



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

Vision

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

Theme

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

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List of Acronyms

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

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Preamble

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



Mission

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



Vission

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



Core values

The Authority commits its staff to uphold the following values:

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

Foreword



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

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

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

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

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

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

Hon. Matia Kasaija

Minister of Finance, Planning and Economic Development

Message from Chairman, Board of Directors




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

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

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

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

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


Governor Emeritus, Leo Kibirango
Chairperson of the Board.

Acknowledgement by Executive Director Financial Intelligence Authority



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

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

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

Sydney Asubo

Executive Director

Executive Summary

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

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

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

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

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

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

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

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

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

Institutional framework for implementing the plan.

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

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

Financing

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

Monitoring and Evaluation (M&E)

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

Key results to be achieved

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

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

1.0 Background

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

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

1.1 Legal framework of FIA

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

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

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

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

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

1.2 Governance and Organizational structure

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

Functions of the Board.

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

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

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

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

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

1.3 The national, legal and policy context

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

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

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

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

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

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

ESAAMLG and FATF

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

EGMONT Group

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

1.4 Purpose of the plan

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

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

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

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

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

1.5 The process of developing the FIA strategic plan

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

The Guiding Principles of the plan

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

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

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

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

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

1.6 Structure of the Strategic Plan

This Plan is organized into nine chapters, namely:

i) Chapter one: Introduction and Background.

ii) Chapter two: Situation analysis, performance under previous plans and PESTEL and SWOT analysis.

iii) Chapter three: The strategic Direction for the Medium-Term including vision, mission, core

values, strategic objectives and strategies.

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

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

vi) Chapter six: Communication and feedback strategy.

vii) Chapter seven: Risk management.

viii) Chapter eight: Monitoring and Evaluation Framework.

ix) Chapter 9: Project profiles.

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

2.1 Performance of the Previous Plan

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

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

Prevention of ML/TF and financial information management

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

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

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

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

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

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

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

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

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

Cross cutting issues

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

HIV/AIDS

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

Gender.

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

Environment

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

Anti-Corruption

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

2.2 Institutional capacity of the FIA

2.2.1 Financial Performance of the previous Plan

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

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

2.2.2 Human Resource Development and management

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

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

Table 1 Number of staff during the Plan implementation period

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

2.2.3 Monitoring and Evaluation

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

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

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

2.3 Key achievements and challenges

2.3.1 Key achievements

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

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

2.3.2 Challenges during the previous strategy implementation

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

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

2.4 SWOT and PESTEL analysis

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

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

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

Table 2 SWOT Analysis

| Strengths | Opportunities |
|---|--|
| <ul style="list-style-type: none"> (i) Strong FIA Board (ii) Competent staff (iii) Good working relations with stakeholders (iv) Good public image and high ethical standards among staff (v) Good track record on adherence to international good practices in corporate governance and financial reporting (vi) Independence and autonomy in the execution of Authority's mandate (vii) Relatively competitive remuneration (viii) Existence of enabling laws | <ul style="list-style-type: none"> (i) Political commitment by Government (ii) Strong legal and institutional framework (iii) Existence of risks and vulnerabilities of AML/CFT identified under the NRA (iv) Existence of many reliable regulators/ supervisory entities (v) Existence of National Identification and Registration Authority and planned increase in coverage of registration services of the entire population (vi) Enforcement of registration of mobile phone users/owners (vii) Membership to regional and international bodies including ESAAMLG, FATF and EGMONT (viii) Technological advancement |
| Weaknesses | Threats |
| <ul style="list-style-type: none"> (i) Over dependence on government rather than own sources for funding operations (ii) Low staffing levels (iii) Insufficient IT systems to carry out AML/CFT detection activities (iv) Dependency on rented premises (v) Limited equipment to support inspection and supervision of accountable persons (vi) Absence of instruments of cooperation with some stakeholders i.e. MoUs (vii) Limitations in implementing cross-border movement of cash and bearer instruments as required by the AMLA 2013 | <ul style="list-style-type: none"> (i) Inadequate awareness of stakeholders on AML/CFT programme (ii) Large informal sector and low levels of financial literacy (iii) Cash and parallel economy (iv) Porous borders (v) Emergence of Terrorist groups in the region associated with conflicts in neighboring States (vi) Inadequate funding from Government (vii) Inadequate security to key staff and Board members (viii) Law suits (ix) Complex emerging technologies e.g. block chain technology which supports the Virtual Assets Service Providers (VASPs) (x) Slow legislative process |

2.5 Stakeholders and Institutional Arrangements

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

2.6 Emerging issues

Lessons learned from the previous strategy

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

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

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

This strategic plan therefore will focus on;

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

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

3.1 Vision, mission and strategic objectives

3.1.1 Vision:

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

3.1.2 Mission

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

3.1.3 Core values

The Authority commits its staff to uphold the following values:

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

3.1.4 Goal

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

3.2 Strategic Objectives for implementing the plan

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

Table 3 Strategic objectives

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

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

3.3 Strategic interventions.

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

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

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

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

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

mitigation measures to address the risks.

- (viii) Enhance a framework for coordination of reforms in management of ML/TF as identified in the NRA.
- (ix) Enhance the performance of the goAML electronic system.
- (x) Enhance data sharing through secure data links.

Strategic objective 2: Increase compliance with the AML Act

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

- (i) Improve AML/CFT Regulation and Supervision Framework.
- (ii) Enforce measures to address threats of ML/TF/PF identified in the NRA and MER in Supervised Financial Institutions and Designated Non-Financial Businesses and Professions.
- (iii) Establish procedures to enforce administrative sanctions against reporting entities that fail to comply with AMLA, 2013 (as amended).
- (iv) Establish a framework under which joint AML/CFT/CPF supervision will be conducted.
- (v) Establish a framework to conduct AML/CFT off-site and on-site examination of DNFPBs operations using a risk- based approach.
- (vi) Establish a mechanism to address AML/CFT/CPF deficiencies identified during onsite and offsite inspection.
- (vii) Develop specific guidelines on AML/CFT/CPF for DNFPBs.
- (viii) Enhance registration of accountable persons in line with AMLA, 2013 (as amended).
- (ix) Develop a framework to bring onboard non-regulated sectors in matters of AML/CFT/CPF.
- (x) Enhance the AML/CFT/CPF legal framework in Uganda.

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

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

- (i) Establish mechanisms to acquire vital information to support analysis.
- (ii) Establish a framework to effectively disseminate intelligence reports to LEAs.
- (iii) Establish an effective data management system.
- (iv) Establish a mechanism to access various databases held by other government agencies.
- (v) Enhance the capacity of inspection teams to identify information gaps/deficiencies.

Strategic objective 4: Strengthen international cooperation

The following interventions will be undertaken to strengthen international cooperation.

- (i) Strengthen partnerships with other International bodies to ensure that FIA meets AML/CFT/CPF FATF requisite standards.
- (ii) Exchange Information with other jurisdictions to support global efforts in combating ML/TF.

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

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

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

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

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

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

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

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

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

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

CHAPTER FOUR:

FINANCING FRAMEWORK AND STRATEGY.

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

4.1 Summary of Strategic Plan Budget

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

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

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

Major cost drivers over the planning period.

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

4.2 MTEF Projections and Implications for Strategic Plan Financing

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

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

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

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

Table 6 Funding Gap (UGX Billions)

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

4.3 Resource Mobilization Strategy

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

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

4.4 Detailed Cost Implementation Matrix

The detailed costed implementation matrix is presented in Annex II.

CHAPTER FIVE:

INSTITUTIONAL ARRANGEMENT FOR IMPLEMENTING THE PLAN

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

5.1 Coordination of the implementation process

5.1.1 Roles and responsibilities of the stakeholders within FIA

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

Table 7 Roles and responsibilities of the stakeholders within FIA

| Responsible Person | Roles and Responsibilities |
|--------------------------------|---|
| Board | <ul style="list-style-type: none"> Lobbying for funding Supervision of implementation of the plan |
| Top Management | <ul style="list-style-type: none"> Lobbying for funding Implementation of the plan |
| Finance and Planning committee | <ul style="list-style-type: none"> Allocate funds for implementing the plan |
| FIA staff | <ul style="list-style-type: none"> Execution of the plan |

5.1.2 Roles and Responsibilities of Other Stakeholders

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

Table 8 Roles and responsibilities of other stakeholders.

