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# Vote:129 Financial Intelligence Authority (FIA)

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## V1: Vote Overview

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### I. Vote Mission Statement

To foster the integrity of the financial system through effective detection and prevention of financial crimes.

### II. Strategic Objective

1. Enhance the identification of the proceeds of crime and the combating of money laundering and financing of terrorism.
2. Ensure compliance with the Anti-money Laundering Act.
3. Enhance public awareness and understanding of matters related to money laundering.
4. Make information collected by it available to competent authorities and to facilitate the administration and enforcement of the laws of Uganda.
5. Exchange, spontaneously or upon request, any information with similar bodies of other countries that may be relevant for the processing and analyzing of information relating to money laundering or terrorism financing.
6. Strengthen the capacity of the Authority to effectively and efficiently deliver its mandate.

### III. Major Achievements in 2019/20

One Risk based audit was conducted and findings assisted the organisation in focusing its resources on the high risk areas as first priority. The FIA risk register was updated once during half year and departments were able to mitigate the identified risks

By half year, 5 onsite inspections were conducted and reports with recommendations to improve compliance in AML/CFT were shared with the respective accountable persons.

FIA received 995 Suspicious Transaction Reports (STRs) which were analysed and 13 intelligence reports were disseminated to Law Enforcement Agencies (Uganda Police Force, Inspectorate of Government, Counter Terrorism Unit, Uganda Revenue Authority).

FIA concluded 03 financial due diligence requests out of the 6 requests received from MoFPED.

2 typology studies were completed on ML/TF in the NGO sector and sports betting sector in Uganda. The findings and recommendations were shared with the respective sector regulators to address the deficiencies identified.

FIA rolled out the goAML electronic system to 90% of the Financial Institutions during the period. This has eased the process of filing reports by reporting entities

### IV. Medium Term Plans

- Phased recruitment of staff
- Rollout the electronic reporting system to all financial institutions
- Build capacity in analysis, both tactical and strategic
- Undertake risk based supervision of AML/CFT for both regulated and non-regulated accountable persons
- Increased coverage of AML/CFT public awareness across the country
- Undertake studies to inform policy and decision making on matters related to AML/CFT
- Improve domestic coordination mechanism with AML/CFT stakeholders
- Improve international cooperation to ease sharing and exchange of information

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## V. Summary of Past Performance and Medium Term Budget Allocations

Table 5.1: Overview of Vote Expenditures (US\$ Billion)

		2018/19 Outturn	2019/20		2020/21	MTEF Budget Projections			
			Approved Budget	Expenditure by End Dec		2021/22	2022/23	2023/24	2024/25
<b>Recurrent</b>	Wage	3.274	3.477	1.717	3.744	3.744	3.744	3.744	3.744
	Non Wage	8.347	9.324	3.707	9.324	11.189	13.427	16.112	19.335
<b>Devt.</b>	GoU	0.387	0.215	0.108	0.215	0.215	0.215	0.215	0.215
	Ext. Fin.	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>GoU Total</b>		<b>12.008</b>	<b>13.017</b>	<b>5.532</b>	<b>13.283</b>	<b>15.148</b>	<b>17.386</b>	<b>20.071</b>	<b>23.294</b>
<b>Total GoU+Ext Fin (MTEF)</b>		<b>12.008</b>	<b>13.017</b>	<b>5.532</b>	<b>13.283</b>	<b>15.148</b>	<b>17.386</b>	<b>20.071</b>	<b>23.294</b>
	Arrears	0.210	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>Total Budget</b>		<b>12.218</b>	<b>13.017</b>	<b>5.532</b>	<b>13.283</b>	<b>15.148</b>	<b>17.386</b>	<b>20.071</b>	<b>23.294</b>
<b>A.I.A Total</b>		<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>Grand Total</b>		<b>12.218</b>	<b>13.017</b>	<b>5.532</b>	<b>13.283</b>	<b>15.148</b>	<b>17.386</b>	<b>20.071</b>	<b>23.294</b>
<b>Total Vote Budget Excluding Arrears</b>		<b>12.008</b>	<b>13.017</b>	<b>5.532</b>	<b>13.283</b>	<b>15.148</b>	<b>17.386</b>	<b>20.071</b>	<b>23.294</b>

