

VIRTUAL NATIONAL DIALOGUE AND REPORT LAUNCH

ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM
FINANCING (AML/CTF) LAWS: AN EXAMINATION OF THEIR
IMPACT ON CIVIC SPACE IN UGANDA.

29TH
JUNE | 2021

Co-funded by:



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ACRONYMS

AMLA	Anti Money Laundering Act
ATA	Anti-Terrorism Act
CTF	Countering Terrorism Financing
CSO	Civil Society Organisation
DPI	Defenders Protection Initiative
FATF	Financial Action Task Force
GLISS	Great Lakes Institute for Strategic Studies
NGO	Non-Governmental Organisation
NPO	Non-Profit Organisation
ODPP	Office of the Director of Public Prosecutions
UHRC	Uganda Human Rights Commission
UWONET	Uganda Women’s Network

INTRODUCTION & BACKGROUND

Since 2016, Defenders Protection Initiative has enhanced its focus towards mitigating the unintended consequences orchestrated by **Financial Action Task Force (FATF)** inspired laws/ regulations on the activities of legitimate charities in Uganda. During this period, DPI has been able to broaden her Anti- Money Laundering and Counter Terrorism Financing (AML/CTF) capacity building initiatives in 8 regions of Uganda, conducted research and strategic engagements by and for civil society actors as a pushback strategy against over-regulation.

DPI with the support from the support from the Civil Society in Uganda Support Programme (CUSP) which is implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH with financial support from the European Union and the German government, commissioned a study whose objective was to examine the impact of Uganda's anti-money laundering and counter terrorism legislation on civic space. In addition to this, the study also explored the extent to which FATF style regulations have impacted on the operations of civil society in Uganda.

In June of 2021, DPI held a Virtual National Dialogue and Report Launch of the study conducted between December 2020 and March 2021 titled: **Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Laws: An Examination of Their Impact on Civic Space in Uganda** on 29h June 2021 with support from Civil Society in Uganda Support Programme (CUSP), Deutsche Gesellscha für Internationale Zusammenarbeit (GIZ), European Union and the German government. The event provided an opportunity to share, reflect and disseminate the findings with over 100 participants across different sectors including advocates, civil society leaders, academia, media practitioners, researchers and the donor community.

Prior to the event, DPI showed participants a video clip providing a basic overview of FATF Recommendation 8 on NPOs as well as highlighting the likely effects on civic space in Uganda.

INTRODUCTION - THE MODERATOR

Ms Sheila Muwanga
 American Jewish World Service



Ms Sheila Muwanga from American Jewish World Service moderated the entire event. In her opening remarks, she pointed out that Money Laundering and Terrorism Financing is not a new issue in Uganda and being part of the global community, the country has had to respond to threats of terrorism citing the July 11th 2010 Kyandondo bombing. She added, Uganda has adopted global Laws and policies that have been developed to address AML/CTF, however, there are concerns around its content and implementation. She highlighted that DPI commissioned research on the impact of these laws onto the civil society and at the event, there is plan to examine, discuss and reflect on the findings of the research and finally launch the report.

PANELISTS:


SYDNEY ASUBO
Executive Director
Financial Intelligence Authority-FIA



STEPHEN OKELLO
Executive Director
National Bureau for NGOs



JOSEPHINE NAMATOVU
Head of the Anti-Corruption Dep
Office of the DPP



CECILIA NAMUDDU MUHWEZI
Head Compliance
Standard Chartered bank



DR. MOSES ISOOBA
Executive Director
Uganda National NGO Forum



YONA WANJALA
Executive Director
Defenders Protection Initiative


DEFENDERS
 PROTECTION INITIATIVE

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29TH
 JUNE, 2021
 10AM - 12PM

MEETING ID
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Mr. YONA WANJALA
Executive Director
Defenders Protection Initiative

Topic
 • Welcome Remarks
 • Unpacking the "No No Harm" Plan of Action that
 seeks to protect the civil society, around the civic
 space regulation of NPOs in Uganda and beyond.
 (Looking them to research findings)