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

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

5.2 Sustainability Arrangements

a) Institutional Sustainability Arrangements;

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

b) Financial Sustainability Arrangements;

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

c) Partnerships and Collaborations;

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

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

5.3 Human Resource Plan

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

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

CHAPTER SIX:

COMMUNICATION AND FEEDBACK STRATEGY

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

Table 9 Stakeholder Engagement Plan

| | Audience | Level of Engagement | Frequency | Primary Channels |
|----|--|----------------------------|------------------------|--|
| 1. | FIA Board, Top Management and Staff | Collaborate | Quarterly/ as required | Meetings and Reports |
| 2. | Governance and security secretariat | Collaborate | Quarterly/ as required | Quarterly and Annual Reports Special Presentations, PWG review |
| 3. | Government Institutions <ul style="list-style-type: none"> • Ministries • Departments/ Agencies • Regulatory agencies • Parliament | Collaborate | Quarterly/ as required | Annual SDPR-PWG Review meetings Quarterly and Annual Reports Special Presentations |
| 4. | NGO actors | Collaborate | Quarterly/ as required | Meetings Special Presentations Targeted workshops and conferences |
| 5. | Bank actors | Collaborate | Quarterly/ as required | Meetings Special Presentations Targeted workshops and conferences |
| 6. | Civil Society | Consult | Bi-annual | Annual SDPR-PWG Review Meetings and Workshops |
| 7. | The mass media | Collaborate | Quarterly/ as required | Media briefs and Press releases Digital Media |

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

7.1 General

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

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

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

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

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| | <p>FIA has a relationship will fail to deliver the required services within the required contractually agreed service standards due to;</p> <ul style="list-style-type: none"> a). Unsuitable service level agreements; b). Poorly enforced existing service level agreements resulting into delays in implementation of ICT projects, c). Interruption or loss of ICT services to FIA and /or, distorted planned performance reporting of FIA | 3 | 2 | | |
| <p>Incompetent and ill-trained IT staff</p> | <p>The risk that IT staff lack technical skills to handle particular IT infrastructure. The IT staff may not sufficiently build capacities for end-causing operational performance challenges, Failure to achieve the expected value and financial savings from ICT Service</p> | 3 | 2 | 6 | <ul style="list-style-type: none"> i). ICT staff to be trained with the required skills to administer goAML; ii). Training in network administration and computer forensic investigations. iii). Adequate budget and work plan for capacity development of ICT staff. |
| <p>Inability to provide ICT resources after a break down</p> | <p>Failure to work normally inabilities able to recover the affected system following a disaster happens or to continuously avail</p> | 5 | 4 | 20 | <ul style="list-style-type: none"> i). Install a secured Critical Information infrastructure (CII) to prevent attacks behind fire walls; ii). Install power backups for CII; |

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

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

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|---|-----------------|-------------------|--|---|---|----|
| 2 | Financial Risks | Procurement risks | <p>i). Risks that procurement office is not informed of procurements in a timely manner;</p> <p>ii). Risks that procurements made are outside the procurement plans;</p> <p>iii). Risks that procurement plans are not prepared in time by the Heads of Directorates/ Departments;</p> <p>iii). Risks that the Authority will incur significant fines through breaches of contracts;</p> <p>iv). Risks that responsibility for monitoring of contacts is not clearly identified and implemented in the Authority.</p> <p>v). Risks that procurement office do not have the necessary skills necessary to support various types of procurements resulting in mis procurements</p> <p>vi) The risk that commitments for the supply of goods and services is done outside IFMS that may result into arrears</p> | 3 | 5 | 15 |
|---|-----------------|-------------------|--|---|---|----|

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|----|-------------------|--|--|---|---|----|--|
| 3 | Operational Risks | Fraud and misappropriation risks | i). Risks that employees either alone or in collaboration between two or more employees use the Authority resources for personal gain; ii). The risk that an external party targets the Authority resources for personal gain | 5 | 3 | 15 | i). Institute systems of internal controls and procedures, ii). Clear management structures, iii). A robust Internal audit program, iv). Systematic expenditure reviews. |
| 15 | | Delayed payments to suppliers, services and works provided | Delay to pay for services provided to the Authority as a result of budget cuts resulting into accumulation of domestic arrears | 3 | 5 | 15 | i). Ensure availability of funds before a commitment for supply is done. ii). Use of commitment control system in procurement. |
| 9 | | Reduced funding due to COVID-19 | The risk that the operations of the Authority are not funded fully by GoU as per the Authority budget that will impact on the achievement of its mandate | 3 | 3 | 9 | Seek for budget support from donors to finance underfunded activities |
| 15 | | Insufficient staffing levels | The risk that that not all vacancies are filed resulting into non-achievement of the strategic objectives of the Authority and other work pressures resulting from workloads. | 3 | 5 | 15 | i). A clear recruitment plan to fill vacant posts available. ii). Management with the help of the Board of Directors to lobby MoFPED for resource allocation to recruit and fill vital positions as per the organization structure. |
| 20 | | The risk of physical attack by terrorists | The risk to physical attack by terrorists because of the nature of the operations of the | 5 | 4 | 20 | i). Ensure housing in a strategic building with other secure offices to add to security limit. ii). Limit access to the Authority |

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

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

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

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

7.2 Risk Criteria

Risk Evaluation

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

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

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

8.1 Performance measurement

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

8.2 Reporting arrangements

8.2.1 Progress reporting

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

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

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

8.2.2 Progress performance annual review

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

8.2.3 Midterm review

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

8.2.4 Terminal evaluation

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

8.3. Capacity building for M&E

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

8.4 Results framework

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

Table 10 FIA results framework, outcome level

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

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

The results framework at output level is indicated in annex I

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

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

Annex I: Financial Intelligence Authority Results framework

| Objective | Intervention | Output | Action | Indicator | Means of Verification | Baseline 2018/19 | Targets | | | | | Responsibility Department / programme |
|--|--|---|---|--|--|------------------|---------|---------|---------|---------|---------|---------------------------------------|
| | | | | | | | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | |
| objective 1: Enhance the identification of the proceeds of crime | Intervention 1.1: Enhance financial intelligence gathering ability | Financial intelligence gathering ability enhanced | Action 1.1.1.1: Recruit 10 additional officers to boost the staff strength | Number of staff recruited | Pay roll | 7 | 3 | 3 | 4 | - | - | Operational Analysis / Human Resource |
| | | | Action 1.1.1.2: Provide adequate training to 17 staff in intelligence gathering techniques | Number of staff trained in Intelligence gathering techniques | Capacity building register | 7 | 3 | 4 | 4 | 3 | 3 | Operational Analysis |
| | | | Action 1.1.1.3: Engage key persons to acquire vital information from different sectors/ institutions of the economy | Number of financial intelligence reports received from the key persons | Incoming Financial Intelligence reports register | 10 | 15 | 20 | 25 | 30 | 35 | Operational Analysis |

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

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

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

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| | Action 1.9.3: Scalability to support the agile reporting requirements. Customize the system to support new report types to increase percentage of Quality intelligence products for Law Enforcement Authorities. | Percentage of report types supported (100% of legally required reports) | Quarterly report | 75% | 80% | 85% | 90% | 95% | 100% | Systems Security and Administration |
| | Action 1.9.4: Capacity building for training & knowledge transfer for stakeholders' system utilization | 1. Frequency of trainings conducted annually 2. Percentage of targeted stakeholders trained | Quarterly report | 4 | 5 | 6 | 6 | 7 | 8 | Systems Security and Administration |
| | Action 1.9.5: Participate in 10 goAML, Egmont and ESAAMLG technical working groups | Number of TWGs, and SWGs attended | Quarterly report | 0 | 2 | 2 | 2 | 2 | 2 | Systems Security and Administration |
| | Action 1.9.6: Develop Application Programming Interfaces (APIs) to establish linkages between targeted MDA's Databases to provide for Integrated Data Sharing capabilities. Enriched intelligence reports disseminated to Law Enforcement Agencies | 1. Number of targeted MDAs databases interlinked 2. Development of the FIA API. 3. Deployment of the API. 4. Number of MDA's Integrated | Quarterly report | 0 | 1 | 1 | 1 | 1 | 1 | Systems Security and Administration |

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

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|---|--|---|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|---|
| <p>Action 2.1.1.4: Establish a framework to conduct 30 AML/CFT off-site and on-site examination using a risk-based approach</p> <p>Action 2.1.1.5: Undertake analysis of 25 AML/CFT/CPF compliance reports submitted by accountable persons</p> | <p>Number of inspections conducted</p> <p>Number of compliance reports analyzed</p> | <p>Inspection reports</p> <p>AML/CFT/CPF compliance reports data base</p> | <p>4</p> <p>2</p> | <p>6</p> <p>5</p> | <p>6</p> <p>5</p> | <p>6</p> <p>5</p> | <p>6</p> <p>5</p> | <p>6</p> <p>5</p> | <p>Inspection and Compliance</p> <p>Compliance and Inspection</p> |
| <p>Action 2.1.1.6: Review 30 AML/CFT/CPF independent Audit reports periodically</p> | <p>Proportion of AML/CFT/CPF independent Audit reports reviewed</p> | <p>AML/CFT/CPF independent Audits database and review reports</p> | <p>1</p> | <p>2</p> | <p>4</p> | <p>6</p> | <p>8</p> | <p>10</p> | <p>Compliance and Inspection</p> |
| <p>Action 2.1.1.7: Build capacity of the supervisory staff to conduct AML/CFT/CPF risk based supervision</p> | <p>Number of staff trained in AML/CFT/CPF risk based supervision</p> | <p>Staff training database and reports</p> | <p>2</p> | <p>2</p> | <p>1</p> | <p>1</p> | <p>1</p> | <p>1</p> | <p>Compliance and Inspection</p> |
| <p>Action 2.1.1.8: Build capacity of 150 accountable persons to comply with their obligations under the AMLA and regulations</p> | <p>Proportion of accountable persons trained to comply with their obligations under the AMLA and regulations</p> | <p>Accountable persons training database and reports</p> | <p>20</p> | <p>20</p> | <p>25</p> | <p>30</p> | <p>35</p> | <p>40</p> | <p>Compliance and Inspection</p> |
| <p>Action 2.1.1.9: Registration drive to Register 20,000 accountable persons</p> | <p>Number of accountable persons registered</p> | <p>Accountable persons database</p> | <p>881</p> | <p>2500</p> | <p>2500</p> | <p>2500</p> | <p>2500</p> | <p>2500</p> | <p>Inspection and compliance</p> |

