, the strategies, the programmes and activities, corruption trends and types. Key messages will also focus on efforts geared towards eradicating corruption and citing wherever it manifests and institutions that are affected, as well as mobilize citizens to combat and resist all forms of corruption.

5.0 ACTION PLAN AND FINANCIAL IMPLICATIONS FOR THE IMPLEMENTATION OF THE POLICY

5.1 INTRODUCTION

This Action Plan (AP) and Cost Implication Framework (CIF) have been developed to guide the implementation of the Zero Tolerance to Corruption Policy (ZTCP). The Policy underlines the Government commitment to fight corruption in public office and guides the efforts and commitments of non government actors to ensure effective complementarities in fighting corruption for improved, more efficient and effective public service delivery.

5.2 STRATEGY GOAL

The main goal of this Strategy is to guide the implementation of the ZTCP over the next three years, by highlighting identified and costed strategies to be undertaken at all levels and by the various Government Institutions.

6.0 BROAD CONSIDERATIONS FOR THE IMPLEMENTATION OF THE ZTCP

6.1 Objectives and Strategic Interventions

The implementation of the ZTCP is hinged on the broad objectives of the Policy. These objectives cascade further to the broad strategies, outputs and output indicators. The Action Plan has kept the Strategic Interventions at a broader level to create entries for specific interventions of all MDAs in the fight against corruption.

6.2 Government-wide Implementation Approach

The ZTCP recognizes that all MDAs, including Local Governments, should proactively be involved in the fight against corruption, based on a deliberate, structured and formalized operational arrangement, and guided by clear systems, procedures and processes.

6.2.1 Structured Implementation of Anti-corruption Interventions by the MDAs

The participation of the MDAs in the fight against corruption has been structured at three levels: Tier One: Core Anti-corruption Institutions; Tier Two: Accountability and Oversight Institutions; Tier Three: Other MDAs including Local Governments. The anticorruption and accountability roles of the institutions in this multi-level arrangement are varied, in concentration and intensity.

Tier One Institutions: The Government of Uganda established a number of Institutions to ensure efficient and effective utilisation of public resources and promote transparency and accountability. In this Action Plan, these institutions are the Core Anti-corruption Institutions (CAIs). These institutions include both the

proactive and reactive anticorruption Agencies, mandated to promote and enhance transparency and accountability in the delivery of public services and to combat corruption.

The proactive Agencies in the anti-corruption fight are those that ensure the proper operation of systems and controls, as well as fostering a conducive environment that protects people from errant public and private officials. The reactive anticorruption Agencies come into play post facto, that is, after acts of corruption have taken place or are suspected to have occurred. These Agencies undertake investigation, prosecution and punishment in the anti-corruption processes.

Many of the CAIs belong to the Anti-corruption Inter Agency Forum (IAF) for effective collaboration and coordination. This arrangement will remain in force, for the implementation of the ZTCP, with the necessary progressive modifications from time to time.

Tier Two Institutions: These Institutions are the oversight and accountability Agencies that do not focus on anticorruption as their primary role. They include MOFPED and MOPS which are responsible for setting management and accountability standards, the various Service Commissions, Local Government Finance Commission, Parliament (through its various Standing and Sessional Committees), among others, which play oversight and accountability monitoring functions in their respective domains. Many of these institutions belong to the Accountability sector

Tier Three Institutions: All the other MDAs which should embrace the anticorruption fight from a preventive perspective, by implementing the own-defined and stipulated or dictated corruption prevention and enforcement measures, as well as comply with accountability standards.

Table 1: Institutional Outlay for the Implementation of the ZTCP

	TIER ONE: CORE AC INSTITUTIONS	ZTCP implementation roles, responsibilities and financing
1.	Inspectorate of Government (IG)	• Ensure good governance in the Republic of Uganda through three cardinal roles of: the Ombudsman function; Anti-corruption function; Enforcement of the Leadership Code of Conduct.[7] • Stimulate public awareness about the values of constitutionalism and activities of the Inspectorate of Government.[8] • Ensure that strategies comprising of both proactive/preventive measures and reactive/enforcement measures against corruption are implemented.
2.	Directorate for Ethics and Integrity (DEI)	• Ensure that Ugandan society upholds moral values and principles • Coordinate all stake holders involved in the fight against corruption country wide • Formulate and put in place an effective anti –corruption legal framework • Ensure that there are standards for mainstreaming of ethics in public and core private institutions.[9]
3.	State House Anti-Corruption Unit (ACU)	• Receive corruption information from Ugandan citizens over a secure and confidential online platform; cause investigation and prosecution • Gather information on corruption occurring in Government and the private sector. • Combat corruption, economic crime and unethical conduct through law enforcement, prevention, public education, promotion of standards and practices of integrity.
3.	Office of the Director of Public Prosecutions (ODPP)	• Provide legal advice to CID during all criminal investigations • Institute and conduct criminal proceedings against any person or authority in any court with competent jurisdiction except the Court Martial • Handle miscellaneous applications, revisions, appeals and

