



# UGANDA WATER SECTOR PARTICIPATORY ACCOUNTABILITY REVIEW

Report of the National Review,  
with Focus on the Districts of  
Lira, Kabarole, and Bunyangabu

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## Synthesis Report of National Review, with Focus on the Districts of Lira, Kabarole, and Bunyangabu

December 2025

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### Note:

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The Water Integrity Network (WIN) advocates for integrity in the water and sanitation sectors to reduce corruption risks and improve services, for the benefit of all. Access to safe water and sanitation are fundamental human rights. Our goal is to contribute to the realisation of these rights, as well as ensure the sustainable use of water resources in the face of the climate crisis.

<https://www.waterintegritynetwork.net>



# BRIEF FOR DECISION MAKERS

## Key findings from the Uganda Water Sector Participatory Accountability Review

A call on government, regulators, service providers, civil society, and development partners to work together to strengthen corruption prevention, improve integrity of sector institutions, and enhance meaningful participation.

Uganda has developed a **clear legal and policy framework for water governance and has effectively consolidated and clarified responsibilities in the last ten years**. There are platforms at the national level to support coordination, planning, and sector review. National performance monitoring frameworks and data systems have improved in both scope and quality.

Notably, there is proactive and strengthened regulation through the Ministry's Water Utility Regulation Department and Water Resource Planning and Regulation Department. Consolidation through the Umbrella Authorities has made oversight more effective. And the country's **anti-corruption and accountability authorities regularly examine the water sector through standard audits, performance audits, and in-depth investigations**.

And yet, **service is not keeping pace with demand**. More worryingly, recurring and persistent challenges remain unaddressed, there are regular reports of malpractice, and risks of corruption in procurement remains high. Overall, the gap between strong rules and weak practice is the defining feature of the sector's integrity landscape. Weak enforcement is the most clear and consistent finding. This is in part a normal evolution of sector governance processes and reform, in part a capacity issue, and worryingly, in part a sign of a culture of impunity.

This means that the system is solid on paper and works relatively well in many cases. But implementation is not always effective and, under stress—for example from climate change, population shifts, undue political interference and exploitation, corruption or contamination incidents—it bursts at the seams. When something goes wrong there are few measures service providers, regulators and actors can take quickly and it is increasingly hard to correct course.

Corruption has not spared the sector and has long-term widespread consequences on sector efficiency and trustworthiness. In a comprehensive report on costs of corruption, the Inspectorate of Government (IG) specifically pinpoints the water and environment sector, putting sector losses at 77% of sector spending (IG, 2021). It highlights particularly high procurement losses in the sector, high losses from billing inefficiencies most likely linked to corruption, and high costs for users through bribes. The definitions used in the IG report may be broad, but **the conclusion, that corruption affects the water sector more than other sectors, merits careful study and urgent action**.

**Without decisive integrity action now, existing weaknesses will continue to undermine water and sanitation service delivery, financial sustainability, environmental protection, and public trust.**

## Expected impact

With stronger integrity systems in place, Uganda can expect:

- Improved coverage and more reliable, efficient, and equitable water services.
- Improved financial performance and better cost recovery.
- Greater compliance with environmental and water resource protection measures.
- Enhanced public trust and stronger accountability between providers and users.

## Recommendations

### **Start by strengthening sector positioning on integrity:**

- Highlight **integrity in sector strategies and policies**, embed **integrity metrics** in sector performance frameworks, and revive platforms such as the Good Governance Technical Working Group. This shows **political backing** and shared direction for tackling integrity risks.
- Increase **research**, follow-up and public awareness of corruption cases and integrity work, ensuring, in particular, that findings from the Office of the Auditor General and Inspectorate of Government are visible and acted upon.

### **Next, focus on the institutional level: improve capacity amongst staff, financial management, corruption controls, and customer service:**

- NWSC and Umbrella Authorities require strengthened capacity and systems for integrity. Continued monitoring and follow-up of audit recommendations is essential. **Financial management** reforms and **digital tools, including open procurement** can be a strong foundation. **Training on integrity and ethics, clear sanctions catalogues, and clear standards of behaviour** (from codes of conducts to standard operating procedures) are then key.
- Other sector stakeholders and institutions, especially in districts and rural areas, including district water offices, water user committees and future Area Service Providers, also require support and training for integrity, financial management, and responsiveness to users.

### **Always ensure accountability through transparent regulation AND civil society engagement:**

- Improve tariff setting processes, gazetting and how service areas are defined, to **ensure roles and accountability are unambiguous, no one falls through the cracks**, and discretionary decisions and informality are limited, especially for services in peri-urban areas and at the limits of rural growth centres.
- Continue strengthening the operational capacity of regulation departments at MWE and their regional offices, especially for **enforcement and collaboration with oversight and anti-corruption institutions**.
- Strengthen capacity for and pursue implementation of open procurement regulations, including in umbrella associations
- **Fund, support, and train civil society** for integrity, monitoring and social accountability, also on climate response. Civil society engagement is a crucial, cost-effective means to strengthen oversight.

## Main findings

The assessment shows that:

- National planning documents, budgeting procedures, and sector review processes are generally well established and are among the most clearly defined elements of the sector.
- Planning, sector review processes, permitting, and drilling oversight appear to face fewer integrity challenges compared to other thematic areas.
- The area with the most pronounced weaknesses is the **governance and management of sector institutions** including service providers. This is one of the only areas where the rules and obligations are also minimal or absent. Sector institutions lack anti-corruption strategies and systems, including whistleblower protection. Many decisions are at the discretion of key players, and there are significant openings for malpractice.

The report also highlights a few specific integrity concerns:

- Procurement, where the corruption risk remains high across the different levels.
- Water quality management, where district capacity has deteriorated, testing is irregular, and communication and follow-up is limited.
- Tariff setting and revenue management, where discretion is high.

Integrity issues in sanitation, especially on-site sanitation, need further investigation.

## Context and approach

The Water Integrity Network conducted this assessment with support from UWASNET starting in 2024. It provides a broad review of transparency, accountability, participation, and anti-corruption measures in the water sector across investment planning, service delivery, governance of sector institutions, resource management, and environmental protection. It compares the de jure (what the law and policy require) with the de facto (what happens in practice) situation. It includes insight from a desk study and from interviews and discussions with over 100 stakeholders primarily in Kampala and in the three districts of Bunyangabu, Kabarole, and Lira.

## Limits and further research needed

- This review focuses most intensely on water service delivery by water authorities, meaning that the findings on some sub-sectors, such as non-networked sanitation and to some extent water resource management, are less deep. As high-risk areas for integrity, these require further study.
- There are ongoing regulatory and policy reforms, for example on tariff setting, procurement, and on rural water service delivery, that are too new to be included in depth in this study but could have a significant impact. They require careful monitoring.
- The verification of field-level practice mostly covers three districts. Expanding studies of corruption and integrity and getting a better view of nuances between districts could be a revealing next step.

## Big questions answered

### Can water institutions really do something about systemic issues like corruption and integrity risks?

Anywhere in the world, corruption may be hidden but its impacts are obvious. In the water and sanitation sectors, **corruption directly stunts the work and results of water sector professionals, and it directly limits the services their users and communities have rights to.**

- Corruption is a management issue.
- It is at sector level, and especially within institutions, that protective mechanisms and anti-corruption measures are weakest.
- Water sector professionals are best placed to understand risks and norms that enable corruption, they can and must act.

At the level of the sector, or any sector institution, action is effective in four key areas:

- **Leadership**, training, and the setting of clear standards of behaviour (for example through codes of conduct).
- Integrity **risk assessments**, risk detection (also by encouraging tips offs and protecting those providing information), risk monitoring.
- Communication, **disclosure** of information, and relations to users and civil society.
- **Integrity controls** in high-risk processes including contracting, financial management, or recruitment, interactions with users.

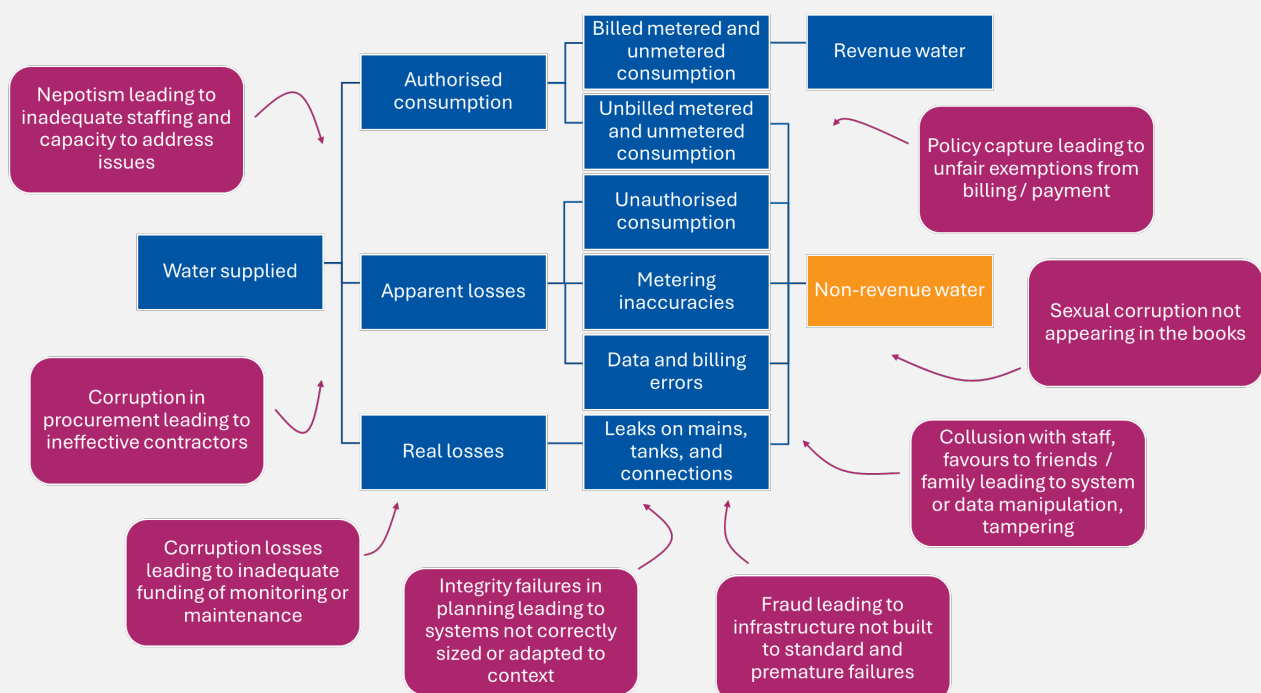
### Is the water sector uniquely corrupt?