## VI. Budget By Economic Classification

Table V6.1 2019/20 and 2020/21 Budget Allocations by Item

<i>Billion Uganda Shillings</i>	2019/20 Approved Budget				2020/21 Draft Estimates		
	GoU	Ext. Fin	AIA	Total	GoU	Ext. Fin	Total
<b>Output Class : Outputs Provided</b>	<b>12.802</b>	<b>0.000</b>	<b>0.000</b>	<b>12.802</b>	<b>13.068</b>	<b>0.000</b>	<b>13.068</b>
211 Wages and Salaries	3.986	0.000	0.000	3.986	4.177	0.000	4.177
212 Social Contributions	0.349	0.000	0.000	0.349	0.384	0.000	0.384
213 Other Employee Costs	0.897	0.000	0.000	0.897	1.247	0.000	1.247
221 General Expenses	3.292	0.000	0.000	3.292	2.988	0.000	2.988
222 Communications	0.071	0.000	0.000	0.071	0.063	0.000	0.063
223 Utility and Property Expenses	1.097	0.000	0.000	1.097	1.208	0.000	1.208
224 Supplies and Services	1.812	0.000	0.000	1.812	1.577	0.000	1.577
225 Professional Services	0.480	0.000	0.000	0.480	0.419	0.000	0.419
226 Insurances and Licenses	0.020	0.000	0.000	0.020	0.080	0.000	0.080
227 Travel and Transport	0.737	0.000	0.000	0.737	0.865	0.000	0.865
228 Maintenance	0.060	0.000	0.000	0.060	0.060	0.000	0.060
<b>Output Class : Capital Purchases</b>	<b>0.215</b>	<b>0.000</b>	<b>0.000</b>	<b>0.215</b>	<b>0.215</b>	<b>0.000</b>	<b>0.215</b>
312 FIXED ASSETS	0.215	0.000	0.000	0.215	0.215	0.000	0.215
<b>Grand Total :</b>	<b>13.017</b>	<b>0.000</b>	<b>0.000</b>	<b>13.017</b>	<b>13.283</b>	<b>0.000</b>	<b>13.283</b>

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Total excluding Arrears	13.017	0.000	0.000	13.017	13.283	0.000	13.283
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## VII. Budget By Programme And Subprogramme

Table V7.1: Past Expenditure Outturns and Medium Term Projections by Programme and SubProgramme