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[7] Constitution of Republic of Uganda 2005: Article 225 (b)
[8] Inspectorate of Government Act, 2002
[9] Constitution of the Republic of Uganda 1995, Article 99(4)

		Constitutional Petitions arising out of criminal cases, including corruption cases.
4.	Office of the Auditor General (OAG)	• Carry out audits and report on the public accounts of Uganda and of all public offices and/or organizations established by an Act of Parliament. • Review, appraise and report on soundness, adequacy and application of internal controls to realize value for money. • Undertake special investigations on Financial and Operational anomalies of spending agencies.[10] • Carry our value for money audits.
5.	Public Procurement and Disposal of Public Assets Authority (PPDA)	• Regulate all public procurement and disposal of public assets processes in Uganda. • Ensure application of fair, competitive, transparent, non-discriminatory and value for money procurement and disposal standards and practices. • Set standards for the public procurement and disposal systems and monitor their compliance by the procuring and disposing entities.[11]
6.	Uganda Police Force – Criminal Investigations Directorate (UPF-CID)	• Detect, prevent and investigate crime • Ensure that fraud related cases countrywide are investigated. • Ensure that corruption in both public and private sectors is effectively dealt with.
7.	Judiciary – Inspectorate of Courts	• Ensure that corruption related offences are adjudicated in a logical, expeditious and cost effective manner. • Ensure that inspections of courts are undertaken
8.	Judiciary – Anti Corruption Court Division	• Adjudicate corruption-related offences in a logical, expeditious and cost-effective manner

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[10] Constitution of Republic of Uganda 2005: Auditor General. Article 162
[11] Public Procurement and Disposal of Public Assets 2011 as Amended: Section I

9.	Ministry of Internal Affairs (MIA)	• Ensure a peaceful and secure environment for exacting accountability • Assist Oversight Institutions in carrying out their functions • Insure that investigations on any misconduct by public officers are conducted and disciplinary action is taken against errant Police Officers.
10.	Uganda Revenue Authority (URA) (Tax Investigations and Internal Investigations Divisions; and the Prosecution Departments).	• Assess and collect specified revenue; • Administer and give effect to the Ugandan tax laws, assess, collect and account for the tax revenue collected • Administer and enforce the laws relating to such revenue and provide for related matters.
11.	Ministry of Finance Planning and Economic Development (MOFPED)	• Set and enforce policy and operational guidelines on planning, budget allocation, utilisation and accountability of public finances; • Regulate the expenditure and allocation of public resources; • Promote and enforce transparent, efficient, and effective management of the revenue and expenditure and the assets and liabilities of votes; • Set standards for the financial management systems and monitor the performance of those systems; • Ensure that the internal audit function of each vote and public corporation is appropriate to the needs of the vote or public corporation concerned and conforms to internationally recognized standards, in respect of its status and procedures. • Resource mobilization
12.	Ministry of Public Service – Inspection (MOPS-I)	• Promote and enforce public service standards, ethos and values • Address inefficiency, ineffectiveness and non-responsiveness in the Public Service • Periodically inspect the entire Public Service to attain set targets and to monitor closely the performance of public officers. • Provide training for Public Officers on building leadership and integrity.

13.	Ministry of Local Government – Inspection	• Monitor and enforce mechanisms for compliance to Local Government performance standards and professionalism. • Enforce mechanisms for prevention, detection and punishments of Local Government Officers for non-compliance with the set performance standards and norms.
14.	Local Government Finance Commission (LGFC)	• Mainstream the Local Government financial policies into their administration, and put in place mechanisms for prevention, detection and punishment of the culprits.
15.	Public Service Commission (PSC)	• Recruit public officers and enforce discipline and adherence to set standards • Vet and supervise members of the District Service Commissions.
16.	Education Service Commission (ESC)	• Recruit Educational Officers and enforce discipline and compliance to set standards
17.	Health Service Commission (HSC)	• Recruit Health Workers and enforce discipline and compliance to set standards
18.	Judicial Service Commission (JSC)	• Recruit, monitor and discipline errant Judicial Officers and non-Judicial staff of the Judiciary • Ensure compliance to ethical, professional and judicial service delivery standards.
20.	Ministry of Justice and Constitutional Affairs	• Provide legal advice and legal services to Government Ministries, Departments and Agencies. • Promote and facilitate efficient and effective machinery capable of providing laws for good governance and accountability. • Draft Bills and Statutory Instruments that ensure good governance and accountability.
21.	Uganda Human Right s Commission	• Educate and encourage the public to defend the Constitution against all forms of abuse and violation. • Formulate, implement and oversee programmes intended to inculcate in the citizens of Uganda awareness of their civic responsibilities and an appreciation of their rights and obligations.
22.	Uganda Land Commission	Ensure the equitable and transparent management, leasing and disposal of any land in Uganda vested in or acquired by the Government of Uganda.

