
Vote:129 Financial Intelligence Authority (FIA)

V1: Vote Overview

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 2020/21

FIA received a total of 1,217 Suspicious Transaction Reports (STRs) from Accountable Persons. 249 reports were analysed and closed, 48 reports were disseminated and 920 reports are still undergoing analysis.

FIA exchanged 14 intelligence reports with 12 foreign Financial Intelligence Units (FIUs) in a bid to fight Money Laundering and Terrorism Financing since they are transnational crimes.

FIA was able to register 134 Accountable persons to support efforts of identifying all the accountable persons as outlined in the AMLA, 2013. Cumulatively, a total of 1,180 accountable persons have been registered with the FIA.

Disseminated 48 intelligence reports to law enforcement Agencies for further investigations, prosecution and asset recovery. These are currently at various stages of investigation and prosecution.

The functionality of the goAML system to increase the identification of proceeds of crime was enhanced through upgrading from version 4.6 to the latest UNODC version 4.7. This version fixed bugs, patched updates, enhanced security and system functionalities such as integration with Egmont secure web, analysis dashboard, automated report links using unique reference numbers, full text search, read status for the message board communications and statistics on rejected reports among others. This has improved the speed of receiving STRs from accountable persons and analysis of reports.

In order to maintain the integrity, confidentiality and accuracy of information, FIA entered a Memorandum of Understanding (MOU) with the National Identification and Registration Authority (NIRA) to provide Biometric card readers and training for the FIA Staff on their use. Acquisition of the biometric card readers has supported FIA to only have verified users on their system.

FIA conducted, one onsite AML/CFT inspection. The findings of the inspection report indicated that that there is increased AML/CFT compliance in the forex bureaus.

FIA received a total of 282 compliance reports from various Accountable persons in line with AML Regulation, 45(1) for AML/CFT compliance analysis.

FIA conducted six AML/CFT trainings with various stakeholders and accountable persons. These included; Insurers through a partnership with Insurance Regulatory Authority (IRA) and Insurance Training College of Uganda (ITC), regional NGOs in Ntungamo, Kapchorwa, Jinja, Arua, Soroti. This broadened AML/CFT understanding among the participants.

FIA published 6 articles. Some of these include; one article was published in the August- September issue 2020 -Trade in

Vote:129 Financial Intelligence Authority (FIA)

Uganda Magazine. It was on the role played by the FIA in facilitating trade and investment in Uganda through combating financial crime.

The other 2 articles were published in the daily Monitor newspaper on the role of the Financial institutions in combating ML/TF published in the Banking Sector (28th July 2020) and the contribution of FIA in fighting illicit flows through gaming (11th September 2020).

IV. Medium Term Plans

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

Vote:129

Financial Intelligence Authority (FIA)

V. Snapshot Of Medium Term Budget Allocations

Table 5.1: Overview of Vote Expenditures (UShs Billion)

		2019/20 Outturn	2020/21		2021/22	MTEF Budget Projections			
			Approved Budget	Expenditure by End Dec		2022/23	2023/24	2024/25	2025/26
Recurrent	Wage	3.744	3.744	1.863	4.574	4.803	4.803	4.803	4.803
	Non Wage	6.357	11.752	6.363	9.343	9.343	9.343	9.343	9.343
Devt.	GoU	0.172	0.215	0.008	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
GoU Total		10.273	15.711	8.233	14.133	14.362	14.362	14.362	14.362
Total GoU+Ext Fin (MTEF)		10.273	15.711	8.233	14.133	14.362	14.362	14.362	14.362
Arrears		0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Total Budget		10.273	15.711	8.233	14.133	14.362	14.362	14.362	14.362
A.I.A Total		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Grand Total		10.273	15.711	8.233	14.133	14.362	14.362	14.362	14.362
Total Vote Budget Excluding Arrears		10.273	15.711	8.233	14.133	14.362	14.362	14.362	14.362

Table 5.2: Budget Allocation by Programme (UShs Billion)

<i>Billion Uganda Shillings</i>	2021/22 Draft Estimates		
	GoU	Ext. Fin	Total
Governance and Security	14.133	0.000	14.133
Grand Total :	14.133	0.000	14.133
Total excluding Arrears	14.133	0.000	14.133