Billion Uganda shillings	FY 2018/19 Outturn	FY 2019/20		2020-21 Proposed Budget	Medium Term Projections			
		Approved Budget	Spent By End Dec		2021-22	2022-23	2023-24	2024-25
<b>12 General Administration and Support Services</b>	<b>0.000</b>	<b>8.711</b>	<b>4.045</b>	<b>9.746</b>	<b>9.981</b>	<b>11.186</b>	<b>12.631</b>	<b>14.365</b>
06 Internal Audit	0.000	0.000	0.000	0.096	0.142	0.165	0.199	0.238
07 Finance and Administration	0.000	2.133	0.932	3.865	2.247	2.609	3.153	3.769
09 Human Resource Management Services	0.000	6.363	3.006	5.570	7.377	8.196	9.064	10.143
1423 Support to Financial Intelligence Authority	0.000	0.215	0.108	0.000	0.000	0.000	0.000	0.000
1623 Retooling of Financial Intelligence Authority	0.000	0.000	0.000	0.215	0.215	0.215	0.215	0.215
<b>21 Prevention of ML/TF and Financial Intelligence Information Management</b>	<b>0.000</b>	<b>4.306</b>	<b>1.486</b>	<b>3.537</b>	<b>5.167</b>	<b>6.200</b>	<b>7.440</b>	<b>8.928</b>
02 Legal, Inspection and Compliance	0.000	0.600	0.150	0.810	1.088	1.298	1.549	1.863
05 International Relations and Strategic Analysis	0.000	1.080	0.426	0.829	1.200	1.399	1.669	2.008
07 Operational Analysis	0.000	2.126	0.816	1.549	2.274	2.783	3.362	4.023
08 AML Systems and ICT Management	0.000	0.500	0.094	0.349	0.605	0.721	0.860	1.035
<b>58 Prevention of ML/CFT, Prosecution and confiscation of proceeds of crime</b>	<b>2.880</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>
02 Legal, Inspection and Compliance	0.380	0.000	0.000	0.000	0.000	0.000	0.000	0.000
03 Operational Analysis	2.050	0.000	0.000	0.000	0.000	0.000	0.000	0.000
04 Information Systems Administration and Security	0.450	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>59 Policy, International Cooperation and Mutual Legal Assistance</b>	<b>9.338</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>
01 Headquarters	7.981	0.000	0.000	0.000	0.000	0.000	0.000	0.000
05 International Relations and Strategic Analysis	0.870	0.000	0.000	0.000	0.000	0.000	0.000	0.000
06 Internal Audit	0.100	0.000	0.000	0.000	0.000	0.000	0.000	0.000
1423 Support to Financial Intelligence Authority	0.387	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>Total for the Vote</b>	<b>12.218</b>	<b>13.017</b>	<b>5.532</b>	<b>13.283</b>	<b>15.148</b>	<b>17.386</b>	<b>20.071</b>	<b>23.294</b>
<b>Total Excluding Arrears</b>	<b>12.008</b>	<b>13.017</b>	<b>5.532</b>	<b>13.283</b>	<b>15.148</b>	<b>17.386</b>	<b>20.071</b>	<b>23.294</b>

## VIII. Programme Performance and Medium Term Plans

Table V8.1: Programme Outcome and Outcome Indicators ( Only applicable for FY 2020/21)

<b>Programme :</b>	12 General Administration and Support Services
<b>Programme Objective</b>	Ensure an efficient and effective Financial Intelligence Authority in achieving its mandate

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<b>Responsible Officer:</b> Sydney Asubo					
<b>Programme Outcome:</b> An Efficient and effective Financial Intelligence Authority (FIA)					
<i>Sector Outcomes contributed to by the Programme Outcome</i>					
<b>1. Sustainable Macroeconomic Stability</b>					
Outcome Indicators	Performance Targets				
			2020/21	2021/22	2022/23
	Baseline	Base year	Target	Projection	Projection
• Level of Compliance of the Authority's planning and Budgeting instruments to NDPII	49%	201819	75%	80%	85%
• Level of compliance of the Authority to Gender and Equity budgeting	53%	201819	85%	90%	95%
• Annual External Auditor General Rating of the Authority	100%	201819	100%	100%	100%
<b>SubProgramme: 06 Internal Audit</b>					
<i>Output: 21 Development of Internal Audit Controls and Risk Management</i>					
Percentage of audit recommendations implemented			40%	45%	50%
Percentage of the strategic actions in the Strategic Plan delivered			40%	45%	50%
No. of risk management assessments conducted			4	4	4
<b>SubProgramme: 07 Finance and Administration</b>					
<i>Output: 01 FIA Support Services and Administration</i>					
No of Financial Statements produced			2	2	2
Percentage of the Strategic actions in the Strategic Plan delivered			40%	45%	50%
<b>SubProgramme: 09 Human Resource Management Services</b>					
<i>Output: 19 Human Resource Management Services</i>					
Percentage of approved FIA structure filled by gender and PWDs			70%	72%	75%
Number of staff trained in relevant capacity building by gender			20	22	25
<b>Programme :</b>	21 Prevention of ML/TF and Financial Intelligence Information Management				
<b>Programme Objective :</b>	<p>(i) Ensure that Accountable/Reporting entities comply with Anti-Money Laundering Act 2013 (As amended) and Anti-Terrorism Act 2002 (As amended) and their respective Regulations and Guidelines and enforce administrative sanctions</p> <p>(ii) Ensure that Money Laundering and Terrorism Financing (ML/TF) are prevented and detected through analysis of financial transactions and dissemination of financial intelligence reports to Law Enforcement Agencies.</p> <p>(iii) Ensure that IT infrastructure supports AML/CFT systems and operations.</p> <p>(iv) Ensure that Financial Intelligence Research and Strategic analysis are conducted</p> <p>(v) Enhance public awareness and understanding of matters related to money laundering across the country</p> <p>(vi) Coordinate the implementation of AML/CFT International standards</p> <p>(vii) Coordinate the planning and budgeting functionality to ensure that vote BFPs, MPS and detailed Budget estimates are comprehensively prepared and submitted as per the timelines.</p> <p>(viii) Ensure financial due diligence on investors is conducted</p>				