Tier Two: General Oversight and Accountability Institutions		Roles focused on accountability oversight and setting standards
23.	The Internal Auditor General (IAG);	• Conduct reviews, appraisals and report on soundness, adequacy and application of internal controls to realize value for money. • Ensure that special investigations on Financial and Operational anomalies of spending agencies are undertaken. • Develop internal audit strategies and supervise their implementation; • Develop internal audit policies, rules, standards, manuals, circulars and guidelines; • Review and consolidate audit reports from the votes and externally financed projects; • Liaise with the Auditor General, Accountant General, Accounting Officers and Internal Auditors on audit matters; • Consolidate the reports of all the audit committees on the respective votes; • Provide evidence to the relevant Parliamentary Oversight Committees when requested to do so.
24.	Financial Intelligence Authority (FIA).	• Prevent money laundering and combat money laundering activities; • Process, analyse and interpret information disclosed to and obtained by FIA in terms of the Anti Money Laundering Act, 2013 related to money laundering and terrorist financing; • Ensure that any matter or information derived from any report or information received is referred to the appropriate Law Enforcement Agency in Uganda 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 of a money laundering offence, a terrorist financing offence or a serious offence; • Inform , advise and cooperate with other competent authorities;
25.	Internal Security Organisation (ISO)	• Collect, receive and process internal intelligence data on financial management and any acts of impropriety; • Advise and recommend to the President or any other relevant authority and stakeholders on what action should be taken in connection with that intelligence data. • Provide early warning on corruption practices; • Make reports to relevant Institutions / stakeholders

26.	Inspectorates of all MDAs	• Carry out regular inspections in accordance with their respective mandates.
27.	Accountant General (AG)	• Review, appraise and report on the extent to which Government assets and interests are accounted for and safeguarded in the operations of the spending Agencies; identify weaknesses and make suggestions for their elimination; • Take charge of the compilation and management of the accounts of votes; • Ensure the custody and safety of public money; • Take charge of the resources of Government; • Ensure that an appropriate system of accounting is established which ensures that all money received is promptly and properly brought to account; • Ensure that the system of internal control is appropriate to the needs of the vote and that as far as is practicable, the system conforms to international standards;
28.	Accountability Sector Secretariat	Ensure coordination of Accountability Sector Institutions in the planning, budgeting, execution, reporting, monitoring and evaluation of Anti-corruption Strategies, programmes and projects.
29.	Parliament through its standing and Sessional committees	• Carry out oversight and accountability function over all Government Institutions and Non-Government Organisations which transact business with Government • Monitor and promote efficiency and effectiveness of Government programmes
30.	Office of the Prime Minister (OPM)	• Overall coordination and monitoring of Government programmes to ensure economy, efficiency and effectiveness (value for money)
31.	Local Government Councils (LGCs).	• Ensure effective devolution of anti-corruption efforts and roles
32.	National Planning Authority	• Produce comprehensive and integrated development plans that promote good governance which is characterised by accountability and transparency. • Carry out periodic national evaluations of the effectiveness of the development plans.
33.	Uganda Bureau of Statistics (UBOS)	• Provide accurate, reliable, complete and timely statistics to guide the strategic planning process. • Review and make proposals for policy changes and formulation arising from research based anti-corruption monitoring
34.	Uganda Law Reform	• Study and keep under constant review all Laws of Uganda with a view to making recommendations for their systematic improvement, development and reform.

	Commission	
35.	Kampala Capital City Authority (KCCA) – Revenue Collection and Mobilisation	• Collect revenue and administer laws related to public revenue. • Identify measures to increase the revenue collection • Ensure compliance to the internal controls by conducting regular quarterly inspection
36.	Religious and Faith Organisations	• They have structures right from village to national level, which can be used to inculcate a culture of integrity, accountability and patriotism to all categories of Ugandans. • Through preaching and teaching, they have a great impact on the communities.
37.	Civil Society Organisations	• Sensitise and mobilise the public to monitor service delivery by holding public officers and institutions accountable. • Partner with Government in development processes.
38.	Academia and Research Institutions	• Periodic critical assessment, and provision of advice to Government as to how the fight against corruption can be improved.
Tier 3: Other MDAs		
	All other MDAs including Local Governments	Mainstream ethics, integrity and preventive anti-corruption measures. Comply with set accountability standards, processes and procedures

6.3 Alignment of the Action Plan to the NDP II

This Action Plan covers three Financial Years (2017/18 – 2019/20), in line with the remaining time span of the second National Development Plan (NDP II – 2015/16 – 2019/20). The purpose of this is to strengthen, from the onset, an aligned implementation of the ZTCP to the national planning and development framework in terms of planning; priority setting; financing; performance monitoring and other considerations.

The NDP II sets the broader framework for the implementation of national development priority interventions to attain development outcomes, goals and objectives. This also includes the implementation of the national policies relevant to the attainment of set goals and objectives. In this line, the NDP II has specifically defined the objectives and interventions to be pursued to enhance accountability. Some of these specifically relate to anticorruption and the ZTCP has an already entrenched fit in the NDP II.