VI. Budget By Economic Clasification

Table V6.1 2020/21 and 2021/22 Budget Allocations by Item

<i>Billion Uganda Shillings</i>	2020/21 Approved Budget				2021/22 Draft Estimates		
	GoU	Ext. Fin	AIA	Total	GoU	Ext. Fin	Total
Output Class : Outputs Provided	15.496	0.000	0.000	15.496	13.918	0.000	13.918
211 Wages and Salaries	4.177	0.000	0.000	4.177	4.862	0.000	4.862
212 Social Contributions	0.384	0.000	0.000	0.384	0.686	0.000	0.686
213 Other Employee Costs	1.247	0.000	0.000	1.247	1.145	0.000	1.145
221 General Expenses	2.937	0.000	0.000	2.937	1.340	0.000	1.340
222 Communications	0.063	0.000	0.000	0.063	0.026	0.000	0.026
223 Utility and Property Expenses	1.208	0.000	0.000	1.208	1.164	0.000	1.164
224 Supplies and Services	4.077	0.000	0.000	4.077	2.821	0.000	2.821

Vote:129 Financial Intelligence Authority (FIA)

225 Professional Services	0.419	0.000	0.000	0.419	0.480	0.000	0.480
226 Insurances and Licenses	0.080	0.000	0.000	0.080	0.879	0.000	0.879
227 Travel and Transport	0.843	0.000	0.000	0.843	0.495	0.000	0.495
228 Maintenance	0.060	0.000	0.000	0.060	0.020	0.000	0.020
Output Class : Capital Purchases	0.215	0.000	0.000	0.215	0.215	0.000	0.215
312 FIXED ASSETS	0.215	0.000	0.000	0.215	0.215	0.000	0.215
Grand Total :	15.711	0.000	0.000	15.711	14.133	0.000	14.133
Total excluding Arrears	15.711	0.000	0.000	15.711	14.133	0.000	14.133

VII. Budget By Sub-Subprogramme , Department And Project

Table V7.1: Past Expenditure Outturns and Medium Term Projections by Sub-SubProgramme,Department and Project

Billion Uganda shillings	FY 2019/20 Outturn	FY 2020/21		2021-22 Proposed Budget	Medium Term Projections			
		Approved Budget	Spent By End Dec		2022-23	2023-24	2024-25	2025-26
12 General Administration and Support Services	7.726	9.746	4.313	9.421	9.650	9.650	9.650	9.650
06 Internal Audit	0.000	0.096	0.014	0.080	0.080	0.080	0.080	0.080
07 Finance and Administration	1.431	3.865	1.812	4.551	4.551	4.551	4.551	4.551
09 Human Resource Management Services	6.123	5.570	2.479	4.574	4.803	4.803	4.803	4.803
1423 Support to Financial Intelligence Authority	0.172	0.000	0.000	0.000	0.000	0.000	0.000	0.000
1623 Retooling of Financial Intelligence Authority	0.000	0.215	0.008	0.215	0.215	0.215	0.215	0.215
21 Prevention of ML/TF and Financial Intelligence Information Management	2.547	5.965	3.921	4.712	4.712	4.712	4.712	4.712
02 Legal, Inspection and Compliance	0.328	0.810	0.202	1.292	1.292	1.292	1.292	1.292
05 International Relations and Strategic Analysis	0.635	1.778	1.044	0.400	0.400	0.400	0.400	0.400
07 Operational Analysis	1.415	3.049	2.587	2.140	2.140	2.140	2.140	2.140
08 AML Systems and ICT Management	0.169	0.328	0.088	0.880	0.880	0.880	0.880	0.880
Total for the Vote	10.273	15.711	8.233	14.133	14.362	14.362	14.362	14.362
Total Excluding Arrears	10.273	15.711	8.233	14.133	14.362	14.362	14.362	14.362

VIII. Sub-SubProgramme Performance and Medium Term Plans

Table V8.1: Sub-SubProgramme Outcome and Outcome Indicators

Sub-SubProgramme :	12 General Administration and Support Services
Objective :	Ensure an efficient and effective Financial Intelligence Authority in achieving its mandate
Responsible Officer:	Sydney Asubo
Outcome:	An Efficient and effective Financial Intelligence Authority (FIA)
1. Sustainable Macroeconomic Stability	

Vote:129 Financial Intelligence Authority (FIA)

