



UGANDA REGISTRATION
SERVICES BUREAU

ANTI – CORRUPTION STRATEGY

JULY 2020 – JUNE 2025



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Bemanya Twebaze **REGISTRAR GENERAL**

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At Uganda Registration Services Bureau (URSB), we uphold all the laws relevant to combatting corruption and the vice is punishable either legally or administratively using the existing disciplinary framework.

FOREWORD

One of the biggest problems affecting economic growth in Uganda today is widespread corruption, as it undermines the quality of services that are delivered to the citizens. Resources for providing essential public goods and services end up being misappropriated or stolen, to the advantage of a few individuals.

Nevertheless, under the effective leadership of His Excellency President Yoweri Kaguta Museveni, Uganda has put in place a strong policy, legal, and institutional framework to fight this vice.

At Uganda Registration Services Bureau (URSB), we uphold all the laws relevant to combatting corruption and the vice is punishable either legally or administratively using the existing disciplinary framework. The Bureau also espouses transparency, integrity and accountability as part of its core values and strives to ensure that employees safeguard these values at all times, and in all circumstances.

Before 2012, URSB was marred with allegations of corruption. Over time, URSB has taken positive steps to eliminate all manifestations of potential, actual and perceived corruption within the Institution by putting in place systems to prevent, detect and punish acts of corruption. Although the Bureau has never had a handbook on corruption, there is zero tolerance towards corruption.

The Bureau's leadership, management and staff have all played, and continue to play a critical role in restoring public confidence in URSB as a Government Institution. I sincerely thank the political leadership of the Ministry of Justice and Constitutional Affairs,

the Board of Directors, management and staff of the Bureau, for their firm commitment to the fight against corruption.

This anticorruption strategy has been compiled based on the existing zero tolerance to corruption approach of the Bureau and all Directorates and Units have been an integral part of its formulation.

The objective of this strategy is threefold. The strategy is intended to:

- i. Provide information and guidance to all staff on corruption issues;
- ii. Strengthen and sustain URSB's achievements in the fight against corruption; and
- iii. Set out the responsibilities of key players in the fight against corruption.

Compliance with this strategy is mandatory for all internal clients (employees at all levels and locations) as well as external clients (including contractors, service providers and partners) of the Bureau.

A hotline 0414 673200 has been created for protected disclosure of information that relates to irregular, illegal or corrupt practices and I encourage clients both internal and external to use it to report all forms of corruption.

Together, we can eliminate all forms of corruption.



Bemanya Twebaze
REGISTRAR GENERAL

LIST OF ACRONYMS

CCTV	Closed Circuit Television
HR	Human Resources
ICT	Information Communication Technology
IEC	Information, Education and Communication
IG	Inspectorate of Government
IGG	Inspector General of Government
ISO	International Organization for Standardization
JLOS	Justice, Law and Order Sector
M&E	Monitoring and Evaluation
NIRA	National Identification and Registration Authority
NSSF	National Social Security Fund
OAG	Office of the Auditor General
ODPP	Office of the Director of Public Prosecutions
PAC	Public Accounts Committee
PPDA	Public Procurement and Disposal of Public Assets
PR	Public Relations
SACCO	Savings and Credit Cooperative Organization
SOP	Standard Operating Procedures
UPF	Uganda Police Force
URA	Uganda Revenue Authority



CHAPTER ONE

Introduction

Uganda Registration Services Bureau (URSB) is a semi-autonomous statutory body established under Chapter 210 Laws of Uganda. The Bureau is responsible for the following functions:-

- Business Registration which includes registration of companies, business names, partnerships, documents and debentures;
- Civil Registration namely registration of all marriages celebrated in Uganda, licensing churches to conduct marriages, solemnizing civil marriages and issuing letters of one's marital status;
- Intellectual Property Registration which includes registration of patents, utility models, industrial designs, trademarks, copyright and neighboring rights;
- Maintaining the Security Interest in Movable Property Register;
- Handling insolvency matters which include bankruptcy, winding up of companies and corporate rescue mechanisms.

URSB was established by Chapter 210 Laws of Uganda in 1998. The Bureau was created to take over the functions of the Registrar General's Office under the Ministry of Justice and Constitutional Affairs. The Act came into force on the 16th of August, 2004 and the self-accounting status was granted in July, 2010. The Bureau is governed by the Board of Directors and the Chief Executive Officer is the Registrar General.

URSB is a member of the Justice Law and Order Sector. In 2012, JLOS designed an Anticorruption Strategy for staff and systems under JLOS, in order to make a significant impact on reducing corruption in the sector institutions as well as building and strengthening the quality of accountability in Uganda as a whole. The Strategy contributes to Uganda's Zero Tolerance to Corruption Policy, 2018, as well as efficient and effective service delivery. The vision of the Strategy is "a corruption free society, the rule of law and respect for human rights."

However, for effective buy-in, ownership and compliance at Institutional level, JLOS deemed it prudent that each member institution customizes the existing sectoral strategy to develop their own institutional Anticorruption programs. To that effect, URSB's Anticorruption Strategy is a framework customized from the JLOS Anticorruption Strategy to promote and strengthen the fight against corruption at URSB.

The National Planning Authority (Development Plans) Regulations, 2018 define cross-cutting issues to mean issues that require action from more than one sector. These are issues that can contribute to accelerating or derailing the progress of development across many sectors. The cross-cutting issues identified by the Regulations include accountability and anti-corruption.



1.1 Corruption defined

Corruption has many definitions and comes in many facets.