7 FUNDING MECHANISMS FOR IMPLEMENTATION OF THE POLICY

The financing of this Policy goes beyond the scope one single sector and individual Institutions. The successful implementation of the ZTCP requires that all MDAs, in varying degrees, implement relevant aspects of the Policy to attain greater results and impact. This also requires that the MDAs are correspondingly and rationally financed to implement interventions under the ZTCP.

7.2 The Costing of the Policy

In determining of the cost for implementing the Policy over the indicated time frame (2017/18 – 2019/20), these considerations have been factored:

a) The implementation of the Policy is Government-wide, by all the MDAs and non State actors, although with high, medium and low concentration of interventions across the MDAs. This layout has been explained in Tier-based institutional roles for Policy implementation. Financing the interventions of the MDAs under this Policy will therefore be rationalised with the level of concentration of the interventions of specific MDAs.

b) The Anti-corruption institutional structure in the country is defined, and funding arrangements are in place. Financing of the Policy therefore builds on, and as much as possible, fits in the existing Government funding framework and arrangements.

c) Comprehensive costing of the Policy was done to determine the holistic financing requirements of the Policy.

d) Comprehensive analysis of the existing anti-corruption and accountability sector and institutional financing for all the institutions involved, including the unfunded priorities was undertaken to determine the current financing level and gap, against the Policy budget requirements over the Action Plan period.

e) The current planned, funded and unfunded institutional interventions (priorities) for anticorruption and accountability were analysed and aligned to the Policy Strategic Interventions. This enabled the identification of the additional and new financing needs and requirements, and suggestion of the new Cost Centres that should be considered for financing and taken up with MOFPED.

The new financing requirements largely relate to widening the scope of the implementation of the ZTCP to cover other MDAs and the sub national level, beyond the present anti-corruption and accountability institutions.

f) As much as possible, this Policy has limited the creation of new Cost Centres and has largely proposed costs within the existing arrangements. Consideration was however placed on the adequacy of funding for the proposed interventions, which inevitably increased the current and projected funding within the present context.

7.3 Financing Framework

The MDAs will be financed under the existing Medium Term Expenditure Framework (MTEF) for institutional (MDAs) and sector allocations. Each MDA, including Local Governments will be responsible for the agreed actions that fall within their mandate with the guidance from the Coordination Centre— the DEI.

It will be necessary that Institutions reprioritise and realign interventions to the Policy to avoid creation of new cost centres. Financing reviews and enhancements to take care of the new demands of the Policy will largely be within the existing cost centres.

Additional funding will be sourced under the various actors for example, Civil Society Networks, Private Sector and Development Partners. Development Partners are critical partners in the financing of the ZTCP. The DEI and all stakeholders will continuously engage the DPs for increased funding to ensure the successful implementation of this policy.

Efforts will be coordinated to ensure that resources are available, that is human, land, time, financial and capital to bear on corruption related issues to ensure maximum results and progress towards the achievement of the policy goals. Joint planning and resource utilization will be encouraged where possible to ensure more coordinated and harmonized efforts.

8.0 COORDINATION ARRANGEMENTS FOR THE IMPLEMENTATION OF THE ZTCP

The ZTCP recognises that the current institutional set up and arrangements to broadly promote equity, integrity, transparency, accountability, value for money; and specifically fight against corruption is remarkable. However, there should be further improvement to ensure more effective coordination, enhance cohesion, collaboration and effectiveness amongst the institutions for a renewed, stronger and more effective anti corruption fight. Moreover, the implementation of the ZTCP is by all the MDAs which creates additional realignment of coordination, collaboration and reporting mechanisms.

8.1 Institutional Coordination Framework and Mechanisms

At the present, the accountability and anti-corruption institutions are organised at two broader levels: the Accountability Sector (AS) and the Inter Agency Forum (IAF).

8.1.1 The Accountability Sector (AS)

At the sectoral level, the Accountability Sector seeks to provide a conducive environment for promoting efficient (technically correct), transparent and accountable planning, budgeting, and utilization of public resources by public institutions. The AS was constituted to spearhead the promotion, supervision and implementation of accountability systems across government in a coordinated, more efficient and effective manner. In the implementation of this policy, the AS will continue to play its role at the sector level.

8.1.2 The Anti Corruption Inter Agency Forum (IAF)

The Anti corruption Inter Agency Forum (IAF) is part of the Accountability Sector, and therefore the broader institutional arrangement for promoting and ensuring equitable, transparent, accountable and value for money in delivery of public services. However, the IAF institutions play the bigger role in the anti-corruption cycle.

The IAF will sustain its role as a coordination platform for AC institutions, and will, with the leadership of the DEI, take the lead in the review, development and implementation of the NACS in line with the ZTCP. The IAF will ensure that all MDAs adequately and appropriately participate in the fight against corruption.

8.1.3 Linkages with other sectors

The ZTCP recognizes the respective roles of the different sectors and institutions in the anti-corruption chain. The DEI and IAF will promote and drive a shared, coordinated and cohesive accountability agenda for the country among all the

Sectors and Institutions in charge of anti-corruption as well as the other MDAs and non State actors.