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Ms. CECILIA NAMUDDU MUHWEZI
Head Compliance
Standard Chartered bank

Topic
 • Research findings opportunities for the banking
 sector to improve the civil society, around the civic
 space regulation of NPOs in Uganda and beyond.
 (Looking them to research findings)

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OPENING REMARKS

MR. YONA WANJALA
Executive Director - DPI



Mr Wanjala in his opening remarks welcomed all participants. He stressed that the event is an open space for civil society to get insights on issues connected to Money Laundering and Terrorism Financing as well as its impact on the civil society work in Uganda.

With regard to the issues of the civic space, the key objective of the concluded project ran with the support of GIZ was to promote dialogue and round table discussion between the regulators and the civil society actors on issues related to the implementation of AML/CTF law.

“We realised as an institution given our field engagements that little is known about AML/CTF Regulations, if it is known, then little is understood or described literally in line with the same”. DPI in collaboration with the technical team at FIA and Compliancy officers from different banks across the country capacitated the civil society sector by conducting robust trainings of the GIZ grantees in the 8 regions of Uganda. The beneficiaries appreciated the concept of AML/CTF and the need of civil society actors to join and complement the fight against it.

He also reminded of the findings in the field engagements that there is limited research in the area of the impact of AML/CTF in the sector and with the support of GIZ, DPI conducted an evidence-based research on the Impact of AML/CTF laws on the civil society in the country. The Lead Researcher Mr. James Nkuubi helped DPI to conduct this study inline with the laws.

Mr Wanjala pointed out that the FATF and its regulations have very good intentions, mean well for all of us in the world, but in one way or the other they have created a policy panic where all countries have to match up to the global standards in protecting the financial systems, the citizenry and institutions from any risk of ML/TF. While it causes a policy panic in some countries across the globe, it also causes policy perversion; while the intentions were very positive in some countries, these laws have been vulnerable to abuse and thus causing shrinking civic space. He recommended that the duty is upon us to see how best we can work together with the regulators in mitigating the unintended consequences of these very positive laws. And also, besides creating awareness, platforms where regulators and the accounting persons can meet and tease out issues on the impact of ML/TF regulations is key.

What DPI continues to do

Mr Wanjala highlighted that DPI is part of various platforms that they use to engage on issues of AML/CTF by creating content, generating knowledge and sharing them;

- › It is coordinating a National Working Group for the NPO sector on FATF which brings together organisations that work on civic space issues and share information up to the grassroots level.
- › It is part of the East and Southern Africa NPO coalition on FATF.
- › Has contributed to the FATF work stream.
- › It is a core member of the global coalition of NPO on FATF.

In conclusion, **Mr Wanjala** advised the participants to get a clear insight on some of the implications and how best we can mitigate the unintended consequences as they listen to all the panellists.

PRESENTATION OF THE RESEARCH FINDINGS/ KEY HIGHLIGHTS

James Nkuubi
Lead Researcher -Kituo Cha Katiba



Mr Nkuubi began his presentation with a recollection of the events of 11th September, 2001 which altered the world more especially a new terrain in world security. Since then there has been a global institutionalisation of counter-terrorism measures. This he added, sparked radical transformation in the global legal frameworks on counter-terrorism – Uganda included which experienced terrorism first hand and has been at the forefront on the fight against terrorism.

Against that background, Mr Nkuubi stressed that the main objective of this research was to examine the extent to which these laws – inspired by the international discourse on terrorism, have impacted civic space in Uganda. He also stressed that the laws cannot be wished away, however the focus is on how to achieve balance between protecting the country from Money Laundering and Terrorism Financing (ML/TF) vis-à-vis respecting and protecting human rights.