No. Corruption and poor integrity are a concern in all sectors and across the globe. Water (and sanitation) are also affected by broad cross-sector corruption issues, such as those in the justice, construction, and other sectors.

And yes. Water is essential, scarce, and technically complex and expensive to manage, which results in specific integrity risks and dynamics in the sector, with direct impact on people's lives and livelihoods. In Uganda, the Inspectorate of Government has highlighted the water and environment sectors as having especially high losses and notable procurement issues.

## Why focus on integrity when there are many pressing technical issues to address?

**Integrity and technical issues are often inextricably linked.** The Inspectorate of Government, for example, makes a link between corruption losses and levels of billing, which can include non-revenue water issues. Although not all non-revenue water can be blamed on corruption, many integrity failures that contribute to non-revenue water are rarely examined in non-revenue water programmes and remain poorly addressed. Persistently high levels of non-revenue water, as noted in Uganda by both oversight institutions and Ministry's Water Utility Regulation Department, are an important indicator that a new approach is needed.



Examples of a few key integrity risks affecting non-revenue water, based on IWA's water balance diagram.

There are a number of instances where integrity issues, including undue interference, may hamper reform and should be examined more carefully: the selection of projects and technologies, billing, financial management, tariff setting, and asset management, for example.

## What are the critical elements of an integrity strategy and better enforcement?

While enforcement of sector regulation and policy in Uganda is a difficult but necessary balancing act—between limiting costs and burden, and ensuring compliance—the study shows there is significant room for action.

Regulators play a key role in enforcement and in implementing corrective actions, but accountability and enforcement shouldn't be only up to them. **Engaging with civil society and building social accountability capacity is a key under-used and under-resourced mechanism for supporting enforcement.** Civil society can provide input and feedback, build trust, boost inspection and monitoring capacity, and provide localised oversight.

**The basis of enforcement is detection, sanction, and incentives. However, the burden of enforcement can be greatly reduced by putting in place strong preventive measures,** that, for example, aim to understand and shift the norms that enable corruption, limit loopholes and opportunities for malpractice and build the capacity of officials to act with integrity. WIN refers to these three pathways of integrity action as the 3Rs: No Reason, No Room, No Reprieve (WIN, 2024c).

The **'no reason'** pathway aims to undermine the accepted ubiquity of corrupt practices and seeks to disrupt the ways in which pressure and rationalisation drive integrity failures. Actions could include:

- Awareness raising and communication on regulation, its purpose, and the consequences of non-compliance
- Leadership for integrity
- Integrity training for utility staff

The **'no room'** pathway relies on structural, legislative, regulatory or managerial interventions to narrow the opportunities available to corrupt actors. The focus is on controls, oversight mechanisms, and institutional reforms to reduce discretion and rebalance resource allocation. Actions could include:

- Requirements for strong customer feedback mechanisms and awards or recognition of strong customer service
- Support to digitalisation – on payments, better billing systems, monitoring
- Support to implementation of the PPDA regulations and the expansion of GGP use, especially in Umbrella Authorities and districts.
- Monitoring of follow-up of Office of Auditor General recommendations and requirements on discussing and responding to findings

The **'no reprieve'** pathway emphasises detection and sanctioning of malpractice. By holding everyone to the same standards and ensuring clear rules and fair enforcement mechanisms, the pressure and opportunity for corruption are reduced. Actions could include:

- Regular integrity and corruption risk assessments, also in planning processes at national and institutional levels (for example using tools like FIIP)
- Support for implementation of strong whistleblower protection systems
- Monitoring of integrity mechanisms in water authorities
- Special supervision processes for non-compliant water authorities
- Permit suspensions, fines
- Training of police and magistrates on water, sanitation, and environmental crimes



## SUMMARY OF KEY FINDINGS PER ASSESSMENT AREA

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation	
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation	Possible areas of improvement and further investigation
Investment and Resource Planning						
Planning for water provision	Strong	Strong	Strong	Moderate	Moderate	<p>Completing plans and increasing capacity for resource monitoring.</p> <p>Addressing data governance challenges and ensuring higher accuracy especially of data on resource levels and service coverage.</p> <p>Increasing levels of citizen engagement for district-level planning and planning of water authorities.</p>
Climate change emergency response, planning and implementation	Strong	Strong	Moderate	Weak	Weak	<p>Raising awareness at district level for climate change plans and processes.</p> <p>Pursuing update and operationalisation of climate change regulations.</p> <p>Monitoring climate change planning of water authorities.</p>
Water resource use regulation, abstraction, and drilling permitting	Strong	Strong	Moderate	Moderate	Moderate	Increasing capacity for monitoring and dissemination of guidelines and best practices.
Access to information on water resource management	Strong	Strong	Weak	Weak	Moderate	Monitoring responses and response times for access to information requests.

Financing						
Setting, collection, reviewing and management of levies and user fees	Moderate	Strong	Moderate	Weak	Moderate	<p>Assessing procurement practices of stakeholders in rural, urban, and peri-urban settings.</p> <p>Improving financial management practices of water authorities and Water User Committees.</p> <p>Monitoring approval, implementation, and impact of new tariff policy.</p> <p>Following up on OAG inputs on non-payment of water bills by public institutions.</p>
Operations and Service Delivery						
Water quality monitoring and control	Strong	Strong	Moderate	Moderate	Moderate	<p>Assessing and addressing risks in water quality testing in rural areas, focusing on enforcement capacity, procurement for testing and parts, overlaps or unclarity in responsibilities, and low awareness.</p>
Operation and maintenance of water supply and sanitation assets and infrastructure, including leakage control	Strong	Strong	Strong	Moderate	Moderate	<p>Investigating possible corrupt practices contributing to NRW.</p> <p>Strengthening capacity of NRW response teams to address integrity risks.</p> <p>Evaluating implementation of National Framework for O&amp;M of Rural Water Infrastructure.</p> <p>Expediting effective implementation of open procurement requirements in all water sector institutions</p> <p>Raising awareness on sexual corruption as both a corruption and gender-based violence issue hampering service delivery, and training staff accordingly.</p>
Sanitation provision	Moderate	Strong	Moderate	Moderate	Moderate	<p>Monitoring development and implementation of new sanitation policy.</p>

						Assessing integrity of planning processes for sanitation infrastructure. Assessing non-sewered sanitation planning, responsibilities, and monitoring processes.
Customer service, complaints, and grievance mechanisms	Moderate	Strong	Weak	Weak	Moderate	Monitoring customer grievance mechanisms of water authorities.
<b>Corporate governance and management</b>						
Governance and oversight	Moderate	Strong	Moderate	Moderate	Moderate	Increasing accessibility of board decisions and of information on status of follow-up of OAG recommendations.
Human resources	Strong	Strong	Weak	Weak	Moderate	<b>Monitoring processes related to payroll.</b>
Internal corruption prevention and control	Moderate	Moderate	Weak	Weak	Weak	Increasing accessibility and follow-up of project audit reports in water and sanitation. Increasing capacity of water authorities to monitor integrity risks and institutionalising corruption detection systems. Monitoring and incentivising integrity practices of water authorities.
<b>Environmental protection</b>						
Environmental standards, wastewater management standards, and pollution control	Strong	Strong	Moderate	Strong	Weak	<b>Strengthening monitoring and capacity for enforcement of environmental standards.</b>
Social and environmental impact assessments	Strong	Strong	Moderate	Weak	Moderate	Clarifying criteria for obligatory Environmental Impact Assessments. <b>Monitoring implementation of Environmental Impact Assessments.</b>

Water ecosystem designation, monitoring, and protection	Moderate	Weak	Moderate	Weak	Moderate	Increasing awareness on water system protection needs and processes.
<b>Sector Oversight</b>						
Joint sector review, participatory oversight	Strong	Strong	Moderate	Moderate	Strong	Including integrity as standing item in work of joint sector review platforms and working groups. Reviving Good Governance Working Group to monitor and encourage integrity action.
Other oversight mechanism	Moderate	Moderate	Moderate	Weak	Moderate	Supporting civil society and media, also to access information, monitor, and act on corruption allegations and cases.



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## List of Acronyms

CSO	Civil Society Organisation
DDP	District Development Plan
DWO	District Water Office / District Water Officer
DWSCG	District Water Supply and Sanitation Conditional Grants
IG	Inspectorate of Government
LG	Local Government
MEMD	Ministry of Energy and Mineral Development
MoFA	Ministry of Foreign Affairs
MoFPED	Ministry of Finance, Planning and Economic Development
MWE	Ministry of Water and Environment
NDP	National Development Plan
NEMA	National Environment Management Authority
NFA	National Forestry Authority
NGO	Non-Governmental Organisation
NWSC	National Water and Sewerage Corporation
O&M	Operations and Maintenance
OAG	Office of the Auditor General
ODPP	Office of the Director of Public Prosecutions
OPM	Office of the Prime Minister
RWSSD	Rural Water Supply and Sanitation Department
UA	Umbrella Authority
UWSSD	Urban Water Supply and Sewerage Services Department
UWASNET	Uganda Water and Sanitation Network
WASH	Water, Sanitation, and Hygiene
WIN	Water Integrity Network
WPC	Water Policy Committee
WUC	Water User Committees
WURD	Water Utility Regulation Department
WRM	Water Resources Management

## BACKGROUND

### Water Resources and Water Supply in Uganda

Uganda's water resources are made up of large lakes (including Lakes Victoria, Albert, Kyoga, George, and Edward), a vast network of rivers that connect to these lakes, and several wetlands. The groundwater renewable resources are estimated at 29,000 cubic metres per year. The total renewable water resources amount to 43.3 billion cubic metres per year, of which only 13.6 billion cubic metres per year are the internal renewable water resources. (Government of Uganda, 2013)

These resources are under threat. The main challenges include governance and management challenges including capacity and integrity issues, deforestation, siltation of dams and rivers, and pollution. Pollution is exacerbated by inadequate sanitation facilities, unsafe disposal of municipal and industrial waste, poor farming practices, and degradation of wetlands (NEMA, 2014; MWE, 2021). These issues combined result in high exposure to hazards and disasters, within the context of limited capacity for climate change adaptation and mitigation.