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<b>Responsible Officer:</b> Wandera Were Samuel					
<b>Programme Outcome:</b> Reduced level of ML and TF cases in all the regions of the country					
<i>Sector Outcomes contributed to by the Programme Outcome</i>					
<b>1. Sustainable Macroeconomic Stability</b>					
Outcome Indicators	Performance Targets				
			2020/21	2021/22	2022/23
	Baseline	Base year	Target	Projection	Projection
• Proportion of ML/TF cases disseminated to LEDs with disaggregated data	10%	201819	10%	15%	30%
• Proportion of STRs analyzed and indicating disaggregated data in terms of age, sex and nationality	29%	201819	30%	35%	40%
<b>SubProgramme: 02 Legal, Inspection and Compliance</b>					
<i>Output: 03 Compliance with AML and CFT laws and Regulations</i>					
Percentage of accountable persons issued with certificates of registration			61%	63%	65%
Number of inspection reports from regulatory bodies reviewed			3	4	5
Number of sanctions applied and disaggregated by Accountable Persons			1	1	1
<i>Output: 04 Legal Representation and Litigation</i>					
Percentage of cases concluded and forwarded for prosecution			100%	100%	100%
<b>SubProgramme: 05 International Relations and Strategic Analysis</b>					
<i>Output: 05 Coordination of the implementation of AML/CFT NRA and MER recommendations</i>					
Number of AML/CFT Awareness campaigns conducted by region			5	10	15
Proportion of Accountable persons and supervisory bodies trained on AML/CFT			55%	60%	65%
Number of recommendations from AML/CFT coordination forum implemented			16	18	20
<i>Output: 06 Financial Intelligence Research and Strategic Development</i>					
Number of studies on ML/TF trends and methods concluded with disaggregated data			2	2	2
<b>SubProgramme: 07 Operational Analysis</b>					
<i>Output: 01 Analysis and Reporting Financial Operations in the different Sectors</i>					
Number of (STR)/LCTR/CBR received and analysed with disaggregated data			480	480	480
Proportion of STRs analysed and disseminated for investigations to the relevant LEAs			10%	20%	30%
Number of due diligence requests on companies handled classified from each requesting MDA			10	10	10
<b>SubProgramme: 08 AML Systems and ICT Management</b>					
<i>Output: 02 Ensure safety and integrity of FIA information</i>					
Number of reporting entities using goAML system disaggregated by Accountable persons			25	30	35
Number of statistical databases on STR/LCTR/CBR established and maintained to reflect national character			1	1	1

## IX. Major Capital Investments And Changes In Resource Allocation

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**Table 9.1: Major Capital Investment (Capital Purchases outputs over 0.5Billion)**