According to the lead researcher, two major contentious aspects pertaining to the AML/CTF framework in Uganda stood out; **the absence of legally bound transactional bank account freezes**. Citing the cases of Action Aid and GLISS whose accounts were frozen in 2018 and UWONET in 2021 on claimed suspicion of money laundering. He pointed out that the Section 17(a) of the **Anti-Terrorism Act (amended) 2017 (ATA, 2017)**, does not specify how long the FIA can freeze bank accounts on suspicion of ML/TF. This, according to Nkuubi not only creates an environment of uncertainty for the organisation under investigation but also paralyses the operations of NGOs which typically conduct time-bound projects and have a trickle- down effect on the several beneficiaries and stakeholders of the NGOs.

Secondly, it was evident from the research that the entire **AML/CTF legal framework is based on ambiguous central terms of the laws such as**; terrorism, acts of terrorism. The terms that are meant to impute criminality are broad, vague and therefore susceptible to abuse, he opined.

“For the laws to be functional, they must be certain.”

In relation to state practice – how the state is implementing the AML/CTF laws, it was inferred from the research findings that three mechanisms are being applied; **administrative enforcement, penalties and sanctions**.

“We cannot wish away the AML/CTF legal framework. Our focus however should be on how to achieve balance between protecting the country from money laundering and terrorism financing vis-à-vis respecting and protecting human rights.”

Administrative Enforcement

Incidences include; the siege of Action Aid in 2018, freezing of GLISS and UWONET accounts in 2017 and 2021 respectively, Nkuubi pointed out that it is not only the organisations that draw attention but the time and context within which these incidents occurred (at the height of the removal of presidential term limits debate and 2021 elections) cannot be ignored. Respondents that participated in the research pointed out that implementation seemingly affects organisations whose work portfolios include human rights, democratization and rule of law – issues that attract state interest. It was also noted that investigations of a highly publicised nature commence, only for them to devolve into nothing, leaving respondents to conclude that the enforcement is administrative harassment.

Nkuubi emphasised that the study DOES NOT condemn investigations or application of the law however, given that Article 38 of the Constitution of Uganda guarantees citizens the right to participate in their governance through civic organisations, such incidents attest to a contestation between Article 38 and the **Anti-Money Laundering Act (amended) 2017 (AMLA)** and the **Anti-Terrorism Act (amended) 2017 (ATA)**.

Penalties and Sanctions

In 2017, 27 organisations were directed to submit to the NGO Bureau annual reports, sources of funding, list of projects, names of directors and bank account details.

In 2019, the FIA made inquiries into the 13 of the most vocal NGOs.

On the eve of 2021 elections, accounts of NGO Forum and UWONET were frozen while the leader of **Chapter 4 Uganda** Nicholas Opio, was arrested for alleged ML/TF for money found on the organisation’s account.

While these of financial-related administrative inquiries appear innocent and are lawful, they send shockwaves of precaution that a flare of negative perceptions of NGOs and impact not only the organisations but the recipients of their services as well, Nkuubi opined.

“When these laws are misused, there are primary victims (the organisations), secondary victims and tertiary victims (the beneficiaries) and tertiary victims (the businesses that thrive on the legitimacy and operations of these organisations

Impacts of the AML/CTF Legislation on Operations of NGOs

The report highlights six (6) major emergent impacts of the AML/CTF;

- › Restrictive civic space and freedoms of association and assembly. Once accounts of NGOs are frozen, activities geared towards that strengthening assembly and association rights are halted too restricting attendant rights of freedom of speech, assembly and association.
- › De-legitimation of the work of CSOs and stigmatization that follows. NGOs are labelled by state officials as subversive agents, agents of disorientation, saboteurs, and purveyors of neo-liberalism among others.
- › Contestation between citizen rights versus NGO rights. Individuals who start-up these organisations guided by Article 38 are criminalised. Implementers of the law do not separate the leadership of the NGO from the NGO itself.
- › Disruption of NGO operations and suffering the brunt of expensive court processes to clear their name.
- › Loss of access of services to the beneficiaries.
- › Silent economic and grants disruption. Reported cases of development partners reconsidering grants agreements because of the uncertainty of freezing of accounts and stigma against certain NPOs.