The country has made some progress in increasing access to water but only about 60% of households had access to at least basic water services in 2022 (WHO/UNICEF, 2023) and disparities in access to water and sanitation services persist between urban and rural populations (Nsubuga, 2014). Total demand is also rising rapidly.

There are over 1,200 piped systems for water supply in the country, the majority of which are managed by water authorities that have performance contracts with the Ministry of Water and Environment (MWE). The National Water and Sewerage Corporation (NWSC) is Uganda's largest urban water authority. It provides water and sewerage services to approximately 21 million people in 282 urban centres (cities, towns, and rural growth centres) across the country (NWSC, n.d). The other main systems are managed by Umbrella Authorities (Northern, Central, Eastern, Karamoja, Mid-Western and South-Western Umbrella Authorities) and a few other water authorities.

In addition, many Ugandans, especially in rural and peri-urban areas, access water from point water sources: approximately 43,000 boreholes, close to 22,000 shallow wells, and more than 29,000 protected springs. Community-Based Organisations support 82% of these point sources, while institutions or individuals manage 16%, and private operators manage approximately 12%. (MWE, 2022)

### Corruption in Uganda's Water Sector

According to the Inspectorate of Government (IG), Uganda loses approximately UGX 9.14 trillion to corruption annually, or nearly one-third of the country's total annual revenue (IG, 2021). In 2024, Uganda was ranked by Transparency International in the 140 position out of 180 countries assessed.



Corruption has been facilitated by several factors including: gaps in and poor implementation of anti-corruption laws, internal weaknesses in accountability agencies, limited citizen access to information, limited citizen capacity to demand accountability from leaders, limited citizen and civil society engagement with government on accountability, and low responsiveness of leaders. There are also other challenges for anti-corruption, notably limited political will to fight political corruption, patronage and impunity, normalisation of corruption, and limited autonomy for anti-corruption agencies.

Corruption has not spared the sector. In a comprehensive report on costs of corruption, the Inspectorate of Government (IG) specifically pinpoints the water and environment sector, putting sector losses at 77% of sector spending. It highlights particularly high procurement losses in the sector, high losses from billing inefficiencies most likely linked to corruption, and high costs for users through bribes. The Inspectorate of Government (IG) notes that, based on evidence on levels of bribery in water and electricity utilities and on average amounts of bribes, costs of corruption for users would be nearly UGX 54 billion. The definitions used in the IG report may be broad, but **the conclusion, that corruption affects the water sector far more than other sectors, merits careful study and urgent action.**

## Water Integrity

Across the globe, corruption and mismanagement leave people without access to safe water or decent toilets, threatening their lives and human rights. They skew policy and budgets towards wasteful special interests. They divert badly needed financing and make for poorly built and maintained infrastructure. Global estimates suggest losses to corruption in water and sanitation could be up to a quarter of all investment.

Integrity in water and sanitation is an antidote. WIN defines integrity as using vested powers and resources ethically and honestly, for the delivery of sustainable and equitable water and sanitation services in the public interest. Integrity is a way to stop corruption and mismanagement impacting negatively on access to safe water and decent sanitation for people worldwide. It is also a way to strengthen water and sanitation institutions and their responses to increasing challenges in the face of climate change.

Integrity can be practically promoted and increased with Transparency, Accountability, Participation and targeted Anti-corruption measures. Research suggests integrity and anti-corruption work within a sector is particularly effective, as it will address more specific risks and build on the expertise of the sector professionals whose work and results are directly and indirectly affected (Pyman and Heywood, 2024).

Promoting integrity is core to realising the human rights to water and sanitation and safeguarding sectors that are essential to life and dignity. This study is a first step in better understanding corruption and integrity risks, to develop an effective sector-based response.

# METHODOLOGY

## Assignment Objectives

The Water Integrity Network (WIN) commissioned an assessment for Uganda to ascertain the state of integrity, transparency, and accountability in the water and sanitation sectors in Uganda, on paper and in practice.

The specific objectives were to:

- Analyse the effectiveness of the legal and policy framework with regards to integrity and governance of Water Resource Management and Water, Sanitation and Hygiene sectors in Uganda, on paper and in practice.
- Document good practices and key challenges regarding integrity and governance in water, sanitation and climate-related projects.
- Assess barriers to youth, women and marginalised community involvement in the water sector.
- Compile recommendations for different water sector stakeholders on how to mitigate the identified integrity risks.

## Study Approach and Design

The study used a Qualitative Research Approach to gain deeper insights into the complex issues of integrity, accountability, transparency, and anti-corruption in the water sector in Uganda. The study was conducted at the national level as well as the local level, focusing on the District Local Governments of Lira, Kabarole and Bunyangabu.

### Data Collection

**Document/Legal Review:** The review systematically examined both primary and secondary literature on integrity, accountability, transparency, and anti-corruption in the water sector in Uganda. Documents examined include: the *Constitution of the Republic of Uganda (1995)*, *Water Act Cap 152 (1997)*, *Pro-Poor Strategy for the Water and Sanitation Sector (2006)*, *Gender Mainstreaming Strategy for the Water and Environment Sector (2018)*, *Water and Environment Sector Investment Plan (2018)*, *National Water and Sewerage Corporation Act (1995)*, and *Anti-Corruption Act (2009)*, among others. Additionally, related studies and literature on integrity in water governance were also sourced, reviewed, and applied in this study.

**Key Informant Interviews and Discussions:** Interviews and discussions were conducted using a semi-structured interview guide and adapted Annotated Water Integrity Scan methodology with a diverse group of over 100 stakeholders in the water sector including government officials at central and local government level, Umbrella Authorities, Water User Committees, and civil society organisations. These inputs were used to contextualise and validate the findings from secondary data reviews. They also helped to generate a deeper understanding of the practical challenges, operational procedures, and institutional dynamics of integrity and water governance in Uganda.

The assignment deployed purposive sampling technique, mostly relying on the judgement of the Consultant (in consultation with WIN and UWASNET) when choosing who to ask to participate in the study with knowledge of integrity questions in the water sector. The sample size was determined using the saturation technique.

### Data Analysis

The insights from the primary and secondary data were triangulated and synthesised to provide a comprehensive understanding of integrity and governance issues in Uganda's water sector. The analysis was structured along four parameters:

- Rules and regulations,
- Roles and responsibilities,
- Corrective actions, incentives and actions, and,
- De facto performance.

### Quality Control

The methodology and tools were jointly agreed on by WIN, partners, and the research team. All analyses, interviews, transcripts and reports were prepared by a qualified team of researchers. Additional review and input on the draft report was provided by WIN.

### Ethical Considerations

The research team adhered to all relevant ethical requirements for undertaking research among human subjects and cited all secondary data sources. Participation in the study was voluntary, and the information collected from primary sources was treated with utmost confidentiality and anonymity to respect the privacy of the respondents. Interviews with respondents were conducted with informed consent.