The Anticorruption Act (2009) defines corruption in terms of its manifestations to include “the solicitation or acceptance, directly or indirectly, by a public official, of any goods of monetary value, or any other form of gratification for him or herself or for another person or entity in exchange for any act or omission in the performance of his or her public functions...”¹

The World Bank defines corruption as “the abuse of public office for private gain”.² The UN Convention Against Corruption, and the African Union Convention on Prevention and Combatting Corruption broaden the scope of corruption to include the public and private sectors.

Corruption can therefore be understood as the misuse of entrusted power for private gain. It affects everyone whose life, livelihood or happiness depends on the integrity of people in a position of authority, threatens the stability and security of societies, and undermines democratic institutions and values.

1.2 Forms of corruption as manifested in JLOS’ Anticorruption Strategy

Corruption in the sector is manifested in the following forms:

1.2.1 Conflict of interest

Conflicts of interest arise from situations in which a member of staff has a private interest that could potentially influence, or appear to influence, the impartial and objective

performance of his or her official duties. Private interests include any advantage to oneself or one’s family, close relatives, friends and persons or organizations with which one has or has had business or political relations. When faced with a potential or actual conflict of interest, staff are required to promptly inform their superiors.

1.2.2 Bribery

Bribery is the act of offering, giving, receiving, soliciting or accepting something of value with the purpose of influencing the action of an official in the performance of his or her public or legal duties. It can also involve kickbacks intended to facilitate particular transactions. Bribery is a criminal offence in Uganda.

1.2.3 Extortion

Extortion occurs when a public official unlawfully demands or receives money or property through intimidation, in exchange for a favorable action, decision or opportunity. Extortion may include threats of harm to a person or his/her property, threats to accuse him/her of a crime/illegal act, or threats to reveal embarrassing information. Some forms of threat are occasionally singled out for separate statutory treatment under the designation “blackmail.” Extortion is a criminal offence in Uganda.

1.2.4 Fraud

Fraud is the use of deception with the intention of obtaining an advantage (financial or otherwise), avoiding an obligation or causing loss to others. This involves being deliberately dishonest, misleading, engaging in deceitful behavior, practicing trickery or acting under false pretenses. Fraud is a criminal offence in Uganda.

¹ Section 3. The Anticorruption Act (2009)

² The World Bank (1997) Helping Countries Combat Corruption: The Role of the World Bank (Washington, DC: World Bank Group). P.8

1.2.5 Embezzlement

Embezzlement is the theft, misappropriation or other diversion of property or funds legally entrusted to someone by virtue of his or her position. Embezzlement is a criminal offence in Uganda.

1.2.6 Gifts

In the context of corruption, a gift is a financial or other benefit, offered, given, solicited or received in the expectation of receiving a benefit in return. Gifts and hospitality may be in themselves a manifestation of corrupt behavior. They may be used to facilitate corruption, or may give the appearance of corruption. Gifts may include cash or assets given as presents, and political or charitable donations. Hospitality may include meals, hotels, flights, entertainment or sporting events.

1.2.7 Nepotism and favoritism

Nepotism is favoritism shown to ethnic groups, relatives or friends without regard to merit. There is no neutrality on the part of the public official exercising authority. Relatives or friends are treated favorably based on the close personal relationship alone rather than on a professional and objective assessment of their skills and qualifications.

1.2.8 Abuse of power

This involves a public servant using his/her vested authority to improperly benefit another public servant, person or entity (or using the vested authority to improperly discriminate against another public servant, person or entity).

1.2.9 Influence peddling

The illegal practice of using one's influence or lobbying in government or connections with persons in authority to obtain favors or preferential treatment for another, usually in return for payment.

1.2.10 Political patronage

Political interference by way of threats, intimidation, and manipulation of political office. This also manifests in form of manipulation in lieu of favors such as salaries, tax waivers and appointments to key positions.

1.2.11 Misuse of funds

Applying funds to other use other than the formally allocated purpose.



1.2.12 Bureaucratic corruption

Unofficial payments to public officials to 'get things done' in a faster manner and overcome the slow and protracted multiple steps in place.

1.2.13 Insider trading/ Abuse of privileged information

Involves the use of privileged information and knowledge that a public officer possesses as a result of his/her position in office to provide unfair advantage to another person or entity to obtain a benefit, or accrue a benefit to himself/herself.

1.3 Potential drivers of corruption

Corruption is an obstacle to economic growth as it undermines effective service delivery. The URSB Strategy identifies the following risk factors which if not examined, could enable corruption to emanate and thrive or flourish:

1. Public perception where uninformed members of the public form a biased opinion that all public offices and officials are exposed to corruption;
2. Ignorance of the public about the laws which the Bureau implements, their rights and responsibilities;
3. Withholding of vital information which the members of the public are entitled to access, for example information on fees payable and procedures for the services offered;
4. Complicated, bureaucratic and lengthy processes and procedures that frustrate stakeholders who may resort to faster options like bribery or use of intermediaries (middlemen) to achieve end results;
5. Willingness of clients to offer bribes even where they are not demanded, and this provides the excuse for people to engage in acts of corruption;
6. Moral degeneration and greed (desire to get rich fast) increase corruption prospects;
7. Economic and social pressures: Low and/or or delayed staff remuneration, salary disparities amongst officials performing the same duties and poor personal financial management lures employees to devise unethical means of survival;
8. Weak internal controls (for example deficiency in regular checks, record keeping and tracking, and segregation of duties) and poor risk management are a bedrock for violating with laws, policies and established procedures;
9. Too many discretionary powers some of which are provided for under the legal frameworks, may sometimes be abused to delay or deny clients a service;
10. Retention of unnecessary manual processes which delay service delivery by encouraging unnecessary human interaction and intervention while causing desperate clients to seek improper shortcuts to achieve their desired result;
11. Lack of clear rules on morally accepted behavior coupled with the absence of, or ineffective punitive consequences for corrupt behavior;
12. Provision of sanctions notwithstanding, failure to hold corrupt practitioners accountable for their actions, and a laissez faire attitude towards corruption amongst individual leaders and followers;