N/A

## X. Vote Challenges and Plans To Improve Performance

### Vote Challenges

1. Insufficient budgetary allocation to recruit staff which has created significant performance gaps in operations of FIA. This has further resulted into;
  - a. Inadequate training of accountable persons on their AML/CFT obligations particularly DNFPs.
  - b. Limited public awareness on matters related to AML/CFT as provided for in AMLA.
  - c. Limited onsite inspections which, negatively impacts on effective enforcement of compliance with AMLA.
2. The existence of unregulated sectors like the real estate that are attractive to launderers as indicated in the National Risk Assessment Report
3. Slow pace of Accountable Persons transitioning from manual to electronic reporting of STRs and LCTRs because of limited technical preparedness in terms of IT infrastructure that supports goAML.
4. Limited use of the financial intelligence generated and disseminated information to competent authorities. Most Law Enforcement Agencies are not conducting parallel financial investigations on most of the predicate offences.
5. Uganda’s economy is predominantly cash-based and informal sector is large. Several transactions are not captured in the formal financial system and therefore cannot be traced or analyzed for AML/CFT. Therefore, criminals can easily exploit such channels.
6. The emergence of new technological innovations like virtual assets that are not yet regulated in many jurisdictions and that creates significant challenges to enforce compliance with the AML/CFT requirements.
7. Significant challenges in implementation of declarations of currency and bearer negotiable instruments at the border entry points, due to inadequate capacity and IT infrastructure to protect identity of travelers who declare.
8. Uganda’s effectiveness on Immediate Outcomes (IO) 1-11 were rated low and therefore there is need to address effectiveness of Uganda’s AML/CFT framework to meet the required international standards to avoid ICRG process.

### Plans to improve Vote Performance

- Increased onsite inspection of Accountable persons on their compliance with AML/CFT obligations
- Increased coverage of AML/CFT public awareness across the country
- Fast track the implementation of ML/TF National Risk Assessment (NRA) and Mutual Evaluation Recommendations (MER)
- Provide training on AML/CFT to both Regulatory Authorities and Accountable persons to support compliance
- Fast track the issuance of AML/CFT administrative sanctions regime for entities failing to comply on AML.CFT
- Increased domestic and international cooperation among key stake holders in the fight against ML/TF/PF
- Improve IT infrastructure to ensure safety of FIA’s information
- Issue AML/CFT regulations to operationalise the amended sections of AMLA, 2013

## XI Off Budget Support

**Table 11.1 Off-Budget Support by Sub-Programme**

N/A

## XII. Vote Cross Cutting Policy And Other Budgetary Issues

**Table 12.1: Cross- Cutting Policy Issues**

**Issue Type:** HIV/AIDS

<b>Objective :</b>	To provide support to staff living with HIV/AIDS to increase their productivity
<b>Issue of Concern :</b>	Approval of the Authority's HIV/AIDS policy to guide intervention to provide support to staff living with HIV/AIDS to increase their productivity
<b>Planned Interventions :</b>	Approval of the Authority's HIV/AIDS policy

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<b>Budget Allocation (Billion) :</b>	0.200
<b>Performance Indicators:</b>	No. of staff counseled No. of HIV/AIDS awareness sessions conducted
<b>Issue Type:</b>	<b>Gender</b>
<b>Objective :</b>	Mainstream gender and equity concerns in all operations of the Authority to ensure services are provided fairly to all staff and members of the public including those with various disabilities
<b>Issue of Concern :</b>	Gender and equity concerns not effectively mainstreamed in its operations to ensure services are provided fairly to all staff and members of the public including those with various disabilities
<b>Planned Interventions :</b>	Provide appropriate facilities for PWDs, Provide facilities and services to cater for expecting mothers at the Authority, provide counseling services for staff with different challenges
<b>Budget Allocation (Billion) :</b>	0.100
<b>Performance Indicators:</b>	No of facilities provided No of staff counseled
<b>Issue Type:</b>	<b>Environment</b>
<b>Objective :</b>	Mainstream environmental concerns in the operations of the Authority to ensure that clean environment is promoted and maintained
<b>Issue of Concern :</b>	Mainstream environmental concerns in the operations of the Authority to ensure eco-friendly environment.
<b>Planned Interventions :</b>	Share documents on line and reduce hard paper usage, Promote usage of shared devices such as printers to reduce on emissions, promote usage of natural light during day and enforce efficient use of power
<b>Budget Allocation (Billion) :</b>	0.100
<b>Performance Indicators:</b>	No. of reams of paper used in comparison to previous year??s level of power usage