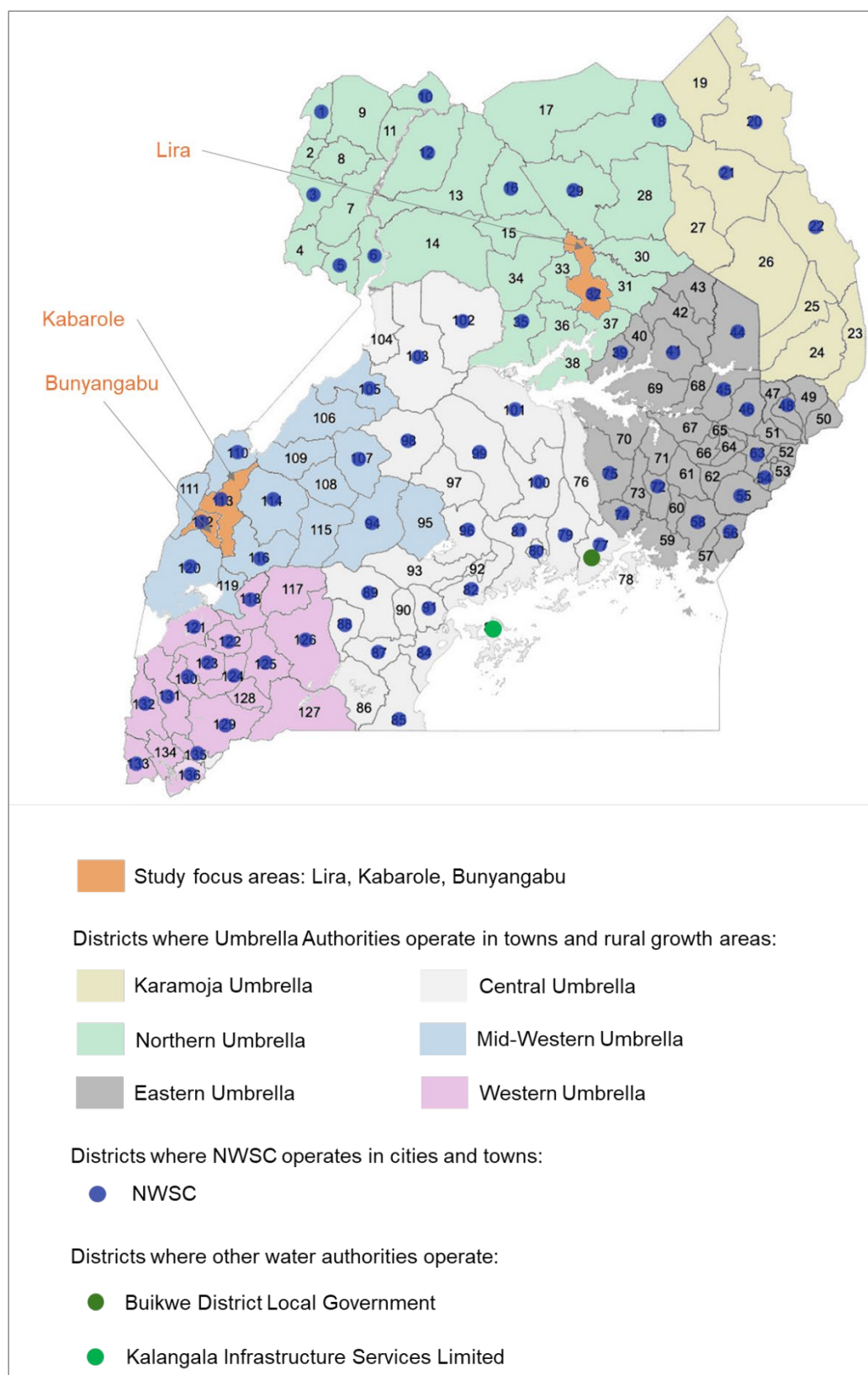
## Limitations

The study assessed the state of integrity in the water sector in Uganda, by considering the following parameters: (1) Setting of rules; (2) Assigning responsibilities (3) Reviewing performance (4) Correcting, improving, or sanctioning performance lapses and non-compliance.

The study considered specifically only three District Local Governments (LGs) (out of 146 in Uganda currently), to serve as a baseline for further programme developments in those areas.

The study focuses primarily on water service provision, though it also discusses networked sanitation and water resource management to a lesser extent. It was not possible to assess some areas in as much detail, including non-networked sanitation.

The study did not examine in detail the issues of corruption and integrity failures in the procurement system which are cross-cutting and have been discussed in other reports.



**Figure 1: Study Areas and Service Areas of Water Authorities in Uganda**

Sources: WIN (Districts of 2020 - Basemap by UNHCR with district by number - <https://data2.unhcr.org/en/documents/details/83043>, (CC BY-SA 4.0), Service areas listed in 2025 on <https://uws.go.ug/about-uws/national-coverage/> and <https://www.nwsc.co.ug/nwsc-areas-2/>)



# FINDINGS

## Investment and Resource Planning

### Planning for water provision including assessment of future demand

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Planning for water provision including assessment of future demand	Strong	Strong	Strong	Moderate	Moderate

#### Rules, processes, standards

Uganda's *Vision 2040* document is the primary policy document outlining the aspirations of the country across sectors. Water is mentioned as a crucial component with significant opportunities and importance for irrigation, livestock rearing, fisheries and aquaculture, hydropower, domestic water consumption, industrial development, water transport, and tourism.

The *Vision 2040* guides the development of five-year National Development Plans (NDP). Different Ministries, Departments, and Agencies develop Strategic Plans to implement the Programmes outlined in these NDPs. They must also integrate the development priorities of local governments into these plans. They then develop three-year Mid-Term Expenditure Frameworks and Annual Ministerial Policy Statements, aligned with the NDPs.

The Ugandan *Constitution* guarantees the right to safe water and to a clean environment and the *Water Act (Cap 152)* vests responsibility for provision of clean and safe water in the central and local governments. The Uganda *Water Policy* gives priority to water for domestic purposes. The Policy further provides for identification and development of adequate and appropriate water supply systems to meet current and future water demands. The *National Irrigation Policy (2018/2019)* has additional provisions for irrigation planning, in line with Integrated Water Resource Management principles.

Uganda is currently concluding *NDP III*, and *NDP IV* is in the final stages of development. Climate Change, Natural Resources, Environment and Water Management, is one of the programmes of the *NDP III*, with as objective ensuring availability of adequate and reliable quality freshwater resources for all uses. Currently, two main Strategic Plans set out aspirations for water provision with targets, the *Strategic Investment Plan for Water and Environment Sector 2018-2030*, and the *National Framework for Operation and Maintenance of Rural Water Infrastructure in Uganda* of 2020.

Further, the *Water and Sanitation Gender Strategy (2018-2022)* (though now formally expired) is the basis for ensuring that annual budgets and planning focus on gender and equity. The *Uganda Pro-Poor Strategy for the Water and Sanitation Sector (2006)*, also relates to equitable access and provides for prioritising disadvantaged areas and increasing density of water points, lowering costs for service delivery to the poor and subsidising rural and disadvantaged areas, and monitoring of service for the poor.

At local level, District Development Plans (DDP) are also developed in alignment with the NDPs. These Plans are often for five years and cover planning for water provision in the different districts. They inform budgeting for water resource provision. They also build on community-level planning data and plans from lower local governments levels, which are developed as per the *Local Government Development Planning Guidelines (2020)*.

Different pieces of legislation recognise the work of CSOs and provide for citizen participation in the planning process for water provision among other sectors, including the Constitution articles 1 and 29 and the *NGO Act of 2016*, in addition to the national and programme development plans.

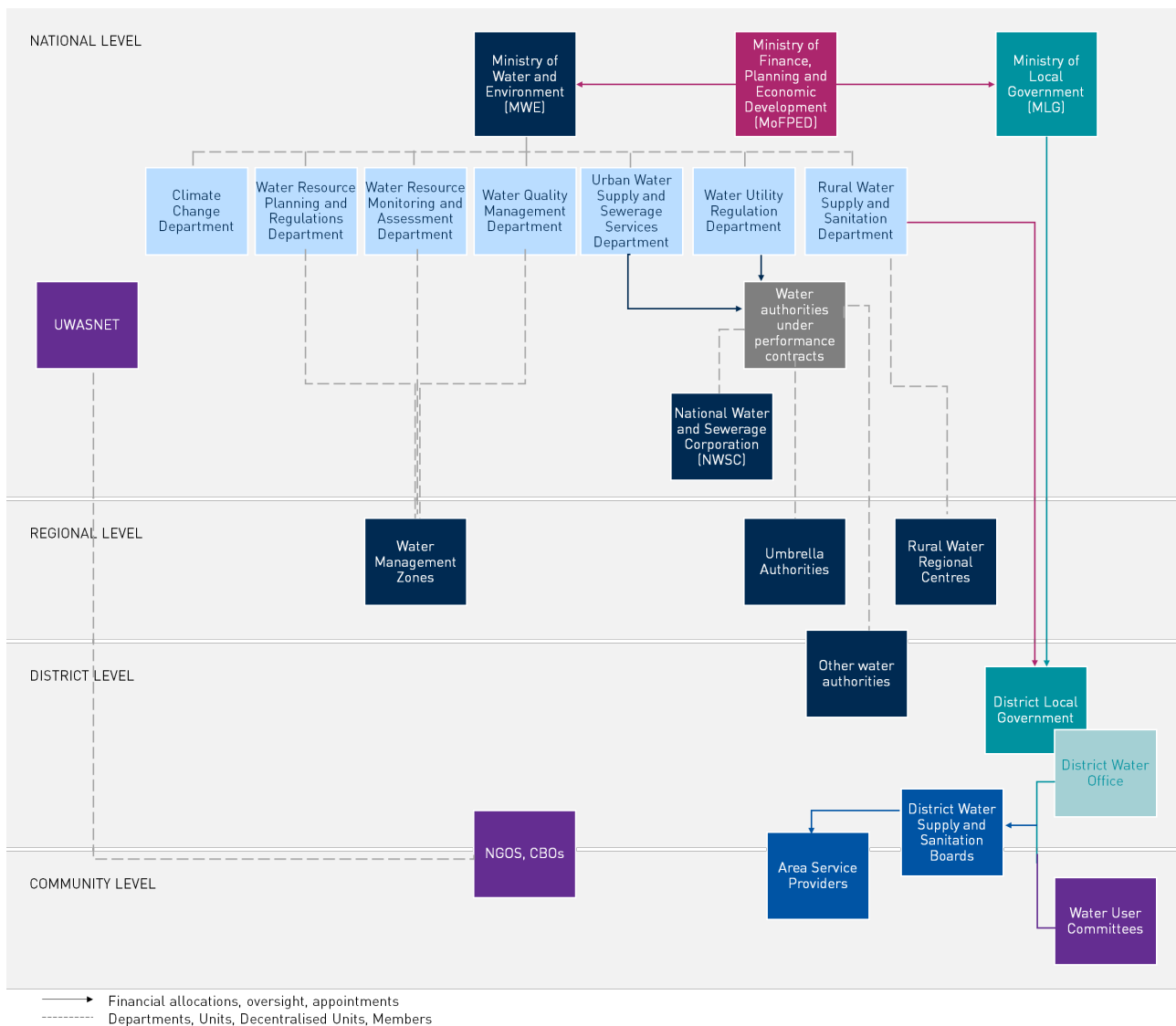
### Roles, responsibilities

Under *NDP III*, the Ministry of Water and Environment (MWE), District Local Governments, the National Environment Management Authority (NEMA), the National Forestry Authority (NFA), the Ministry of Energy and Mineral Development (MEMD) and the Ministry of Foreign Affairs (MoFA) are responsible for improving coordination, planning, regulation and monitoring of water resources at catchment level. This includes:

- Developing and implementing integrated catchment management plans for water resources catchment areas,
- Establishing functional gender-sensitive regional and zonal management committees for water resources,
- Ensuring efficient use of water resources information for early warning and decision-making, and
- Maintaining natural water bodies and reservoirs to enhance water storage capacity to meet water resource use requirements.

The Ministry of Water and Environment (MWE) is the ministry in charge of preparing strategic plans related to water under the Climate Change, Natural Resources, Environment and Water Management Programme. MWE also has the power to set service areas and provide policy guidance to any water authority. The ministry directly oversees water authorities (National Water and Sewerage Corporation (NWSC), six Umbrella Authorities, Buikwe District Local Government, and Kalangala Infrastructure Services Limited) through performance contracts.