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| Intervention 2.4: Ensure effective legal representation and litigation | effective legal representation and litigation ensured | Action 2.4.1: Preparation and filing court documents | Number of court documents filed in court (including filing fees) | Report on court documents prepared and filed in court | 10 | 10 | 10 | 10 | 15 | 20 | 25 | Legal | |
| | | Action 2.4.2: Establish and equip the law library with 100 law books | Number of Law books bought | Library stock register | 0 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | Legal |
| | | Action 2.4.3: Subscription to professional bodies | Number of ULS Subscriptions paid | | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 20 | |
| | | a) ULS | Number of EALS Subscriptions | | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 20 | |
| | | b) EALS | Number of IBA Subscriptions paid | Annual Subscriptions register | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 20 | Legal |
| | | c) IBA | Number of ACAMS Subscriptions paid | | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 20 | |
| Action 2.4.4: Ensure all lawyers are issued with the annual practicing certificate | Action 2.4.4: Ensure all lawyers are issued with the annual practicing certificate | d) ACAMS | Number of lawyers issued with practicing certificates | Practicing certificates | 4 | 4 | 4 | 4 | 4 | 4 | 4 | Legal | |
| | | Action 2.4.5: Build capacity of the legal staff to effectively represent FIA | Number of legal staff trained | Staff Training reports | 3 | 4 | 4 | 4 | 4 | 4 | 9 | Legal | |
| | | Action 2.4.6: Procure of 2 motor vehicles for field operations | Number of vehicles procured | Asset Register | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | Legal |

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|---|---|---|---|---|--------------------------|---|---|----|----|----|----|----|----|-----------------------------|-----------------------------|
| objective 3: improve collection, analysis and dissemination of information to competent Authorities | Intervention 3.1: Establish mechanisms to acquire vital information to support analysis | A mechanism to acquire vital information to support analysis established. | Action 2.4.7: Recruit 5 staff to support operations of the department | Number of staff recruited | Staff Enrolment register | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | Legal |
| | | | | | | Action 3.1.1: 25 Engagements with foreign FIU(s) to acquire vital information to support analysis | 3 | 5 | 5 | 5 | 5 | 5 | 5 | Operational Analysis | |
| | | | | | | Action 3.1.2: Maintain 12 classified information assets to acquire vital information to support analysis | 8 | 12 | 12 | 12 | 12 | 12 | 12 | Operational Analysis | |
| | Intervention 3.2: Establish a framework to effectively disseminate intelligence reports to LEAs | A framework to effectively disseminate intelligence reports to LEAs established | Action 3.2.1: Engage 5 LEAs i.e. UPF, IG, URA, UWA and DPP to enroll on the FIA's information exchange system (goAML) to effectively receive FIA intelligence reports | Number of LEAs enrolled and using FIA's information exchange system | Quarterly reports | 1 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | Operational Analysis |
| | | | | | | Action 3.1.3: Develop and review a mechanism to receive ML/TF/PF related information from members of the public | 0 | 1 | 1 | 1 | 1 | 1 | 1 | Operational Analysis | |
| | | | | | | Action 3.3.1: Acquire an IT solution to integrate all databases of information received | 0 | 1 | 1 | 1 | 1 | 1 | 1 | Operational Analysis and IT | |
| | Intervention 3.3: Establish an effective data management system | An effective data management system established | Action 3.3.2: Maintain 6 up to date databases of all information received | Number of databases updated | Quarterly report | 5 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | Operational Analysis and IT |
| | | | | | | Quarterly report | 5 | 6 | 6 | 6 | 6 | 6 | 6 | Operational Analysis and IT | |

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

| | | | | | | | | 20% | 30% | 40% | 50% | 60% | 70% | Operational Analysis |
|--|---|--|---|--|-----------------------------------|-----|-----|-----|-----|-----|-----|-----|-------|----------------------|
| | | | | Proportion of information exchanges responded to | Quarterly reports | 20% | 30% | 40% | 50% | 60% | 70% | 80% | | |
| | | | | <p>Action 4.1.2: Enhance the exchange of information with other jurisdictions to support global efforts in combatting AML/CFT</p> <p>Action 4.1.3: Strengthen partnerships with other international bodies to meet AML/CFT/CPF obligations (ESAAMLG activities, EGMONT activities, and FATF)</p> | <p>Engagement reports</p> | 20% | 40% | 50% | 60% | 70% | 80% | | Legal | |
| | | | <p>a framework to coordinate implementation of FATF – ICRG recommendation on Uganda established</p> | <p>Number of ICRG recommendations implemented on each respective Immediate Outcome (IO)</p> | <p>Periodic progress reports</p> | 1 | 8 | 4 | 4 | 4 | 4 | | Legal | |
| | <p>Intervention 4.2: Establish a framework to coordinate implementation of FATF – ICRG recommendation on Uganda</p> | <p>Intervention 4.3: Strengthen domestic cooperation with AML/CFT/CPF stakeholders</p> | <p>Domestic cooperation with AML/CFT/CPF stakeholders strengthened</p> | <p>Number of MOUs signed with key stakeholders</p> | <p>Quarterly reports</p> | 0 | 2 | 2 | 2 | 2 | 2 | | Legal | |
| | | | | <p>Action 4.3.2: Coordinate 20 activities of the national AML/CFT/CPF taskforce</p> | <p>Quarterly reports</p> | 4 | 4 | 4 | 4 | 4 | 4 | | Legal | |
| | | | | <p>Action 4.3.3: Coordinate 8 meetings towards the Implementation of ICRG action plan (2 years)</p> | <p>Quarterly progress reports</p> | 0 | 4 | 4 | 0 | 0 | 0 | | Legal | |

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|---|--|---|---|---|---|---|---|---|---|-------|
| Action 4.3.4: Attend 8 ICRG face to face meetings | Number of ICRG Face to face meetings attended (3 delegates) | Reports on the ICRG Face to face meetings | 0 | 5 | 3 | 0 | 0 | 0 | 0 | Legal |
| Action 4.3.5: Coordinate 10 meetings towards the Implementation of ESAAMLG activities | Number of meetings held and Follow-up reports submitted | Follow-up reports | 2 | 2 | 2 | 2 | 2 | 2 | 2 | Legal |
| Action 4.3.6: Attend 5 ESAAMLG Meetings | Number of ESAAMLG Meetings attended (5 delegates) | Reports on ESAAMLG Meetings | 1 | 1 | 1 | 1 | 1 | 1 | 1 | Legal |
| Action 4.3.7: Coordinate 10 stakeholder meetings towards the implementation of FATF activities | Number of meetings held and Follow-up reports submitted | Follow-up reports | 2 | 2 | 2 | 2 | 2 | 2 | 2 | Legal |
| Action 4.3.8: Coordinate 10 working group meetings towards the implementation of EGMONT activities | Number of working group meetings and quarterly reports submitted | Quarterly reports | 2 | 2 | 2 | 2 | 2 | 2 | 2 | Legal |
| Action 4.3.9: Coordinate 10 meetings to discuss AML/CFT/CPF initiatives with partners and other agencies | Number of meetings held with Development partners | Quarterly reports | 2 | 2 | 2 | 2 | 2 | 2 | 2 | Legal |