13. Interference from persons exercising authority and power exerts undue pressure for people to engage in acts of corruption;
14. Job insecurity caused by conditions of service for example short term employment contracts;
15. Recruitment of unethical employees or absence of a moral criteria for recruiting employees;
16. Violation of established HR policies for example refusal of staff to take their leave when due, and retention of staff at a work station for longer periods than others;
17. Weak or uncommitted leadership which may result in failure to address the vice;
18. Limited organizational capacity to detect and combat sophisticated or well organized acts of corruption;
19. Limitation on the freedom of expression, which may cause some people to remain quiet as opposed to exposing corrupt tendencies;
20. General lack of education on the negative effects of the vice may also undermine the efforts to fight corruption.

The above notwithstanding, URSB has taken all steps to ensure zero tolerance to corruption, which has greatly improved service delivery and increased public trust and confidence in URSB as a Government Institution.

1.4 Situational analysis

Before 2012, URSB was marred with allegations of corruption. Increasingly, URSB has taken positive steps to eliminate all manifestations of potential, actual and perceived corruption within the Institution. The Bureau's leadership

and management have played, and continue to play a critical role in restoring public confidence by reinforcing anticorruption interventions.

Over time, different policies and systems have been put in place as effective tools to curb corruption and worthy to note are the following measures which have helped URSB in the fight against corruption:-

1. Continuous modeling of employees through training and mentorship on behavioral change, through their incorruptible leaders with integrity;
2. Full automation of work processes prone to corruption so as to improve efficiencies and reduce opportunities for corruption brought about by unnecessary human interaction;
3. Integration of some payment systems between Uganda Revenue Authority (URA) and URSB reduced the risk of revenue leakages caused by issuance of fake payment receipts and underpayment of service fees;
4. Roll out of online registration systems to allow clients enter verifiable data directly onto the Bureau's web based systems, thereby improving turnaround time and transparency while controlling bribery;
5. Installation and maintenance of client queue management systems for all services, as a best practice of addressing the bottleneck of prioritizing particular clients over others;
6. Proper identification of all staff by wearing of employment identity cards and uniforms on selected days and events;
7. Periodic review and wide publicity of the client charter, and maintenance of an interactive website to provide information to the public, thereby combating corruption driven by absence of essential information on the Bureau's fees and services offered;



8. Use of suggestion boxes and other client feedback mechanisms like a toll free line, WhatsApp number, website and call center for monitoring of established service delivery standards;
9. Strengthened the internal audit, and compliance and enforcement functions to play an oversight role in combatting corruption by ensuring that established laws, policies and procedure are adhered to, and that public resources are properly utilized;
10. Put in place a Human Resource Policy which is complemented by strong Human Resources (HR) practices like regular staff rotation, mandatory taking of leave by all employees and disciplinary action against errant employees;
11. Addressed the temptation to engage in acts of corruption by salary revision and motivating staff through incentives like provision of medical insurance, lunch and housing allowance for all employees;
12. Established the URSB Savings and Credit Cooperative Organization (SACCO) to provide cheaper credit to staff while giving them the opportunity to save for the future;
13. Phasing out of closed office cubicles and introduction of open office layouts for effective supervision of staff and client interactions;
14. Installation of Closed Circuit Television (CCTV) cameras on premises occupied by URSB to enhance transparency;
15. Simplification of processes (e.g. lean company formation documents and assessment of fees by banking officers, on the Bureau's premises) to eliminate the role of intermediaries or middlemen who often misinform clients about the fees charged by the Bureau;
16. Developing of Standard Operating Procedures (SOP) for key business processes, aimed at fostering a culture of compliance and reduce corruption risks by checking of discretionary powers of employees. In August 2018, URSB begun on the journey of getting certification for ISO 9001-2015 as a demonstration of its commitment to provide quality services to its clients;
17. Decentralization of URSB services to improve service delivery while reducing the transactional costs incurred by clients in accessing services from only one center in Kampala, which could force the clients to take shortcuts;
18. Continuous public education and awareness raising in multiple languages, on all services offered by the Bureau through Information, Education and Communication (IEC) materials, mobile registration clinics, workshops, training seminars, user groups meetings and print, broadcast and social media;
19. Access controls for all Information Technology (IT) systems where one user cannot finish a task from start to end in order to protect the information in the systems;
20. Rewards to, and recognition of employees for good behavior to encourage others to emulate them;
21. Elimination of bribery through publication of all registration procedures and fees payable, to reduce exploitation of clients by unscrupulous persons;
22. Establishment of a One Stop Shop (Uganda Government Business Facilitation Centre) at URSB with key Government Agencies like Uganda Revenue Authority, Kampala Capital City Authority, National Social Security Fund, Uganda Printing and Publishing Corporation and Posta Uganda, has significantly reduced costs, time and bureaucracies entailed in establishing a business.