The Ministry of Finance, Planning and Economic Development (MoFPED) leads the budget preparation process. In doing so, it considers the sector and district strategic plans, results presented by sector ministries, and the results of sector and local government consultations. It also dictates the allocation formulas for the District Water Supply and Sanitation Conditional Grant (DWSCG) and how it can be spent.



**Figure 2: Institutional Framework for Water and Sanitation**

Source: WIN, adapted from the Institutional framework for water supply and monitoring by REAL-Water (2023).

NWSC and Umbrella Authorities establish corporate or strategic plans to comply with their performance contracts and build and operate water and sanitation systems in designated urban areas and rural growth centres. For example, NWSC's *Corporate Plan 2024-2027* considers increasing population and demand of water services to provide estimates and plans for future demand. It includes strategies such as increasing the water production capacity, expanding the water network storage capacity and water network extensions. NWSC and Umbrella Authorities also implement pro-poor strategies. For example, NWSC proposes to reduce the pro-poor tariff from UGX 25 per 20-litre jerrycan to UGX 38, and to construct 17,255 new public stand posts. The Mid-Western Umbrella Authority's policies include allowing instalments for payments and connections, and free connection for poor communities.

District Water Offices (DWO) are responsible for developing the District Development Plan (DDP) for water and sanitation, for applying for the DWSCG, and for managing funds for the provision of water services. They oversee Area Service Providers and private operators. They report to the District Councils, MWE, and the Ministry of Finance, Planning and Economic Development (MoFPED). District Councils themselves also report to the Ministry of Local Government, which provides administrative support, technical advice, guidance and mentoring to effectively execute local government district plan processes.

Lower local governments (sub-counties, municipal divisions) have the responsibility to circulate information about development priorities and strategy in communities and to guide and facilitate the involvement of parish/ward and community level actors in the planning process.

Civil society organisations (CSOs) engage actors at local level, especially during district budget and planning conferences. UWASNET (Uganda Water and Sanitation Network) also represents CSOs at national level by participating in technical working meetings and sub-programme meetings hosted by MWE (like the Sanitation Working Group) or by coordinating CSO engagements with Parliament and other stakeholders on development of *NDP IV*.

### Performance monitoring

As per the *Water Policy* (1999), MWE is responsible for monitoring, assessing, and forecasting water resources and water quality and for managing related data. It is also responsible for setting performance indicators to gauge progress and effectiveness of strategies and for supporting monitoring and performance auditing at local level.

Under *NDP III*, the MWE is required to produce annual programme performance reports, a key performance review reference during finalisation of the subsequent financial year's Budget Framework Papers. Data for production of these reports is based on management information system reports. Local governments and MWE also produce quarterly programme performance reports for MoFPED and the Office of the Prime Minister to justify release of funds.

MWE's Water Utility and Regulation Department (WURD) regularly conducts performance assessment for NWSC and Umbrella Authorities against their respective performance contracts and issues an Annual Regulator's Report. In terms of investment and resource planning, the latest annual regulator's report on Water Utility Performance Report FY 2023/2024 includes indicators for connections and growth in connections, growth in pro-poor connections, and financial viability, including budget for investments. The report notes an improvement in achievement of budgets for investment but highlights that targets should be more ambitious to ensure sustainability. It also highlights the need for financial discipline and better reporting, as well as the need to address discrepancies in the numbers for service coverage.

At local level, for coordination and performance monitoring, the *National Framework for Operation and Maintenance of Rural Water Infrastructure in Uganda* (2020), provides for the establishment and strengthening of thematic working groups, as well as a Joint Sector Review and annual District Water Offices meeting. It also provides for an annual consultative meeting on operations and maintenance with the implementing agencies, development partners, and NGOs to share strategic direction and lessons, review and benchmark.



The Office of the Auditor General (OAG) is mandated under article 163 of Uganda's Constitution, to audit and report on the public accounts of Uganda and of all public offices. The Auditor General is also mandated to conduct financial and value-for-money audits in respect of any project involving public funds and to submit to Parliament annually a report of the accounts audited. In line with this, the Auditor General annually audits accounts of institutions including MWE and all the associated departments and agencies, including NWSC. Umbrella Authorities receiving public funding, are audited under MWE. The accounts of all local governments (including lower local governments) are also audited annually.

Audit provisions for public projects funded by donors are often stipulated in funding agreements. For some projects, the audit function is exercised by the Office of the Auditor General, for other projects, audit is done by an external auditor sanctioned by the Office of the Auditor General. In some instances, project donors hire auditors to audit their projects.

Reports from audits conducted by the Auditor General, except for forensic audits, are mostly accessible online. These include financial audit reports, thematic audit reports, and value-for-money audit reports. Project audit reports are however mostly not accessible to the public. Recent relevant thematic reports include a value-for-money audit of monitoring and assessment of available ground and surface water resources. The 2024 OAG report to Parliament also includes information on local government spending and the use of the District Water Supply and Sanitation Conditional Grant specifically.

### Corrective measures

Uganda's laws on budgeting do not explicitly provide for corrective measures, incentives, and/or sanctions for poor or non-performance of duties and responsibilities during the planning and budgeting processes.

The Minister has powers to issue policy directives to any water authority, and the authority is bound by that directive. The performance contracts with service providers have provisions for sanctions including powers to the Minister to end the contract, on grounds including non-compliance to the terms and conditions of the contract.

The mandate of the Office of the Auditor General ends with the presentation of findings and recommendations to Parliament. The OAG does perform follow-up audits but has no sanctioning powers. Audit reports are discussed in the relevant parliamentary committees and later presented and adopted by the whole house. The Ministry of Finance is obligated to develop a treasury memorandum, detailing how the recommendations have been implemented. The Inspectorate of Government (IG) has the mandate to follow-up on recommendations and can investigate, prosecute, or give directives for administrative sanctions like dismissal from public service. The Office of the Director of Public Prosecutions (ODPP) can also follow-up on cases.

### De facto practice

There are plans available at all levels. They are key in guiding resource mobilisation and coordination. This includes local plans, which have clear targets.

For example, the *Bunyangabu Water and Sanitation Roadmap* (2020-2030) has as targets: increasing the proportion of people with access to basic water service to 65% by 2030 and increasing the proportion of people with access to safely managed sanitation to 35% by 2030. The *Kabarole District WASH Master Plan* (2018-2030), has targets for 2030 and proposes key strategies such as promoting self-supply technologies such as rainwater harvesting to increase access in water-stressed and hard-to-reach areas, identifying alternative funding sources, and implementing measures for effective operations and maintenance of water facilities. These plans are fully integrated into the District Local Government framework and serve as guiding documents for the implementation of SDG 6 in the districts. However, despite the elaborate planning process, water provision does not meet demand.

Overall, service coverage in urban areas has improved but the proportion of the population still accessing only basic or less adequate services remains similar since 2000. In rural areas, improvement is more pronounced but nearly 40% of the population still relies on limited and unimproved sources or surface water (WHO/UNICEF, 2025).

Some areas in Kampala and upcountry often face intermittent water shortages, especially in dry seasons (Tsimpo and Wodon, 2018). *“In areas like Kawanda, they’ve been without water for two months, despite the Katosi line passing through that area,”* noted one of the respondents. *“In Lubowa along Entebbe Road, people in that area sometimes go months without getting any water. National Water [NWSC] even has what they call dry zones,”* the respondent added.

In areas served by Umbrella Authorities, meeting the demands of the rapidly increasing population is also a challenge. Several areas remain underserved and the capacity of Umbrella Authorities to expand services is limited. For example, one respondent noted, *“when you bring water services into an area, this will attract many people to move to that area, and they also start coming up with businesses, and then the population rapidly grows. Sometimes, other industries come up because now they are putting that service to use. So, we find out that we don’t ever meet the demand. So, sometimes, the abstraction of water is not sufficient to meet the demand on the ground.”* Another respondent from an Umbrella Authority, noted *“almost 70% of our sources cannot provide sufficient water”*. As a result, water providers tend to focus on maintaining what is available rather than expanding their networks.

**Several factors contribute to these issues including rapid expansion of the population, uncertainty related to climate change, insufficient capacity, limited resources, and aging water systems that cannot handle present pressures. There are also still weaknesses, capacity challenges, and integrity risks in the planning process, notably at local government level.**

In its 2024 report, the OAG flags several concerns in water-related programmes that underline these challenges and could merit further investigation:

- The value-for-money audit of monitoring and assessment of available ground and surface water resources noted improvements but also inaccuracies and gaps in data, as well as a high number of non-functioning monitoring stations (nearly half). These factors have a direct impact on the quality and effectiveness of planning processes.

- In its review of the Local Economic Growth Support Project implemented by the Ministry of Local Government, it noted delays and the fact that several schemes for small-scale irrigation were built with no structure, or Water User Committee, or supplier to run the project after handover.
- In its review of the use of the District Water Supply and Sanitation Conditional Grant (DWSCG), the OAG notes that data on system functionality is not up to date and that funds were used on projects that were not in the District Development Plans in seven districts (OAG, 2025). Some other projects for schools were not allocated funding under the assumption that they were covered by separate programmes, suggesting unclarity in roles and responsibilities for planning. In some districts, funds were seemingly unfairly allocated to sub-counties, with sub-counties with least access also receiving fewer funds (OAG, 2024).

Indeed, there are some potential **overlaps and gaps in coordinated efforts for water resource management and planning**. While the MWE is responsible for national water policy and resource management, local governments manage water within their jurisdictions as do water authorities. Several different cross-sector groups (including the Water Policy Committee and Water Sector Working Groups) provide policy advice to the ministry, making planning overall a difficult balancing act.

**Citizen participation is an important weakness in many areas.** Although NWSC conducts annual Customer Satisfaction Surveys, there is no evidence of citizens participating directly in their planning processes and there is no framework to support this. This also holds for Umbrella Authorities. Sometimes communities or their leaders directly demand services, including extensions of piped water services to their areas, but cannot be accommodated directly. Furthermore, despite the requirements in place, lower local government are largely ineffective in facilitating effective community participation. Most of the Parish Development Committees (PDCs) and the Local Councils (LCs) are weak, disoriented and demotivated to carry out meaningful consultations with communities.