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|---|--|--|--|--|------------------------------------|---|----|----|----|----|----|---------|----|---------|
| objective 5: Increase public awareness and understanding of matters related to ML/TF | Intervention 4.4: Increase compliance with international standards AML/CFT /CPF | Increased compliance with AML/CFT /CPF international standards | Action 4.4.1: Regular review of AML/CFT laws | Number of AML/CFT/CPF laws reviewed | Reports on laws reviewed | 1 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | Legal |
| | Intervention 5.1: Establish a framework for conducting public awareness programs to deepen AML/CFT understanding | A framework for conducting public awareness programs to deepen AML/CFT understanding established | Action 5.1.1: 20 AML/CFT/CPF articles published in different newspapers and magazines | Number of stake holder engagements held | Reports on stakeholder engagements | 0 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | Legal |
| | | | | Number of articles published in the different newspapers and magazines | Quarterly progress reports | 4 | 4 | 4 | 4 | 4 | 4 | IR & SA | | |
| | | | | Number of public campaigns conducted | Quarterly progress reports | 8 | 8 | 8 | 8 | 8 | 8 | IR & SA | | |
| | Intervention 5.2: Review the communication strategy to inform public awareness | Communication strategy to inform AML/CFT/CPF public awareness reviewed | Action 5.1.2: 40 AML/CFT/CPF public campaigns conducted across the regions of the country | Number TV and Radio talk shows held on different stations | Quarterly progress reports | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | IR & SA |
| | | | | Approved communication strategy | Printed communication strategy | 0 | 1 | 0 | 0 | 0 | 0 | IR & SA | | |
| | Intervention 5.3: Build capacity of accountable persons and LEAs in AML/CFT/CPF | Capacity of accountable persons and LEAs in AML/CFT/CPF built | Action 5.3.1: Develop AML/CFT/CPF outreach programmes targeting Accountable person/Reporting entities and LEAs | Approved AML/CFT/CPF outreach programme | Quarterly report | 8 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | IR & SA |
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|---|--|--|---|---|---|---|-------------------|----|----|----|----|----|----|----|----|----|----|--|--|--|--|--|--|----------------------|----------------------|
| | | | | | | | 0 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | | | | | IR & SA | |
| Objective 6: Strengthen the capacity of FIA to conduct financial due diligence | Intervention 6.1: Establish a framework for conducting FDD | A framework for conducting FDD established | Intervention 6.2: Establish a mechanism to acquire vital information to support FDD | Intervention 6.3: Promote staff capacity to effectively conduct FDD | Develop a capacity plan tailor-made for accountable persons and regulatory bodies. | Curriculum developed | Curriculum used | | | | | | | | | | | | | | | | | | |
| | Intervention 6.1: Establish a framework for conducting FDD | A framework for conducting FDD established | Intervention 6.2: Establish a mechanism to acquire vital information to support FDD | Intervention 6.3: Promote staff capacity to effectively conduct FDD | Action 5.3.2: Develop a capacity plan tailor-made for accountable persons and regulatory bodies. | Curriculum developed | Curriculum used | | | | | | | | | | | | | | | | | | |
| | | | | | Action 5.3.2: Conduct 150 AML/CFT Training sessions Train FIs and DNFBPs on proper implementation of the AML/CFT obligations especially in respect of ML/TF risk assessment, CDD, TFS, and STRs | Number of AML/CFT Training sessions conducted | Training reports | 30 | 30 | 30 | 30 | 30 | 30 | 30 | 30 | 30 | 30 | | | | | | | IR & SA | |
| | | | | | Action 6.1.1: Develop procedures/guidelines to be followed to conduct FDD | FDD Procedures/Guidelines document | Quarterly reports | 0 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | | | | Operational Analysis | |
| | | | | | Action 6.2.1: Subscription to closed information databases. | Number of closed information databases accessed | Quarterly reports | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | | | | | | | Operational Analysis | |
| | | | | | Action 6.2.2: Engagement of individuals/entities that have ability to collect secret information on subjects of FDD | Number of reports generated by the individuals/entities engaged to provide secret information | Quarterly reports | | 12 | 14 | 16 | 18 | 20 | 20 | 20 | | | | | | | | | | Operational Analysis |
| | | | | | Action 6.3.1: Recruitment of staff | Number of staff recruited to conduct FDD | Quarterly reports | 1 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | Operational Analysis | |

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|---|---|---|--|--|--------------------------|--------------------------|--|--|------|------|------|------|------|------|------|------|----------------------|
| | | | | | | | | | 0 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | Operational Analysis |
| Objective 7: Efficiency and effectiveness of FIA to execute the mandate | Intervention 7.1: Ensure a safe and secure working environment | A safe and secure working environment established | Action 6.3.2: Training of staff to equip with the requisite FDD skills | Number of trainings undertaken by staff | Quarterly reports | Quarterly reports | Number of security initiatives put in place | Quarterly reports | 4 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | Human Resource |
| | | | Action 7.1.1: Enhanced security at office premises | Number of eligible staff provided with security | Quarterly reports | Quarterly reports | Action 7.1.2: strengthened security for eligible staff | Number of eligible staff provided with security | 3 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | Human Resource |
| | | | Action 7.1.3: Secured working environment by promptly paying for office accommodation, utilities, cleaning services and security cameras | Proportion of budget allocated to securing working environment | Quarterly reports | Quarterly reports | Action 7.1.3: Secured working environment by promptly paying for office accommodation, utilities, cleaning services and security cameras | Proportion of budget allocated to securing working environment | 20% | 30% | 30% | 30% | 30% | 30% | 30% | 30% | Human Resource |
| | Intervention 7.2: Establish a mechanism to recruit and retain competent staff | A mechanism to recruit and retain competent staff established | Action 7.2.1: Qualified staff recruited, trained, adequately compensated and facilitated | percentage of approved FIA structure filled | Management Reports | Management Reports | Action 7.2.1: Qualified staff recruited, trained, adequately compensated and facilitated | percentage of approved FIA structure filled | 60% | 80% | 100% | 100% | 100% | 100% | 100% | 100% | Human Resource |
| | | | Action 7.2.2: Salaries and Wages of staff processed and paid by the 30th day of every month. | Proportion of staff paid by the 30th day of every month | Pay roll | Pay roll | Action 7.2.2: Salaries and Wages of staff processed and paid by the 30th day of every month. | Proportion of staff paid by the 30th day of every month | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% | Human Resource |
| | | | Action 7.2.3: Medical Insurance | Proportion of staff accessing medical insurance | Medical insurance report | Medical insurance report | Action 7.2.3: Medical Insurance | Proportion of staff accessing medical insurance | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% | Human Resource |
| | | | Action 7.2.4: Bereavement support (Next of Kin) | Proportion of affected staff paid bereavement support within one day of incident | Monthly reports | Monthly reports | Action 7.2.4: Bereavement support (Next of Kin) | Proportion of affected staff paid bereavement support within one day of incident | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% | Human Resource |

| Action | Monthly reports | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% | Human Resource |
|---|---|------|------|------|------|------|------|------|------|------|----------------|
| Action 7.2.5: Staff Welfare | Proportion of staff accessing staff welfare on equal term basis | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% | 100% | Human Resource |
| Action 7.2.6: Strengthened capacity for staff to fulfil FIA's mandate through training | Number of staff trained | 15 | 40 | 45 | 50 | 55 | 60 | | | | Human Resource |
| Action 7.2.7: Develop an incentive and reward policy to promote staff innovativeness and retention | Number of staff benefiting from the Incentive and reward policy | 10% | 15% | 20% | 25% | 30% | 35% | | | | Human Resource |
| Action 7.2.8: FIA subscribe to professional bodies to allow officers benefit from Continuous Professional Development (CPD) | Proportion of professional bodies subscribed to | 20% | 40% | 60% | 70% | 80% | 90% | | | | Human Resource |
| Action 7.2.9: Develop staff attachment policy to gain 15 experiential learning from developed FIUs | Attachment policy developed and Number of experiential learning missions attended | 0 | 3 | 3 | 3 | 3 | 3 | | | | Human Resource |
| Action 7.2.10: Training Committee members trained | Number of training committee members trained | 0 | 1 | 1 | 1 | 1 | 1 | | | | Human Resource |
| Action 7.3.1: Board of Directors fully constituted to provide policy direction | Proportion of positions filled on the board | 100% | 100% | 100% | 100% | 100% | 100% | | | | Human Resource |
| Intervention 7.3: Strengthen FIA governance structures to promote checks and balances | FIA governance structures strengthened to promote checks and balances | | | | | | | | | | |