Recommendations

At its core, the research purposed to examine the ways in which to balance protecting Uganda and its well-meaning NPO sector from exploitation by terrorist and fulfilling the rights of citizens under Chapter (4) of the Constitution. The following recommendations informed by the research were submitted in the report;

- › Periodic internal NGO house-keeping in form of legal audits to elicit compliance.
- › The AML/CTF framework is new so there is need for creating awareness on AML/CTF legislation not just among top management of NGOs but the entire organisation through training and refresher courses.
- › Establish a consistent coordinated legal response team/platform to engage with relevant authorities to address unwarranted abuse on CSOs and keeping abreast with evolving legal amendments.
- › Comprehensive legislative push for amendment to the law for clarity on conceptual terms that are currently broad and vague like terrorism, acts of terrorism, etc. that are susceptible to abuse.
- › The need for Constitutional oversight by Uganda National Human Rights Commission (UNHRC) on methodologies employed by regulatory and enforcement bodies; Uganda Police, FIA DPP, to examine to what extent they are compliant with the procedural guarantees of fair justice.
- › Consider the possibility of de-registering NGOs as Accountable Persons.

“We need to understand that we have to go through some hardships (compliance, reporting to regulatory bodies, AML/CTF policies and mechanisms) for a greater good.”

Muhwezi also reassured the de-risking does not target NGOs in particular. “Banks like any other businesses are looking to make a profit and will not turn away a client unless there is a clear risk associated with banking with said client,” she added. NPOs also need to assess their risk level (likelihood to be used for ML/TF) and build capacity to mitigate the risks.

“ The reality is the AML/CTF laws are a good thing to ensure that we (our organisations) are not used to further terrorism or as conduits for money laundering.”

SUGGESTED PRACTICAL REMEDIAL APPROACHES FOR BOTH REGULATORS AND SECTOR PLAYERS TO MITIGATE THE UNINTENDED ASSAULT ON CIVIC SPACE



Josephine Namatovu
Head of Anti-Corruption - ODPP

She warned against non-compliance which if deemed an offence attracts penalties. This, she added, may further cripple the work of NPOs. Echoing Dr Isooba and Ms Muhwezi, Namatovu emphasised compliance-- being on the right side of the law even as NPOs advocate for de-registration as Accountable Persons.

As regards AML/CTF legislation, Namotovu pointed out that it is informed by FATF and as a member country, Uganda has international obligations to fulfil or otherwise risk being black-listed. This, she cautioned, would gravely impact not just personal and organisation's international transactions but Uganda's economy as a whole. That said, Namatovu shared the following remedial approaches already put in place by the ODPP to create an enabling legal environment for NPO operations;

- › Maintaining an already cultivated cordial relationship with NPOs.
- › Continued dialogue with relevant stakeholders both NGO and Government to address evidence-based challenges.
- › Sensitisation of NGOs on their rights and obligations under the law.
- › She also recommended that NPOs to conduct evidence-based advocacy as far as de-registering NPOs as Accountable Persons. There has to be a substantiated justifiable reason for Uganda to divert from international obligations/recommendation.

In her final remarks, Namatovu called for collaboration and consolidated efforts to addressing AML/CTF legislation-related challenges. Stating that, “law enforcement agencies are not the enemy. The ODPP can’t find a solution on its own but works with stakeholders to identify evidence-based challenges and dialogue on/develop approaches of addressing them.”

REMEDIAL APPROACHES IN PLACE /PLANNED BY THE NATIONAL BUREAU FOR NON-GOVERNMENTAL ORGANISATIONS TO MITIGATE THE UNINTENDED ASSAULT ON CIVIC SPACE IN UGANDA.

Steven Okello

Executive Director - National Bureau for NGOs



He spoke to Government's appreciation for the work and role of NGOs in the country for the last 30 years adding that the existence of anti-money laundering and countering terrorism financing laws do not take away from that appreciation.