In addition, most citizens do not know about the planning processes and the relevance of their participation, and they lack information and guidance on how to participate in planning and budget processes (ACODE, 2023). Most local governments do not have clear feedback mechanisms. In addition, many citizens cannot read enough to participate in the budgeting processes as they are conducted (ibid).

It is somewhat difficult to ascertain whether NWSC and Umbrella Authorities and other authorities effectively respect their pro-poor policies and obligations to expand services to vulnerable populations. The Annual Regulator's Report on Utility Performance FY 2023/2024 on utility performance does highlight a few pro-poor actions of water authorities as well as challenges. It reports against only one related KPI on pro-poor connections but only for NWSC as well as the two water authorities Kalangala Infrastructure Services Limited and Buikwe District Local Government—but not the Umbrella Authorities. In 2023/2024 NWSC performed below target on pro-poor connections for the first time in three years.

## Climate change emergency response, planning and implementation

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Climate change emergency response, planning and implementation	Strong	Strong	Moderate	Weak	Weak

### Rules, processes, standards

Uganda has enacted a legal and policy framework for climate change emergency response, planning, and implementation, including coordination across actors. One main element is the *Uganda National Climate Change Policy* (2015), which aims at:

- Identifying and promoting adaptation policy responses for Uganda;
- Promoting mitigation policy responses for Uganda;
- Promoting monitoring, detection, attribution and prediction policy responses for Uganda and;
- Supporting the integration of climate change issues into planning, decision-making and investments in all sectors.

The policy specifically aims at ensuring that climate change concerns are integrated into national efforts for sustainable and long-term conservation, access and effective use and management of water resources. The policy identifies strategies for water including:

- Encouraging water harvesting and efficient water utilisation among individuals, households, institutions and sectors;
- Strengthening the conservation and protection against degradation of watersheds, water catchment areas, riverbanks and water bodies;
- Ensuring that all guidelines for infrastructure/hydraulic works mainstream climate change;
- Supporting institutional and human capacity building in water resource use, development and management, and;
- Strengthening water resource monitoring networks.

The *National Climate Change Act* (2021) provides for climate change response measures; participation in climate change mechanisms; institutional arrangements for coordinating and implementing climate change response measures; and financing for climate change.

The *National Environment Act (2019)* mandates the National Environment Management Authority (NEMA) and other lead agencies to put in place strategies to address climate change and its effects, to develop guidelines to address the impacts of climate change on ecosystems, including by improving the resilience of ecosystems, and promoting low carbon development. In addition, these agencies are also tasked with advising institutions, firms, sectors, or individuals on strategies to address the impacts of climate change, including those related to the use of natural resources.

There are also several strategies and plans, including the *National Climate Change Communication Strategy (2017-2021)*.

Many water-sector specific policies and plans, like the *Water Act (Cap 152)*, have not been updated recently and still do not make references to climate adaptation. However, MWE's Climate Change Department has developed guidelines for mainstreaming climate change into sectoral and local government policies and plans. Climate response planning should therefore increasingly be integrated in water sector planning processes, institutional plans, and the District Development Plans.

In its *Corporate Plan 2024-2027*, NWSC mentions the high risks related to climate change for water supply and the need for mitigation measures but also acknowledges that "currently the coordination of mitigation efforts is inadequate" and proposes few concrete measures.

According to the Local Government Development Planning Guidelines (2020), citizens are allowed to participate in environmental planning processes at village, parish, and sub-county levels. In addition, Section 9 (1) and (6) of the Public Finance Management Act, 2015 (as amended) state that each Accounting Officer shall, in consultation with the relevant stakeholders ('including citizens'), prepare a Budget Framework Paper for the agency or local government. Section 13 (2) and (15) state that the proposed annual budget shall be prepared in consultation with the relevant stakeholders including citizens.

### Roles, responsibilities

The National Climate Change Advisory Committee, created under the National Climate Change Act (2021), is responsible for: the identification of priorities and strategies for adaptation and mitigation programmes, and advising on appropriate policies, laws, and measures for effective implementation of adaptation and mitigation.

MWE's Climate Change Department is responsible for:

- Disseminating and popularising the National Climate Change Policy to all stakeholders;
- Monitoring and providing strategic advice on the implementation of the National Climate Change Policy and its costed Implementation Strategy;
- Providing technical support in the mainstreaming of Climate Change issues into Sector Plans, Budgets and Strategies;
- Providing technical guidance and support to the various stakeholders on Climate Change issues;
- Processing Letters of Approval for all duly approved Clean Development Mechanism projects, and;
- Serving as the National Focal Point for the United Nations Framework Convention on Climate Change (UNFCCC) and providing coordination and support for Uganda's effective participation in the United Nations Climate Change meetings.

Under section 9 of the *National Environment Act* (2019), NEMA is responsible for formulation and implementation of environmental and climate change policies, plans and programmes.

## Performance monitoring

The *Uganda National Climate Change Policy* (2015) provides for a Monitoring and Evaluation Framework for its implementation. The policy also provides for an independent external evaluation five years after implementation launch. All the different agencies are expected to report on a quarterly and semi-annual basis on their progress in the implementation of their respective tasks under the policy.

There are several additional platforms for monitoring and performance review including: Water and Environment Sector Working Group meetings; annual Joint Programme Review meetings; Joint Technical Review meetings; and Coordination meetings with development partners, CSOs and other stakeholders. MWE also produces an Annual Programme Performance Report and programme budget monitoring reports with input from agencies involved in the programme.

All Ministries, Departments and Agencies are required to prepare and provide periodic financial performance report to the Ministry of Finance, Planning and Economic Development. Programme performance reports are submitted periodically to the Office of the Prime Minister. As for other programmes and planning processes, the Office of the Auditor General, also carries out periodic thematic and value-for-money audits. As of 2025, there were seven such reports available online since 2020.

WURD's *Annual Regulator's Report FY 2023/2024* on the performance of water authorities, does not provide input on KPIs or initiatives related to climate change responses.

## Corrective measures

The current legal framework does not provide sanctions or any other corrective measure, in case of non-performance or poor performance of these roles and responsibilities.

## De facto practice

Climate change is a major challenge for the country, affecting the population with increased incidence of droughts, floods, and seasonal changes.

The government is currently developing regulations to operationalise the *Climate Change Act*, developing a Climate Change Vulnerability Index, and conducting climate change mainstreaming trainings, among other interventions. MWE's Climate Change Department has developed all the essential tools, instruments, and strategies required by the UNFCCC, including the Nationally Determined Contribution (NDC) and a comprehensive set of guidelines. Still, the overall implementation and coordination of climate change interventions is limited. For example, while each sector is required to create a National Adaptation Plan (NAP), so far, only two sectors—agriculture and health—have completed their NAPs. The Water Sector NAP is only nearing conclusion.

One major challenge is the limited resources available to implement the developed plans. The budget for the Climate Change Department is still limited, often just enough to cover salaries. In addition, the Climate Change Unit could expand its outreach.

**None of the respondents interviewed at district level were aware of any coordination platforms for climate change adaption and mitigation at district level.**

## Water resource use regulation, abstraction, and drilling permitting

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
<b>Water resource use regulation, abstraction, and drilling permitting</b>	Strong	Strong	Moderate	Moderate	Moderate

### Rules, processes, standards

According to Section 18 of the Water Act (1997), no person is allowed to construct or operate any water works unless authorised to do so under the Act. A person wishing to construct any works or to take and use water must apply to the MWE in a prescribed form for a permit. The Act also provides for quantification of water permits and duration of water permits.

The Act (section 34) also gives responsibility to MWE to manage and monitor the permitting systems.

MWE has an online platform for users to apply for permits (<https://weis.mwe.go.ug/>). It includes detailed guidelines for users on how to apply and use the system.

There are also national construction guidelines by MWE and the Uganda National Bureau of Standards on materials and drilling processes.

Under the Uganda Water Policy (1999), all developers and providers of water services are required to keep and provide data and information including abstraction records, drilling logs, installation records, as well as information on equipment and techniques used for implementation and development of water sources.

### Roles, responsibilities

MWE's Water Resource Planning and Regulation Management department sets policies and regulations on water use. It is responsible for receiving and processing all applications for water abstraction construction permits and must give public notice of the application in a prescribed manner. It must make its decision within 90 days of receiving permit applications. It also is responsible for licensing borehole drilling companies and ensuring that all operators hold valid annual drilling permits. It is in charge of monitoring compliance. It manages and publishes information about permits, permitting processes, and related fees.

MWE is responsible under the Uganda Water Policy (1999) for monitoring, assessment and forecasting of water resources and water quality including groundwater. These functions are carried out by its Water Resources Monitoring and Assessment Department with support from Water Management Zones at catchment level. The policy also tasks District Local Governments with monitoring groundwater abstractions in relation to recharge.



Water authorities are mandated by the Water Act (Section 81) to establish protected zones on land adjacent to any water, borehole, treatment system, or other works forming part of a water supply system or from which water supply is drawn. The Act further mandates these Authorities to erect and maintain fences on or enclose the land under the protected zone and to prohibit activities within the protected zone.

### Performance monitoring

MWE and local authorities monitor water resources, abstraction, and compliance with permits. However, it was not possible to assess the process in detail.

Performance monitoring occurs through standard programme and institutional reporting and oversight processes (programme reports, audits). MWE also publishes basic information on permit compliance on its online platform:

<https://weis.mwe.go.ug/>

### Corrective measures

Under section 25 of the Water Act (1997), MWE has powers to cancel any water permit if the holders have:

- Failed to comply with any express or implied condition to which the water permit is subject;
- Taken or used more water than they are entitled to take in any period;
- Taken or used water for a purpose other than that for which they are entitled, and;
- Failed to comply with any provision of the Water Act (1997).

Fines are also issued.

