



THE REPUBLIC OF UGANDA

**GOVERNMENT STRATEGY AND PLAN OF ACTION  
TO FIGHT CORRUPTION AND BUILD ETHICS AND  
INTEGRITY IN PUBLIC OFFICE  
Fiscal Years 2000/1-2002/3**

**Directorate of Ethics and Integrity  
Office of the President  
Kampala, July 2000**

## FOREWORD

One of the most serious ethical problems confronting Government is the problem of corruption in public office. Corruption threatens the moral, political, economic and social wellbeing of the country, impairing service delivery, diverting and wasting scarce resources and undermining the legitimacy of Government.

**The issue of ethics in the Public Service has been gaining increased concern among citizens, the media, politicians and policy-makers. The strengthening of public confidence in government and public institutions constitutes a necessary condition for both effective democratic governance and a healthy economic development.**

Regardless of the many dimensions of public ethics, it is clear that a strategy to foster it cannot be limited to fight corruption, theft, robbery, favoritism and clientelism within the public sector. Indeed, public ethics has become an issue beyond these 'obvious' tasks. In other words, **public ethics goes far beyond merely “not to rob” and “behaving according to the law”**. It includes some guiding principles about the preeminence of public interest over private interests, integrity, probity and accountability of a public officer. Every time the scarce public resources are misspent, key principles of public service ethics are being violated. On the contrary, every time the use of public resources is being optimized, improving society's welfare and the quality of life of the poor, the principle of public service as a vocation based on ethical grounds is being reinforced.

The NRM Government from inception identified the eradication of corruption as a national priority. Government in the late 90s intensified its efforts by establishing the Directorate of Ethics and Integrity as a **one stop centre providing political leadership on corruption** and to ensure improved coordination of all anti-corruption efforts. Government is committed to the fostering of an ethical government in an ethical society, and remains committed to a policy of **“zero tolerance” for corruption**. This Government Strategy and Plan of Action sets forward the commitments of Government to advance towards that goal over the next three years.

**Hon. Miria R.K. Matembe  
Minister of Ethics and Integrity  
July 12, 2000**

## **Executive Summary**

Corruption defined as the “use of public office for private gain” is a grave problem that Government is committed to eradicating. In this regard, it has adopted a policy of zero tolerance for corrupt practices, and building an ethical government in an ethical society.

Controlling corruption requires both preventive and reactive strategies. Preventive strategies include creating workable rules for the management of the public resources and the use of public authority that come with public office. Rules must be workable in that government actors have the capacity and resources necessary to comply with them. Voluntary compliance with such rules must be built by instilling and reinforcing values of ethics and integrity in public service; minimizing opportunities for corrupt practices; and reducing temptation. Finally, systems of monitoring and supervision must be put in place to detect irregularities that can give rise to corrupt practices. This includes creating an environment in which a knowledgeable and active civil society can monitor government and hold it accountable.

Reactive strategies respond to corrupt practices once they have taken place by punishing the offenders and so deterring others. While such strategies are essential, they do not conclusively reduce corruption. The emphasis on prevention strategies must be as strong or stronger than the emphasis on reactive strategies. Currently, criminal prosecutions for corrupt acts are rare because of underreporting, poor investigative capacity, corruption and susceptibility to political interference.

The priorities for Government action are:

- Strengthening the capacity of law enforcement for better investigation, prosecution and judgment, particularly of corruption cases.
- Strengthening the procurement system.
- Implementing public sector pay reform.
- Strengthening financial accountability, especially at the local government level.
- Ensuring effective coordination of agencies on corruption issues.
- Reviewing and strengthening the legal framework related to corruption.
- Reviewing and strengthening the system for enforcement of codes of conduct.
- Enabling the development of a strong civil society capable of monitoring government and holding it accountable.

Corruption cannot be reduced by fiat alone. To reduce corruption, preventive and reactive strategies must be planned and developed into concrete initiatives that take full account of resource constraints and competing priorities. The Directorate of Ethics and Integrity is the Government's anticorruption planner. However, anticorruption initiatives cannot be localized into a single ministry. Instead, ethical concerns must be mainstreamed into government planning across the board. This calls for planning capacity at the level of the anticorruption planner and at the level of implementing agencies. Unfortunately, planning and budgeting capacity is very weak across Government. Because anticorruption planning involves many agencies, it is limited by the average planning capacity of Government.

In revising this Plan of Action, Government reviewed the 1998 Government Policy and Plan of Action to Fight Corruption, and the process that gave rise to it. A number of weaknesses in the planning process and the plan were identified, which Government took steps to rectify in this round. Planning was more inclusive, and consultation more extensive, reaching out to include agencies with responsibilities for broad systems of government, recognizing the importance of the preventive roles they play. Civil society was consulted both through interviews and in a Coalition-Building Workshop. Assumptions concerning resources were made explicit. In light of the poor planning capacities of the agencies and the fact that the anticorruption and ethics building agenda is not yet mainstreamed, it is recognized that collaborative planning and monitoring and evaluation must be ongoing.

The present Plan of Action, detailed in Appendix I, represents those commitments that could be concretized within the span of the planning exercise. The Plan includes continued action on key 1998 commitments not yet completed, steps to improve planning and monitoring, actions to set standards of behavior, build voluntary compliance and strengthen supervision and monitoring, and actions to ensure sanctions. Some initiatives are:

- Tabling the amended Leadership Code before Parliament;
- Establishing a system to ensure expediting corruption cases in the Judiciary;
- Implementation of procurement reforms;
- Appointment of an auditor to audit the office of the Auditor General;
- Tabling of a White Paper before Parliament setting out a government policy on access to government information;
- Development of a Sector Wide Approach (SWAP) to strengthening the capacity of the Justice, Law and Order sector;
- Development of civil litigation strategies against corrupt actors, including suits by whistleblowers (*qui tam*);
- Developing a direct referral mechanism between the Auditor General and the IGG;
- Instituting a system of objective performance appraisals for civil servants using Results Oriented Management (ROM);
- Holding regular press conferences on anticorruption activities and disseminating DEI's report on progress and the Plan of Action to media and key government actors.

The accomplishment of the commitments in some cases is based on critical assumptions, and in particular, the assumption of adequate resources.

Government is fully cognizant of the harms caused by corruption and remains committed to a zero-tolerance policy. Government and civil society in partnership can make ethical behavior in public office the norm.

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## **List of Acronyms**

AG	Auditor General
CID	Criminal Investigation Department
CTB	Central Tender Board
DEI	Directorate of Ethics and Integrity
DPP	Directorate of Public Prosecutions
GOU	Government of Uganda
IGG	Inspector General of Government
LC	Local Council
MOFPED	Ministry of Finance, Planning and Economic Development
NSSF	National Social Security Fund
PAC	Public Accounts Committee
SWAP	Sector-Wide Approach to planning in the Justice, Law and Order sector
SWIPCO	Swiss International Procurement Company
UCB	Uganda Commercial Bank

**GOVERNMENT STRATEGY AND PLAN OF ACTION TO FIGHT  
CORRUPTION AND BUILD ETHICS AND INTEGRITY IN PUBLIC OFFICE  
2000/1 2002/3**

**1 INTRODUCTION**

In 1998, the Government advanced the first comprehensive plan: The Government Policy and Plan of Action to Fight Corruption. The Plan included actions by a number of government institutions including the Directorate of Public Prosecution (DPP), the Inspector General of Government (IGG), the Criminal Investigations Department (CID) of the Police, the Office of the Auditor General (AG), and the Ministry of Finance, Planning and Economic Development (MOFPED). At the same time, the Directorate of Ethics and Integrity (DEI) was created in the Office of the President under the leadership of a Cabinet Minister for the purpose of providing political leadership in the fight against corruption. Within a little over a year, important progress was made on most of the commitments made in the Plan of Action for 1998/9 to 2000/1. This document revises and updates that Plan of Action to Fight Corruption.

Section 1 introduces the plan, Section 2 gives the background to the plan which includes the incidence of corruption, main causes of corruption, what Government has done, problem statement, aim of the plan and the specific objectives of the plan. Section 3 explains the importance of preventive strategies to prevent the occurrence of corrupt acts, and the reactive strategies to sanction corrupt acts when they occur. Section 4 explains the challenges of comprehensive planning for building ethics and integrity in public office and reducing corruption. Section 5 presents highlights of the Plan. The activities of the Plan, operationalised and costed, are set out in Appendix 1. Appendix 2 lists items that DEI will monitor. Appendix 3 lists a number of suggested actions that were advanced in the course of consultations, which will be explored and developed as appropriate.

**2 BACKGROUND**

**2.1 Incidence of Corruption**

Corruption in Uganda has been documented to be at a high level. This is as evidenced in the National Integrity Survey which indicates that petty corruption is rampant and the population believes that the incidence of corruption is increasing. The 1997 Transparency International corruption perception index that reflected the views of a large sample of businessmen, whose firms operate in many countries, ranked Uganda as the 73<sup>rd</sup> from a list of 85 countries i.e among the bottom 15%. The press which is

another significant source of information has experienced greater freedom in the recent past and has increased emphasis on investigative journalism and exposing alleged corruption. The articles highlighted in box 1 are an indicator of the type of grand corruption in the country.

**Box 1 ARTICLES ON CORRUPTION IN THE NEWSPAPERS**

- The Board of Directors of the Uganda Electricity Board dismisses the Managing Director and 11 other officials following an investigation by the IGG and CID, and an external audit which reveals mis-procurement totaling to US\$15 million.
- Members of parliament request to see report of an inquiry into alleged diversion of US\$68 million in public funds allocated to rehabilitation of Luwero triangle area.
- Parliament votes to establish a select committee to probe allegations of theft and diversion of funds in the Ministry of Agriculture.
- The basis on which SWIPCO was selected in 1996 as the government's procurement advisor/agent, and the terms of the SWIPCO contract, are alleged to be improper by the IGG and the chairman of the PAC.
- The company constructing a head quarters building for the National social Security fund alleges that they were required to pay a bribe of US\$1 million in order to obtain the contract. The IGG demands that the company be barred from future government contracts. The NSSF managing director is sent on leave.
- The IGG queries the award of a US\$10 million contract for the manufacture of new vehicle license plates.

Source Annex 1 "The Extent of Corruption in Uganda" paper presented during course on Controlling Corruption: Towards an Integrated Strategy by World Bank Institute

## 2.2 Main causes of Corruption

The high level of corruption in Uganda can be attributed to some of the following factors

- ***Political instability in the past:*** Past political regimes in Uganda experienced a rise in the trend of political turmoil and human rights abuse. There was a progressive breakdown of the rule of law and ethics and a decline in individuals upholding integrity. This gave rise to the tendency to take bribes to survive due to the decline in real wages and political interference. Among others, the loss of experienced officials and non-compliance to formal procedures made corruption central at all levels.
- ***Inadequate laws:*** In several instances corruption cases are lost on technical grounds arising from issues such as lack of evidence. This calls for law reform including review of the corruption-related laws and initiation and enactment of new laws.
- ***Weak sanctions:*** Although basic laws are in place the sanctions provided for are not effective deterrents. Administrative sanctions such as suspension, transfer and forced retirement are not effective deterrents for corrupt actions.
- ***Weak Administrative Controls:*** The general breakdown of administrative controls has made it difficult or near impossible to keep track of administrative transactions. In addition there are low moral and ethical standards within the institutions.
- ***Poor salaries:*** The high incidence of poverty, economic hardships and rising cost of living have lured many public office bearers to seek bribes. As a result of economic hardships , it becomes difficult for lowly paid workers to continue to follow the official norms and high ideals of honesty.
- ***Lack of adequate facilities:*** Inefficient systems within Government sector have at times given room for corrupt acts because of lack of adequate tools, funds, equipment and space to carry out tasks effectively and efficiently.

- ***Insecure and precarious tenure of office:*** Sometimes people in top positions feel insecure and threatened because of job insecurity. They hence demand big bribes, kick back or engage in downright extortion and plunder to quickly amass wealth while they have the opportunity.
  
- ***Personal greed/Ambition:*** Some public officials have unrestrained desires to get rich quickly by fair or foul means. It is hence immaterial how much salary they are paid or what facilities they are given. Such officials, who may have stolen millions of shillings may for instance, even when transferred to other positions, continue to be corrupt.
  
- ***Case Backlog:*** In several of the anti corruption agencies, an issue of case backlog curtails the pace at which corruption cases are exposed and disposed off within the criminal justice system.
  
- ***Weak Procurement system:*** It is estimated that 90% of the corruption cases are procurement related. Yet, in several instances, procurement procedures and standards are not adhered to because of the sometimes urgent need, poor planning skills, refusal to follow guidelines and the cumbersome nature of the guidelines.
  
- ***Civil society contribution:*** The civil society has not been aggressive in requiring accountability from government officials. This has been a result of the past political instability. The general population is just beginning to appreciate freedom of expression. This has led to monopolistic operation of some government officials, which gives opportunity for carrying out corrupt practices.