On the contrary, he submitted, the laws exist to protect the NGOs given their nature of work. "NGOs are vulnerable to ML/TF. They carry out large projects, heavily funded and therefore large transactions are channelled through their accounts. This can pose a risk of them being used as conduits for ML/TF by channelling illicit money through their accounts or creating fake NGOs as conduits for ML," Okello said.

Notwithstanding, the leader of the NGO Bureau acknowledged the contentious issues within the law as highlighted in the report. In response, he recommended more research from both from Government and NGO sides to review the existing AML/CTF legal framework and examine missed opportunities when developing these laws."

In lieu of the proposed research, Okello revealed that the NGO Bureau is in the process of reviewing the NGO policy and streamlining operations by increased automation of services so as to integrate with other stakeholders FIA, URSB and reduce the burden on NGOs.

The NGO Bureau leader proposed the following as remedial approaches to be adopted by NGOs to mitigate the laws unintended assault on civic space in Uganda;

- › Conducting regular risk assessment and control mechanisms.
- › Keeping proper books of records
- › Improving information sharing between all stakeholders.
- › Increased awareness creation on the rights and obligations of NGOs under the AML/CTF laws.
- › More research both from Government and NGO when developing these laws and reviewing current laws.
- › NGO sector ensuring internal credibility not to tarnish the entire sector through self-regulation.
- › Umbrella bodies offering better leadership so every voice is heard, none is left out.
- › More partnerships between Government and NGO sector.
- › NGOs to sign MOUs with people they work with.

DO NO HARM PROJECT

Yona Wanjala

Executive Director - DPI



Mr Wanjala highlighted the **Do No Harm** programme, an initiative by DPI to promote application of AML/CTF legislation without impacting on the operations of legitimate NPOs. The project aims at building the capacity of the sector to elicit compliance. The initiative is guided by the mantra; **capacitate, participate** and **partner for solutions**.

Wanjala revealed that efforts to build capacity are already underway. They include; developing an AML/CTF curriculum tailored for the CSO sector, automation of a sectorial AML/CTF health-check and offering support to NGOs in developing AML/CTF policies at institutional level. Other planned initiatives under the Do No Harm project include simplifying content and concepts pertinent to novel anti-money laundering, terrorism financing, FATF, reporting obligations among others.

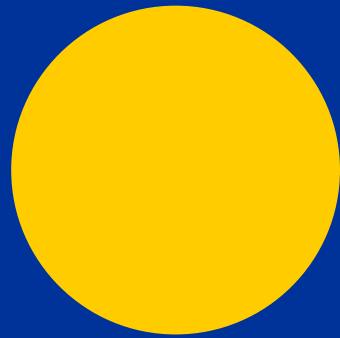
The programme also encourages partnerships for solutions. Money laundering and terrorism financing cannot be fought in isolation. Government needs civil society, civil society needs Government," Wanjala added. There isn't a "they" or "us", we all are citizens affected by money laundering and terrorism financing.

In regards to participation, **Do No Harm** initiative also highly encourages civil push back against over regulation.

Mr. Wanjala concluded his presentation with by echoing previous speakers on internal "house-cleaning" of the NPO sector and compliance with the laws of the land. This not only builds the NPOs reputation but inspires confidence in the sector.

CLOSING REMARKS

Nicholas Gonze
Representative of the EU Delegation
in Uganda



Speaking on behalf of the EU, Mr Gonze reaffirmed their support for the fight against ML/TF. Adding that the enactment of AML/CTF legislation is a key step in this fight. “However, he noted, though legitimate we are concerned that enactment of these laws has been problematic and has detrimental effects on the operations of civil society organisations and their beneficiaries notably, the freezing transactional accounts of several NPOs during the election season and the arbitrary arrest and prosecution of HRDs on claims of money laundering among other incidences.