In addition, under section 39 of the Water Act (1997), any person who causes or allows water to be wasted, misused, or without reasonable cause, excessively consumed; or takes or uses water for a purpose other than that provided by the water permit, commits an offence, and is liable upon conviction to a term of imprisonment of not more than five years or to a fine of not more than six million shillings and is liable to a fine of one million shillings for every day during which the offence is continued.

There are however no penalties or corrective measures for failure to execute duties by the mandated officers and agencies.

### De facto practice

According to the MWE Annual Performance Report (2023), 419 permits (245 new and 174 renewal) were issued in FY2022/23 compared to 374 permits issued in FY 2021/2022. The report further highlights that compliance with groundwater abstraction permit conditions was at 78.7% in 2023 against a target of 77% (the same level same as in FY 2021/22, which was then below the target of 82%). **In cases where there was poor compliance, MWE attributes this to limited funding. Limited personnel to monitor and enforce compliance at community level has also been mentioned as a challenge.**

**Respondents disagreed on compliance to water abstraction permitting.** Some respondents felt that there are increasing abstraction activities without approval from MWE, especially in the districts. Some respondents noted, for example: *“Many water sources lack abstraction permits, and the public is unaware of the types of water sources that require permits”* or *“You find someone abstracting water on their farm without any permit, but you can’t just invade someone’s farm to check for permits. It is a challenge especially at the community level.”* However, others noted that abstraction permitting is strictly followed at all levels.

Similarly, opinions diverged on drilling permits and compliance. One respondent said: *“It’s very difficult to drill in Uganda without a permit,”* but added *“The drilling companies are licensed to drill. They are given a blanket permit that allows them to drill up to a certain depth. When they drill, they apply for borehole logs and can request permits for multiple sites. Some companies, especially those with more financial resources, can apply for permits for 20 or even 30 sites. When they drill, they use the same permit number for all the sites.”* Others mentioned that sometimes the processes for record keeping were not followed. There are also reports on rural water point system functionality that highlight drilling and construction issues and raise questions on dissemination, knowledge and compliance with national standards and guidelines (Danert, 2022; Danert et.al, 2024).

The MWE produces an Annual Programme Performance Report for the Natural Resources, Environment, Climate Change, Land and Water Management programme. The 2023 report highlights that a total of thirty-seven (37) requests were received for borehole drilling, out of which 29 were granted permission to drill boreholes in their respective sites. The report further notes that in the same year, Under the District Water and Sanitation Conditional Grant (DWSCG), 825 boreholes or hand-pumped wells, 107 protected springs, 77 Rainwater Harvesting Tanks and 4 valley tanks were constructed.

## Access to information on water resource management

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Access to information on water resource management	Strong	Strong	Weak	Weak	Moderate

### Rules, processes, standards

Article 41 of the *Constitution of Uganda* (1995) grants every citizen the right of access to information in the possession of the State or any other organ or agency of the State except where the release of the information is likely to prejudice the security or sovereignty of the State or interfere with the right to the privacy of any other person. The *Access to Information Act (2005)* specifies the classes of information that can be accessed and the procedures for accessing public information. The Access to Information Regulations (2011) provide for fees and requisite forms while accessing public information.

Section 114 of the *National Environment Act* (2019) specifies that every person shall have a right of access to environmental information relating to the implementation of the Act, subject to the Constitution (1995) and the Access to Information Act, 2005. Section 114(2) states requests for environmental information are to be made to NEMA.

The right of access to information is not extended to proprietary or confidential information.

### Roles, responsibilities

Under the *Access to Information Act* (2005), information officers must receive information requests and provide a response within 21 days.

### Performance monitoring

Under section 43 of the *Access to Information Act* (2005), the Minister responsible for Information is obligated to submit an annual report to Parliament on requests for access to information made by the public. This information is supposed to be contained in the ministerial annual policy statement.

### Corrective measures

The current legal framework does not provide sanctions or any other corrective measure, in case of poor or non-performance of these roles and responsibilities by different actors.

### De facto practice

**Although Uganda has enacted laws on access to information, several challenges still hinder citizens from accessing public information.** These include a broad range of exemptions under the *Access to Information Act* (2005), lack of internal appeal mechanisms, secrecy in Uganda's public service, exorbitant access fees, and technicalities based on access forms. Even websites provided for easing access to information are rarely updated and information requests often go unanswered.

**However, participants interviewed did not identify access to information as a problem.** They mentioned that they are able to access information through dialogue, engagement, and collaboration. The information provided did not make it possible to ascertain whether other actors with no close working relationship with officials in the mandated government agencies had a similar position.

## Financing

### Setting, collecting, reviewing, and managing levies and user fees

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Setting, collection, reviewing and management of levies and user fees	Moderate	Strong	Moderate	Weak	Moderate

#### Rules, processes, standards

##### Tariffs and fees for service provision

Under section 94 of the *Water Act* (1997), water authorities are mandated to fix charges, fees or deposits for commodities, services or facilities provided, with the approval of the Minister.

Section 5(2)b of the *NWSC Act* mandates the NWSC to set tariffs and charges, make and levy rates and fix terms and conditions for work done or services, goods or information supplied by it. NWSC is also mandated to determine the time within which charges shall be paid, and the terms and conditions of payment. NWSC applies a uniform tariff across its services, differentiated by customer categories. Rates, first water tariff schedules for the different consumer categories (Public Standpipes-PSPs, Institutions & Government; Industrial & Commercial, etc.), and the indexation formulas are provided and approved by the Minister for Water and Environment in Statutory Instruments (2002, 2004, 2006). Statutory Instrument 2018 No. 50 of 7th December 2018 clarifies that the NWSC water and sewerage rates shall be subject to indexation every financial year against the following parameters: domestic price index, exchange rate, foreign price index, and electricity tariff.

The tariffs of other water authorities are also governed by *the Tariff Policy for Small Towns, Rural Growth Centres and Large Gravity Flow Schemes* (2009), which aims to ensure financial sustainability of service. This policy states that revenue generated from water sales should be sufficient to meet operation and maintenance costs. The policy also aims at:

- promoting equity in service provision and fair treatment of consumers;
- ensuring that service delivery is efficient through provision of market signals that accurately reflect the cost of supply to achieve efficient production and allocation of resources, and;
- reducing the economic and financial burden of subsidies on government.

Similarly to the process for NWSC, tariffs are first proposed by the Umbrella Authorities and other water authorities and then subject to approval by the Minister. These tariffs are scheme-specific and not uniform.

The National Framework for O&M of Rural Water Infrastructure clarifies that MWE'S Rural Water Supply and Sanitation Department (RWSSD) is mandated to approve the tariff structures of systems managed by other Area Service Providers.

Section 50 and 51 of the *Water Act*, allow Water User Committees and Water User Associations to set tariffs and collect revenue. These tariffs are generally agreed on through consensus.

There are limited provisions on the process of tariff approval by the ministry. There are no provisions on publication of tariffs and fees at any of these levels. However, tariff-related information, including the tariff structure, fees and statutory instruments, is available online. There are currently no obligations for any public consultations or user or civil society engagement on tariff setting. There are no provisions on tariff collection processes.

MWE has conducted a review of the existing tariff policy to harmonise tariff setting for all water authorities, establish principles on cost-recovery and cross-subsidisation, and establish processes for stakeholder consultation and indexation. The resulting new policy is pending approval (WURD, 2024).

#### Other charges and fees

Section 32 of the Water Act gives power to the Minister to fix other fees and charges, including water permits and discharge permits.

The second schedule of the *Water Resources Regulations* (1998) further provides for levies and fees for services including registration, water permits, and drilling permits. The current fees are published online.

#### **Roles, responsibilities**

For service provision: MWE's WURD sets tariffs policies and approves the tariff proposals of all water authorities. MWE's RWSSD approves tariffs from other service providers.

MWE, and primarily MWE's Water Resources Planning and Regulation department, sets other fees and charges.

#### **Performance monitoring**

The performance contracts signed between MWE and water authorities have performance indicators on different areas, including the setting and managing of levies and fees, but information is relatively limited.

The annual programme review meetings and reporting are also a platform for monitoring and reviewing performance. WURD's Annual Regulator's Report FY 2023/2024, for example, includes information on tariff policy.

#### **Corrective measures**

The current legal framework does not provide for sanctions or any other corrective measure, in case of poor or non-performance of the roles and responsibilities.

## De facto practice

**According to expert interviews conducted, the process of setting and collecting tariffs needs to be more transparent.** Proposed tariffs should be clearly outlined, explaining the rationale behind different rates for domestic, industrial, or other categories, and the reasons for these decisions. Tariffs are often negotiated behind closed doors. Paperwork for approvals is prepared by WURD and submitted to the Minister for approval, but internal processes are not well elaborated. According to respondent interviews, sometimes this process also includes cabinet approval. The minister's approval generally comes without a clear explanation of the calculations made.

*"What people receive is a bill, but without transparency about how it was determined. The way tariffs are set by NWSC and Umbrella Authorities is quite opaque—they conduct their internal calculations, propose tariff changes, and then submit them to the Minister of Water and Environment through the [Water Utility and] Regulation Department. However, the process often seems to be closed off, with the decisions largely in the hands of NWSC," a respondent noted.*

WURD's Annual Regulator's Report FY 2023/2024 notes challenges in complying with tariffs for water at public standpipes, noting the direct impact on poor households in particular. The report also mentions that public standpipes in urban areas *"are often operated by vendors without formal contracts, leading them to charge exploitative fees that can be two to three times higher than official tariffs."* This conclusion suggests possible risks related to procurement and contract management in water authorities, as well as broader integrity issues related to the application of the *Uganda Pro-Poor Strategy for the Water and Sanitation Sector* (which has not been updated and dates back to 2006), as well as issues related to affordability and the realisation of the human rights to water and sanitation.

The report also highlights some **challenges for collection efficiency**, especially in Karamoja. It mentions a high level of arrears on water bills from other public institutions and agencies. The OAG also looks at this issue but for NWSC only. This could be an area that requires further assessment. Indeed, WIN research on revenue collection from public institutions has highlighted that some cases of non-payment by public institutions can be related to integrity risks, including unclear tariff policies and undue interference, though there are other reasons. Most importantly the research highlights the impact of non-payment on the financial viability of utilities and their services to the most vulnerable in particular (WIN and End Water Poverty, 2020).