### **2.3 What Government has done so far**

Despite the high incidence of corruption as highlighted above Government has undertaken several efforts to fight corruption and promote issues of ethics and integrity. Some of these are as highlighted below.

***Political accountability;*** The government has made significant strides in creation of a political and economic environment that is conducive to fighting corruption and building Integrity in public office. In this regard, so far, three ministers have resigned

and taken political responsibility for causing grave losses and/or mismanagement of public offices.

***Constitution reform:*** It has been clearly articulated in the constitution that, “all public offices shall be held in trust for the people’, that ‘all persons placed in positions of leadership and responsibility shall, in their work be answerable to the people’ and that ‘all lawful measures shall be taken to expose, combat and eradicate corruption and abuse or misuse of power by those handling political and other public offices”. In this regard the supreme law clearly states the position of the country with regard corruption.

***Establishment of specific institutions:*** The government has specifically established institutions to deal with corruption. These include the Directorate of Ethics and Integrity preceded by the Anticorruption Unit that was formed in 1996, and the Inspectorate of Government.

***Decentralisation policy:*** In 1993, Government introduced the decentralisation policy to further its commitment to devolve and transfer power, responsibilities and resources to local governments and to bring services closer to the people. It is believed in the long run that with this policy in place, it will be easier for civil society and the population at large to monitor and check public officials who are misusing public resources.

***Liberalisation and privatisation:*** The process of divesting public enterprises and parastatals previously owned and run by government, as a measure to reduce monopoly which provides a fertile ground for carrying out corrupt acts, has been undertaken

***Civil service reform:*** A process of reviewing and re-organised public service, with the intention of reducing the size of civil service to one which is small, better paid, more efficient and less corrupt, is ongoing. In this regard there has been improved remuneration of judicial officers, political leaders and top civil servants as one of the means of plugging the ‘need’ for corruption attributed to poor remuneration.

## **2.4 Problem statement**

The main problem that is being addressed by this plan is that though a number of institutions created to fight corruption have been in place for a long time, the country is still bedeviled with corruption mainly because of the lack of capacity.

## **2.5 Aim of the plan**

The aim of this plan therefore is to build capacity for coordination, planning and monitoring the anticorruption efforts, so as to build ethics and integrity among holders of public office.

## **2.6 Specific Objectives**

- To build the capacity of anticorruption institutions to fight corruption and build ethics and Integrity in public office.
- To coordinate the planning for anticorruption activities and building ethics and in public office.
- To set standards, through law reform and ethics codes of conduct, for fighting corruption and building ethics and integrity in public office.
- To provide a framework for monitoring progress of implementation of Government's efforts to fight corruption and to build ethics and integrity in public offices.

## **3 Reducing Corruption: The Way Forward**

Both preventive and reactive strategies are necessary to reduce corruption. Corrupt acts are prevented by putting in place workable rules both for the management of public resources and the use of public authority, building voluntary compliance, and supervising and monitoring compliance. Once such systems are in place, it becomes possible to react to corrupt practices through imposing sanctions on those involved and recovering diverted funds.

### **3.1 Definition of Corruption**

“Corruption” is broadly defined as “the use of public office for private gain”. It includes such activities as embezzlement, nepotism, favoritism, self-dealing, insider trading, influence peddling, or the use of public office or assets for political advantage. An act is considered as one for private gain, whether it is for the benefit of the individual government actor, or for the benefit of any other individual or group with which he or she is associated, such as family, friends, an ethnic group, a religious group, or a political group. While, implied by definition, corrupt acts involve at least one government actor, many corrupt acts also involve non-government actors who seek private advantages from government. Corruption has both legal and ethical dimensions. Corrupt acts in government the state are contrary to the purpose of government, whether or not they are illegal, and whether or not they cause financial loss, because the purpose of government is national service and, all actions of government should be in the interest of the public. There is also increasing recognition of private sector corruption, in which a person who occupies a position of trust betrays that trust for personal gain.

## 3.2 Proactive and Preventive Measures

The definition of “corruption” implies that the resources and authority of public office should be used for public, rather than private, purposes. For such a definition to have meaning, there must be clear rules that describe how public office should be used in the public interest. For such rules to be effective, they must be rules with which a government actor can reasonably be expected to comply. While sanctions for corrupt acts may deter, an effective system depends primarily on voluntary compliance.<sup>1</sup> Values must be instilled or reinforced, opportunities for corrupt acts reduced, and temptation minimised. Finally, systems for supervision and monitoring are essential to deter corrupt acts and correct bad practices that may provide opportunities for corruption. Accordingly, preventing corruption requires:

- Creating workable rules for the management of public resources and the use of public authority
- Assuring that compliance is possible, by building capacity and providing necessary resources
- Promoting voluntary compliance, by reinforcing values, minimizing opportunity and reducing temptation, and
- Creating mechanisms for monitoring and supervision, both by government and civil society.

***Making rules.*** For the behavior of government actors to be held to a standard, there must be a standard in place. Rules for the use of public office are created through laws and regulations, procedural guidelines, and codes of conduct. Several commitments in this Plan of Action, deal with the creation of rules and standards. For example, Government commits to tabling a revised Leadership Code before Parliament that includes provisions concerning conflict of interest. The Uganda Revenue Authority will put in place a Code of Conduct for its officers. Government procurement will be reformed, and regulations, guidelines and laws will be amended or advanced to set out clearly.

***Making compliance possible.*** The behavior required of government actors by imposing rules and regulations and laws must be attainable; or else, irregular practices

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<sup>1</sup> Research shows that while the threat of sanctions may have some deterrent impact, obedience to law is assured, not primarily by deterrence, but by voluntary compliance because of perceived fairness and legitimacy. See, e.g., Tyler, Tom. (1990). *Why People Obey the Law*. New Haven: Yale University Press.

will occur that will provide a fertile ground for corrupt practices. This may require harmonization of duties among government institutions, building human capacity and assuring sufficient resources to government actors to perform their duties. For example, vesting financial management responsibilities in government actors who lack even the necessary basic skills in mathematics invites mismanagement. Similarly, assigning police the duty to respond to complaints without giving them transportation to do so invites irregular payments between an anxious complainant and an otherwise immobile police officer.

***Building voluntary compliance.*** To assure voluntary compliance, values must be instilled or reinforced. Uganda is developing a sense of national identity, a sense of ownership of the government and its resources, and a sense of entitlement to government services. The link must be established between personal moral values and moral behavior with respect to government and its resources. Sensitization and education programs remain important to ensure that both government and civil society actors understand their respective roles and duties.

Opportunities for corrupt practices must be minimized. Opportunities are minimized through reducing unnecessary government actor discretion, minimising unnecessary contact between government actors and the public, and also by eliminating unnecessary monopolies of authority. This Plan of Action includes a commitment to advance a clear policy concerning public access to government information, so that access to information no longer depends on the individual discretionary information of government actors.

Temptation for corrupt acts must be reduced. Temptation for government actors may be reduced by removing public servants from financial desperation by paying them a reliably disbursed living wage and reasonable pensions on retirement from public service. Currently, most civil servants earn less than a living wage, and are obliged to find other ways of supplementing their personal income. This Plan of Action includes the commitment to lobby for the adoption of improved public sector wages. Temptation for corrupt acts by private actors can be reduced by minimising the delays; bottlenecks and arbitrary decision making that tempt private actors to offer facilitation payments to government actors.

***Monitoring and supervision.*** Regular monitoring and supervision provides guidance to government actors and deters irregular practices as well as corrupt acts. Effective mechanisms of monitoring and control must be built into all government systems,

including those for revenue collection, financial management, procurement and government contracting, human resources management, and law enforcement. For example, this Plan of Action includes the commitment to put in place an objective system for appraising the performance of public servants. This aims at assisting them to improve their performance, and ensuring against corruption in hiring and promotion. It also includes a commitment to improve the monitoring capacity of the Auditor General, by recruiting more auditors and training them in conducting specialised audits.

The most important role in monitoring and supervision, however, is played by an active civil society. Fighting against corruption and reinforcement of ethics and integrity in public office, cannot be entirely successful if it is driven from the top. Civil society must be sensitised, educated, empowered and mobilised. While Government may not be able to mobilise civil society without compromising its independence, it can create an environment in which civil society can operate effectively. This Plan of Action includes measures such as sensitisation workshops to alert the public of the dangers of corruption and the avenues of recourse for victims, the adoption of a government policy on access to information to improve the public's access to government information, the development of the legal means for the public to sue corrupt actors on their own behalf (*qui tam* actions), and the initiation of legislation to protect whistleblowers.

### **3.3 Sanctioning Corruption**

The application of sanctions for corrupt acts while punishing the corrupt actor, serve as a deterrent to others, and, furthermore, provides an avenue for the recovery of diverted funds. Several of the commitments of the 1998 Plan of Action dealt with the application of sanctions.

A focus on sanctions is appropriate where a functional system for the management of public resources and authority is in place. In absence of such a system, when sanctions are applied they are not seen as justified nor as effective deterrents. It is not possible, and therefore punishment is unjust and does not deter. For example, decentralisation is pushing resource management to a local level. In theory, sub-county chiefs should be managing public resources accountably, and their books should be audited by the Auditor General. In reality, many sub-county chiefs lack basic skills in accounting and financial management and are not capable of keeping

books. They have no books for the Auditor General to audit. Further, at present, the Auditor General does not have the resources to audit at the sub-county level. A focus on sanctions would be inappropriate at this time. Instead, a functioning system must be put in place and the capacity of government actors improved. Accordingly, there is a current push to recruit graduates with a better grasp of management of public resources into these posts complimented with dissemination of financial guidelines.

Although systems are better developed in the center, they also suffer from major dysfunctions that contribute to the incidence of corruption. While, as a moral issue, poverty is no excuse for committing a crime, it seems likely that as long as public sector pay for the majority of civil servants is less than is needed to survive, corruption among the ranks of such government actors will continue to be a practice, even if sanctions are effectively applied. **This suggests that, with regard to such actors, reducing corruption requires an emphasis on addressing root causes of corrupt practices that are at least as strong or stronger than the emphasis on imposition of sanctions.**

Nevertheless, where systems are in place, expectations are clear, and when government actors abuse their positions, sanctions must be applied. To date, the application of criminal sanctions for corrupt acts has been rare. Corruption is underreported, and mounting sufficient evidence to prosecute the corrupt is very difficult. Corruption and susceptibility to political interference within the law enforcement agencies and the Judiciary, provide opportunities for derailment of investigation, prosecution, and judgment, although the independent impact of this factor is difficult to judge.

**Reporting.** There is reason to suspect that corruption is being substantially underreported. First, supervision and monitoring systems that might normally detect and report corrupt acts are weak, underfunded, and sometimes politically compromised. Second, public reporting of corrupt acts depends on the public's recognition of corruption as a wrong, awareness of avenues of recourse, confidence in the effectiveness of lodging a complaint, and fear of retribution. The District Integrity Workshops that have been carried out by the IGG have routinely prompted an increase in the number of complaints lodged. It is reasonable to expect that as public confidence in action on corruption-related complaints rises, the level of complaints will also rise.

***Mounting a case.*** To successfully prosecute a crime, the evidence must show the defendant's guilt beyond a reasonable doubt. This threshold of reasonable doubt is purposefully difficult to ensure that the innocent are not wrongfully convicted. However, gathering this amount of evidence to show that a corrupt act has taken place can be challenging. Witnesses are one possible source of evidence, but it often occurs that the only witnesses are the parties to the act who are engaged in a conspiracy of silence. A secondary source of evidence is financial documents, such as forged invoices or ledgers that cannot be reconciled. However, Uganda's cash economy often leaves few financial records. A third source of evidence is in the ownership of assets, such as inexplicable wealth and a lifestyle that cannot be supported on legitimate income. Again, the cash economy makes it difficult to discover assets and show that they are the fruits of corrupt practices. Furthermore, such assets may be held outside of the country.

In Uganda, the investigative capacity of law enforcement agencies is very weak, making it difficult to amass sufficient evidence for prosecution. The CID currently receives approximately \$300 per month per Region to spend on conducting investigations, and manages its 50,000 annual complaints without a single computer. Investigations are hampered by the lack of funds to transport investigators to inspect crime scenes or interview witnesses. Investigators lack accounting and computer skills that would allow them to access and understand financial records. While documentary evidence plays a critical role in the prosecution of corruption cases, there is only one documents expert in the country, relied upon by all the law enforcement agencies, and the time span between lodging a complaint and receiving a report on average is currently one and a half years. Funds are lacking to transport state witnesses to court to testify. The law enforcement agencies and the Judiciary are struggling with case backlog. At the same time, delay provides an opportunity for the erosion and loss of evidence, case tampering or the intimidation of witnesses. Given this weak capacity, it is particularly difficult for law enforcement to mount a case against sophisticated actors engaged in grand corruption, while petty acts by unsophisticated actors are more easily detected and punished.

***Prosecution.*** The IGG is presently playing the primary role in investigation and prosecution of corruption complaints. In 1999, the IGG received 4845 complaints. Of these, 733 were referred to other agencies, and 2382 were investigated and completed. Of these, just 30 were prosecuted; others that were well-founded were referred for administrative action, which has a lower standard of proof

(“preponderance of the evidence.”). The IGG has only until recently the powers to prosecute only recently.