To that end, Gonze submitted that it is essential that AML/CTF laws are implemented with due respect for fundamental rights and freedoms guaranteed under the constitution of Uganda. CSOs contribute to Uganda’s development objective. They are recognized as development agents in the NDP III and as key aspects of the democratic process, he added.

According to Gonze, contrary to popular opinion, CSOs mitigate the risk of terrorism as they facilitate dialogue between citizens, groups and authorities to diffuse tensions and frustrations among them that are often exploited by extremist groups to promote violence and terrorism. Furthermore, thorough advocacy and their watch-dog roles, CSOs also strengthen good governance, transparency and contribute to the fight against corruption and money laundering.”

That said, Gonze also echoed the CSOs role and responsibility to ensure compliance with AML/CTF legislation. However, it also their responsibility to ensure weakness in the law are identified and corrective measures are undertaken. This he said, presents an opportunity for collaboration with the FIA, NGO Bureau and other sector regulators and stakeholders to build capacity to achieve a greater compliancy with AML/CTF legislation.

Mr Gonze ended his address with appreciation for the participation of the Government agencies, the FIA, NGOs and the private sector in the event. He hoped that it will not only lead to more constructive changes and collaboration between the Government and CSOs but also serve as first step to establishing a platform for more regular engagement.

KEY QUESTIONS FROM THE PARTICIPANTS IN THE CHATROOM.

- › In case you have been suspected of terrorism financing or money laundering and your funding was time bound, later after investigations, it’s found that the funding was for a genuine project, but time for implementation has ended, what is done to the money that was frozen? Does it go back to the donor? or the beneficiary organisation? And what will the funds be used for in this case?’ **Mbereyinka Bernard – Kisoro**
- › My concern is when police or government agencies, use the press to depict that the NGOs are criminal patterns with hostile environment, they express that investigations are underway, but after the final findings, they do not come back to undo the damage- **ALIGANYIRA MOSES**
- › How can effective strategies, such as self-regulation of the sector, be replicated and expanded in order to protect civic space, while addressing concerns about vulnerability in the non-profit sector?- **Charles Donaldson Ogira**
- › De-legitimization of CSO works and stigmatization is more pronounced before and during every election cycle here in Uganda, could this be to just to be paralyze the sector to abandon the oversight role by some NGOs- **Moses Lwochaza**
- › Before Executing the Laws against the NGOs, what is the level of understanding to this law amongst the NGOs- **Pr. Taremwa Albert (LOSCO)**
- › How can we change the mindset if I may say of government as regards to the organization dealing with governance? Accountability etc because this as the presentation has put it that is really demeaning our work as CSOs despite our compliance as one of my colleagues above stated that its always up during election time- **a participant**
- › There is Need for a holistic NGO governance capacity development programs to support NGOs with capacity needs because most CSOs still ignorant of the regulatory requirements and many are caught on the wrong side of the law- **Fredrick Olinga, DENIVA/QUAM**
- › Also S. 7A (2) of Anti-Terrorism Act uses the word “DPP shall go to court ...” this is unconstitutional since under the constitution DPP is not subject to directions of anyone, however DPP insists on going to court even where evidence is not sustainable. Isn’t this a case of DPP going against the constitution?- **Magelah Peter**

- › Why Freeze and then investigate? There is need to pay for compensation to those whose accounts have been frozen and now unfrozen. The Damages need to be compensated- **Michael Aboneka**
- › There is too much parallel reporting. If the bank reports their Clients' transactions on a daily, why would the NGOs also be required to do the same?- **Michael Aboneka**
- › Time to comprehensively review the Laws such as the AMLA. Compliance is not always the issue.... but the bad spirits lying thereunder- **Michael Aboneka**
- › In Africa, its only Uganda and Eswatini that list NPOs/NGOs as accountable persons, yet their primary trade is not dealing in money. NPOs are now in the same category with Casinos, banks, Betting companies, etc- **Xavier Ejoyi, Action Aid Uganda.**
- › @Cecilia Whereas banks are good partners with NGOs lately the banks approach to enforcing the law is wanting. For example, in my organization we handled 8 cases of Banks freezing NGO bank accounts between January and May 2021, in all the cases banks wanted more information in line with KYC requirements, however 5 of these cases the banks froze the accounts without first asking the NGOs to submit the required information!- **Peter Magelah**
- › How can we ensure smooth conduct of KYC and other obligations between banks and NGOs? - **Peter Magelah**
- › How can we ensure some form of standardization of requirements (KYC, EDD etc) across banks because different banks ask NGOs of different things and this causes chaos and confusion- **Peter Magelah**