Outcome Indicators	Performance Targets				
			2021/22	2022/23	2023/24
	Baseline	Base year	Target	Projection	Projection
• Level of Compliance of the Authority's planning and Budgeting instruments to NDP11	75%	20202021	80%	85%	90%
• Level of compliance of the Authority to Gender and Equity budgeting	85%	20202021	85%	87%	90%
• Annual External Auditor General Rating of the Authority	100%	20202021	100%	100%	100%
Department: 06 Internal Audit					
Budget Output: 21 Development of Internal Audit Controls and Risk Management					
Percentage of audit recommendations implemented			40%	50%	60%
Percentage of the strategic actions in the Strategic Plan delivered			40%	50%	60%
No. of risk management assessments conducted			4	4	4
Department: 07 Finance and Administration					
Budget Output: 01 FIA Support Services and Administration					
No of Financial Statements produced			2	2	2
Percentage of the Strategic actions in the Strategic Plan delivered			40%	60%	80%
Budget Output: 19 Human Resource Management Services					
Percentage of approved FIA structure filled by gender and PWDs			10%	20%	30%
Number of staff trained in relevant capacity building by gender			10	20	30
Department: 09 Human Resource Management Services					
Budget Output: 19 Human Resource Management Services					
Percentage of approved FIA structure filled by gender and PWDs			65%	70%	75%
Number of staff trained in relevant capacity building by gender			20	25	30
Sub-SubProgramme : 21 Prevention of ML/TF and Financial Intelligence Information Management					
Objective :	<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>				
Responsible Officer:	Wandera Were Samuel				

Vote:129 Financial Intelligence Authority (FIA)

Outcome: Reduced level of ML and TF cases in all the regions of the country					
1. Sustainable Macroeconomic Stability					
Outcome Indicators	Performance Targets				
			2021/22	2022/23	2023/24
	Baseline	Base year	Target	Projection	Projection
• Proportion of ML/TF cases disseminated to LEDs with disaggregated data	10%	20202021	15%	17%	20%
• Proportion of STRs analyzed and indicating disaggregated data in terms of age, sex and nationality	30%	20202021	35%	37%	40%
Department: 02 Legal, Inspection and Compliance					
Budget Output: 03 Compliance with AML and CFT laws and Regulations					
Percentage of accountable persons issued with certificates of registration			65%	68%	70%
Number of inspection reports from regulatory bodies reviewed			3	3	3
Number of sanctions applied and disaggregated by Accountable Persons			1	1	1
Budget Output: 04 Legal Representation and Litigation					
Percentage of cases concluded and forwarded for prosecution			100%	100%	100%
Department: 05 International Relations and Strategic Analysis					
Budget Output: 05 Coordination of the implementation of AML/CFT NRA and MER recommendations					
Number of AML/CFT Awareness campaigns conducted by region			5	5	5
Proportion of Accountable persons and supervisory bodies trained on AML/CFT			60%	65%	70%
Number of recommendations from AML/CFT coordination forum implemented			16	18	20
Budget Output: 06 Financial Intelligence Research and Strategic Development					
Number of studies on ML/TF trends and methods concluded with disaggregated data			2	2	2
Proportion of recommendations from MER and NRA			16	18	20
Department: 07 Operational Analysis					
Budget Output: 01 Analysis and Reporting Financial Operations in the different Sectors					
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%	10%	10%
Number of due diligence requests on companies handled classified from each requesting MDA			10	10	10
Department: 08 AML Systems and ICT Management					
Budget Output: 02 Ensure safety and integrity of FIA information					
Number of reporting entities using goAML system disaggregated by Accountable persons			35	40	45
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

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

Vote:129 Financial Intelligence Authority (FIA)

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 DNFBPs.
 - 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

- i. The Authority will continue implementing a phased recruitment of staff and ensure that they are well trained and acquire professional accreditation. The number of staff in the Authority currently stands at 62.5% of the approved positions which affects implementation of activities.
- ii. Conduct public awareness across the country to increase understanding of AML/CFT matters.
- iii. Roll out of goAML electronic reporting system to more accountable persons, including DNFBPs to ease reporting.
- iv. Enhance awareness of accountable persons to file STRs and streamline the dissemination of information to competent authorities.
- v. Undertake 2 sector-specific ML/TF risk assessments to identify vulnerabilities with a view to support strategic analysis and inform policy.
- vi. Enhance capacity building of accountable persons, especially DNFBPs to detect and report suspected ML/TF activities.
- vii. Review the National AML/CFT Policy, the AML Act, 2013 and accompanying regulations to ensure that they meet international standards and emerging ML/TF challenges.
- viii. Support the Ministry of Lands, Housing and Urban Development to establish a framework for the AML/CFT regulation of the sector.
- ix. Strengthen domestic coordination among the key AML/CFT stakeholders to fast track the implementation of the FATF-ICRG Action Plan in order to get the country out of the grey-list.
- x. Improve on efficiency of IT systems to support analysis function and boost efficiency of the Authority.