CHAPTER TWO

Introduction

A number of Policies, Laws and Regulations have been put in place to mitigate corruption risks in Uganda. Uganda has also ratified and/or signed a number of International Treaties and Regional Commitments.

2.1 International and Regional Treaties and Obligations

These include;

- a) **United Nations Convention against Corruption, 2003:** The Convention's commitments promote and strengthen measures to prevent and punish acts of corruption. This Convention also addresses the cross border nature of corruption with its provisions facilitating international cooperation in returning the proceeds of corruption.
- b) **United Nations Convention against Transnational Organized Crime, 2000 (The Palermo Convention):** This Convention aims at fighting organized crime across borders and applies to the prevention, investigation and prosecution of established transnational offences including corruption.
- c) **African Union Convention on Preventing and Combating Corruption, 2003:** The Convention tackles prevention, criminalization, international cooperation, eradication and asset recovery for corruption related offences in the public and private sectors. It also establishes the necessary conditions to foster transparency and accountability in the management of public affairs.

2.2 National Policies and Legal Framework

The National laws and policy include:

- a. **The Constitution of the Republic of Uganda (1995):** The Constitution of the Republic of Uganda provides the foundational bedrock for the policy and legal framework for accountability and anticorruption. Under the National Objectives and Direct Principles of State Policy, the State and citizens of Uganda are obligated to "preserve and protect and promote a culture of preserving public property" (objective xxv) and that "all measures should be taken to eradicate corruption and abuse of office and misuse of power by those in public office." Article 3 (4) of the Constitution further requires all citizens at all times to defend the Constitution, and therein, Article 17(1)(i) makes it a duty of every citizen of Uganda to combat corruption and misuse or wastage of public property.
- b. **Zero Tolerance to Corruption Policy, 2018:** The Zero Tolerance to Corruption Policy is a framework that aims at firmly renewing Government's commitment to fighting corruption by strengthening synergies, collaboration and coordination amongst all stakeholders for effective

implementation of anticorruption measures, and inculcating a culture of Integrity, Accountability and Patriotism at all levels.

- c. **The Anti-Corruption Act, 2009:** This Act was enacted to provide for the effective prevention of corruption in both the public and the private sector.
- d. **The Whistleblowers Protection Act, 2010:** The Whistleblowers Protection Act 2010 provides for the procedures by which individuals in both the private and public sector may in public interest disclose information that relates to irregular, illegal or corrupt practices. The Act also provides for protection against victimization of persons who make disclosures.
- e. **The Inspectorate of Government Act, 2002:** The Act establishes the office and functions of the Inspectorate of Government with a mandate to eliminate corruption, abuse of authority and of public office and to supervise the enforcement of the Leadership Code of Conduct. Under Section 8 (1) of the Act, it empowers the Inspectorate of Government to investigate actions that a person may have done while serving in a public office even when the person has ceased to hold that office.
- f. **The Leadership Code Act, 2002;** This Act provides for a minimum standard of behavior and conduct for leaders; to require leaders to declare their incomes, assets and liabilities; to put in place an effective enforcement mechanism and to provide for other related matters.

The law provides corruption preventive mechanisms through disclosure of assets, and this also facilitates asset tracking and recovery of those found culpable of acts of corruption.

- g. **The Access to Information Act, 2005:** This Act provides for the right of access to information pursuant to Article 41 of the Constitution. It prescribes the classes of information referred to in that Article and the procedure for obtaining access to that information.
- h. **The Public Finance Management Act, 2015:** The Act is a wide comprehensive legislation for management of public funds. It provides for the prudential management and application of public funds, establishes mechanisms and outlines roles of key duty bearers in public finance management. The Act for instance provides for establishment of office of the Internal Auditor General, and the roles of Accounting Officers, among others.
- i. **The Public Procurement and Disposal of Public Assets Act (PPDA), 2003 (as amended):** The Act establishes the PPDA Authority that is responsible for setting standards and regulate all public procurement and disposal of public assets activities by public entities. The importance of the PPDA is very central because most of the Government funds are spent on procurement of goods and services. Therefore, having in place a corruption free system of procurement and disposal of public assets is key to fighting corruption.



2.3 Institutional framework

Overall, the mandate of enforcement of the above highlighted laws and many others not explicitly described here, is vested in various anticorruption and accountability institutions such as:

(i) The Directorate of Ethics and Integrity – Office of the President

The Directorate of Ethics and Integrity (DEI) provides policy and strategic leadership to the Government's effort in the fight against corruption. The Directorate was established as the policy arm of Government to guide and coordinate government interventions and Government Agencies involved in the fight against corruption with an additional role of rebuilding ethics and integrity in the Ugandan society. DEI also oversees the implementation of Uganda's Zero Tolerance to Corruption Policy, 2018.

(ii) The Inspectorate of Government

The Inspectorate of Government (IG) is an independent institution charged with the responsibility of eliminating corruption, abuse of authority, and of a public office. The IG derives its mandate from the Constitution of the Republic of Uganda, the Inspectorate of Government Act, and the Leadership Code Act. Its powers include the power to investigate or cause investigation, arrest or cause arrest, prosecute or cause prosecution, make orders and give directions during investigations; as well as access and search of premises or property or search a person or bank account or safe deposit box.

(iii) The Office of the Auditor General

The Office of the Auditor General (OAG) plays a central role in the fight against corruption by providing other anticorruption agencies with audit information. The main function of the Auditor General is to audit and report on the public accounts of all public offices or bodies and/or organizations established by an Act of Parliament. The OAG also conducts financial and value for money audits in respect to any project involving public funds.