Data for 1999 from the CID are not available, record of 1998, indicate that the CID received just 21 reports of corruption of which 13 were investigated. The CID also received 3557 complaints of fraud and embezzlement (including, and most likely predominated by, private sector cases of fraud and embezzlement), of which 1909 were investigated. DPP continues to be dependent on police prosecutors who are unfamiliar with the rules of evidence and procedure. The Plan of Action includes the DPP’s long-term program to replace police prosecutors.

**Judgment.** Because of low levels of reporting and prosecution, the Judiciary is receiving very few corruption-related cases. In response to a request from DEI, the Judiciary assembled records on embezzlement and abuse of office cases in 1998 and began case tracking. They show records of approximately 200 such cases, some filed as early as 1993. Because the Judiciary was unable to separate cases of embezzlement in the private sector from those in the public sector, the actual number of corruption-related cases in the courts since 1993 is probably significantly lower than 200. Approximately 60 of these cases have been concluded, leaving 140 active cases. Notwithstanding the small number of corruption cases, the Judiciary has been handling such cases more expeditiously by sensitising magistrates on the importance, of disposing them off by requiring monthly updates on status, and encouraging aggressive case scheduling with prosecutors.

Clearly, one way to assure effective sanctions for corrupt acts is to strengthen the capacity of law enforcement agencies, both with respect to their ability to deal with complaints and their ability to control corruption in their own ranks. Because bringing a case from complaint to conviction involves a chain of events under the control of different agencies, much like an assembly line, the system will only be as strong as its weakest link, and the capacity of all the agencies must be built continuously.

This Plan of Action contains several commitments dealing with capacity building in law enforcement, such as the replacement of lay prosecutors by trained prosecutors in the DPP, the creation of an internal inspectorate in the DPP, and introduction of computerised case management in both the DPP and the IGG. More generally, however, the capacity of law enforcement agencies is being addressed by the sector-wide approach to the Justice, Law & Order sector being spearheaded by the Ministry of Justice, and due to be implemented in the next fiscal year. This effort has

identified weak investigatory capacity as a key issue to be addressed. Accordingly, this Plan of Action provides that DEI and the SWAP will participate in each other's planning to ensure harmony between anticorruption efforts and the strengthening of law enforcement.

Given the difficulties in mounting criminal cases, another avenue for imposing sanctions is that of civil claims, which need only be proved by a preponderance of the evidence. This Plan of Action proposes to develop mechanisms for bringing civil suits against corrupt actors, both by Government, in the form of suits for conversion and breach of fiduciary duty, and by citizens, in the form of *qui tam* actions for corruption. The success of such efforts, however, also depends on the capacity of the law enforcement system.

### **3.4 Strategies for Reducing Corruption**

The Government recognizes the essential role of both preventive and reactive strategies in curbing corruption. Accordingly, the broad strategies for the reduction of corruption, both at the center and at the local level, include:

- Putting in place workable rules for the management of public resources and the use of public authority, and setting clear standards of behavior for public and private actors. Key systems include those for revenue collection, financial management, and procurement; and for human resource management, at both the national and local levels.
- Assuring that compliance with rules is possible by building human capacity and providing adequate facilitation;
- Promoting voluntary compliance by developing and reinforcing national values of ethics and integrity, values of public service, and reducing the tolerance for corruption;
- Minimizing opportunity by promoting economic liberalization and reducing government actor discretion where appropriate;
- Reducing temptation by improving public sector wages to assure the living wage; and by identifying and eliminating bureaucratic bottlenecks, excessive delays, and unnecessary government actor discretion as contributing causes of corruption;
- Strengthening systems of monitoring and supervision across government, and within agencies;

- Creating an environment in which a knowledgeable civil society can monitor government action and hold the government accountable, by, for example, improving public access to government information;
- Ensuring that laws provide for sanctions for corrupt behavior and recovery of funds; and
- Strengthening the capacity of law enforcement agencies generally, and for dealing with corruption cases in particular, to assure sanctions and recover funds.

#### **4 Planning for Anticorruption**

President Museveni identified corruption as a priority problem requiring high-level action. An Anticorruption Unit was created in the Office of the Vice President. Under a tight time schedule, in consultation with the IGG, the DPP, the CID, the AG, and the Ministry of Finance, the 1998 Government Policy and Plan of Action to Fight Corruption (1998 Plan of Action) was drafted.

It soon became clear that a number of changes were needed. First, the mission of the unit was reconceived to focus on building ethics and integrity, rather than on anticorruption, and the unit renamed to be the “Directorate of Ethics and Integrity”. The name “Anticorruption Unit” conveyed the idea of a policing force. Renaming the unit was an acknowledgment that the control of corruption would require much more than effective policing and the application of sanctions. It would require the creation and reinforcement of appropriate norms and standards of conduct in the public service, by setting standards, improving monitoring, reducing temptation, and reinforcing values.

Second, the Directorate was moved to the Office of the President, providing it with higher visibility.

Third, a Cabinet Minister was appointed to head the agency to create a spokesperson at Cabinet level for corruption-related concerns. The role of the Minister of Ethics and Integrity is to provide political leadership for the building of ethics and integrity and the control of corruption, initiating legislation and serving as a catalyst for policy change.

Created in 1998, DEI was immediately affected by a hiring freeze. Notwithstanding, DEI launched monthly interagency meetings attended by the IGG, the DPP, the CID,

the AG, and the Ministry of Justice, eventually expanding to include the Judiciary. These meetings dealt with the coordination of investigation and prosecution of high-profile corruption cases, monitoring of performance under the 1998 Plan of Action, and discussion of anticorruption activities such as sensitisation workshops. DEI initiated revisions to the Leadership Code to include provisions for conflict of interest, public declarations, and declarations of assets of family members; and lobbied for the Bill providing for the independence of the Auditor General, the revision of the statute for the Inspector General of Government, and the expediting of corruption cases in the Judiciary. DEI also began monitoring performance on the Plan of Action, and providing quarterly progress reports to the donor community.

As of March, 2000, DEI was fully staffed with six professional staff to address its responsibilities:

- Comprehensive planning for anticorruption;
- Coordination of anticorruption activities;
- Monitoring of anticorruption activities;
- Dissemination of information concerning anticorruption activities;
- Initiation of relevant legislation; and
- Lobbying for the specific anticorruption and ethics and integrity building activities and policies.

#### **4.1 Reconsidering the 1998 Government Plan of Action**

The 1998 Plan of Action was the first comprehensive anticorruption planning effort, involving the DEI, the CID, the IGG, the DPP, the AG, the Ministry of Finance Planning and Economic Development and the Ministry of Public Service. It provided a guide for Government's efforts in anticorruption, and a focal point for discussions between Government and donors on anticorruption. Important progress was achieved on its commitments over the course of the year, if not always by the specified deadlines. (See "Assessment of Progress on the Government Plan of Action to Fight Corruption, December 1998 – March 2000".)

As Government prepared to revise the Plan of Action for the fiscal years 2000/1-2002/3, it critically reconsidered both the 1998 Plan and the planning process that gave rise to it. A number of weaknesses were identified:

- The focus of the Plan was skewed towards the application of sanctions, with insufficient emphasis on needed institutional reforms, reflecting the composition of the original group of collaborating agencies;
- The Plan was not operationalised, and responsibility centers for many of the commitments were not identified;
- As a consequence, some commitments were unrealistic. Some had unrealistic time deadlines, given without a proper understanding of the sequence of steps of implementation and the time necessary for their completion. Other commitments required additional resources that were not forthcoming. Other commitments were made for independent structures of Government without their assent, and the implementation of such commitments could not be guaranteed;
- The Plan was made without consultation with civil society;
- Neither the Plan, nor Government's anticorruption efforts, nor the constraints faced by Government, were adequately publicised within government or within civil society, leading to a widespread disillusionment and a conviction that Government was doing nothing about corruption.

In response to these identified weaknesses, the Government acted to strengthen the anticorruption planning process in order to advance a more comprehensive and more realistic plan.

#### **4.2 Revising the Government Plan of Action**

To remedy the weaknesses identified above, Government made the following changes in the planning process:

- Collaborative planning was extended to new agencies. The Judiciary, which has been playing a progressively stronger and stronger collaborative role, was extensively involved. For the first time, efforts were also made to include agencies that play important roles in shaping or maintaining the institutional framework of government such as the Uganda Revenue Authority, and the

Ministry of Local Government. The important preventive and proactive roles of these agencies in stemming corruption is fully recognized.

- A Working Group of the agencies was formed to develop commitments from the agencies themselves, in order to ensure that commitments were both feasible and the affiliated institutions were advised/ informed in making the choice. Agencies were asked to provide the information that would allow these commitments to be operationalised and costed.
- Each commitment was linked with an implementing actor, and assumptions of resource availability were made explicit.
- A watershed Coalition-Building Workshop was held in Entebbe from March 13<sup>th</sup>-15<sup>th</sup> 2000, bringing together in working groups representatives of the branches of government with a broad spectrum of representatives of civil society organisations, including the media, the private sector, NGO's, universities and research institutes, and religious organisations. This Workshop generated a number of suggestions for anticorruption initiatives, not only for Government, but also for civil society.
- Individual in-depth interviews were held with different civil society groups to learn their suggestions for Government actions in anticorruption, and their priorities.
- On March 30<sup>th</sup>, an Interagency Forum was held to discuss and finalise suggested anticorruption activities.

These steps represented a number of critical “firsts”. This was the first time that the effort to reduce corruption led to the inclusion of the agencies responsible for broad systems of government. This was the first time that assumptions about resource availability had been made explicit. This was the first time that civil society had been consulted in anticorruption planning. And while the 1998 Plan had benefited from interagency consultation, consultations for this revision were considerably more extensive.

While these actions resulted in an improvement in the planning process and therefore in the Plan, Government recognizes that the state of the art of anticorruption planning cannot outstrip the planning and budgeting capacities of the Government as a whole.

The planning and budgeting capacities of some agencies were so low that they could not participate effectively. The attempt to include new agencies was only partly effective as some agencies were unable to identify the appropriate person within the agency to participate. Other agencies did not make the link between their activities and the corruption agenda; and as agencies were unable to develop new activities and provide necessary information within the required span of the planning exercise.

The revised Plan is therefore not only composed of those activities that could be operationalised and costed within the span of the planning exercise. Government is acutely aware that there are many other actions that must be urgently pursued in order to respond to the corruption problem. **Government will continue to focus efforts on these other actions even if planning for them does not yet permit them to be concretized.**

### **4.3 The Challenge of Planning for Anticorruption**

Some government activities can be localized in a single ministry for more efficient planning and coordination, such as government efforts in health or education. This is not true of anticorruption efforts. Government responsibility for curbing corruption in public service is necessarily shared across all government structures, which have a responsibility to curb corruption in their own ranks, and which may make policies that have an impact on the incidence of corruption in other government structures as well.

Comprehensive planning for anticorruption efforts therefore requires the anticorruption planner to work in collaboration with all of these structures. Collaborative planning is necessary because the different structures must advise on the desirability and feasibility of specific anticorruption activities in their domains, given available resources, constraints, and other commitments of the structure. Consultation also builds necessary rapport for implementation.

Effective planning for anticorruption therefore requires planning and budgeting capacity at two levels: at that of the anticorruption planner, and at that of the implementing agency. Without such planning capacity, plans are likely to contain commitments that are either not properly targeted to achieve the goal or are not feasible, in that they do not take proper account of existing constraints, assumptions or risks: and commitments that cannot be implemented because the actors responsible for implementation have not been brought on board. **Ordering institutional changes**

**in a vacuum of information and without regard to constraints has been demonstrated to be an ineffective planning technique, resulting in plans that are neither implemented nor implementable.**

DEI, the Government's anticorruption planner, was only staffed as of March, 2000, in the middle of this planning exercise. It was suffering from the capacity problems of a new agency, including inadequate office space. But planning for anticorruption is also affected by the planning capacities of other structures of Government.

Poor planning and budgeting capacity is a well-recognized problem in Government.<sup>2</sup> With a history of unreliable resource flows, agencies develop the skills necessary in determining their activities as the resource envelope is utilised and as balances on other planned budgeted expenditure are realised. There would be diverted to capacity building for planning, depending on the amount of resources received: i.e they are not skilled in determining their activities in advance, prioritising them, and calculating the amount of resources needed to accomplish them. For example, in the course of this exercise, it was discovered that some agencies had successfully lobbied for new staff, but had not budgeted for the operational funds necessary to equip and deploy the new staff.

At the same time, "rightsizing" the public service eliminated the jobs of planners in many agencies, leaving some agencies with the ability or the responsibility to predict future trends, develop new activities or recommend institutional changes. Planning activities become "extra" work heaped on staff members who lack planning skills, an overview of their agency, and the authority to commit the agency.