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| | | | | | | | | 0 | Quarterly report | Risk matrix developed | | | 6 | 6 | 6 | 6 | 6 | 6 | 6 | Internal Audit |
| Action 7.3.2: Risks identified and a risk matrix developed for mitigation purposes | | | | | | | | 0 | Quarterly report | Risk matrix developed | | | 6 | 6 | 6 | 6 | 6 | 6 | 6 | Internal Audit |
| Action 7.3.3: Review of the internal Audit Charter, Internal Audit Manual for effective Internal Audit Activity | | | | | | | | 0 | Performance report | Internal Audit Charter review report | | | 1 | 1 | 1 | 1 | 1 | 1 | 1 | Internal Audit |
| Action 7.3.4: Training of Risk Champions in risk assessment | | | | | | | | 0 | Quarterly report | Number of trainings conducted for risk champions | | | 2 | 2 | 2 | 2 | 2 | 2 | 2 | Internal Audit |
| Action 7.3.5: Internal Audit Quality assurance and improvement program conducted to support FIA operations on a quarterly basis | | | | | | | | 4 | Internal Audit Quality assurance and improvement program report | Number of internal audit and quality assurance reports | | | 4 | 4 | 4 | 4 | 4 | 4 | 4 | Internal Audit |
| Action 7.3.6: Strengthened Internal Controls within the Authority | | | | | | | | 4 | Quarterly Internal Audit reports | Proportion of internal controls implemented arising from Internal Audit reports/recommendations | | | 4 | 4 | 4 | 4 | 4 | 4 | 4 | Internal Audit |
| Action 7.3.7: Enhanced skills in the Management of Internal Audit activity | | | | | | | | 1 | Training reports | Number of trainings attended | | | 1 | 1 | 1 | 1 | 1 | 1 | 1 | Internal Audit |

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

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|--|--|----------------------------------|-----|-----|-----|-----|-----|-----|---------------------------|
| Action 7.4.5: Enhanced security of FIA Information and Staff by Upgrading FIA entrance security scanner | Proportion of FIA mobile assets secured. | Quarterly reports | 20% | 30% | 40% | 50% | 60% | 70% | Security and System Admin |
| Action 7.4.6: Ensure Internet business continuity and availability through Procurement of a fail over Data Link for connectivity | 1. Internet Service Uptime 2.Mobile Internet Access points activated. | Quarterly reports | 0% | 20% | 40% | 60% | 80% | 95% | Security and System Admin |
| Action 7.4.7: IT security Business Impact Assessment (BIA) conducted to predict consequences of security incidents including third party risk assessment and criticality classification | Number of Business Impact Assessment (BIA) conducted | Business risk assessment report. | 0 | 2 | 2 | 2 | 2 | 2 | Security and System Admin |
| Action 7.4.8: Disaster Recovery Site established to ensure business continuity and business resumption as a fail over; 1. Establishment of a DR Site 2. Establishment of a business resumption site (warm site) 3. Data restoration tests. | Proportion of information which can be recovered from the site | Quarterly reports | 30% | 40% | 50% | 60% | 70% | 80% | Security and System Admin |

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|--|---|--|-------------------|-------------------|-------------------|------|------|------|------|------|------|---------------------------|
| | | | | | | 0% | 20% | 40% | 60% | 80% | 100% | Security and System Admin |
| | | Percentage of user accounts created. | Quarterly reports | Quarterly reports | Quarterly reports | 20% | 30% | 40% | 50% | 60% | 70% | Security and System Admin |
| | <p>Action 7.4.9: FIA mail servers upgraded to provide for an Autonomous FIA mail exchange, storage and management; 1. Mail system implemented. 2. Percentage of user accounts created. 3.Amount of storage utilized</p> | <p>1. Proportion of licenses procured. 2. Classification of license categories</p> | Quarterly reports | Quarterly reports | Quarterly reports | 20% | 30% | 40% | 50% | 60% | 70% | Security and System Admin |
| | <p>Action 7.4.10: Renew Software Server Licenses to maintain functionalities and support of all FIA software</p> | <p>1. Proportion of required ICT secure certificates deployed.</p> | Quarterly reports | Quarterly reports | Quarterly reports | 100% | 100% | 100% | 100% | 100% | 100% | Security and System Admin |
| | <p>Action 7.4.11: Security secure certificates for servers e.g Netrix Auditor to Secure FIA network environment.</p> | <p>Proportion of required ICT secure certificates deployed.</p> | Quarterly reports | Quarterly reports | Quarterly reports | 100% | 100% | 100% | 100% | 100% | 100% | Security and System Admin |
| | <p>Action 7.4.12: Build ICT staff capacity through knowledge transfer, training and benchmarking to enhance their competence</p> | <p>Proportion of ICT staff trainings, workshop and ICT Conferences attended.</p> | Quarterly reports | Quarterly reports | Quarterly reports | 10% | 20% | 30% | 40% | 50% | 60% | Security and System Admin |
| | <p>Action 7.4.13: Review & Update ICT Governance documents in line with the National IT Standards; 1. Approved draft of the ICT Strategy. 2. Approved draft ICT Policy</p> | <p>Proportion of compliance with the National IT standards</p> | Quarterly reports | Quarterly reports | Quarterly reports | 20% | 40% | 50% | 60% | 70% | 80% | Security and System Admin |

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|--|---|-------------------|-----|-----|-----|-----|-----|-----|---------------------------|
| Action 7.4.14: Recruitment of IT staff; in areas of Application support, Network Support, Service Desk, Software development, Information Security and Call center management | Percentage of IT vacancies filled. | Quarterly reports | 10% | 20% | 40% | 60% | 80% | 90% | Security and System Admin |
| Action 7.4.15: Accountable persons and supervisory bodies supported by IT by procuring 2 Vehicles to conduct IT outreach activities | Number of ICT Vehicles for ICT Operation procured. | Quarterly reports | 0 | 0 | 0 | 1 | 1 | 0 | Security and System Admin |
| Action 7.4.16: IT staff subscribe to professional bodies to allow IT officers benefit from Continuous Professional Development (CPD) for example gain continuous professional IT knowledge, skills and sharing of existing IT challenges | Percentage of certifications held by the department staff | Quarterly reports | 20% | 25% | 30% | 35% | 40% | 50% | Security and System Admin |

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

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|--|--|--|--|--|--|-------------------|-----|-----|-----|-----|-----|-----|-------------------------------------|
| | | | | | | | 0% | 10% | 20% | 30% | 50% | 60% | Systems Security and Administration |
| | | | | | Percentage of queries resolved within SLA timelines. | Quarterly report | | | | | | | |
| | | | | <p>Action 7.5.3: Establishment of a Call Center for registration and Compliance queries. (Call Center Management System) to ensure better helpline management & response to queries / feedback Recruitment of 3 staff to man the call center)</p> <ol style="list-style-type: none"> 1. Percentage of calls registered. 2. Percentage of open call tickets. 3. Percentage of closed tickets. 4. Percentage of queries resolved within SLA timelines. | | | | | | | | | |
| | | | | <p>Action 7.5.4: Maintain, replace equipment that has reached it's end of life</p> | Proportion of items that have reached their end of life disposed off | Quarterly reports | 30% | 40% | 50% | 60% | 70% | 80% | Systems Security and Administration |
| | | | | <p>Action 7.5.5: Critical software Vulnerability Checks Software updates and patches including change requests conducted;</p> <ol style="list-style-type: none"> 1. Percentage of Software upgrades and patches carried out. 2. Percentage of software threats detected and resolved. | Percentage of Software upgrades and patches carried out. | Quarterly reports | 30% | 40% | 50% | 60% | 70% | 80% | Systems Security and Administration |

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|--|--|---|--|--|--|--|--|--|-------------------|-----|-----|-----|-----|-----|-----|-------------------------------------|
| | | | | | | | | Proportion of FIA computers connected to the central UPS | Quarterly reports | 20% | 30% | 50% | 60% | 70% | 90% | Systems Security and Administration |
| | | Power stability maintained across the FIA during power cuts through installation and maintenance of a functional centralized UPS for electric power stability and cross over during power cuts; | | | | | | Availability of services during power surge across all FIA operations. | | | | | | | | |
| | | Action 7.5.10: | | | | | | | | | | | | | | |
| | | Intervention 7.6.: Establish a framework for effective budgeting and planning processes as per the PFMA | | | | | | | | | | | | | | |
| | | A framework for effective budgeting and planning processes as per the PFMA established | | | | | | | | | | | | | | |
| | | Intervention 7.6.: Ensure Budget Framework Paper (BFP), Ministerial Policy Statement (MPS) produced and submitted as per PFMA timelines | | | | | | | | | | | | | | |
| | | A framework for effective budgeting and planning processes as per the PFMA established | | | | | | | | | | | | | | |
| | | Intervention 7.6.: Quarterly performance budget reports produced | | | | | | | | | | | | | | |
| | | A framework for effective budgeting and planning processes as per the PFMA established | | | | | | | | | | | | | | |
| | | Intervention 7.6.2: | | | | | | | | | | | | | | |
| | | Staff trained in budgeting and planning as per Public Finance management Act | | | | | | | | | | | | | | |
| | | Quarterly performance budget reports produced | | | | | | | | | | | | | | |
| | | A framework for effective budgeting and planning processes as per the PFMA established | | | | | | | | | | | | | | |
| | | Intervention 7.6.3: | | | | | | | | | | | | | | |
| | | Staff trained in budgeting and planning as per Public Finance management Act | | | | | | | | | | | | | | |
| | | Proportion of staff trained in Budgeting and planning | | | | | | | | | | | | | | |
| | | A framework for effective budgeting and planning processes as per the PFMA established | | | | | | | | | | | | | | |
| | | Intervention 7.7.: Process all approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | A framework for effective financial reporting established | | | | | | | | | | | | | | |
| | | Quarterly report | | | | | | | | | | | | | | |
| | | Number of days in which approved payment requests are effected | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 5 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |
| | | Approved payment requests within 2 days | | | | | | | | | | | | | | |