(iv) The Public Procurement and Disposal of Public Assets Authority

The Public Procurement and Disposal of Public Assets Authority (PPDA) is mandated to set standards and regulate all public procurement and disposal of public assets activities by public entities. The realization of this is key in achieving value for money in public procurement.

(v) The Anticorruption Division of the High Court

The Anticorruption Court Division of the High Court is under the Uganda Judiciary. It is a specialized court that was established in 2008 by an administrative instrument to handle only cases of corruption. It plays a critical role in expediting the adjudication of corruption cases that are prosecuted by the Director of Public Prosecutions (ODPP), the IGG, and URA.

(vi) Leadership Code Tribunal

The Leadership Code Tribunal handles matters which arise under the Leadership Code. It is mandated to receive, examine and adjudicate any breach of the Leadership Code that is referred to it by the Inspectorate of Government.

(vii) The Uganda Police Force (UPF)

The UPF is the national police force of Uganda that is primarily mandated to enforce law and order, ensure public safety and observance of human rights. The Police has in place the Criminal Investigations Directorate that is responsible for detection, prevention and investigation of crime including corruption in both public and private spheres. The Directorate has a specialized department called the 'Anticorruption Division' that focuses on the prevention, detection and investigation of corruption and fraud.

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

The ODPP is mandated by the Uganda Constitution under Article 120 to conduct prosecutions against any person or authority in any court other than a court martial, and direct the Uganda Police Force in investigations. The ODPP has a specialized Department of Anticorruption that has given greater attention to the investigation and prosecution of corruption related crimes.

(ix) The Anti-Corruption Unit – State House Uganda

The Anti-Corruption Unit is a specialized office under State House Uganda, whose function is to receive corruption information from Ugandan citizens over a secure and confidential online platform.



CHAPTER THREE

Introduction

This chapter highlights the objectives, critical interventions and offers guidance on the coordination and implementation of the interventions aimed at fighting corruption in URSB. The interventions demonstrate URSB's commitment to eliminate all forms of corruption.

To strengthen transparency and accountability, the third National Development Plan (2020/21 – 2024/25) requires all Ministries, Departments and Agencies to Mainstream Anti-Corruption initiatives in their Plans, Projects and Programs.

The Strategy has been anchored on the National Zero Tolerance to Corruption Policy of 2018, and the JLOS Anticorruption Strategy's vision of **ZERO TOLERANCE TO CORRUPTION to enhance good governance**.

The strategic framework put in place consolidates past achievements and seeks to maximize greater collaboration toward the realization of the zero tolerance for corruption policy of Government.

3.1 Goal and objectives

The Bureau's vision as defined in the Strategic Development Plan is to create a center of excellence for reliable registration services. Its mission is to provide seamless and reliable registration services.

The Bureau's accountability and transparency framework as enshrined in the core values is intended to ensure proper observance of the existing policies, rules and regulations.

This Strategy provides specific actions which will assist the Bureau to achieve its vision, mission and objectives.

URSB's anticorruption strategy intends to;

- i. Provide information and guidance to all URSB employees on corruption issues;
- ii. Strengthen and sustain URSB's achievements in the fight against corruption; and
- iii. Set out the responsibilities of key players in the fight against corruption and consolidate URSB's gains from the fight against corruption is premised on three critical pillars under the JLOS Anticorruption Strategic framework namely:
 - i. Prevention,
 - ii. Detection, and
 - iii. Punishment.



Operational and institutional reforms are focused on strengthening the anticorruption enforcement chain (prevention, detection/ investigation, and punishment/prosecution).

The successful implementation of URSB's anticorruption strategy will be guided by the following principles as derived from Uganda's Zero Tolerance to Corruption Policy, 2018:

1. **Leadership:** There must be committed leadership at all levels, right from the top leadership to the lowest level, to ensure the anticorruption aspirations are realized.
2. **Systematic approach;** The fight against corruption should be based on deliberate and effective anticorruption measures, established systems, procedures and processes.
3. **Inter-Agency collaboration and strategic partnerships:** URSB will work with strategic partners and strengthen alliances with committed anticorruption stakeholders to build a corruption free institution.
4. **Equity and fairness:** All URSB staff must be treated justly and fairly in the implementation of this strategy.
5. **Collective responsibility:** It is the duty and responsibility of all staff to fight corruption and abuse of authority. The participation of the public and all stakeholders is important.
6. **Transparency and accountability:** Information sharing, openness and access to information are fundamental in efforts and activities that seek to fulfill and enhance transparency and accountability. It is important that information which enables stakeholders to fully participate and fulfill their roles in the fight against corruption is disclosed.

This strategy recognizes the important roles different stakeholders have to play in order to achieve transparency and accountability in the delivery of URSB services.

7. **Capacity building:** All aspects of the strategy must be supported with comprehensive education, training and awareness creation to ensure that URSB is better prepared, adequately equipped and well positioned to drive and sustain the anticorruption fight.

3.2 Strategic Objectives, Interventions and Indicators

Strategic Objective 1: Put in place a framework for the prevention of corruption

This objective seeks to identify and design mitigating strategies to prevent the occurrence of acts of corruption.