These problems are accentuated in planning for anticorruption, which requires planning by many agencies. When agencies are unable to come forward with necessary information or make realistic commitments, a comprehensive plan suffers the cumulative effects of the Government's lack of planning capacity. At the same time, many agencies do not yet understand that fighting corruption is part of their primary mission, and so may see corruption-related planning as an external tax on their very limited resources. Improving planning for fighting corruption and building ethics and integrity in public office will be a long-term effort as planning capacity is

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<sup>2</sup> The Ministry of Finance, Planning and Economic Development is currently engaged in a long-term project to improve Government planning and budgeting capacities through the Medium Term Expenditure Framework (MTEF).

improved and as these concerns are mainstreamed into day-to-day planning across Government.

#### **4.4 Reorienting Government Action on Anticorruption**

There is an acknowledged gap between the felt priorities for reducing corruption as set out in Section 1.4, and the Plan of Action, evolving from a planning process which is limited by planning and budgeting capacities. Accordingly, Government commits to the following actions to improve the planning process and to reorient Government action on anticorruption and to build ethics and integrity:

- Broadening the collaboration in monitoring and planning to include agencies whose activities have strong implications for the prevention of corruption, and working with them regularly to develop specific anticorruption activities;
- Continuing consultations with civil society on anticorruption priorities;
- Monitoring and reporting not only on progress against this Plan of Action but also on institutional changes and capacity building efforts relevant to anticorruption;
- Disseminating this Plan of Action and information concerning anticorruption activities; and
- Exploring and concretizing suggestions for capacity building and institutional change arising from consultations as set out in Appendix 3.
- Identifying, initiating and lobbying for institutional change and capacity building.
- Seeking technical and financial assistance as needed.

## **5 Highlights of the FY2000/1-2002/3 Plan of Action**

The actions of the Plan of Action are set out in detail in Appendix 1. This section presents highlights of the commitments. These include commitments concerning planning, monitoring, coordination and initiation of anticorruption efforts; commitments concerning preventive strategies; commitments concerning reactive strategies; and commitments to create an environment in which civil society can be an active partner.

### **5.1 Commitments from DEI Concerning the Planning, Monitoring, Coordination and Initiation of Anticorruption Efforts**

DEI will continue to convene the regular interagency meeting of anticorruption agencies that include the CID, the DPP, the IGG, the AG, the Judiciary, and the Ministry of Justice. These meetings address the coordination of action on high-profile corruption cases, and of joint anticorruption activities.

However, planning and monitoring will be conducted regularly with a wider group of government stakeholders, and specifically will include government structures that have responsibility for core systems of government, such as the Ministry of Local Government, the Uganda Revenue Authority, the Ministry of Finance, the Ministry of Public Service, the Procurement Task Force/Reformed Central Tender Board, and the SWAP for the Justice, Law & Order Sector. Periodically, this regular monitoring, coordinating and planning meeting will be open to invitees from civil society. The purpose of these meetings is to monitor progress against the Plan of Action, mainstream corruption concerns into agency planning, and to develop and plan for anticorruption initiatives for eventual inclusion in this Government Plan of Action.

To ensure close collaboration with ongoing planning on justice reform, DEI will be represented at both the technical planning meetings and the steering committees of the SWAP, while the SWAP will participate in the meetings convened by DEI.

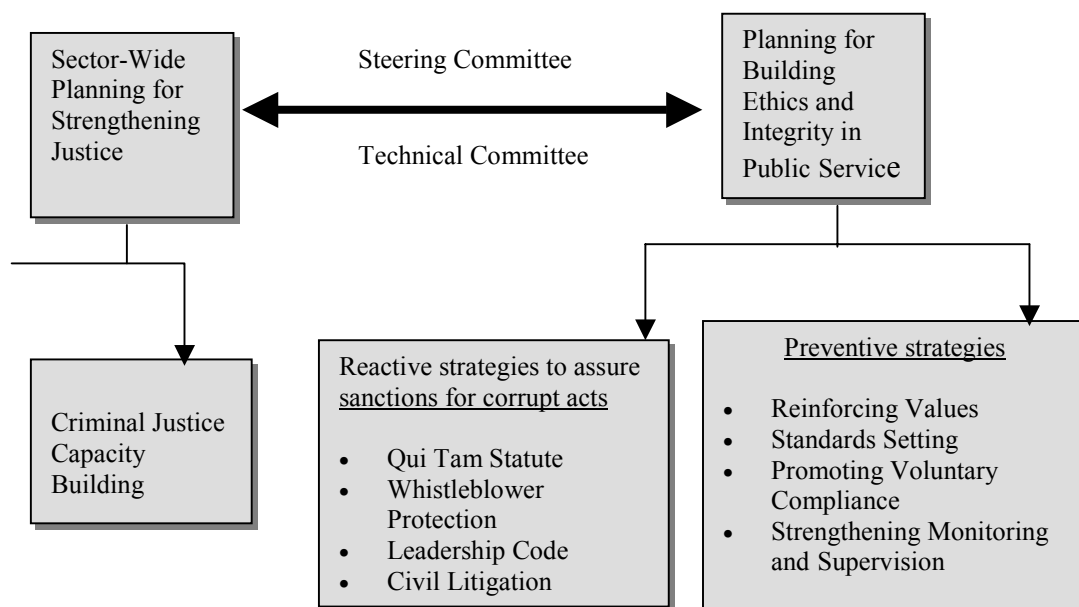


Figure 1. Sector-wide planning for strengthening the justice system will address general capacity building measures in criminal justice, while anticorruption planning will focus on proactive and preventive measures, and on reactive measures more tightly targeted to assuring sanctions for corrupt acts.

DEI will produce a quarterly report monitoring progress against the Plan of Action, on important institutional developments relevant to the strengthening of ethics and integrity in public office as identified in Section 1.4, and on progress on the handling of high-profile corruption cases.<sup>3</sup> DEI will continue to meet with donors and provide them with this update; after the meeting, DEI will hold a press conference and provide the media with a copy of this report. DEI will also provide this report to key actors in government.

<sup>3</sup> The 1998 Plan of Action named seven corruption scandals to be tracked by DEI. Three have been concluded (Uganda Railways Corporation, the National Social Security Fund, and the Valley Dams). DEI will continue to monitor the progress of the remaining four (Uganda Electricity Board, SWIPCO, the Helicopters issue, and UCB).

DEI will take steps to improve the dissemination of information on anticorruption activities to the public. DEI will seek financing to develop and implement a professional comprehensive communications strategy on Government anticorruption efforts. Finally, DEI will develop an information management system that will allow DEI to serve as a clearinghouse for Government information on corruption and anticorruption activities.

With its small staff, DEI is not primarily an implementer of anticorruption activities but a coordinator and a catalyst. DEI will explore, initiate, develop, and lobby for other anticorruption actions, such as those listed in Appendix 3. DEI will also play an active role in encouraging implementation of commitments under the Plan of Action.

## **5.2 Continuing Work on Commitments from the 1998 Plan of Action**

Some commitments in the revised Plan of Action are carryovers from the 1998 Plan of Action. These include:

- The implementation of procurement reforms with provisions for adequate control and supervision. Regulations will provide for the inclusion of an antibribery clause in procurement documents and for the blacklisting of companies found to have engaged in corrupt practices.
- The tabling before Parliament of the amended Leadership Code with provisions for public declarations of assets, conflict of interest provisions, provisions for declaration of assets of family members, and sanctions for breach.
- Continued work on expediting corruption cases, although corruption cases have already been expedited through instructions to magistrates, case status tracking and aggressive case scheduling.
- The appointment of an auditor to audit the Auditor General.

## **5.3 Preventive Strategies**

This Plan of Action contains a number of commitments designed to prevent corruption by setting standards for the management of public resources and the use of

public authority, for building voluntary compliance, and for strengthening systems of supervision and monitoring.

***Making rules and setting standards.*** This Plan of Action contains commitments for

- The tabling before Parliament of an amended Leadership Code, as discussed above.
- The development of enforceable internal codes of conduct for officers of the Uganda Revenue Authority and prosecutors in the Directorate of Public Prosecutions; and for revision and publication of the general Code of Conduct for civil servants.
- New rules, guidelines and legislation for government procurement, as procurement is decentralised to ministries and overseen by the Reformed Central Tender Board. These procurement regulations will include provisions for an antibribery pledge in procurement documents and provisions for blacklisting companies found to have engaged in corrupt practices. Anticorruption agencies will provide comments on the adequacy of safeguards against corruption in procurement.
- The publication of rules, regulations, guidelines and manuals on financial management for Local Governments to strengthen local Public Accounts Committees, and local procurement procedures.
- The amendment and updating of the Local Government Financial and Accounting Regulations, and the Local Governments Act.

***Building voluntary compliance.*** The Plan of Action contains commitments to:

- Sensitise the public about the harms of corruption and their avenues of recourse through workshops, hotlines, a quarterly magazine and radio spots and the training of trainers to carry the message to the grassroots (IGG).
- Sensitise the public about the importance of paying taxes (the URA).
- Sensitise judicial officers, staff, and court users about the harms of corruption in the Judiciary (Judiciary).

- Sensitise civil servants about corporate values and public service (Ministry of Public Service).
- Consult with Accounting Officers about procurement reforms and their new responsibilities in the reformed procurement system.
- Train Local Government staff in financial management, internal auditing, procurement, and public accounts management.

***Strengthening supervision and monitoring.*** The Plan of Action contains commitments to:

- Increase internal inspections in the Judiciary and the DPP.
- Computerise financial management in the Judiciary.
- Table before Parliament a Bill to grant autonomy to the Auditor General.
- Recruit more auditors to the Auditor General, and train staff in specialised audits such as Value for Money audits, and computerised audits; network with auditees computer systems for faster and easier access to financial data.
- Appoint an auditor to audit the Auditor General.
- Audit classified expenditures, for the first time.
- Monitor the performance of the recently launched financial commitment and control system designed to reduce domestic arrears.
- Ensure compliance with Treasury Accounting instructions.
- Institute a system of objective performance appraisals for civil servants using Results Oriented Management (ROM).
- Review Local Government PAC reports and assist Local Governments to prepare final accounts, and to carry out regular inspections.

## 5.4 Reactive Strategies

This Plan of Action contains a number of measures to improve Government's ability to improve sanction for corrupt acts. These include:

- Amendment of the Leadership Code to provide for sanctions for breach, making it truly enforceable. Currently, the Leadership Code does not provide for sanctions for breaches.
- Development of a means of internal enforcement for the Code of Conduct for the staff of the Auditor General.
- Timely action on the recommendations of the Commission of Inquiry into the Police upon report of the Commission.
- Tabling before Parliament an enabling law for the IGG to give a statutory basis for the IGG's constitutional authority.
- Building the capacity of law enforcement agencies and the Judiciary. The Plan of Action proposes a wide variety of such measures, including the replacement of lay prosecutors by trained prosecutors under the DPP, the introduction of computerised case management under the DPP and the IGG, the opening of new Resident State Attorney and State Prosecutors' offices for the DPP, training for CID, DPP, IGG and judicial officers. The CID, IGG and Judiciary will reduce their case backlogs.

It should be noted that most of the capacity building initiatives proposed are depending on securing financing. In the near term, however, general capacity building for law enforcement will be advanced under a Sector Wide Approach (SWAP) for the Justice, Law & Order sector, spearheaded by the Ministry of Justice.

- The development of civil actions for sanctioning corrupt acts requiring a lower standard of proof than criminal prosecution, and allowing court awards of damages. Such remedies may either be common law, such as suits for breach of fiduciary duty and conversion, or may be statutory. Government would then have the option to choose between criminal prosecution and civil suit depending on the

strength of the case. In conjunction with the development of civil remedies for corruption, Government will develop *qui tam* legislation to allow whistleblowers to bring suit. Government will also develop protections for whistleblowers. While such measures can create an alternate channel for sanctions, their success is still dependent on the capacity of the legal system, and in particular, the Judiciary.

**Box 2: WHAT IS A QUI TAM ACTION?**

Qui tam suits have ancient roots in the common law. “Qui tam” is an abbreviation for the Latin phrase “qui tam pro domino rege quam pro sic ipso in hoc parte sequitur” meaning “who sues for the king as well as himself in this matter.” A qui tam action allows a private citizen to sue on behalf of government, and receive a share of any financial penalties imposed. In essence, it is a reward system for whistleblowers.

For example, in the United States, the Federal Civil False Claims Act, 31 U.S.C. §§ 3729-33, provides for treble damages for filing a false claim with government, such as a claim for goods or services not delivered, or false costing data. Because it is the government that is damaged by such claims, typically only the government would have standing to sue. However, this Act contains *qui tam* provisions that allow citizens to file the suit against the defrauder on behalf of government, and keep a portion of the damages. In the last fifteen years, qui tam actions are said to have resulted in the recovery of between one and two billion dollars of government funds. Qui tam actions are usually brought by whistleblowers who have the information necessary to prove the case.