XI Off Budget Support

Table 11.1 Off-Budget Support by Department and Project

N/A

XII. Vote Cross Cutting Policy And Other Budgetary Issues

Table 12.1: Cross- Cutting Policy Issues

Vote:129 Financial Intelligence Authority (FIA)

Issue Type: HIV/AIDS

Objective :	To provide support to staff living with HIV/AIDS to increase their productivity
Issue of Concern :	Roll out of the approved Authority's HIV/AIDS policy in providing support to staff living with HIV/AIDS to increase their productivity
Planned Interventions :	Roll out of the approved Authority's HIV/AIDS policy
Budget Allocation (Billion) :	0.100
Performance Indicators:	No. of staff counseled No. of HIV/AIDS awareness sessions conducted

Issue Type: Gender

Objective :	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.
Issue of Concern :	Gender and equity concerns are effectively mainstreamed in its operations to ensure services are provided fairly to all staff and members of the public including those with various disabilities
Planned Interventions :	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
Budget Allocation (Billion) :	0.100
Performance Indicators:	No of facilities provided No of staff counseled

Issue Type: Environment

Objective :	Mainstream environmental concerns in the operations of the Authority to ensure that clean environment is promoted and maintained
Issue of Concern :	Mainstream environmental concerns in the operations of the Authority to ensure eco-friendly environment.
Planned Interventions :	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
Budget Allocation (Billion) :	0.100
Performance Indicators:	No. of reams of paper used in comparison to previous years 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
Executive Director	FIA1	1	1
Deputy Executive Director	FIA2	1	1
Director Systems Administration and Security	FIA3	1	1
Manager Accounts	FIA4	1	1
Manager Human Resource	FIA4	1	1
Manager Legal	FIA4	1	1

Vote:129 Financial Intelligence Authority (FIA)

Manger Compliance and Inspection	FIA4	1	1
HR OFFICER	FIA6	1	1
RECORDS OFFICER	FIA6	1	0
OFFICER (ED S PERSONAL ASSISTANT)	FIA6	1	0
PROCUREMENT OFFICER	FIA6	1	1
DIRECTOR AUDIT	FIA 3	1	0
Director Legal ,Inspection and Compliance	FIA 3	2	1
DIRECTORE FINANCE AND ADMINISTARTION	FIA 3	1	0
MANAGER SYSTEMS /SECURITY	FIA 4	1	0
STORES ASSISTANT	FIA 9	1	0
Director systems administration and security	FIA3	1	1
Manager Audit	FIA4	1	1
Manager International Relations and Strategic Analysis	FIA4	1	1
Senior Auditor	FIA5	1	0
Senior Compliance and Inspection officer	FIA5	1	1
Senior Legal Officer	FIA5	1	0
Senior Systems Officer	FIA5	1	1
Senior Operations Officer	FIA5	1	1
Operational Analysis Officer	FIA6	4	4
Accountant	FIA6	1	0
Compliance Officer	FIA6	4	4
Data Base administrative officer	FIA6	1	1
Information Security Officer	FIA6	1	1
Law Clerk	FIA7	1	1
Driver	FIA8	4	4
Receptionist	FIA8	1	1
Office General Assistant	FIA9	1	1

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 FY2021/22	Gross Salary Per Month (UGX)	Total Annual Salary (UGX)
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

Vote:129 Financial Intelligence Authority (FIA)

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
DIRECTOR AUDIT	FIA 3	1	0	1	1	16,000,000	192,000,000
Director Legal ,Inspection and Compliance	FIA 3	2	1	1	1	16,000,000	192,000,000
DIRECTORE FINANCE AND ADMINISTARTION	FIA 3	1	0	1	1	16,000,000	192,000,000
MANAGER SYSTEMS /SECURITY	FIA 4	1	0	1	1	13,000,000	156,000,000
OFFICER (ED S PERSONAL ASSISTANT)	FIA6	1	0	1	1	5,000,000	60,000,000
Total		11	1	10	10	99,800,000	1,197,600,000

Table 14.1 NTR Forecast