KEY RECOMMENDATIONS FROM THE PARTICIPANTS IN THE CHATROOM.



- › I think our framing of the challenge needs to transcend the realm of law and compliance. We need to focus on the political intensions of the abuse of laws, otherwise known as rule by law- **Xavier Ejoyi, Action Aid Uganda**
- › NGOS can and should account for compliance to existing laws even when we all agree that the laws need to be reviewed. We however, need to be vigilant that we are not apologists of political transgressions in our framing- **Xavier Ejoyi, Action Aid Uganda.**
- › Whereas it is true in some instances that the regulators are high handed, hence narrowing civic space, it's equally demanding that due diligence is very important on the part of players in order to mitigate the impact- **a participant**
- › Training is key on both sides of the regulators/ enforcement on one hand, and players, on the other- **a participant**
- › It's really important for all stakeholders to comply to what is required of them- **Sarah NKayimbi**
- › Legitimacy is not an option- need for a shift in NGO practices to demonstrate our legitimacy and Compliance to all regulatory requirements is critical to Us- **Fredrick Olinga, DENIVA/QUAM**
- › Effective monitoring and evaluation for compliance and support is important at all levels to us as NGOs- **Betty Bwanika**

SOCIAL MEDIA ENGAGEMENT



OVERVIEW

The event was organised to launch the report to the different stakeholders.

The discussion which was attended by more than 100 participants across different sectors commended promptly at 10 am.