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

8.1.4 Non State stakeholder roles in the implementation of the Policy

Beyond the Government / public sector actors, the Civil Society, Religious and Faith Based Organisations (RFBOs), Private Sector, academia, the media as well as traditional and cultural institutions will play crucial roles in the fight against corruption. Through the ZTCP, the Government through the DEI will ensure that these stakeholders define and execute their roles, and that there is effective multi-stakeholder complementarity.

The Private Sector, CSOs, Religious and Faith-Based Organisations will design relevant plans of action for intervention within their areas of mandate and focus. These institutions will mainstream the anti-corruption measures into their existing or new programmes, and within their budgets.

8.1.5 Reporting Arrangements

Within their institutional and sectoral setting, institutions will be expected to report on the activities implemented under the ZTCP.

9.0 MONITORING AND EVALUATION (M&E)

9.1 Rationale for M&E of the Policy

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

9.2 Monitoring and Evaluation Mechanisms

The DEI will make mutual consultations to ensure that consensus is reached on the methods of monitoring and evaluation and on the benchmarks and indicators to be used. The M&E framework and processes shall be open and participatory so that the M&E process is fully supported by all stakeholders.

Leadership, coordination, management and involvement of both internal and external stakeholders are key for the successful implementation of the M&E system for the policy.

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

9.3 The M&E System for the Policy

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

9.4 M&E Roles, Responsibilities and Reporting

At the commencement of this Policy, the DEI will map out the institutional roles and responsibilities for M&E. As well, the information needs and standards, availability and adequacy of information required, frequency, flow and format for reporting plus feedback to realign, will be clarified. The DEI will coordinate the development of a detailed M&E system for implementation of this policy, capturing and guiding the respective institutional and sectoral roles and commitments for M&E. Integrated stakeholder M&E mechanisms to track institutional performance progress and inform national progress will be developed and implemented.

The DEI will prepare, produce and share periodic assessment reports against the agreed indicators and targets for both outcome and output level of each strategic objective. This will be in addition to the production, on an annual basis, of a report on the prevalence of corruption and national anti-corruption efforts.

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

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

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

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

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

9.5   Key Data Sources

Existing data sources including institutional reports, administrative data, national and international reports shall be utilized to enhance the M&E functions under this policy.

In addition, effort shall be made to establish and operationalise research, data and information generation initiatives to ensure a locally available and credible depository of knowledge and information on corruption, accountability and anti-corruption mechanisms.

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

10. COST MATRIX FOR THE IMPLEMENTATION PLAN FOR THE ZERO TOLERANCE TO CORRUPTION POLICY

STRATEGIES	OUTPUTS	OUTPUT INDICATORS	BUDGET 2017/18 (000)	AVAILABLE FUNDS 2017/18 (000)	FUNDING GAP 2017/18 (000)	ACTORS / RESPONSIBILITY CENTRE	MEANS OF VERIFICATION / DATA SOURCES
OBJECTIVE 1. TO INSTITUTE AND EFFECTIVELY ENFORCE ANTI-CORRUPTION MEASURES							
1.1: Undertake a review of the anti-corruption Laws and Regulations to identify and address the gaps. **Formulate a law on lifestyle audit**	Anti-corruption legal framework strengthened.	• Number of Laws and Regulations reviewed • Number of new anti-corruption Laws and Regulations formulated.	230,000	100,000	130,000	DEI in consultation with IAF Institutions and other stakeholders	• Reviewed Laws and Regulations • Cabinet Memoranda for the reviewed Laws & Regulations • Process Reports for the Review processes
1.2: Strengthen the implementation of existing anti-corruption legislation	Enforcement of anti-corruption legislation strengthened.	• Number of corruption complaints received	4,155,000	1,661,652	2,493,348	CID	• Institutional reports • Corruption Perceptions & Integrity Survey reports
		• Number of corruption cases investigated	4,475,000	1,789,496	2,685,504	IG	
		• Number of corruption cases prosecuted • Percentage of convictions	3,340,000	1,336,168	2,003,832	ODPP	
		• % of backlog of corruption cases completed	410,000	160,000	250,000	ACD	
		• Number of audits undertaken	88,662,712	88,662,712	-	OAG	
			1,910,000	763,824	1,146,176	PPDA	