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

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|--|--|--|--|--------------------------------|---|---|---|---|---|---|---|---|---|---|---|-------------|
| | | | | | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | Accounts |
| | | | | | | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | Accounts |
| | | | | | Number of financial statements | Number and date when financial reports are provided | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Accounts |
| | | | | Number of financial statements | Number and date when financial reports are provided | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Accounts |
| | | | | Number of financial statements | Number of scheduled international and domestic financial management conferences and workshops attended to cope with the changing accounting reforms | Performance Reports | Performance Reports | Performance Reports | Performance Reports | Performance Reports | Performance Reports | Performance Reports | Performance Reports | Performance Reports | Performance Reports | Accounts |
| | | | | Number of financial statements | Accounts offices partitioned and secured | Procurement report | Procurement report | Procurement report | Procurement report | Procurement report | Procurement report | Procurement report | Procurement report | Procurement report | Procurement report | Accounts |
| | | | | Number of financial statements | Number of motor vehicles acquired | Asset Register | Asset Register | Asset Register | Asset Register | Asset Register | Asset Register | Asset Register | Asset Register | Asset Register | Asset Register | Accounts |
| | | | | Number of financial statements | Time taken to process approved procurements in line with PPDA lead times | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Quarterly report | Procurement |
| | | | | Number of financial statements | Intervention 7.8: Establish a framework for effective procurement processes in line with PPDA Act and regulations | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | A framework for effective procurement processes in line with PPDA Act and regulations established | Procurement |

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

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

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

Annex II: Cost implementation Matrix

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

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

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

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

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

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| Objective 5: Increase public awareness and understanding of matters related to ML/TF | Intervention 4.4: Increase compliance with AML/CFT / CPF international standards | Increased compliance with AML/CFT /CPF international standards | Action 4.3.4: Attend 8 ICRG face to face meetings | | | | | | | | | | 0.026 | 0.016 | - | - | - | 0.041 | |
| | | | Action 4.3.5: Coordinate 10 meetings towards the Implementation of ESAAMLG activities | | | | | | | | | | 0.010 | 0.010 | 0.010 | 0.010 | 0.010 | 0.010 | 0.052 |
| | | | Action 4.3.6: Attend 5 ESAAMLG Meetings | | | | | | | | | | 0.005 | 0.005 | 0.005 | 0.005 | 0.005 | 0.026 | |
| | | | Action 4.3.7: Coordinate 10 stakeholder meetings towards the implementation of FATF activities | | | | | | | | | | 0.010 | 0.010 | 0.010 | 0.010 | 0.010 | 0.052 | |
| | | | Action 4.3.8: Coordinate 10 working group meetings towards the implementation of EGMONT activities | | | | | | | | | | 0.010 | 0.010 | 0.010 | 0.010 | 0.010 | 0.052 | |
| | | | Action 4.3.9: Coordinate 10 meetings to discuss AML/CFT/CPF initiatives with Development partners and other agencies | | | | | | | | | | 0.010 | 0.010 | 0.010 | 0.010 | 0.010 | 0.052 | |
| | | | Action 4.4.1: Regular review of AML/CFT laws | | | | | | | | | | 0.016 | 0.016 | 0.016 | 0.016 | 0.016 | 0.078 | |
| | | | Action 4.4.2: Stake holder meetings and workshops | | | | | | | | | | 0.016 | 0.016 | 0.016 | 0.016 | 0.016 | 0.078 | |
| | | | Action 5.1.1: 20 AML/CFT/CPF articles published in different newspapers and magazines | | | | | | | | | | 0.040 | 0.040 | 0.040 | 0.040 | 0.040 | 0.200 | |
| | | | Action 5.1.2: 40 AML/CFT/CPF public campaigns conducted across the regions of the country | | | | | | | | | | 0.240 | 0.240 | 0.240 | 0.240 | 0.240 | 1.200 | |
| | | | Action 5.1.3: 15 TV/Radio talk shows conducted using different stations on AML/CFT/CPF | | | | | | | | | | 0.018 | 0.018 | 0.018 | 0.018 | 0.018 | 0.090 | |
| | | | Intervention 5.2: Review the Communication strategy to inform AML/CFT/CPF public awareness | Action 5.2.1: Review, update and print the communication strategy | | | | | | | | | | 0.050 | 0.100 | - | - | - | 0.150 |
| | | | | Action 5.3.1: Develop AML/CFT/CPF outreach programmes targeting Accountable person/Reporting entities and LEAs | | | | | | | | | | 0.291 | 0.340 | 0.389 | 0.437 | 0.486 | 1.943 |
| Intervention 5.3: Build capacity of accountable persons and LEAs in AML/CPF | Action 5.3.2: Develop a capacity development plan tailor-made for accountable persons and regulatory bodies. | | | | | | | | | | 0.049 | 0.049 | 0.049 | 0.049 | 0.049 | 0.243 | | | |

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| Objective 6: Strengthen the capacity of FIA to conduct financial due diligence | Intervention 6.1: Establish a framework for conducting FDD | A framework for conducting FDD established | Action 5.3.2: Conduct 150 AML/CFT Training sessions Train FIs and DNFPs on proper implementation of the AML/CFT obligations especially in respect of ML/TF risk assessment, CDD, TFS, and STRs | 0.030 | 0.030 | 0.030 | 0.030 | 0.030 | 0.030 | 0.030 | 0.150 | | | | |
| | | | | Intervention 6.2: Establish a mechanisms to acquire vital information to support FDD | A mechanisms to acquire vital information to support FDD established | Action 6.1.1: Develop and review procedures/guidelines to be followed to conduct FDD | 0.058 | 0.046 | 0.044 | 0.041 | 0.041 | 0.041 | 0.231 | | |
| | | | | | | | Action 6.2.1: Subscription to closed information databases. | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.250 | | |
| | | | | | | | | Action 6.2.2: Engagement of individuals/entities that have ability to collect secret information on subjects of FDD | 0.960 | 1.280 | 1.600 | 2.000 | 2.400 | 8.240 | |
| | | | | | | | | | Action 6.3.1: Recruitment of staff | 0.132 | 0.420 | 0.612 | 0.612 | 0.612 | 2.388 |
| | | | | | | | | | | Action 6.3.2: Training of staff to equip with the requisite FDD skills | 0.076 | 0.077 | 0.080 | 0.081 | 0.082 |
| | Intervention 6.3: Promote staff capacity to effectively conduct FDD | Staff capacity to effectively conduct FDD promoted | Action 7.1.1: Enhanced security at office premises | 0.048 | 0.053 | 0.058 | 0.064 | 0.070 | 0.293 | | | | | | |
| | | | | Action 7.1.2: Strengthened security for eligible staff | 0.150 | 0.165 | 0.182 | 0.200 | 0.220 | 0.916 | | | | | |
| | | | | | Action 7.1.3: Secured working environment by promptly paying for office accommodation, utilities, cleaning services and security cameras | 1.197 | 1.316 | 1.448 | 1.593 | 1.752 | 7.306 | | | | |
| | | | | | | Objective 7.2: Establish a mechanism to recruit and retain competent staff | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | | | |
| | | | | | | | Action 7.2.1: Qualified staff recruited, trained, adequately compensated and facilitated (One officer in procurement and one in HR) | 0.132 | 0.132 | 0.132 | 0.132 | 0.132 | 0.660 | | |
| | | | | | | | | Action 7.2.2: Wage bill | 3.744 | 4.014 | 4.284 | 4.554 | 4.824 | 21.420 | |
| Objective 7: Efficiency and effectiveness of FIA to execute the mandate | A safe and secure working environment established | Action 7.2.3: Medical Insurance | 0.288 | 0.317 | 0.346 | 0.374 | 0.403 | | 1.728 | | | | | | |
| | | | Action 7.2.4: Bereavement support (Next of Kin) | 0.014 | 0.014 | 0.014 | 0.014 | 0.014 | 0.070 | | | | | | |
| | | | | Action 7.2.5: Staff Welfare | 0.317 | 0.396 | 0.428 | 0.475 | 0.507 | 2.123 | | | | | |
| | | | | | Action 7.2.6: Strengthened capacity for staff to fulfil FIA's mandate through training | 0.114 | 0.116 | 0.120 | 0.122 | 0.123 | 0.594 | | | | |