Developing qui tam legislation to allow whistleblowers to sue corrupt public and private actors will provide another means of checking corrupt action. Civil remedies provide an easier path to sanctions. Because civil suits result in the imposition of damages rather than prison sentences, they are proved by “a preponderance of the evidence”, rather than the higher criminal standard, “beyond a reasonable doubt.” Giving the standing to sue to private actors effectively privatizes investigation and prosecution, and reduces the ability of powerful defendants to intervene to prevent the case from going forward. This legislation must be developed in parallel with mechanisms to protect whistleblowers.

## **5.5 Promoting Monitoring and Supervision by Civil Society**

This Plan of Action contains several measures designed to create an environment in which the independent civil society can be facilitated further to monitor and hold the government accountable. These include:

- Improving the flow of government information to civil society. DEI commits to press conferences on anticorruption activities, the dissemination of the Plan of Action, reaching out to representatives of civil society such as media representatives, legal stakeholders, local governments, private sector associations, and religious and cultural associations to learn their concerns and priorities and to encourage them to mainstream anticorruption efforts into their activities

- Conducting sensitisation programs as described in Section 3.3. p 9
- Developing a Government policy (White Paper) on access to government information; currently there is no such policy and access depends on the discretion of the individual government actor.
- Initiating legislation to allow qui tam actions so that the public can sue corrupt officials directly (see Box 2).
- Developing legislation and mechanisms for the protection of whistleblowers.

## **5.6 Policy Commitments**

In addition to specific activities, Government commits to several standing policies for the purpose of dealing with corruption. Specifically, Government will:

- Ensure that political leaders who either knowingly or negligently fail to prevent grave losses and damage caused by corrupt officials under their supervision take political responsibility. Such leaders will be required to step down on their own or will be asked to do so by the appointing authority.
- Take punitive action against Accounting Officers who, in violation of standing regulations and procedures, commit the Government to bad contracts.
- Ensure follow-up on high-profile corruption cases.

**Box 2: PRIORITIES FOR GOVERNMENT ACTION**

- **Strengthening the capacity of law enforcement for better investigation, prosecution and judgment, particularly of corruption cases.**

Laws can neither be enforced, nor can legal sanctions imposed for corrupt acts, unless the legal system is strengthened. To reduce corruption, particular attention is needed to build the necessary capacity to deal with white collar crime.

- **Strengthening the procurement system.**

Poor procurement practices result in financial mismanagement and create opportunities for corruption. Government must reform the procurement system, assure adequate enforcement of procurement laws and regulations, and build technical capacity for professional procurement both at the Reformed Central Tender Board and in the procuring entities.

- **Strengthening financial accountability more broadly, especially at the local government level.**

Much remains to be done at the center, but as decentralisation proceeds, the need to build financial management capacity and systems of financial accountability at the district level is increasingly urgent.

- **Ensure public sector pay reform.**

Problems of corruption, particularly petty corruption, are likely to continue as long as the majority of public servants are in financial desperation. At the same time, effectiveness of the pay reform in reducing corruption through incomes is impaired when Government cannot compete with the private sector for well-trained professionals.

- **Ensuring effective coordination of agencies on corruption issues.**

Government will work to mainstream corruption and ethics concerns into agency planning, to coordinate agency efforts on anticorruption, and to assist agencies to improve information management.

- **Reviewing and strengthening the legal framework related to corruption.**

Government will table the amended Leadership Code before Parliament. The laws that provide sanctions for corruption must be reviewed and strengthened, and alternatives for civil liability developed. A mechanism must be developed to require people to account for the sources of their wealth.

- **Reviewing and strengthening the system for enforcement of codes of conduct.**

Enforceable codes of conduct must be put in place to direct government actors in the performance of their duties.

- **Enabling and nurturing a strong civil society capable of monitoring government and holding it accountable.**

A strong civil society that does not tolerate corrupt practices and holds government accountable is the ultimate protection against corrupt practices. Such a civil society must be built by conducting civic education and creating awareness, by improving communications from government to the public on anticorruption activities, by improving public access to government information on demand, and by allowing citizens to bring suit against corrupt actors on behalf of the state. Whistleblowers must be protected.

## **5.7 Assumptions and Risks**

Improving planning capacity is a long-term goal. While every effort was made to concretize commitments, difficulties in planning could be render the timeframe unrealistic.

The Plan of Action indicates where funding for activities has not yet been secured. Where the accomplishment of commitments requires additional funding, the commitments will only be carried out provided that such funding is received.

The effectiveness of the legislative initiatives described in the Plan of Action, depends on their eventual adoption by Parliament. Parliament is called upon to adopt:

- the amended Leadership Code,
- the Bill for the independence of the Auditor General,
- the statute implementing the new constitutional powers of the IGG,
- a policy on access to Government information,
- legislation giving private citizens the right to sue for corrupt practices (qui tam),
- the statute implementing procurement reforms, and
- the Whistleblowers Protection Act.

Action by the Judiciary would be needed to put in place a formal mechanism for expediting corruption cases.

The effectiveness of all legislative initiatives, however, is ultimately dependent on the capacity and effectiveness of the law enforcement system. Further, no policy studies have been conducted to estimate the cost of implementation of legislation, leaving open the possibility that statutes will be under enforced due to lack of resources.

## **6 Conclusion**

The costs of corruption are many and tragic. Where government revenue is lost due to corrupt practices, there is a corresponding reduction in services – a child who does not get an education, a dying person who does not receive necessary medical treatment, a village that does not get clean water. Where public authority is abused,

human rights are denied, the innocent go to prison, and criminals prey on their victims without fear of receiving any punitive measure.

Government remains committed to a policy of “zero tolerance” for corruption. However, corruption cannot be eradicated by fiat. Strategies must be identified, and then translated into concrete activities taking full account of resource constraints and competing priorities. This requires both building the planning capacity of Government, and mainstreaming ethical concerns into planning across Government. Improving planning and mainstreaming will be long-term efforts.

The eradication of corruption is necessarily part of a broader agenda of building ethics and integrity in public office. Ethical values, standards and guidelines must be developed and mainstreamed through sensitisation and education.

These are not tasks that Government can accomplish alone, because Government does not exist in isolation. The fight to eradicate corruption and build ethics and integrity in public office must be carried out in partnership with an active, demanding and independent civil society. In partnership, both can be transformed to realise a more ethical society with a higher level integrity than before the existence of a partnership.

## Appendix 1. Activities and Monitorable Indicators

Where specific initiation and completion times are known, they have been indicated. Otherwise, times are given as short-term (within two years), medium-term (Five to five years) and long-term (two to ten years). Operations are provided where available.

Budget figures are for two years (FY 2000/01-2001/02) unless otherwise indicated. Where there are continuing costs, the budget figure is marked with an asterisk (\*) to refer the reader to the detailed costing breakout (accompanying document). Where the Funding column indicates that funding is required, the amount given is the difference between the two year budget and the amount of secured funding. The notation "Secured DP funding" indicates that funding has been secured from development partners. The notation "N.A." (not applicable) means that the activity requires no funds.

Criminal Investigations Department (CID)							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Build capacity of CID to investigate corruption cases	Improve skills and capacity in National Fraud Squad by recruiting and training investigators in auditing and forensic specialities.  Assumption: Ministry of Finance agrees to meet salary costs	Number of specialists recruited and trained	<ul style="list-style-type: none"> <li>Recruit 20 graduates, including 7 accountants, 7 auditors, 6 banking/finance</li> <li>Train specialists in police work at Police Training School Kibuli (9 months)</li> </ul>	On receipt of funds	One year	92,285	Unsecured
	Improve skills and capacity in National Fraud Squad by specialist training, refresher training, senior management advanced training, senior management workshops and IT training	Number of refresher courses held; number of senior management trained in advanced techniques; number of senior management workshops held; number of officers with IT skills	<ul style="list-style-type: none"> <li>Specialist Training undertaken for 5 officers in handwriting and 5 officers in ballistics over a 2 year period</li> <li>Quarterly refresh courses held at Police Training School Kibuli for 120 lower rank cadre in groups of 30</li> <li>10 members of senior management to attend 6 month Fraud Investigation course at Kenya CID Training School over 2 year period</li> <li>Annual 5 day workshops for 129 senior officers held</li> <li>60 officers trained at UMI in IT over 3 year period</li> </ul>	On receipt of funding	Three years	297,490 annually	Unsecured

<b>Criminal Investigations Department (CID)</b>							
<b>Objective</b>	<b>Actions</b>	<b>Monitorable Indicators</b>	<b>Operations</b>	<b>Initiate</b>	<b>Complete</b>	<b>Budget Ush '000</b>	<b>Funding Ush '000</b>
	Improve capacity in National Fraud Squad by provision of transport facilities, computer workstations and other office equipment and technical equipment	Transport procured; workstations procured; office equipment procured	<ul style="list-style-type: none"> <li>Procure 4 double cabin pickups</li> <li>Procure 75 motorcycles</li> <li>Procure one staff van</li> <li>Procure 75 computer workstations</li> <li>Procure office equipment</li> <li>Procure crime lab equipment</li> </ul>	On receipt of funds	Within one year	1,690,557	Unsecured
Apply sanctions, recover funds	Eliminate backlog of corruption cases.	Reduction in (600) backlogged cases	<ul style="list-style-type: none"> <li>Resolve 10 cases per week</li> </ul>	On receipt of funds	Within two year	267,680	Unsecured
	Share information with other government agencies involved in anti-corruption and coordinate investigations with other law enforcement bodies.	Meetings attended; investigations coordinated; other agencies report good coordination	<ul style="list-style-type: none"> <li>Attend monthly interagency meetings</li> </ul>	Immediately	Ongoing	N.A.	-----
Monitor corruption	Maintain statistics on crime data pertaining to corruption by, for example, breaking out government actor embezzlement and fraud cases from general embezzlement and fraud categories.	Production of corruption statistics in annual crime report	<ul style="list-style-type: none"> <li>Consult with DPP, Judiciary, IGG and DEI to develop a common categorization of corruption cases</li> <li>Sort cases according to this categorization in the crime report</li> </ul>	Immediately	Ongoing	N.A.	-----

<b>Directorate of Ethics and Integrity</b>							
<b>Objective</b>	<b>Actions</b>	<b>Monitorable Indicators</b>	<b>Operations</b>	<b>Initiate</b>	<b>Complete</b>	<b>Budget Ush '000</b>	<b>Funding Ush '000</b>
Coordinate the monitoring and planning of anticorruption activities	Convene monthly interagency meetings of law enforcement agencies for the purpose of coordinating action on high-profile cases.	Meetings held; agencies represented	<ul style="list-style-type: none"> <li>Meeting to be held monthly</li> </ul>	Immediately	Ongoing	1,800 annually	Own funds

## Directorate of Ethics and Integrity

Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
	Convene interagency meetings among agencies with responsibility for core institutions of government and law enforcement agencies for the purpose of coordinating efforts, monitoring progress under the Plan of Action and proposing new anticorruption activities (Government planning and monitoring group)	Meetings held; agencies represented; initiatives proposed	<ul style="list-style-type: none"> <li>Hold technical meeting twice a month</li> <li>Hold steering committee meeting quarterly</li> </ul>	Immediately	Ongoing	3,280 annually	Own funds
	Convene meetings with the Government planning and monitoring group and representatives of civil society for the purpose of coordinating efforts, monitoring progress under the Plan of Action and proposing new anticorruption activities	Meetings held; agencies represented; initiatives proposed	<ul style="list-style-type: none"> <li>Meeting to be held every six months</li> </ul>	Immediately	Ongoing	1,740 annually	Own funds
	Participate in the technical and steering committees for the sector-wide project to strengthen the justice system	Meetings attended	<ul style="list-style-type: none"> <li>Attend meetings</li> </ul>	Immediately	Ongoing	N.A.	-----
Monitor anticorruption efforts and disseminate information	Publish quarterly report of progress on implementation of the Plan of Action and on institutional changes with significant impact on corruption issues, and disseminate to donors, key government actors, and press	Publication of report	<ul style="list-style-type: none"> <li>Maintain list of issues to be monitored</li> <li>Gather data</li> <li>Publish 1000 copies of the report quarterly</li> </ul>	Immediately	Ongoing	5,680 annually	Own funds
	Publish an annual assessment of progress against the Plan of Action	Publication of report	<ul style="list-style-type: none"> <li>Gather data</li> <li>Publish report</li> </ul>	Immediately	Ongoing	To be costed	
	Convene meetings with donors and present progress report; hold press conference and disseminate progress report; disseminate report to key government actors	Meetings held; donors represented; press conferences held; reports disseminated	<ul style="list-style-type: none"> <li>Convene donor meeting quarterly</li> <li>Hold press conference</li> <li>Distribute report</li> </ul>	Immediately	Ongoing	1,800 annually	Own funds
	Continue publicity programme of posters and brochures	Number of posters posted; number of brochures distributed	<ul style="list-style-type: none"> <li>Print posters and brochures</li> </ul>	On receipt of funds	Ongoing	15,500	Unsecured
	Develop a management information system to track information on corruption and anticorruption efforts and set up a resource center allowing DEI to serve as information clearinghouse	Database and record keeping system created	<ul style="list-style-type: none"> <li>Identify key stakeholders (users)</li> <li>Prepare statement of user requirements</li> <li>Set priorities of functionality</li> <li>Design of MIS</li> </ul>	On receipt of funds	July 2002	7,628	Unsecured
	Develop and implement an information, education and communication strategy to publicise Government efforts on anticorruption	Development of strategy; increased public awareness of Government anticorruption efforts	<ul style="list-style-type: none"> <li>Conduct study</li> <li>Design IEC strategy</li> <li>Develop IEC materials</li> <li>Train trainers</li> </ul>	On receipt of funds	One year	65,500	Unsecured