1.3: Design and implement systems for prevention of corruption	Systems for prevention of corruption developed and implemented	• Number of corruption prevention mechanisms • Percentage of corruption prevention mechanisms implemented	100,000	100,000	-	IG	• Institutional reports • Sector performance reports
1.4: Enhance the capacity of anti-corruption Institutions to detect, pre-empt, investigate, prosecute and adjudicate cases of corruption.	Capacity of anti-corruption Institutions strengthened	• %age of staff in-position against establishment • Number of staff trainings conducted. • Percentage of staff with specialized skills. • Number of anti-corruption institutions with requisite equipment. • Percentage improvement of institutional performance	969,000	969,000	-	• IAF	• Annual staff performance reports • Sector performance reports • Annual Institutional performance reports • Ministerial Policy Statement
1.5: Adopt and implement regional and international legal instruments on anti-corruption	Regional and International legal instruments on anti-corruption domesticated and implemented	• Number of legal instruments domesticated. • Percentage of implementation of legal instruments on anti-corruption provisions • Number of regional and international programs leveraged • Number of good practices adopted	287,000	87,000	200,000	• DEI (in collaboration with IAF Institutions) • FIA	• Self-Assessment Reports • Country Review reports • National enacted legislation
1.6: Institute measures that promptly detect, investigate and report possible incidences of	• Measure for prompt detection, investigation and reporting of money launderin	• Number of measures for prompt management of money laundering incidences and cases	3,000,000	3,000,000	-	FIA	• Annual institutional reports

money laundering	g instituted	• Number of anti-money laundering mechanisms					
1.7: Enhance monitoring, follow-up and reporting on implementation of anti-corruption policies, laws, and measures.	Harmonized and effective monitoring and reporting mechanisms developed and implemented	• Number of mechanisms in place. • Number of mechanisms operational.	300,000	200,000	100,000	• DEI	• Reports of joint monitoring • Follow up reports • Institutional reports
1.8: Establish and facilitate internal inspection units in all MDA/LGs	Functional Inspection units established in all MDA/LGs	• Number of functional Inspection Units	1,250,000	1,250,000	-	• MOFPED • MOPS • MDAs	• MDA inspection reports
1.9: Strengthen internal audit function in all MDA/LGs.	Internal audit function in MDA/LGs strengthened	• Number of audit reports. • Percentage increment in budget allocation.	1,250,000	1,250,000	-	• MOFPED • IAG	• Audit reports • IAG reports • IAF reports
OBJECTIVE 2: TO STRENGTHEN PARTNERSHIPS AMONG ALL STAKEHOLDERS FOR THE EFFECTIVE IMPLEMENTATION OF THE ANTI-CORRUPTION MEASURES.							
2.1: Review NACS to align it with the policy.	• NACS reviewed • NACS disseminated • NACS implemented	• NACS in place • Number of dissemination reports. • Number of progress reports.	300,000	100,000	200,000	DEI (in consultation with all stakeholders	• Consultation reports • Review reports • Dissemination reports • Follow-up reports
2.2: Develop and implement institutionally customized anti-corruption strategies among all MDAs/LGs	• Institutional AC strategies developed and implemented. • LG Anti-corruption structures strengthened.	• Number of institutional AC strategies developed. • Number of AC strategies operational • LG Anti-corruption structures functional	300,000	100,000	100,000	• DEI • MDAs	• Customized AC Strategies • LGAC structures

2.3: Develop and sustain institutional coordination, networking and cooperation framework.	• Ownership and sharing of anti-corruption agenda enhanced. • Intra and inter-institutional reporting arrangements developed. • IAF communication strategy developed and implemented.	• IAF strengthened. • IAF communication strategy in place. • High profile case management system operational. • Structured and effective inter-agency collaboration arrangements in place.	500,000	500,000	-	• DEI • IAF • MDAs • JLOS	• IAF Communication strategy. • High-profile case management system • Inter-agency reports
2.4: Strengthen coordination and networking framework with the non-state actors.	• Formal collaboration with non-state actors developed and implemented. • Anti-corruption Public-Private-Partnership (ACPPP) strengthened	• Number of MDA-Non State actors cooperation arrangements • Anti-corruption Public-Private-Partnership (ACPPP) operational.	200,000	100,000	100,000	• DEI • IAF • AS • JLOS	• ACPPP MOUs • Annual and bi-annual review reports • Performance reports of non-state actors
2.6: Establish and operationalise District, Sub-county, Parish and Community Integrity and Accountability Structures	• LG and community based integrity and accountability structures	• Number of LG and Community based AC and accountability structures established. • Number of DIPFs functional. • Number of Barazas operational.	500,000	500,000	-	• OPM • MOLG • MOPS • DEI • LGFC • IAF • JLOS • LGs • Community based anti-corruption structures	• Institutional reports • Sector reports • LG AC reports
2.7: Establish a national resource center on corruption related issues	• Anti-corruption research conducted. • National resource center established.	• National resource center operational. • Number of corruption related research undertakings.	500,000	500,000	-	• DEI • IAF • AS • JLOS • CSOs	• Resource center in place • Research reports