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| Action 7.2.7: Develop and operationalise an incentive and reward policy to promote staff innovativeness to increased staff retention | 0.150 | 0.105 | 0.105 | 0.105 | 0.105 | 0.105 | 0.105 | 0.570 |
| Action 7.2.8: FIA subscribe to professional bodies to allow officers benefit from Continuous Professional Development (CPD) | 0.025 | 0.025 | 0.025 | 0.025 | 0.025 | 0.025 | 0.025 | 0.125 |
| Action 7.2.9: Develop staff attachment policy to gain 15 experiential learning from developed FIUs | 0.114 | 0.116 | 0.120 | 0.122 | 0.123 | 0.123 | 0.123 | 0.594 |
| Action 7.2.10: Training Committee members trained | 0.190 | 0.193 | 0.200 | 0.203 | 0.205 | 0.205 | 0.205 | 0.990 |
| Objective 7.3: Strengthen FIA governance structures to promote checks and balances | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Action 7.3.1: Board of Directors fully constituted to provide policy direction | 0.074 | 0.074 | 0.074 | 0.074 | 0.074 | 0.074 | 0.074 | 0.370 |
| Action 7.3.2: Risks identified and a risk matrix developed for mitigation purposes | 0.025 | 0.025 | 0.025 | 0.025 | 0.025 | 0.025 | 0.025 | 0.125 |
| Action 7.3.3: Review of the Internal Audit Charter, Internal Audit Manual for effective Internal Audit activity | 0.015 | - | - | - | - | - | - | 0.015 |
| Action 7.3.4: Training of Risk Champions in risk assessment | - | 0.039 | 0.039 | 0.039 | 0.039 | 0.039 | 0.039 | 0.155 |
| Action 7.3.5: Internal Audit Quality assurance and improvement program conducted to support FIA operations | - | 0.050 | - | - | - | - | - | 0.050 |
| Action 7.3.6: Strengthened Internal Controls within the Authority | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.250 |
| Action 7.3.7: Enhanced skills in the Management of Internal Audit activity | - | 0.049 | 0.051 | 0.053 | 0.056 | 0.056 | 0.056 | 0.209 |
| Objective 7.4: Establish a mechanism to safeguard ICT infrastructure against evolving National and International threats | | | | | | | | 0.000 |
| Action 7.4.1: 25 Cyber Security Audits "Security Operating Center (SOC) conducted by; | | | | | | | | |

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

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

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

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

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

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| | | | | | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.000 |
| | | | | | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.000 |
| | | | | | | | | 0.038 | 0.039 | 0.040 | 0.041 | 0.041 | 0.041 | 0.041 | 0.198 |
| | | | | | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.000 |
| | | | | | | | | | | | | | | | 0.000 |
| | | | | | | | | 0.048 | 0.048 | 0.048 | 0.048 | 0.048 | 0.048 | 0.048 | 0.240 |
| | | | | | | | | 0.026 | 0.026 | 0.026 | 0.026 | 0.026 | 0.026 | 0.026 | 0.130 |
| | | | | | | | | 0.021 | 0.021 | 0.021 | 0.021 | 0.021 | 0.021 | 0.021 | 0.104 |
| | | | | | | | | 0.026 | 0.026 | 0.026 | 0.026 | 0.026 | 0.026 | 0.026 | 0.130 |
| | | | | | | | | 0.198 | 0.198 | 0.198 | 0.198 | 0.198 | 0.198 | 0.198 | 0.990 |
| | | | | | | | | 0.055 | 0.055 | 0.055 | 0.055 | 0.055 | 0.055 | 0.055 | 0.276 |
| | | | | | | | | 0.100 | 0.100 | 0.100 | 0.100 | 0.100 | 0.100 | 0.100 | 0.500 |
| | | | | | | | | 0.216 | 0.219 | 0.227 | 0.230 | 0.230 | 0.233 | 0.233 | 1.125 |
| | | | | | | | | 0.100 | 0.100 | 0.100 | 0.100 | 0.100 | 0.100 | 0.100 | 0.500 |
| | | | | | | | | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.250 |
| | | | | | | | | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.050 | 0.250 |
| | | | | | | | | 0.200 | 0.200 | 0.200 | 0.200 | 0.200 | 0.200 | 0.200 | 1.000 |
| | | | | | | | | 0.040 | 0.048 | 0.052 | 0.056 | 0.056 | 0.060 | 0.060 | 0.256 |
| | | | | | | | | 0.100 | 0.120 | 0.130 | 0.140 | 0.140 | 0.150 | 0.150 | 0.640 |
| | | | | | | | | 0.080 | 0.100 | 0.120 | 0.130 | 0.130 | 0.140 | 0.140 | 0.570 |
| | | | | | | | | 0.100 | 0.070 | 0.050 | 0.040 | 0.030 | 0.030 | 0.030 | 0.290 |
| | | | | | | | | 33.800 | 37.147 | 38.299 | 40.448 | 42.790 | 42.790 | 42.790 | 192.484 |
| | | | | | | | | 33.800 | 37.147 | 38.299 | 40.448 | 42.790 | 42.790 | 42.790 | 192.484 |

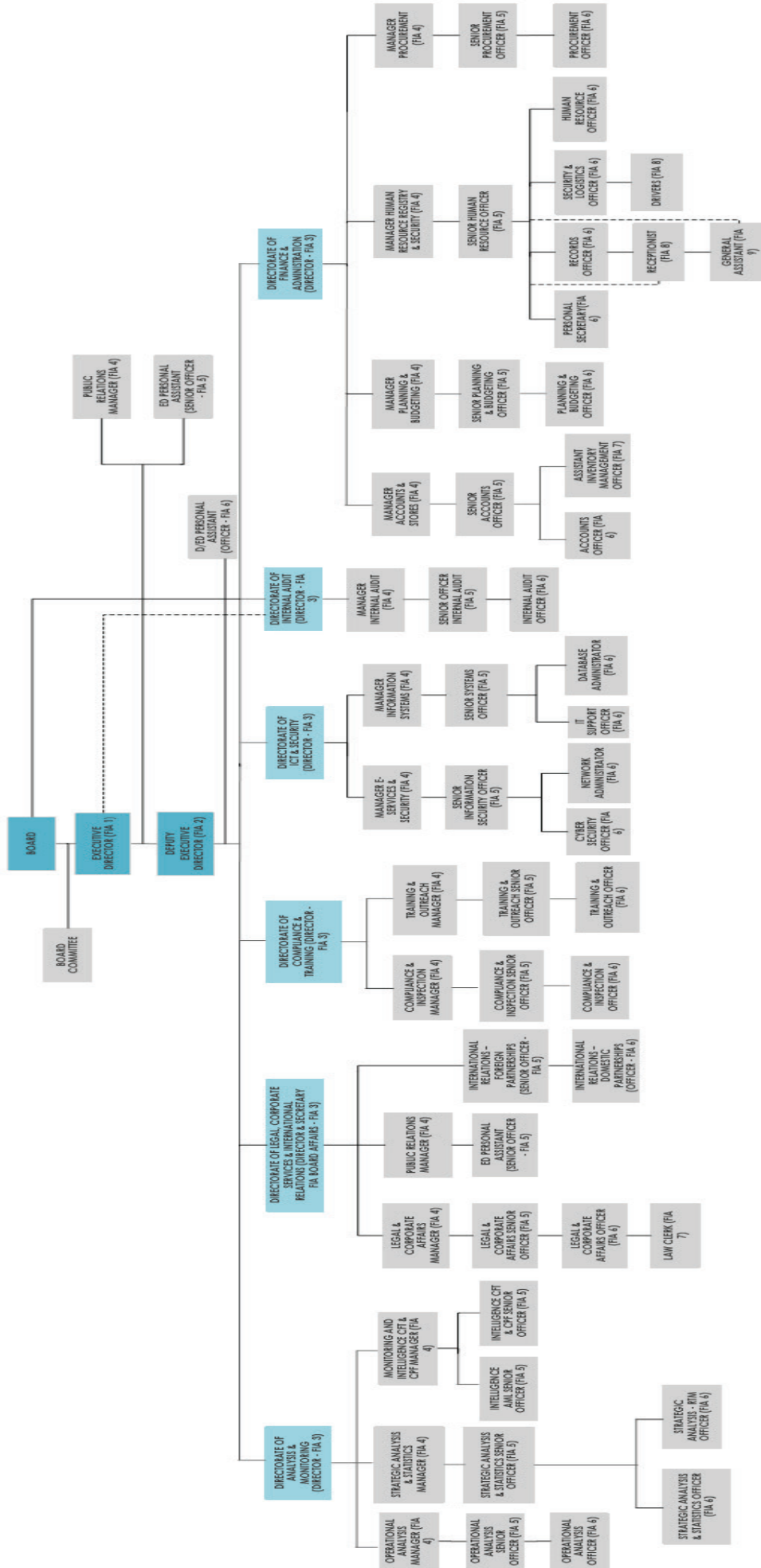
Annex III: Matrix linking FIA Strategic Plan to NDPIII Framework