### XIII. Personnel Information

Table 13.1 Staff Establishment Analysis

Title	Salary Scale	Number Of Approved Positions	Number Of Filled Positions
SENIOR OFFICER ( PUBLIC RELATIONS)	FIA 5	1	0
HR OFFICER	FIA6	1	0
RECORDS OFFICER	FIA6	1	0
OFFICER ( ED S PERSONAL ASSISTANT)	FIA6	2	1
PROCUREMENT OFFICER	FIA6	1	0
DIRECTOR AUDIT	FIA 3	1	0
Director Legal ,Inspection and Compliance	FIA 3	1	0
DIRECTORE FINANCE AND ADMINISTARTION	FIA 3	1	0
MANAGER SYSTEMS /SECURITY	FIA 4	1	0
STORES ASSISTANT	FIA 9	1	0

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Senior Auditor	FIA5	1	0
Senior Legal Officer	FIA5	1	0
Senior International and Strategic Analysis Officer	FIA5	1	0
Senior Operations Officer	FIA5	2	0
Operational Analysis Officer	FIA6	10	5
Accountant	FIA6	2	1
Compliance Officer	FIA6	5	4
International Relations and Strategic Analysis Officer	FIA6	4	2
IT OFFICER	FIA6	5	3

**Table 13.2 Staff Recruitment Plan**

Post Title	Salary Scale	No. Of Approved Posts	No Of Filled Posts	Vacant Posts	No. of Posts Cleared for Filling FY2020/21	Gross Salary Per Month (UGX)	Total Annual Salary (UGX)
HR OFFICER	FIA6	1	0	1	1	5,000,000	60,000,000
Operational Analysis Officer	FIA6	10	5	5	5	25,000,000	300,000,000
RECORDS OFFICER	FIA6	1	0	1	1	5,000,000	60,000,000
Senior Auditor	FIA5	1	0	1	1	9,000,000	108,000,000
Senior Legal Officer	FIA5	1	0	1	1	9,000,000	108,000,000
SENIOR OFFICER ( PUBLIC RELATIONS)	FIA 5	1	0	1	1	9,000,000	108,000,000
STORES ASSISTANT	FIA 9	1	0	1	1	1,800,000	21,600,000
Accountant	FIA6	2	1	1	1	5,000,000	60,000,000
Compliance Officer	FIA6	5	4	1	1	5,000,000	60,000,000
DIRECTOR AUDIT	FIA 3	1	0	1	1	16,000,000	192,000,000
Director Legal ,Inspection and Compliance	FIA 3	1	0	1	1	16,000,000	192,000,000
DIRECTORE FINANCE AND ADMINISTARTION	FIA 3	1	0	1	1	16,000,000	192,000,000
International Relations and Strategic Analysis Officer	FIA6	4	2	2	2	10,000,000	120,000,000
IT OFFICER	FIA6	5	3	2	2	10,000,000	120,000,000
MANAGER SYSTEMS /SECURITY	FIA 4	1	0	1	1	13,000,000	156,000,000
OFFICER ( ED S PERSONAL ASSISTANT)	FIA6	2	1	1	1	5,000,000	60,000,000
PROCUREMENT OFFICER	FIA6	1	0	1	1	5,000,000	60,000,000
Senior International and Strategic Analysis Officer	FIA5	1	0	1	1	9,000,000	108,000,000
Senior Operations Officer	FIA5	2	0	2	2	18,000,000	216,000,000
<b>Total</b>		42	16	26	26	191,800,000	2,301,600,000