OBJECTIVE 3: TO INCULCATE A CULTURE OF INTEGRITY, ACCOUNTABILITY AND PATRIOTISM AT ALL LEVELS.							
3.1: Establish ethics and integrity function in all MDAs and local governments	• Institutional structures and programmes for promotion of ethics and integrity established. • Ethics and integrity embraced in all MDAs	• Number of institutional structures established • No. of program in place. • No of MDAs embracing ethics and Integrity/LGs • No. of LGs embracing ethics and Integrity/LGs	1,000,000	-	1,000,000	• DEI • MDA/LGs	• DEI reports • MDA reports • Sector reports
3.2: Introduce integrity and performance-based recruitment &promotion system.	• Integrity and performance-based recruitment & promotion system developed and implemented. • Accountable performance and service delivery enhanced.	• No. of functional systems in place • % reduction in complaints relating to recruitment • % reduction in complaints relating to promotion. • % improvement in performance • Feedback mechanism in place.	100,000	-	100,000	• DEI • MOPS • Service Commissions (JSC, HSC, ESC, PSC, DSC)	• Reports of recruitment Commissions • MOPS reports • Institutional reports on promotions and staff performance
3.3: Empower citizens to demand for accountability and to report corruption	• Social accountability and empowerment strengthened at all levels. • Demand-driven accountability promoted. • Public education and awareness	• Number of public empowerment interventions. • Percentage increase in reported cases. • Percentage increase in demand for accountability	500,000	500,000	-	• DEI • IG • IAF • AS • JLOS • MDAs	• Institutional reports • Inter-agency and Sector reports

	on national anti-corruption laws and policies promoted. • Reporting mechanisms strengthened						
3.4: Promote mainstreaming of National Ethical Values of Uganda in all sectors.	• National Ethical Values (NEVS) Policy disseminated. • Ethics and Integrity introduced into the school curriculum as a compulsory examinable subject • Social values restored	No. of dissemination activities on NEVS conducted per Region Ethical values integrated into the teaching and learning process at all levels of the education sector	600,000	-	-	• DEI • MDAs	• Institutional reports • Inter-agency and sector reports • National integrity survey reports
3.5: Strengthen performance management and accountability systems and controls.	• Public performance management and accountability systems strengthened. • Integrity in public affairs management promoted • E-governance system strengthened	• Public management systems implemented. • e-governance system operational	800,000	800,000	-	• MOICT • MOPS • MOFPED • MDAs •	• DEI Coordination reports • Sector reports • Institutional reports • National, regional, and international integrity and corruption survey reports
3.6 Strengthen performance management and accountability systems and controls.	• E governance system strengthened	• Number of E-governance systems operational	400,000	400,000	-	• MOPS • MOFPED • MOICT	•

3.7: Institute a mechanism for identification and recognition of Institutions and persons of integrity	• Personal integrity promoted. • Institutional-centered integrity enhanced. • Individual-centered integrity enhanced	• Institutional recognition reward system in place • Individual recognition reward system in place • % reduction in number of disciplinary cases.	400,000	400,000	-	• DEI • IAF • JLOS	• Institutional reports • Sector reports
OBJECTIVE 4: TO PROMOTE POLITICAL COMMITMENT DEMONSTRATED BY LEADERS AT ALL LEVELS.							
4.1: Develop and enforce Code of Conduct for political leaders	• Code of conduct developed • Exemplary leadership promoted.	• Code of Conduct in place • Number of political leaders recognized	100,000	-	100,000	• DEI	• DEI Coordination reports • Code of Conduct for political leaders
4.2: Enhance compliance with the Political Parties and Organizations Code of Conduct	• Compliance enhanced • Political party accountability enhanced. • Financial regulations on campaigns and activities of political parties followed.	• Number of political parties complying • Number of political parties subscribed to the Political Parties' Code of Conduct. • Number of regulations on financing of campaigns and activities of political parties in place.	60,000	-	60,000	• DEI • Electoral Commission • Uganda Police Force • Political parties	• Activity Reports Regulation on financing of campaigns and activities of political parties
4.3: Increase funding for Anti-Corruption	• coordinated planning and budgeting • Inter institutional budget reviews	• %age of increase in funding of AC institution	20%	-	20%	• MOFPED • IAF	• Institutional reports • Inter-agency reports • Sector reports

Institutions	s						
4.4: Sensitize political leaders and citizens at all levels in the vitality of demonstrating exemplary practice of integrity.	• Political leaders and citizens sensitized on transparency, and accountability	• Number of political leaders sensitized	570,000	-	570,000	• DEI • IG	• DEI performance reports • IG performance reports
4.5: Rationalize public remuneration and motivation	• Public officials well remunerated • Public officials well motivated. • Salary Review Commission established. • Minimum-wage implemented.	• % increase of public officers with Competitive remuneration • Operational Salary Review Commission. • Minimum - wage in place.				• MOPS • MOFPED • DEI • EOC	• Revised salary scales • Reviewed Uganda Public Service Standing Order
4.6: Ensure follow up and implementation of recommendations of anti-corruption and oversight institutions and Commissions of Inquiry.	• Recommendations of anti-corruption and oversight institutions and commissions of inquiry implemented	Number of recommendations implemented	500,000	-	500,000	• DEI • IAF	• Progress reports • Inter-agency reports
TOTAL BUDGET			**117,668,712**	**106,028,852**	**11,639,860**		

11. RESULT MATRIX FOR THE IMPLEMENTATION OF THE ZERO TOLERANCE TO CORRUPTION POLICY, 2018

Policy Impact:

    (i)   Med-term: Reduced level of corruption in Uganda

    (ii)   Long term: Corruption-free Uganda

Policy Outcomes:

(i) Strengthened preventive and enforcement anti-corruption measures

(ii) Strengthened anti-corruption institutions

(iii)   Enhanced and effective institutional coordination of anti-corruption efforts

(iv)   Enhanced and visible public participation in accountability and anti-corruption work

(v) A culture of integrity, transparency and accountability inculcated at all levels in society especially the youth.