Directorate of Ethics and Integrity							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Reform laws for the purpose of reducing corruption and assuring sanctions	Organize a legal forum composed of legal stakeholders such as the Uganda Law Society and the Bench that will consider legal issues affecting corruption, make recommendations, and draft legislation as needed to carry out the activities below:	Meetings held; stakeholders represented; work plan carried out	<ul style="list-style-type: none"> <li>Identify participants</li> <li>Draft work plan</li> <li>Convene meetings</li> </ul>	Immediately	Ongoing	5,160 annually	Own funds
	<ul style="list-style-type: none"> <li>Develop recommendations on the use of civil litigation against corrupt actors (conversion, breach of fiduciary duty). Develop an implementation plan for the recommendations in consultation with the Ministry of Justice.</li> </ul>	Completed recommendations; plan for implementation	<ul style="list-style-type: none"> <li>Research and analyse issues</li> <li>Draft recommendations</li> <li>Draft proposal for implementation</li> </ul>	Short-Term	Short-Term	N.A.	-----
	<ul style="list-style-type: none"> <li>Initiate legislation for qui tam actions (reward system for whistleblowers)</li> </ul> <p>Assumptions: Timely Cabinet approval of principles and draft Bill</p>	Principles adopted by Cabinet; law tabled before Parliament	<ul style="list-style-type: none"> <li>Consult widely</li> <li>Research issues</li> <li>Draft principles</li> <li>Table principles to Cabinet</li> <li>On approval, draft Bill</li> <li>Transmit draft Bill to First Parliamentary Council for finalisation</li> <li>Table Bill before Cabinet and lobby for adoption</li> </ul>	Short-Term	July, 2002	60,000	Own funds
	<ul style="list-style-type: none"> <li>Initiate legislation and devise a means for the protection of whistleblowers</li> </ul> <p>Assumptions: Timely Cabinet approval of principles and draft Bill</p>	Principles adopted by Cabinet; law tabled before Parliament	<ul style="list-style-type: none"> <li>Consult widely</li> <li>Research issues</li> <li>Draft principles</li> <li>Table principles to Cabinet</li> <li>On approval, draft Bill</li> <li>Transmit draft Bill to First Parliamentary Council for finalisation</li> <li>Table Bill before Cabinet and lobby for adoption</li> </ul>	Short-Term	July, 2001	60,000	Own funds
	<ul style="list-style-type: none"> <li>Comment on the procurement legislation to be drafted by the Ministry of Finance Planning and Economic Development to assure that it contains sufficient safeguards against corrupt acts.</li> </ul>	Recommendations communicated to Ministry of Finance	<ul style="list-style-type: none"> <li>Review legislation</li> <li>Consult with anticorruption agencies</li> <li>Draft recommendations</li> </ul>	When procurement Bill drafted	Within one month	N.A.	-----

## Directorate of Ethics and Integrity

Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Table key legislation before Parliament	Table before Parliament the amended Leadership Code  Assumption: Parliament does not adjourn early because of the Referendum	Bill tabled	<ul style="list-style-type: none"> <li>Table before Cabinet</li> <li>Cabinet approval</li> <li>Table before Parliament</li> </ul>	Immediately	June 2000	N.A.	-----
	Table before Parliament the Bill for the autonomy of the Auditor General	Bill tabled	<ul style="list-style-type: none"> <li>Table before Cabinet</li> <li>Cabinet approval</li> <li>Table before Parliament</li> </ul>	Immediately	March 2001	N.A.	-----
	Table before Parliament the IGG statute	Bill tabled	<ul style="list-style-type: none"> <li>Table before Cabinet</li> <li>Cabinet approval</li> <li>Table before Parliament</li> </ul>	Immediately	July 2000	N.A.	-----
Mainstream corruption and ethics concerns in other organizations	Arrange meetings with such actors as the Local Governments Association, the Media Council, the Uganda Editors' Association, local governments, professional associations, research institutions, and cultural institutions to discuss cooperative efforts in anticorruption.	Meetings held; agreements on activities reached	<ul style="list-style-type: none"> <li>Schedule monthly meetings</li> <li>Hold meetings</li> <li>Reach agreements on activities</li> </ul>	Short-Term	Ongoing	360 annually	Own funds
Explore and concretize anticorruption activities and lobby for their adoption	Explore and concretize the anticorruption activities that come from consultations and workshops; develop recommendations. Discuss recommendations with implementing actors and lobby for their adoption where appropriate.	Recommendations on each activity; agreements with implementing actors	<ul style="list-style-type: none"> <li>Consider each recommendation</li> <li>Identify implementing actors</li> <li>Consult with implementing actors</li> <li>Reach agreements on activities</li> </ul>	Short-Term	Ongoing	N.A.	-----
Seek resources for the reinforcement of capacity and the undertaking of anticorruption initiatives	Assist agencies in developing funding proposals for the undertaking of anticorruption initiatives not currently financed and for capacity building.	Proposals developed; funding obtained; capacity built	<ul style="list-style-type: none"> <li>Consult and analyse needs</li> <li>Develop proposals</li> <li>Contact sources of funding</li> </ul>	Short-Term	Ongoing	N.A.	-----

## Directorate of Public Prosecutions (DPP)

Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Monitor and detect internal corruption and mismanagement	Create an internal inspectorate and carry out one inspection of all DPP offices per year	Number of offices inspected in a year	<ul style="list-style-type: none"> <li>Identify officer to carry out inspections and equip officer</li> <li>Inspect South and West regions</li> <li>Inspect North and East regions</li> <li>Inspect Central regions</li> <li>Repeat each year</li> </ul>	Immediately	Ongoing	11,340 annually	Own funds
	Carry out quarterly inspections and inspections in response to complaints	Number of offices inspected in a year	<ul style="list-style-type: none"> <li>See above</li> </ul>	On receipt of funds	Ongoing	251880*	Unsecured
Build capacity for law enforcement	Train 60 prosecutors per year (for 5 years) to replace CID prosecutors	Number of prosecutors recruited and trained	<ul style="list-style-type: none"> <li>Obtain authorisation, advertise and recruit 60 State Prosecutors</li> <li>Train newly recruited Prosecutors</li> <li>Completion of clerkship of new Prosecutors</li> <li>Deploy new Prosecutors</li> <li>Repeat each year</li> </ul>	Immediately	Dec., 2003	2,581,400	Partial; funds required 1,020,600
	Introduce computerised case management where Resident Judges are stationed	Functional computerised case management systems in all stations	<ul style="list-style-type: none"> <li>Train systems administrators</li> <li>Train up-country staff in use</li> <li>Purchase equipment for one region</li> <li>Connect case management system to HQ</li> <li>Repeat for each regional office</li> </ul>	Immediately	July 2002	350,000*	Partial; funds required 200,000
	Establish at least 5 Resident State Attorneys' offices and 10 State Prosecutors' offices per year	Number of RSA and SP offices established	<ul style="list-style-type: none"> <li>Build/secure rental property</li> <li>Set up documentation centre</li> <li>Attach state attorneys and prosecutors to offices</li> </ul>	Immediately	July 2002	1,367,500	Partial funding; 1,157,500 required
	Institute specialised training and programmes to combat rising white collar crime and set up specialised Economic Crime Unit	Number of courses held; number of persons trained	<ul style="list-style-type: none"> <li>Conduct course on Economic Crime, 5 days, 20 RSA</li> <li>Advanced attachments, 2 persons, 2 months</li> <li>Conduct on-the-job training in prosecutorial skills, 5 days, 50 staff</li> <li>Set up specialised Economic Crime unit</li> </ul>	On receipt of funds	Within one year	488,320	Unsecured

Directorate of Public Prosecutions (DPP)							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Set internal standards for prosecutors	Develop a Code of Conduct and minimum standards for prosecutors	Publication and dissemination of Code and standards	<ul style="list-style-type: none"> <li>• Consultation</li> <li>• Draft of Code and standards</li> <li>• Publication of Code and standards</li> <li>• Training in Code and standards</li> </ul>	Medium-Term	Medium-Term	185,000	Unsecured

Inspector General of Government							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Sensitise and educate the public about corruption and recourse	Raising of public awareness through workshops	Number of workshops held; number of people trained	<ul style="list-style-type: none"> <li>• Hold 10 2-day workshops for 200 persons at District level</li> <li>• Hold 35 2-day workshops for 200 people at District level for national coverage</li> <li>• Hold 75 2-day workshops for special interest groups</li> </ul>	Immediately	Ongoing	2,160,000 annually	Partial funding; 1,980,000 required
	Train trainers to raise public awareness at grassroots level	Number of trainers trained	<ul style="list-style-type: none"> <li>• Train 2 persons in each sub-county in groups of 30 through two 5-day workshops per month</li> </ul>	On receipt of funds	Ongoing	194,000 annually	Unsecured
	Publication of magazine Assumption: Friedrich Ebert Foundation to continue to support publication	Number of issues published	<ul style="list-style-type: none"> <li>• Publish magazine</li> </ul>	Immediately	Ongoing	31,200 annually	Secured DP funds
	Conduct publicity campaigns through radio spots, hotline, and web page	Number of radio spots, number of calls to hotline, publications of web page	<ul style="list-style-type: none"> <li>• Maintain web site</li> <li>• Put on radio spots</li> <li>• Put on quarterly TV educ-drama</li> <li>• Put on weekly 30 minute TV talk show</li> <li>• Publish full page newspaper article</li> </ul>	Immediately	Ongoing	320,340 annually	Partial funding; 248,000 required

## Inspector General of Government

Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Apply sanctions, recover funds	Investigate and conclude high profile cases involving top management of the civil service and political leaders, with prosecution where warranted by the evidence	Number of cases concluded; number of cases prosecuted where circumstances warrant; conviction rate	<ul style="list-style-type: none"> <li>2,000 cases investigated and brought to conclusion</li> </ul>	Immediately	July 2001	260,000	Own finances
	Investigate and conclude an additional 1,500 cases to eliminate case backlog	Number of cases concluded; number of cases prosecuted; conviction rate	<ul style="list-style-type: none"> <li>1,500 cases investigated and brought to conclusion</li> </ul>	On receipt of funds	July 2001	195,000	Unsecured
	Computerise case management, including data on verification of Leadership Code	Case data available on computers; trend analysis possible		Immediately	July 2000	58,525	Secured DP funds
Minimize opportunity through monitoring	Enforce the Leadership Code  Assumptions: If amended Leadership Code, enforcement will require more resources	Percentage of leaders declared; percentage of verifications	<ul style="list-style-type: none"> <li>Distribute forms</li> <li>Collect forms</li> <li>Verify forms</li> </ul>	Immediately	Ongoing	To be costed	-----
	Carry out a National Integrity Survey to measure perceptions of corruption every two years	Number of surveys held	<ul style="list-style-type: none"> <li>Design survey</li> <li>Train enumerators</li> <li>Conduct survey</li> <li>Analyse data</li> <li>Publish results</li> </ul>	Short-term; on receipt of funds	Ongoing	280,000	Unsecured
Build capacity for investigation and prosecution	Train staff in IT, basic investigation, cross profession	Number of staff trained	<ul style="list-style-type: none"> <li>Train 70 staff in IT</li> <li>Train 100 staff in specialised skills</li> <li>Two 1-week cross-training in accountancy and law for groups of 15 staff, quarterly</li> </ul>	Immediately	July 2002	345,200	Partial funding; funds required: 19,200