| NDPIII GOAL | NDPIII theme | NDP III STRATEGIC OBJECTIVES | NDP III DEVELOPMENT STRATEGY | NDP III Programme objectives: Governance and Security | NDP III Programme: Governance and Security programme interventions | Current Development challenges to be addressed | FIA's strategic interventions |
|--|--|--|---|--|---|--|---|
| To Increase Household Incomes and Improve Quality of Life of Ugandans (Ref: NDP III, page xviii) | Sustainable Industrialization for inclusive growth, employment and sustainable wealth creation. (Ref: NDP III, page xviii) | 1. Strengthen the private sector to create jobs. (Ref NDP III key objective 2, Page xviii) | Provide a suitable fiscal, monetary and regulatory environment for the private (Ref: NPD III strategy 6, Page 45) | 1. Strengthen policy, legal, regulatory and institutional frameworks for effective governance and security | <p>1. Review and enact appropriate legislation; Domesticating international and regional treaties</p> <p>2. Review, and develop appropriate policies for effective governance and security</p> <p>3. Simplify, translate and disseminate laws, policies and standards</p> | <p>Government will continue to support and strengthen the private sector as the main engine for growth, job creation and increased household income to address the various challenges constraining private sector growth including:</p> <ul style="list-style-type: none"> • slow bureaucratic decision making by the public service, • corruption, case backlog in the judiciary, and • inadequate access to patient capital. <p>In addition, government will continue to provide an enabling environment for private sector growth through:</p> <ul style="list-style-type: none"> • maintaining macroeconomic stability, provision of long-term finance at affordable rates, • reduction in the amount of domestic arrears and putting in place mechanisms to ensure these are kept low as well as strengthening the use of PPP arrangements. <p>By so doing, both domestic and foreign investors will be incentivized to increase investment in agro-processing, manufacturing, mineral mining and beneficiation and tourism. Insurance will be leveraged to enhance productivity by deepening the insurance industry to increase risk management. (Ref: NDP II, page 45)</p> | <p>Enhance the identification of proceeds of crime and combating of Money Laundering in order to protect the integrity of the financial system and protect the economy from the dangers of money laundering and financing of terrorism.</p> <p>Ensure compliance with the AMLA to strengthen the regulatory environment of the financial system and ensure that all accountable persons comply with AML/CFT obligations</p> <p>Enhance public awareness and understanding of matters related to ML/TF in order to empower the public to take preventive measures, detect and promptly report ML/TF suspicions.</p> <p>Disseminate financial intelligence reports to competent authorities to support administration of justice through prosecution, and tracing and freezing of assets generated from crime.</p> <p>Exchange, spontaneously or upon request any information with similar bodies of other countries that may be relevant for the processing or analyzing of information relating to ML/TF and other transnational crimes</p> |

| | | | | | | | |
|--|--|--|---|---|--|---|--|
| | | <p>2. Strengthen the role of the state in guiding and facilitating development. (Ref: NDP III, key Objective 5 page xviii)</p> | <p>Enhanced role of the state to drive growth</p> | <p>2. Strengthen transparency, accountability and anti-corruption systems</p> | <p>1. Strengthen the prevention, detection and elimination of corruption 2. Strengthen and enforce Compliance to accountability rules and regulations 3. Develop and implement an asset recovery framework 4. Mainstream Anti-Corruption initiative (transparency, Accountability and Anti-Corruption-TAAC) initiative in all MDA Programmes/ budgets</p> | <p>The role of the state in development has been limited due to, initially, weak capacity of government (financial and technical) but, later on, adoption of the liberalization policies. As a result of this, government divested itself from the ownership of many strategic but publicly owned enterprises and corporations. However, Uganda's economic history and experience in the energy sector has shown that the private sector is not always able to efficiently allocate resources within the context of a country's long-term growth prospects. In sectors like energy or transport, the state is more ideally suited to invest, as it can invest for the long term and is not seeking immediate short-term gains. The state can afford longer periods of capital recovery with minimal profits. Under this plan, government will invest directly or in partnership with the private sector (under PPP arrangements) in selected strategic sectors, particularly energy, transport infrastructure and specialized health and education institutions to compensate for market failures and develop strategic competitive advantages. It will also mean protecting our nascent industries to in our bid to industrialize.</p> | <p>Conduct quality financial due diligence on investors intending to partner with government on development projects through Public Private Partnerships (PPP) Provide financial intelligence to competent authorities to support administration of justice through prosecution, and tracing and freezing of assets generated from crime.</p> |
|--|--|--|---|---|--|---|--|

Annex IV: FIA Organogram

FINANCIAL INTELLIGENCE AUTHORITY ORGANISATIONAL CHART EFFECTIVE JULY 2021



Annex V: Retooling Project profile

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

| THE NATIONAL SUMMARIZED STRUCTURE FOR IDENTIFIED PUBLIC PROJECTS | |
|--|--|
| The NDPI | |
| Already existing in the NDPII | No |
| Already existing in the MFPEP PIP | Yes |
| PROJECT INTRODUCTION | |
| Problem Statement | <p>The emerging global, regional and national ML and TF trends have directly placed additional responsibilities on the oversight role of the FIA resulting into an ever expanding scope of Anti Money Laundering (AML) and Countering the Financing of Terrorism (CFT). The FIA is also in the midst of several new development initiatives with an aim of enhancing its physical and operational capacity. Notable of such initiatives is the goAML system project. Coping with the dynamic environment, requires sustained support to FIA operations through equipping the office with ICT, Transport equipment and furniture to create a conducive work environment. The current FIA retooling project, Project 1423: Support to Financial Intelligence Authority expires in June 2020 in line with the conclusion of the NDP II. Therefore, the FIA seeks to build on the benefits that have accrued to the Authority in the current strategic period through requesting for a new re-tooling project for inclusion in the next Project Investment Plan (PIP) for the period 2020 – 2025 in accordance with the NDP III planning guidelines.</p> |
| | <p>Problem Causes</p> <ul style="list-style-type: none"> Limited operational capacity Emerging new technologies for example Virtue Assets Service Providers (VASPs) |

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

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

THE NATIONAL SUMMARIZED STRUCTURE FOR IDENTIFIED PUBLIC PROJECTS

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

PROJECT ANNUALISED TARGETS (OUTPUTS)

Project annualized targets

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

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

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

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

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

Output 3: Accumulated office equipment and furniture

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

ESTIMATED PROJECT COST AND FUNDING SOURCES

| | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 | Total cost |
|-------------------------|---------------|---------------|---------------|-------------|-------------|----------------|
| Project annualized cost | 7,542,500,000 | 3,772,500,000 | 5,952,500,000 | 397,500,000 | 397,500,000 | 18,062,500,000 |

RESULTS MATRIX

Results matrix

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

| | | | | | | | | | | | |
|--|---|--|------------------|------------------|------------------|------------------|------------------|------|-----------------|--------------------------------------|---|
| | Output 2: Modern ICT infrastructure for both hardware and software acquired | Indicator 1: Proportion of modern ICT infrastructure for both hardware and software acquired | 10% | 25% | 47% | 70% | 85% | 100% | Assets register | Funds shall be provided as projected | Rapid evolving technology and equipment |
| | Output 3: Accumulated office equipment and furniture procured | Indicator 1: Proportion of required office equipment and furniture procured | 17% | 60% | 70% | 80% | 90% | 100% | Assets register | Funds shall be provided as projected | Change in policy on implementation of Section 10 of the AMLA, 2013 (as amended) |
| | | | | | | | | | | | |
| | Output / Activity Title | | FY2020/21 | FY2021/22 | FY2022/23 | FY2023/24 | FY2024/25 | | | | |
| | Output 1: Accumulated asset base of transport equipment for the Authority | | | | | | | | | | |
| | Activity 1: Procurement of 6 vehicles for Directors | | | | | | | | | | |
| | Activity 2: Procure 6 vehicles for Managers | | | | | | | | | | |
| | Activity 3: Procure 8 Pool Vehicles for field operations | | | | | | | | | | |
| | Activity 4: Procure 2 Motorcycles | | | | | | | | | | |
| | Output 2: Modern ICT infrastructure for both hardware and software acquired | | | | | | | | | | |
| | Activity 1: Procurement of 65 Hardware (Computers – laptops and desktop computers) | | | | | | | | | | |
| | Activity 2: Procure 7 Software packages and Implementation of information Security solutions such as Commvault solution, Data loss prevention solution, Check point solution, Device tracking solution, Network monitoring solution, Cisco firepower full suite | | | | | | | | | | |
| | Activity 3: Procure period licenses to support the computer software packages and running applications | | | | | | | | | | |
| | Activity 4: Acquire Enterprise Resource Planning (ERP) System | | | | | | | | | | |
| | Activity 5: Upgrade goAML system to enterprise version with improved Business processes and implementation of the goAML integration API (Application Programming Interface) | | | | | | | | | | |
| | Activity 6: Acquire 65 Cisco IP phone solution and hardware | | | | | | | | | | |

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