(vi)   Political commitment at all levels to attain zero tolerance to corruption promoted.

Policy Objectives:

The objectives of the Zero Tolerance to Corruption Policy (ZTCP) are:

1. To institute and effectively enforce anti-corruption measures.
2. To strengthen partnerships among all stakeholders for the effective implementation of the anticorruption measures.
3. To inculcate a culture of integrity, accountability and patriotism at all levels especially among the youth.
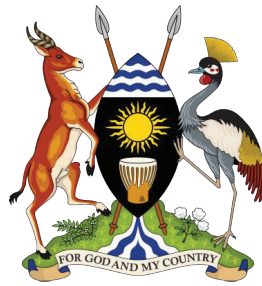4. To promote political commitment demonstrated by leaders at all levels.

ANNEX 1: MEMBER INSTITUTIONS TO THE INTER AGENCY FORUM

(i)   Directorate for Ethics and Integrity (DEI) in the Office of the President

(ii)   Inspectorate of Government (IG);

(iii)   State House Anti-corruption Unit (ACU)

(iv)   Public Procurement and Disposal of Public Assets Authority (PPDA);

(v)   Office of the Auditor General (OAG);

(vi)   Office of the Accountant General

(vii)   The Internal Auditor General, Ministry of Finance, Planning and Economic Development (MOFEPD)

(viii) Office of the Director of Public Prosecutions (ODPP);

(ix)   Anti-Corruption Division, Courts of Judicature and Inspectorate of Courts

(x)   Criminal Investigations Directorate of the Uganda Police Force

(xi)   Financial Intelligence Authority

(xii)   Uganda Revenue Authority

(xiii) Public Service Inspectorate Unit (PSIU);

(xiv)   The Ministry of Local Government— Inspection (MLG-I)

(xv)   Local Government Finance Commission

(xvi)   Public Service Commission (PSC)

(xvii) Judicial Service Commission (JSC)

(xviii) Education Service Commission (ESC)

(xix)   Health Service Commission (HSC)

(xx)   Internal Security Organisation

(xxi)   Justice Law and Order Sector (JLOS) – Secretariat

(xxii) Accountability Sector – Secretariat

ANNEX 2: MEMBER INSTITUTIONS TO THE ACCOUNTABILITY SECTOR

(i)   Ministry of Finance, Planning and Economic Development (MOFEPD)

(ii)   The Inspectorate of Government (IG)

(iii)   The Directorate for Ethics and Integrity (DEI)

(iv)   Office of the Auditor General (OAG)

(v)   The Accountant General, MOFPED

(vi)   The Internal Auditor General, MOFPED

(vii) The Uganda Bureau of Statistics (UBOS)

(viii) The Uganda Revenue Authority (URA)

(ix)   The Public Procurement and Disposal of Public Assets Authority (PPDA)

(x)   The Ministry of Public Service

(xi)   The Ministry of Local Government

(xii) Uganda Revenue Authority

(xiii) Financial Intelligence Authority

(xiv) Kampala Capital City Authority— Revenue Collection and Mobilisation (KCCA)

(xv) Bank of Uganda

(xvi) Capital Markets Authority

(xvii)   Private Sector Foundation

(xviii)   Uganda Retirement Benefits Regulatory Authority (URBRA)

(xix)   Uganda Development Bank Limited

(xx)   Uganda Investment Authority

(xxi)   Insurance Regulatory Authority

(xxii)   Economic Policy Research Centre

(xxiii)   National Planning Authority

(xxiv)   Uganda Free Zones Authority

(xxv)   Uganda Microfinance Regulatory Authority (UMRA)

(xxvi)   Microfinance Support Centre (MFSC)

(xxvii)   Development Partner Representatives

(xxviii)   Civil Society Representatives

MEMBER INSTITUTIONS TO THE INTER AGENCY FORUM

THE REPUBLIC OF UGANDA

REBUILDING ETHICS AND INTEGRITY

INSPECTORATE OF GOVERNMENT

STATE HOUSE UGANDA
ANTI CORRUPTION UNIT

PPDA
Public Procurement & Disposal of Public Assets Authority

OAG
OFFICE OF THE AUDITOR GENERAL

MINISTRY OF FINANCE, PLANNING AND ECONOMIC DEVELOPMENT

Office of the Director of Public Prosecutions
Uganda

THE JUDICIARY
UGANDA

UGANDA POLICE
PROTECT & SERVE

Financial Intelligence Authority
Safe money for a Secure Market

URA
Uganda Revenue Authority
DEVELOPING UGANDA TOGETHER

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Justice for All

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