Judiciary							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Sensitise the public and judicial staff about corruption	Publish posters, newspaper articles, hold radio shows, seminars and workshops to sensitise the public and judicial actors about judicial procedures and corruption	Number of posters posted, number of newspaper articles published, number of radio shows held, number of seminars and workshops held, number of attendees	<ul style="list-style-type: none"> <li>Print 1000 pamphlets, 1000 Court User Guides per month</li> <li>Print 10000 posters per year</li> <li>Quarter page advertisements each month</li> <li>2x 30 minute radio programmes per week</li> <li>1 x 30 minute talk show programme per week</li> <li>5 workshops per month</li> </ul>	On receipt of funds	Ongoing	358,094*	Unsecured
	Keep abreast of developments in judicial anticorruption activities through research	Number of documents received in library; number of back-to-office reports; number of workshops; number of officer sensitised	<ul style="list-style-type: none"> <li>Conduct library research</li> <li>Conduct field research</li> <li>Conduct electronic research</li> <li>Hold workshops</li> </ul>	On receipt of funds	July 2002	24,045*	Unsecured
	Hold sensitisation workshops for judicial officers	Number of workshops held; number of officers sensitised	<ul style="list-style-type: none"> <li>Hold 1 workshop per month for judicial officers</li> </ul>	On receipt of funds	July 2002	180,000	Unsecured
Expedite case handling	Clear backlog of cases	Additional sessions held; reduction in backlogged cases	<ul style="list-style-type: none"> <li>Hold 40 additional High Court sessions</li> <li>Hold additional lower court sessions</li> <li>Introduce circuits</li> </ul>	On receipt of funds	July 2001	854,346	Unsecured
Minimize opportunity for corrupt acts	Increase inspection and monitoring of judicial staff to evaluate case handling and treatment of the public.	Number of supervision visits; number of inspection visits	<ul style="list-style-type: none"> <li>Conduct supervision visits</li> <li>Conduct inspection visits</li> </ul>	On receipt of funds	Ongoing	162,290 annually	Unsecured
	Facilitate Chief Magistrates to travel and supervise subordinate magistrates	Procurement of vehicles; supervision and inspection visits made	<ul style="list-style-type: none"> <li>Procure vehicles</li> <li>Conduct supervision visits</li> <li>Conduct inspection visits</li> </ul>	On receipt of funds	Ongoing	1,937,400* over two years	Unsecured
	Create an information management system to track finances in Judiciary and create transparent financial management	System installed and functional	<ul style="list-style-type: none"> <li>Procure and install 29 site computers, 15 workstations, HQ LAN and software</li> </ul>	Immediate	Dec., 2000	171,120	Secured DP funds

Judiciary							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Professionalise the Bench	Develop costed proposal for training and/or replacing lay magistrates	Proposal produced	<ul style="list-style-type: none"> <li>Development of proposal</li> </ul>	Immediate	Dec., 2000	N.A.	-----

Ministry of Finance							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Strengthen protections against procurement fraud	Ensure that the new procurement laws and regulations provide for blacklisting of companies that engage in corrupt practices	Publication of laws and regulations with appropriate clauses	<ul style="list-style-type: none"> <li>Finalization of regulations</li> </ul>	Immediately	July, 2001	N.A.	-----
	Implement procurement reforms by putting in place the Reformed Central Tender Board and ensure that it has the legal authority and adequate facilitation to play its regulatory role  Assumption: Necessary technical assistance and funding are forthcoming	Adoption of law; Functional Reformed Central Tender Board	<ul style="list-style-type: none"> <li>Workshop on procurement reforms (May, 2000)</li> <li>Draft guidelines</li> <li>Put in place Reformed Central Tender Board</li> <li>Draft Bill on procurement reforms</li> <li>Seek advice of anticorruption agencies on draft Bill</li> <li>Table Bill in Parliament</li> </ul>	Immediately	July, 2001	13,795,000 (estimate)	Partial funding; funds required 13680250
Strengthen monitoring and controls	Table Bill for the administrative independence of the Auditor General to allow AG to set own priorities	Bill tabled	<ul style="list-style-type: none"> <li>Revise Bill</li> <li>Table in Cabinet</li> <li>Cabinet approval</li> <li>Table in Parliament</li> </ul>				
	Appoint an auditor to audit the Auditor General	Appointment of auditor	<ul style="list-style-type: none"> <li>Appoint auditor</li> </ul>	On receipt of funds	July, 2001	120,000*	Unsecured
	Monitor Commitment and Control system and output-oriented budgeting to ensure that they strengthen financial management and reduce opportunities for corruption	Transactions reviewed; irregularities detected and corrected		July, 2001, with receipt of funds	July, 2002	25,000	Unsecured
	Monitor local government's financial activities to ensure increased accountability of fund transfers from central government	Transactions reviewed; irregularities detected and corrected		On receipt of funds	Ongoing	750,000*	Unsecured

Ministry of Finance							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Ensure follow-up	Publish Treasury Memorandum annually and ensure implementation	Memorandum published	<ul style="list-style-type: none"> <li>Follow up PAC/Audit queries</li> <li>Prepare Memorandum</li> </ul>	Immediately	Ongoing	66,500 annually	Own funds
	Ensure compliance with Treasury Accounting instructions	Implementation of instructions		Immediately	Ongoing	N.A.	-----

Ministry of Information							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Empower civil society to monitor Government action by improving access to Government information	Develop Government policy on information access and table it before Parliament.	White paper presented to Parliament	<ul style="list-style-type: none"> <li>Conduct consultations</li> <li>Seek Cabinet approval of White Paper</li> <li>Table before Parliament</li> </ul>	Immediately	Dec. 2000	10 million	Unsecured

Ministry of Internal Affairs							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Assure accountability in the Police	Act on the recommendations of the Commission of Inquiry into the Police; refer crimes to law enforcement agencies for investigation	Implementation of recommendations; referral of cases	<ul style="list-style-type: none"> <li>Implement recommendations</li> <li>Refer reported crimes for investigation</li> </ul>	Immediately		To be costed	-----

Ministry of Justice							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Build capacity of law enforcement agencies	Development of Sector-Wide Approach Program (SWAP) to strengthen the Justice, Law and Order sector; implementation of Plan	Production of funded, costed, prioritised medium-term strategic plan; implementation of Plan	(Addressed under separate planning initiative)	Immediate	July, 2001	To be costed	-----

Ministry of Local Government							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Make budget transparent	Monitor and public central government transfers to local governments	Monthly releases published in local newspapers		Jan. 2000	June 2000	19,860	Secured DP funds
Build transparency and accountability in Local Government Public Accounts Committees	Prepare and print the Local Government Public Accounts Committees (PACs) rules and regulations and distribute to all stakeholders	Copies of Local Government rules and regulations printed and distributed		March 2000	April 2000	6,785	Secured DP funds
	Train Local Government PAC members in above rules and regulations	Workshops held; number of members trained		April 2000		103,506	Secured DP funding
	Review Local Government PAC reports of all Districts and present report to National Parliament	Number of District reports reviewed; report produced		Oct. 2000	March 2001	5,000	Unsecured
	Print and distribute 1,000 copies of above report to Local Government PACs	Number of reports printed and distributed		April 2001		6,785	Unsecured
Improve local government capacity in daily accounts work	Prepare and print Bookkeeping Entry Manual for Districts, Urban Councils and Sub-Counties; print and distribute 3,500 copies	Bookkeeping entry manual prepared; number of copies printed and distributed		Jan. 2000	Dec. 2000	43,272	Secured DP funds
	Provide on-the-job training to accounts staff using Bookkeeping Manual	Number of staff members trained		Jan. 2001	Dec. 2001	227,000	Unsecured

## Ministry of Local Government

Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Strengthen voluntary compliance with proper procurement guidelines	Prepare and print Local Governments Tender Board regulations	Prepare workshop to brainstorm the final draft Tender Board Regulations		Jan. 2000	June 2000	8,150	Secured DP funds
	Sensitise 630 Local Governments Tender Board members	Number of members sensitised		July 2000	Dec. 2000	137,554	Unsecured
	Review Tender Board awards, analyse reports and produce case studies for future training	Awards and reports analysed case studies produced	<ul style="list-style-type: none"> <li>Organise consultancy to review reports and draft report</li> <li>Print and distribute review and case studies</li> </ul>	Jan. 2001	June 2001	6,785	Unsecured
Build capacity in financial management	Provide on-the-job training to Local Government staff in areas of financial management	Number of staff trained	<ul style="list-style-type: none"> <li>Train staff in 45 Districts</li> <li>Train staff in 63 Urban Councils</li> <li>Train staff in 900 Sub-Counties</li> </ul>	June 2000	Dec. 2001	279,000	Unsecured
Strengthen laws	Amend and update the Local Government Financial and Accounting Regulations, 1998; print and distribute 2500 copies	Regulations updated; number of copies printed and distributed		Jan 2000	June 2000	7,500	Secured DP funds
	Amend and update the Local Governments Act, 1997; print and distribute 2500 copies	Acts updated; number of copies printed and distributed		July 2000	Dec. 2000	7,500	Secured DP funds
Strengthen monitoring and supervision	Provide on-the-job training to Local Government internal auditors	Number of auditors trained		April 2000	June 2000	36,000	Unsecured
	Assist Local Governments to prepare final accounts and liaise with Auditor General to ensure that all written accounts are audited	Number of Local Government final accounts produced	<ul style="list-style-type: none"> <li>Assist 91 Sub-counties in the DDP Districts to produce final accounts</li> <li>Assist 809 Sub-counties in the Non-DDP Districts to produce final accounts</li> </ul>	March 2000	June 2001	444,500	Partial funding; funding required 400,000
	Carry out regular inspections and on-the -job training	Number of Local Governments inspected; number of persons trained		July 2000	June 2001	50,000	Unsecured

Ministry of Public Service							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Improve monitoring and reduce corruption in human resources	Put in place a performance appraisal system that will serve as the basis of meritocratic promotion	Appraisals and assessments conducted	<ul style="list-style-type: none"> <li>Complete consultations</li> <li>Train appraisers and appraisees</li> <li>Launch in Public Service</li> <li>Begin appraisal interviews and assessments</li> </ul>	Immediately	June, 2001	40,500	Secured DP funds
Set standards	Review General Code of Conduct, print and distribute it to civil servants	Number of civil servants with copies	<ul style="list-style-type: none"> <li>Review Code of Conduct</li> <li>Print</li> <li>Distribute</li> </ul>	Immediately	July, 2000	75,000	Secured DP funds
Sensitise government actors	Sensitise public servants in corporate values (revitalisation programme)	Number of public servants trained	<ul style="list-style-type: none"> <li>Train top managers</li> <li>Train middle managers and below</li> </ul>	Immediately	March, 2001	154,836	Secured DP funds

Office of the Auditor General							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Build capacity for financial monitoring and control	Recruit and deploy 40 additional audit staff	Number of audit staff recruited and deployed	<ul style="list-style-type: none"> <li>Recruit staff</li> <li>Assure travel costs for deployment</li> </ul>	Immediately	Short-term	733,220 annually	Partially funded; funds required 639,562
	Provide in-depth training to staff in value for money audits, risk-based financial audits, and computerised audits and deploy staff	Number of staff trained	<ul style="list-style-type: none"> <li>Train 30 members of staff in Financial Audit</li> <li>Train 10 members of staff in Value for Money audit</li> <li>Train 5 staff in audit of computerised accounting systems</li> </ul>	On receipt of funds	Within 1 year	72,000	Unsecured

Office of the Auditor General							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
	Provide initiation in specialised audits to entire staff: VFM, forensic audits.	Number of staff trained	<ul style="list-style-type: none"> <li>Train 300 audit staff in VFM audits (phased in thirds)</li> <li>Train 300 audit staff in Financial audits (phased in thirds)</li> <li>Train 80 audit staff in computer auditing (phased in halves)</li> <li>Train 50 staff in forensic auditing (phased in halves)</li> </ul>	On receipt of funds	2 years from receipt of financing	930,400*	Unsecured
	Increase flow of relevant audit information through linkages with auditees' computer systems  Assumption: Auditees' systems will be similarly computerised	Amount of audit information accessible through network	<ul style="list-style-type: none"> <li>Link and network offices</li> </ul>	Short-term; on receipt of funds	3 years from receipt of financing	60,000	Unsecured
	Meet audit reporting deadlines for all local governments, projects and state corporations; increase supervision of staff using local firms at sub-county level  Assumption: Auditees produce timely final accounts	Percentage of audits completed on time	<ul style="list-style-type: none"> <li>Seek financing</li> <li>Plan and execute audits according to deadlines</li> </ul>	Short-term; on receipt of funds	1 year from receipt of funding	To be costed	Unsecured
	Production of audit reports on classified expenditures	Production of report	<ul style="list-style-type: none"> <li>Produce report</li> </ul>	Immediately	Dec. 2001	N.A.	-----
Set standards	Develop proposal for mechanism for internal enforcement of Code of Conduct	Proposal developed	<ul style="list-style-type: none"> <li>Develop proposal</li> </ul>	Short-Term	Dec. 2001	N.A.	-----
Apply sanctions and recover funds	Develop and implement a non-discretionary policy requiring referral of audit reports showing certain types of irregularities to law enforcement agencies to be considered for immediate criminal investigation in consultation with IGG and CID	Publication of policy; percentage of audit reports meeting criteria referred	<ul style="list-style-type: none"> <li>Consult</li> <li>Develop policy</li> <li>Publish policy</li> <li>Implement and begin referrals</li> </ul>	Immediately	Dec. 2001	N.A.	-----

Uganda Revenue Authority							
Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
Sensitise public to improve tax compliance	Conduct a national taxpayer survey to identify specific (critical) issues of concern to taxpayers	Survey conducted	<ul style="list-style-type: none"> <li>Conduct survey</li> <li>Analyse data</li> <li>Draw conclusions for action</li> </ul>	Immediately	July 2001	24,500	Secured DP funds