Strategic Interventions:

1. Constitute an Ethics and Integrity Committee to spearhead the efficient and effective delivery of the Strategy;
2. Appoint integrity focal persons to champion the ethics and integrity drive in their respective Directorates and Units;
3. Regular staff trainings on forms of corruption and the effect of corruption on organisational image;
4. Obtain the International Organization for Standardization (ISO) 9001-2015 certification for a quality management system that is client oriented. The standardization of key processes through Standard Operating procedures will provide uniformity across board;

5. Improve budgetary allocation across board to improve service delivery;
6. Improve on supervision and strict compliance to anticorruption policies, laws and regulations in place;
7. Establish a toll free hotline where clients (internal and external) can report errant behavior;
8. Develop a code of conduct for acceptable behavior, to be signed by, and to bind all staff;
9. Automate key manual processes to limit unnecessary human intervention;
10. Establish a central document management system for recording and tracking information and strengthening transparency;
11. Improve public awareness through sensitization of clients on their rights and obligations;
12. Develop a comprehensive communication strategy and update the client service charter;
13. Develop and roll out an e-learning course on integrity for all staff;
14. Regular staff surveys to determine the ethical climate of URSB;
15. Periodic and comprehensive review of the HR manual and employee benefits, for motivation and satisfaction of staff;

Critical factors

- i. Cooperation of URSB staff
- ii. Goodwill from the public

iii. Goodwill and ownership from the Board and Top Management

iv. Increased budgetary support for anticorruption initiatives

Strategic Objective 2: Put in place mechanisms to detect corruption

This objective will establish and/or strengthen key arrangements within URSB to ensure that cases of corruption are detected, reported and investigated.

Strategic Interventions:

1. Improve staff capacity to detect and deter the various forms of corruption;
2. Establish and strengthen the public complaints systems;
3. Strengthen risk management through periodic audits on the existing controls;
4. Strengthen compliance reviews and checks to ensure observance of the anticorruption laws, policies and procedures in place;
5. Formulate a whistleblowers policy and establish a toll free whistleblowers' hotline;
6. Conduct lifestyle audits;

Critical factors

- i. Increased budgetary support for anticorruption initiatives
- ii. Stakeholder involvement and support
- iii. Cooperation of URSB staff



Strategic Objective 3: Put in place mechanisms for sanctions and punitive measures for those involved.

This objective is intended to ensure that those found guilty for engaging in acts of corruption are held responsible and accountable for their actions. In addressing the vice, the Bureau will establish mechanisms to ensure that those found culpable are punished.

Strategic Interventions:

1. Undertake relevant anticorruption trainings for staff;
2. Provide clear rules for remedial or disciplinary action against those involved in corruption, in the Bureau's HR manual;
3. Institute deterrent punishments for perpetrators of corruption;
4. Build a credible and secure exhibit handling center;
5. Constitute a permanent disciplinary committee and a corresponding appellate committee to investigate tendencies of corruption and impose sanctions for errant behavior;
6. Within the Bureau, name, shame and punish corrupt staff;
7. Build and strengthen partnerships with stakeholders and strategic institutions in the accountability sector;
8. Strengthen the internal audit, and compliance and enforcement functions to play an oversight role in combatting corruption by ensuring that established laws, policies and procedure are adhered to, and that public resources are properly utilized

Critical factors

- i. Active stakeholder participation
- ii. Adequate budgetary support for anticorruption initiatives

Classification of Sanctions

The following sanctions shall be administered depending on the class of offence. However, the Management of URSB reserves the right to modify sanctions depending on the severity of the offence, the circumstances under which the offence was committed and its impact on the Bureau and its employees.

Classification of Offence	1 st Occurrence	2 nd Occurrence	3 rd Occurrence
Minor Misconduct	Verbal Warning	Written Warning	Final written warning
Major Misconduct	Written Warning	Final written	Suspension or Termination
Gross Misconduct	Termination		

Practices constituting minor misconduct shall include, but are not limited to the following improper behavior:

- i. Unauthorized late coming to work;
- ii. Unauthorized absenteeism from work; and
- iii. Leaving work earlier than the scheduled time for closure, without authorization.

Major misconduct shall include, but not be limited to the following offences:

- i. Consistent non adherence to the Bureau's rules, procedures and policies on anticorruption;
- ii. 3 repeated violations that are minor misconducts in nature.

Gross misconduct is very serious in nature because it offends the existing Anti-Corruption laws, and shall include but not be limited to the following offences:

- i. A conviction in a Court of Law for any corruption related offence;
- ii. Theft of Bureau funds,
- iii. Fraud or embezzlement of the Bureau's funds;
- iv. Soliciting or accepting bribes in an official capacity for the purposes of carrying out a favor;
- v. Holding another remunerative employment prejudicial to effective performance of one's official duties without written permission of the Registrar as the case may be (moonlighting);
- vi. 2 repeated violations that are major misconducts in nature

The Bureau may report gross misconduct to the law enforcement agencies for further action.

The Bureau shall comply with the procedures in its Human Resource Policy Manual in investigating misconduct, determining misconduct, and administering the framework for sanctions.

It is envisaged that if all critical factors prevail, the different interventions will achieve the set objectives to propel URSB towards **ZERO TOLERANCE TO CORRUPTION**.



CHAPTER FOUR

Introduction

This chapter gives the indicators upon which performance will be assessed, and the structures through which the Strategy will be implemented and its outputs monitored.

4.1 Performance indicators

In the implementation of this Strategy, performance will be measured using the following indicators.