Participants followed the conversation live on Zoom and others on Twitter

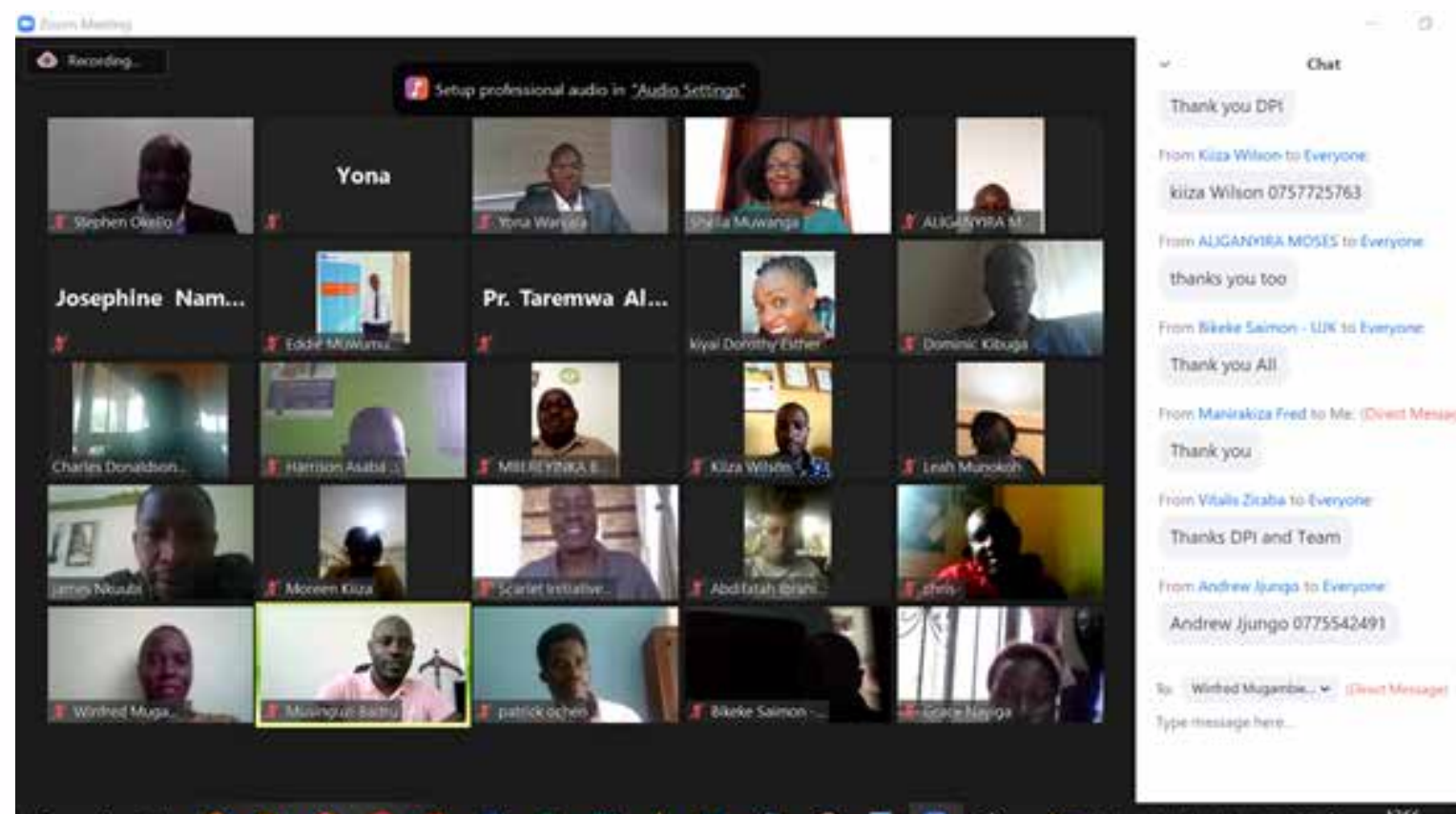
Channels

Zoom
Twitter
Youtube

Hashtag used

#AMLCTFRegulation

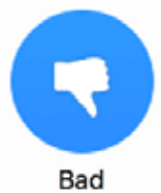
ZOOM



Zoom chat


The whole chat conversation from the launch is attached separately in a PDF document

How was your meeting experience?



Zoom survey

The survey at the end of the launch is attached separately in a Microsoft Excel document.

 Jude_Mugabi (1)

CHALLENGES, RECOMMENDATIONS, CONCLUSION



Challenges

- › Time management wasn't good as the event kicked off 40 minutes late.
- › Participants didn't get time to have their questions and concerns addressed because of the limited time.
- › Poor internet network affected both the panellists and participants as the affected kept going on and off of the platform.
- › Social media restrictions in the country limited the host of the event from livestreaming it on social media for example in Uganda, Facebook has been turned off by Uganda Communications Commission since January 2021 to date.

Recommendations

- › DPI and the participants should improve on their time management to enable future events start on time with the right number of participants.
- › Adjustment of the allocated time for the event should be made to accommodate the entire program for the event.
- › Both the participants and the panellists should consider using the best internet network during such event to limit on the risk of missing out or receiving inadequate information.
- › DPI should concentrate on making the best use of the social media sites like Twitter that are accessible for the Uganda Nationals to do the livestream for future event.

Conclusion

In nutshell, the virtual National Dialogue and Report Launch event was a success. The report on the Impact of Anti-Money Laundering and Counter Terrorism Financing laws on civic space in Uganda served its purpose; created awareness amongst various stakeholders and partners. The Virtual National Dialogue also created an opportunity for those in the Civic space, the implementors and the regulators to weigh in, share thoughts and seek a way forward that works for all parties and the country at large. The lively discussion ended up stretching for an extra hour, bringing the event to a closing time 1pm.

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