## Uganda Revenue Authority

Objective	Actions	Monitorable Indicators	Operations	Initiate	Complete	Budget Ush '000	Funding Ush '000
	Develop literature on all tax laws and procedures in simplified translations appropriate to the needs of various taxpayers	Production of translations of taxpayers guides	<ul style="list-style-type: none"> <li>Develop taxpayers guides</li> </ul>	On receipt of funds	Within one year	72,620	Partial funding; funds required 60,240
	Adopt interactive programmes that promptly address taxpayers needs (e.g., seminars, workshops, tax clinics, live talk shows, etc.)	Seminars and outdoor broadcasting programmes held	<ul style="list-style-type: none"> <li>Develop TV programmes</li> <li>Develop radio programmes</li> <li>Develop documentaries/articles</li> <li>Develop music and drama pieces</li> </ul>	On receipt of funds	Within two years	991,924	Partial funding; funds required: 608,520
	Increase capacity in the use of audio and visual aids, e.g., drama, music, commercial spots/jingles, documentaries, outdoor broadcasting	Progress of electronic programmes	<ul style="list-style-type: none"> <li>Procure outside broadcast equipment</li> <li>Procure colour printer</li> </ul>	On receipt of funds	Within one year	102,000	Unsecured
	Create a modern library and Tax Information Center for on spot taxpayer guidance	Creation of library room; number of library documents; number of users	<ul style="list-style-type: none"> <li>Procure books, periodicals, materials</li> </ul>	On receipt of funds	Ongoing	35,000	Partial funding; funds required 20,000
	Resource facilitation for increased activities	Resources mobilised	<ul style="list-style-type: none"> <li>Implement</li> </ul>	On receipt of funds	Ongoing	55,800*	Partial funding; funds required: 11,750
Set standards for internal conduct	Develop Code of Conduct for URA staff	Publication of Code; training of staff members; improved conduct of staff	<ul style="list-style-type: none"> <li>Complete consultations and drafting of URA Code of Conduct</li> <li>Debate widely the URA Code of Conduct</li> <li>Redraft and seek approval of URA Code of Conduct</li> <li>Publicise the Code of Conduct and train staff</li> </ul>	On receipt of funds	June, 2001	25,850	Partial funding; funds required: 22,350

## **Appendix 2. Monitoring by DEI**

DEI commits to monitor progress on the Plan of Action quarterly. In addition, DEI will report on the follow-up on high-profile corruption scandals, and on institutional developments relevant to reducing corruption and building ethics and integrity in public office such as those responsible for:

- Putting in place workable rules for the management of public resources and the use of public authority, and setting clear standards of behavior for public and private actors. Key systems include those for revenue collection, financial management, and procurement; and for human resource management, at both the national and local levels.
- Assuring that compliance with rules is possible by building human capacity and providing adequate facilitation;
- Promoting voluntary compliance by developing and reinforcing national values of ethics and integrity, values of public service, and reducing the tolerance for corruption;
- Minimizing opportunity by promoting economic liberalization and reducing government actor discretion where appropriate;
- Reducing temptation by
  - improving public sector wages to assure the living wage;
  - identifying and eliminating bureaucratic bottlenecks, excessive delays, and unnecessary government actor discretion as contributing causes of corruption;
- Strengthening systems of monitoring and supervision across government, and within agencies;
- Creating an environment in which a knowledgeable civil society can monitor government action and hold the government accountable, by, for example, improving public access to government information;
- Ensuring that laws provide for sanctions for corrupt behavior and recovery of funds; and
- Strengthening the capacity of law enforcement agencies generally, and for dealing with corruption cases in particular, to assure sanctions and recover funds.

### **Appendix 3. Actions for Further Consideration/Development**

Many suggestions for reducing corruption came from the consultations that were held in the form of individual interviews with public and private sector actors, an interagency Working Group, a Coalition-Building Workshop in Entebbe from March 13-15<sup>th</sup>, and an Interagency Forum on March 30<sup>th</sup>. Often repeated themes were:

- the need to develop national values of ethics and integrity,
- the need for public sector pay reform,
- the need for better controls in procurement, the need to build the capacity of law enforcement agencies and the Judiciary,
- and the need to improve public access to Government information.

Some of the suggestions, such as developing whistleblower protections and allowing private actors to sue corrupt officials, are already incorporated in the Plan of Action and are not repeated here. Government will further consider the suggestions below, and, where advisable and practical, develop them into concrete anticorruption initiatives.

#### **Sensitisation, Education, Values**

- Work in collaboration with anticorruption agencies to coordinate sensitisation efforts to ensure against duplication and wastage of resources.
- Initiate a school curriculum for primary students to promote values such as ethics and integrity, and to teach about the harms of corruption, in collaboration with the Curriculum Development Center.
- Develop and implement a program of continuous civic education aimed at the grassroots.
- Invite society to reflect on national values, particularly as they pertain to ethics and integrity, to begin to articulate a national position on integrity integrated with Vision 2025.
- Donors should support initiatives like the Uganda Debt Network proposal to build a grassroots anti-corruption movement, or the TI Uganda proposal for mass national awareness raising.

#### **Character**

- Base school promotion not only on academic excellence but also on character.
- Lead by example.

- Develop and implement a reward program to recognize individuals of outstanding integrity.
- Vet public actors according to character, not just academics.
- Create a reward program for integrity, medals, national day; recognize people in districts

### **Research**

- Conduct a study into the extent and causes of corruption.
- Conduct reviews of economic policies to identify policies that create undue opportunity or incentive for corruption.
- Conduct a study of corruption linked to the electoral process and make recommendations.
- Conduct a study of the extent and causes of corruption in tax administration, and the extent and causes of tax evasion, and make recommendations.
- Research should be conducted to show whether increasing remuneration in fact reduces corruption.
- Identify research institutions for input.

### **Consultation and Coordination**

- Develop a mechanism for regular consultation with civil society, both private sector and social organisations, for the mainstreaming of corruption issues.
- Liaise with professional associations to assist them in devising enforceable standards for their members. Consider the conditions under which government actors should be required to be members of such professional associations.
- Involve civil society and the private sector in improving public sector performance.
- DEI should link with Makerere University.
- DEI should use the existing structure of LC's and make a local official selected by local community responsible for Ethics and Integrity.
- Include cultural institutions and Local Councils in anticorruption planning.

- Mainstream ethics and integrity through designated personnel in government departments.

### **Monitoring**

- Maintain and publish a list of government institutions that have put in place enforceable codes of conduct, and persuade those who haven't to develop one.
- Evaluate the status of statistical monitoring of the performance of anticorruption agencies with respect to corruption cases and seek assistance for agencies to create and maintain performance statistics.
- Develop a survey instrument to measure tolerance for corruption among public and private actors, and conduct annual surveys.
- Collect hard data on corruption.
- DEI should develop benchmarks and indicators.

### **Procurement**

- Deal with the problem of government actors who hold tenders.
- Give tenders to the lowest bidder.
- Central Tender Board should evaluate whether a contract is necessary as part of its scrutiny of contracting.

### **Resource management**

- Reduce government actor discretion and monopolies/liberalization of trade, marketing, prices, exchange control; depersonalize resource allocation; tax reform and regional rationalization/harmonization of tax rates to reduce smuggling.
- Decentralise resource management.

### **Terms and Conditions of Service**

- Reform public sector pay to ensure competitive wages.
- Remove patronage/party affiliation as a basis for promotion in the public sector.

## **Standards of Conduct**

- Use professional councils to enforce standards of conduct on members.
- Ensure that business associations have codes of conduct.
- Ensure that government institutions have enforceable codes of conduct.

## **Criminal Sanctions**

- Develop a common classification of corruption-related crimes for easier statistical tracking in CID, DPP, IGG and Judiciary.
- Review current anticorruption laws (Prevention of Corruption Act, penal code sections) to determine whether reforms are needed and make recommendations.
- Require people to account for the sources of their wealth, e.g., by amending the Leadership Code to provide for the confiscation of assets not declared
- Develop an elite unit of well-paid police.
- Build capacity in the anticorruption agencies.

## **Judiciary and Lawyers**

- Build the capacity of the Judiciary.
- Ensure that magistrates have an accounting system to handle the fines and fees they collect.
- Facilitate Chief Magistrates to visit and supervise subordinate magistrates.
- Conduct awareness campaigns on importance of corruption-free judiciary.
- Peg judicial salaries to the dollar.
- Professionalise the Bench.
- Introduce modern court recording in Judiciary.
- Supply Judiciary with law books and reports.
- Ensure that the Judicial Service Commission has mature experienced judges.
- Ensure adequate judicial inspection.

- Improve records management in judiciary.
- Appoint a planner in the Judiciary and the Public Relations Officer and Planner should be charged with conducting a strategic planning exercise to develop and implement a plan of action for Judiciary.
- Unnecessary contact between judicial actors and public should be limited; contacts should be monitored.
- Develop court rules.
- Improve pay for judicial support staff.
- Transfer the budget for transportation of witnesses from the Judiciary to the CID and IGG.
- Judiciary will develop a formal proposal for ensuring that support staff can be hired and fired by the Judicial Service Commission and present it to the Public Service Commission.
- Foreign banks must assist in recapturing diverted funds.
- Lawyers need to be brought on board to curb delaying tactics and ethical violations.
- Law Council needs to play its proper disciplinary role, and sensitise lawyers about professional ethics.

## **Parliament**

- Address problem of Parliamentary votebuying.
- Enact Recall Bill to recall members of Parliament.
- Parliament should sensitize the public.
- PAC should be facilitated to leave Kampala and go to districts.
- Address Parliamentary failure to raise quorum by adopting an internal rule requiring Speaker to give permission for absence and providing sanctions for absence without permission.
- Lawmakers should explain the laws they make to the people.

## **Local Government**

- Local governments must address corruption in human resources management, not just financial management.
- DEI should vest responsibility for ethics and integrity at the local level in local leaders selected by local communities.
- Amend the Local Government Act so that district PAC's are not appointed by District Councils.

## **Access to government information**

- Review the Official Secrets Act and revise as necessary to reduce amount of classified information and permit the free flow of information necessary to hold Government accountable.
- Government should contract Uganda Management Institute's School of Journalism or a similar institution to develop communication strategies for anti-corruption agencies
- Reserve space in the national newspaper for discussion of corruption issues.
- Improve flow of information from government to public.
- Publicise more Government transactions e.g. monies received and spent by Government
- Create a freedom of information act to enable the constitutional guarantee of access to information.

## **Civil Society**

- Streamline government/NGO relations; eliminate mutual suspicion.
- Coordinate the NGO's.
- Review National NGO Authority and its handling of NGOs.
- Create measures to protect whistleblowers.
- DEI to start a civil society campaign drawing on traditional proverbs, dance, drama and music to promote integrity.
- Create a well-facilitated regular forum between civil society and government on corruption issues.

- Mainstream anticorruption concerns into civil society programs.
- Civil society organisations should network.
- Donors should make transparency a condition for support. Media should be allowed into all donor-government negotiations while embassies should have clear way of publicising information especially regarding moneys/grants etc.

## **Media**

- DEI should work with the Media Council.
- Donors should support newspapers.
- Media should not respond to market demand but should take responsibility to promote social values.
- Government should give access to information to media.
- DEI should arrange regular press briefings.
- Government should promote newspapers by removing taxes on newsprint.
- Newspapers should be noncommercial.
- Parastatals and government should run advertisements in private newspapers to support media and give them running costs.
- Editors should be involved in the anticorruption crusade, not just reporters.
- Give briefings to Uganda Editors Association.
- Raise reporters' wages to ensure press independence.
- Donors should train reporters on investigation, reporting and researching to improve quality of press.
- Review laws affecting media, including sedition, publication of false news, criminal libel; decriminalise publication offenses.
- Institute a policy on media training for journalists in Government media to enhance the quality of output

## **Private Sector**

- Assure job security for workers.
- Invest in building the capacity of workers, train and sensitise them.
- Uganda Employers Association should assure that whistleblowers don't lose their jobs in private sector.
- Develop corporate values.
- Sponsor research about corruption and anticorruption activities.
- Create a private sector advisory group to monitor anticorruption activities and produce quarterly reports.
- Professional associations should have codes of conduct.
- DEI should follow up discussions with Uganda Law Society on developing a strategy to handle allegations of corruption against lawyers through its Disciplinary Committee.
- Advisory body should create a set of ethics and integrity values to be integrated into National Values.
- Private sector should train and sensitise staff.

## **Other**

- Stop using soldiers to do tax administration.
- Districts should work with Uganda Debt Network to review accountability mechanisms/monitor expenditure
- Seek opinions from the Uganda Law Society regarding contemplated law reforms.
- Remove obstacles to tax administration so that tax payers are not subject to undue harassment.
- Review and reform the management of pensions of public servants.
- Promote peace and security.
- Fight corruption campaign like the AIDs campaign, and focus on positive, not negative messages.
- Develop a working definition of corruption.

- Anticorruption plans must be adjusted with regular review.
- Address the problems of corruption in procurement and tax evasion.
- Auditors from the Auditor General should be made physically and financially independent of the institutions they audit.