4.1.1 Strategic Objective 1

In putting in place a framework for the prevention of corruption, successful performance will be measured through the:

- i. Constitution of an Ethics and Integrity Committee to spearhead the efficient and effective delivery of the Strategy;
- ii. Appointment of integrity focal persons to champion the ethics and integrity drive in their respective Directorates and Units;
- iii. Number of key processes automated;
- iv. ISO 9001 -2015 certification of the Bureau;
- v. Number of corruption cases detected, reported, investigated and concluded;
- vi. Percentage of the population aware of URSB services after conducting a survey;
- vii. Formulation of a code of conduct
- viii. Number of staff policies reviewed and implemented
- ix. Number of anticorruption staff trainings held;
- x. Number of processes automated;
- xi. Establishment of a central document management system;
- xii. Development of a comprehensive communication strategy;
- xiii. Design and roll out of an e-learning course on integrity;



4.1.2 Strategic Objective 2

In putting in place mechanisms to detect corruption, successful performance will be measured through the:

- i. Number of cases reported against staff; number and nature of actions taken;
- ii. Number of staff tried in courts of law;
- iii. Establishment of a toll free whistleblowers' hotline;
- iv. Number of lifestyle audits conducted;
- v. Number of staff trained in detecting and deterring corruption;
- vi. Maintenance of an up to date risk register;
- vii. Number of compliance reviews and checks conducted;

4.1.3 Strategic Objective 3

In putting in place mechanisms for sanctions and punitive measures for those involved in corruption, successful performance will be measured through the:

- i. Number of trainings conducted;
- ii. Number and nature of actions taken against errant staff;
- iii. Number of staff tried in the disciplinary committees and courts;
- iv. Establishment of an exhibit handling center;
- v. Number of partnerships created with stakeholders and strategic institutions in the accountability sector;
- vi. Constitution of a permanent disciplinary committee and a corresponding appellate committee to investigate tendencies of corruption and impose sanctions for errant behavior.

4.2 Implementation

This Anti-Corruption Strategy will be implemented using the structures provided for in this Chapter.

4.2.1 URSB Board of Directors

The Board shall play a supervisory role over URSB's management in monitoring and evaluating their performance in realizing the objectives of this Strategy.

4.2.2 Registrar General

The Registrar General will mobilize resources, give strategic guidance and supervise management on the implementation of the Strategy.

4.2.3 Ethics and Integrity Committee

The oversight role for the efficient and effective implementation of the Strategy will be exercised by the Ethics and Integrity Committee.

The Committee will also provide guidance to the Registrar General on issues of ethics and integrity in URSB.

The Committee will recommend persons from each Directorate, Unit, Regional and Branch office who are fit and proper to become the ethics and integrity champion, and submit their names to the Registrar General, on a semiannual basis.

4.2.4 Directors and Heads of Units

Directors and Heads of Units will ensure the successful implementation of activities of the Strategy. They shall also model good behavior amongst the staff they supervise by being exemplary.

4.2.5 Ethics and Integrity Focal Persons

These focal persons will be drawn from representation from all Directorates, Units, Regional and Branch offices.

They will lead the anticorruption drive in their Directorates, Units, Regional and Branch office for a period of 6 months, with the primary role of educating their coworkers on the forms and the undesirable impact of any manifestation of corruption, on the Bureau's image.

They will be supervised by the Ethics and Integrity Committee, in the discharge of their roles.

4.2.6 Individual employee

It is the role of each employee to desist from corruption and report any person(s) involved or suspected to be involved in corrupt practices.

4.2.7 Monitoring and evaluation by the Compliance and Enforcement Unit

The Strategy's implementation will be continuously monitored and evaluated annually by the Compliance and Enforcement Unit, to establish progress made in its implementation.

Monitoring and Evaluation reports will be prepared and submitted to the Registrar General on an annual basis.

ACTION PLAN FOR THE IMPLEMENTATION OF THE URSB ANTI – CORRUPTION STRATEGY (JULY 2020 – JUNE 2025)

Introduction

This Anti-Corruption Strategy will be implemented using the structures provided for in Chapter 4 of the Strategy. The oversight role in the efficient and effective delivery of the Strategy will be exercised by the Ethics and Integrity Committee whereas the Compliance and Enforcement Unit will coordinate with other relevant actors in the implementation of the Strategy.

Below is the action plan for the implementation of the Strategy's 3 pillars of Prevention, Detection, and Punishment for corrupt activities.

Key Output	Activities	Inputs	Timeline	Indicator	Resp. person
Strategic Objective 1: Put in place a framework for the prevention of corruption This objective seeks to identify and design mitigating strategies to prevent the occurrence of acts of corruption.					
Transparent and accountable systems established	<ul style="list-style-type: none"> Set up an ethics and integrity committee to lead the anticorruption drive Appoint ethics and integrity focal persons 	Appointment of the: <ul style="list-style-type: none"> ethics and integrity committee members integrity focal persons from all Directorates and Units, to the committee 	Immediate	<ul style="list-style-type: none"> Proposed committee established Focal persons appointed 	RG
	Train Bureau staff on ethics, integrity, transparency and accountability	<ul style="list-style-type: none"> Funds Consultants to deliver the training 	Short term	Number of consolidated training and refresher sessions conducted	DHRA
	Establish and disseminate service standards for all Directorates and Units	Ongoing	Short term	URSB certified to ISO 9001	ISO Project Implementation Committee
	Implement participatory procurement processes to ensure the quality of service or product is not compromised	<ul style="list-style-type: none"> Human resources Funds 	Immediate	Value for money audit reports	Head Procurement
	Establish mechanisms for monitoring and evaluating (M&E) compliance to national, sectoral and institutional anticorruption policies, laws and regulations in place	Human resources	Short term	<ul style="list-style-type: none"> Functional M&E structures and systems in place M&E reports 	DPR
	Create a conducive environment and publicize the formal procedures for reporting corrupt activities	<ul style="list-style-type: none"> Funds for rewards Human resources 	Immediate	Establishment of a whistleblowers' hotline	C&E
	Develop a code of conduct for acceptable behavior and practice	<ul style="list-style-type: none"> Human resources 	Immediate	Code of conduct signed by all staff	DHRA

Key Output	Activities	Inputs	Timeline	Indicator	Resp. person
	Automate manual processes	<ul style="list-style-type: none"> Funds Human resources Contractors 	Short term	% of processes which have been automated	Directors/Heads of Units/DICT
	Establish a central document management system for tracking information and strengthening transparency	<ul style="list-style-type: none"> Funds Human resources Consultants 	Short term	<ul style="list-style-type: none"> % increase in number of searches Improved turnaround time Reduction in complaints about loss of documents 	Head, Records
Awareness and knowledge on corruption and its implications	Improve public awareness on the services provided by the Bureau through regular sensitizations	<ul style="list-style-type: none"> Funds M&E expert consultants 	Medium term and continuous	<ul style="list-style-type: none"> % increase in public confidence in URSB % increase in uptake of URSB services 	All Service Directors/Heads, Head PRCA, DPR
	Develop a comprehensive communication strategy for the Bureau	Human resources	Short term	Communication strategy in place and implemented	Head PRCA
	Update and enforce the client service charter	<ul style="list-style-type: none"> Human resources 	Immediate	Updated client service charter in place	Directors/Heads, Head PRCA
	Develop an e-learning course on integrity for all Bureau employees and seconded staff	Funds	Medium term	e-learning course rolled out	DHRA, DIA, C&E
	Regular staff surveys to determine staff perception towards corruption practices	Human resources	Short term	Number of surveys conducted	DPR
Prevention mechanisms implemented	Harmonize terms and conditions of service for all Bureau staff	Funds	Short term	Harmonized salary structure implemented	DHRA, DF, HLAS
	Develop and implement a reward system to promote exemplary performance of employees at all levels	<ul style="list-style-type: none"> Funds Human resources 	Immediate	Reward mechanism in place	DHRA, C&E

Key Output	Activities	Inputs	Timeline	Indicator	Resp. person
Strategic Objective 2: Put in place mechanisms to detect corruption This objective will establish and strengthen interventions within URSB to ensure that cases of corruption are detected, reported and investigated.					
URSB's capacity to detect and investigate corruption strengthened	Provide specialized investigative anticorruption training for relevant staff within URSB	<ul style="list-style-type: none"> Funds Human resources Consultants 	Short term	Increased capacity of relevant staff to detect and deter corruption	DHRA
	Establish and strengthen the public complaints systems (hotlines, online feedback mechanism, etc.)	<ul style="list-style-type: none"> Funds Human resources 	Short term	Functional reporting systems put in place	Head PRCA
	Strengthen Enterprise Risk Management	Human resources	Short term	Number of high risk corruption activities identified and mitigated	DIA, C&E
	Compliance reviews and checks on adherence to laws, policies and procedures	<ul style="list-style-type: none"> Funds Human resources 	Immediate	Decrease in noncompliance to laws, policies and procedures	C&E
	Develop a policy or guidelines for informers/complainants (whistleblowers)	Human resources	Immediate	Policy or guidelines in place	C&E
	Conduct lifestyle audits	Human resources	Medium term	Number of lifestyle audits conducted	DIA
Strategic Objective 3: Put in place mechanisms for sanctions and punitive measures for those involved. This objective will establish mechanisms to ensure that those found culpable are punished.					
Deterrent punishments for corrupt practices administered	Train the Bureau's investigators, and corruption oversight functions on effective investigation of corruption cases	<ul style="list-style-type: none"> Funds Trainers 	Short term	Improved capacity for investigators and oversight functions	DHRA
	Enforce stringent internal disciplinary measures against errant officers found culpable	Human resources	Immediate	HR Policy Manual revised	DHRA

Key Output	Activities	Inputs	Timeline	Indicator	Resp. person
	Build a credible and secure exhibit handling center	Funds	Short term	Storage facility put in place	DF, C&E
	Constitute a permanent disciplinary committee with a period of tenure	Appointment of members to the disciplinary committee	Immediate	<ul style="list-style-type: none"> Number of corruption cases concluded within a year Number of staff found culpable in a year 	RG
	Build and strengthen coordination and partnerships with strategic institutions in the accountability sector	Human resources	Short term	<ul style="list-style-type: none"> Enhanced cooperation with anticorruption stakeholders Functional MoUs with strategic institutions in the accountability sector 	DIA
	Strengthen the internal audit, and compliance and enforcement functions to regularly monitor the implementation of the activities of this Strategy, in accordance with the results obtained	Human resources	Immediate and continuous	Monitoring reports	DIA, C&E
<p>Timeline Key: For the purpose of effective implementation, monitoring and evaluation of this Strategy, the timelines indicated in the action plan are tied to the following time frames: Immediate: - within six months from the commencement of the Strategy Short Term: - between 1 and 3 years of the commencement of the Strategy Medium term: - within five years of the commencement of the Strategy</p>					

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. At the bottom of the page, there is a decorative watercolor wash in shades of light blue, teal, and yellow, creating a soft, artistic border. The overall appearance is clean and professional, suitable for writing or drawing.

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This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. At the bottom of the page, there is a decorative watercolor splash featuring soft blends of light blue, teal, and pale yellow, giving it a clean yet artistic appearance.



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