In 2024, the OAG also reviewed NWSC's billing system and took note mainly of challenges related to IT management and to the use of estimates for billing rather than accurate meter readings.

More broadly, **there is no possibility for users to question the calculations, the bills they receive, or the amounts they are asked to pay.** The IG specifically highlights billing issues in its report on the cost of corruption and also notes the **significant financial cost of bribery for water users** (IG, 2021). With more independence and clear processes, the regulatory authority could improve tariff setting and collection, and develop a grievance or appeal mechanism.

Umbrella Authorities also experience collection challenges. One respondent provided an example stating: *“someone will come and apply for water and he has a construction site, and then he will consume some good cubic metres of water, and once the construction reaches a certain level before even a month ends, or even after one month is billed, he will just disappear, and he will come back after six months or one year.”*

**Some malpractices have been mentioned.** Scenarios include workers of Umbrella Authorities overcharging unsuspecting user communities over and above the expected charges. There are also scenarios where staff collect money from water users and use it for their own personal needs. Often, customers complain when their payments are not reflected in the system. One key informant noted: *“You can find that our standard new connection fee is 220,000 shillings, but you get our staff who go and tell the communities that it’s 500,000 shillings. When the customer pays, he/she goes and deposits the official money, and he/she keeps the balance.”* Another asserted: *“A plumber collects money and has brought maybe 80% or maybe has collected 10,000 from someone, but because at that point, he has a financial need, he uses that money, and he doesn’t declare the collected money from the customer”.* The Umbrella Authorities have embarked on sensitising customers through radio and SMS on fees and proper payment channels.

Different studies also refer to limited willingness and ability to pay fees in rural areas (Real-Water, 2023 citing UWASNET, 2020; Lockwood, Mulumba, and Henry, 2018). Interviewees suggested that low participation, misunderstanding of the need to pay for service, and tensions in communities contribute to non-payment, which in turn contributes to lengthy periods of non-functionality of some water sources. Interviewees also suggested that **record-keeping and financial management skills are limited at community level** and in Water User Committees, which has allegedly resulted in embezzlement or misuse of funds collected for water system maintenance.

There is little available information to assess de facto practices on the setting, management, and collection of other kinds of fees or charges in the water sector.





Photo: Ssenyonga J. takes his cows to drink from the stream and draws water for his own use. Photo taken along the Kasangati-Namugongo road, less than 20 kilometres from Kampala. Joel Mwesigwa (WIN photo competition 2020)

## Operations and Service Delivery

### Water quality monitoring and control

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
<b>Water quality monitoring and control</b>	Strong	Strong	Moderate	Moderate	Moderate

#### Rules, processes, standards

Both the *Water Act (1997)* and the *Uganda Water Policy (1999)* have provisions on ensuring water quality. The *Water Act (section 107)* gives responsibility to MWE for coordinating all public and private activities to influence and regulate water quality in the management of water resources.

The *National Environment Management Policy (2014)* looks at strengthening the capacity to measure and to continuously assess and monitor the quality and quantity of water resources.

The *National Framework for Operation and Maintenance of Rural Water Infrastructure in Uganda* (2020) notes the roles of several actors for water quality surveillance and monitoring, with MWE through its Regional Water Supply Centres and District Local Governments in the lead. The Implementation Guidelines for Local Governments of the District Water Supply and Sanitation Conditional Grant (DWSCG) (2022), require the testing of all new water sources and 20% of the existing water sources annually.

The *National Water Quality Management Strategy* (2006) emphasises the importance of water quality management and establishes a tiered water quality laboratory system with the National Water Quality Reference Laboratory at the top and regional laboratories established in four Water Management Zones (WMZ).

Water quality is measured against specified national standards, in line with WHO guidelines. There are also testing standards, with requirements on how often sampling should be carried out. The standards are set by the Uganda National Bureau of Standards (in particular, Standard US EAS 12:2014 focuses on drinking water).

MWE has an online portal to communication information on water resources, including water quality (<https://weis.mwe.go.ug/>). However, there do not appear to be national obligations or rules for handling water quality issues or communicating water quality data and concerns to users.

### Roles, responsibilities

The Water Quality Management Department at MWE is responsible for (MWE, n.d):

- Reviewing and initiating improvements to the policy, legal and institutional framework for water quality management in Uganda;
- Developing, reviewing and updating water quality management plans;
- Carrying out water quality assessments and offering advice on water quality issues to different stakeholders;
- Providing support for water treatment especially in small towns, rural growth centres and institutions that are not under NWSC;
- Operating a National Reference and Regional Laboratories for environmental quality analysis;
- Monitoring, quality assurance and regulating operations of water testing laboratories in Uganda;
- Establishing and operating a National Water Quality Database, and;
- Conducting research in water quality and supporting innovations for low-cost water treatment.

The National Water Quality Reference Laboratory and the Environment Laboratories Division is responsible for:

- Development and implementation of a local proficiency testing scheme in collaboration with the Uganda National Bureau of Standards;
- Provision of services for water testing equipment calibration;
- Regulation, monitoring, supervision and technical audit of water testing laboratories, and;
- Provision of capacity building for all water testing laboratories in analytical techniques and quality systems.

Water authorities operationalise water quality testing and monitoring to comply with their performance contracts.

### Performance monitoring

The Water Quality Department at NWSC is responsible for ensuring that the water supplied to NWSC customers meets WHO and national standards for clean and safe water. Water (and wastewater) samples are collected by water quality experts and tested in 75 laboratories across the country. These labs are supervised by the regional labs located in Kampala, Mbarara, Gulu and Mbale. NWSC publishes weekly water quality reports on its website. In its Service Charter (2023) NWSC provides basic information to users on its responsibilities for water quality and provides communication channels for users to report water quality concerns.

Umbrella Authorities also monitor water quality by periodically collecting and testing samples. Some of the Umbrella Authorities have established mobile water quality monitoring laboratories to perform the testing. For example, Mid-Western Umbrella has six decentralised labs within their areas of operation. They do not generally publish results.

MWE's WURD monitors compliance of water authorities with water quality standards and publishes results in its Annual Regulator's Report.

District Water Offices also monitor water quality by collecting and testing water samples from water points under their jurisdiction. They do this with support from MWE through its Regional Water Supply Centres. Findings are published in internal reports and rarely made public, except for excerpts in the Auditor General's reports.

### Corrective measures

MWE's WURD has recommendations for action in its Annual Regulator's Report. It can institute penalties and awards as the situation may warrant, on any provider that is non-compliant in quality matters.

### De facto practice

MWE's WURD Annual Regulator's Report of 2023/2024 repeatedly notes the importance of water quality compliance and reports a high average compliance rate of 95% across all water authorities. It notes however that challenges do persist, for example with Eastern Umbrella. It recommends increasing testing frequency and improving collaboration with local authorities for protective measures against contamination.

In interviews, Key Informants also mentioned water quality challenges for some piped water systems managed by Umbrella Authorities, especially due to aging infrastructure under strain: *"The systems that we are managing were constructed over 10 years back when the population pressures were not the way they are now. And people have extended most of their cultivation activities near most of the water catchment areas. Whenever it rains, we have erosion—the soils are now moving, and when they move, they enter into these water bodies. And these are the same water bodies where we are tapping water that we supply to our communities. However, our treatment facilities were not designed to handle such a load of impurities in the water. In such cases, we are forced to shut down some of the water systems. In some cases, we shut them down until the rivers stabilise,"* noted one of the Key Informants.

Water quality issues in rural areas are most significant. Water quality **monitoring at the district and community level is quite limited**. NGOs sporadically fund water quality testing activities, but there are substantial financial and capacity gaps that hinder the institutionalisation of water quality testing (Aquaya, 2023a and 2023b).

*“We have a team that moves around getting samples, testing them, and interpreting the results. From the findings, if it is a managerial issue, it is addressed. If it is a complicated issue that may require further investment and community engagement, we treat it according to the situation and availability of resources. The main challenge is that we keep losing our water quality experts to other players in the industry,”* noted one of the Key Informants.

In Lira district, only 48% of the water points are free from faecal contamination. It appears water is generally safest with piped systems and boreholes, compared to wells and springs (Aquaya, 2023b). Another issue, especially in the Lira district is high iodine in the water, which when excessive can have negative health effects, especially for children. Respondents noted that there are increasing cases of iodine in the water, with no immediate solution.

Faecal contamination of drinking water is widespread in Kabarole district as well. Approximately 65% of rural water sources do not meet national microbial water quality standards. Worse still, most water users are unaware of contamination and associated risks. The majority of Kabarole’s water supply systems receive no treatment or regular testing, although there is increased awareness amongst stakeholders of safe water management practices (Aquaya, 2020).

There are known issues of high manganese and high iron content in water. The latter has been documented most extensively and has led to the MWE issuing a ban on the use of galvanised iron pipes in 2016. Still, the issue remains a concern, especially as the strategic focus on piped systems and professionalisation may be affecting maintenance and follow-up of older systems relying on handpumps that may still have galvanised iron parts. (Danert, 2022; Danert et.al, 2024).

In addition to staffing issues noted above, **low capacity or funding at local level is mentioned as a key factor behind the water quality issues and limited testing**. This conclusion is also brought forward by the OAG, which noted in its 2024 annual report that 34 districts lacked water quality testing kits, and that only 6% of existing water sources in 44 districts were tested and 89% of new sources were tested, despite the higher requirements of the DWSCG Implementation Guidelines (OAG, 2025).

**Coordination issues and unclear responsibilities (for example between the national institutions, water authorities, decentralised institutions including Regional Water Supply Centres and Water Management Zones, District Local Governments, and Area Service Providers), limited enforcement and corrective action, procurement challenges, and further integrity risks** could also be limiting the effectiveness of water quality monitoring and leading to water quality issues, especially in rural areas. In particular, low awareness and communication to users is an important concern. Further investigation would be relevant on all these risks.





Photo: Omotayo-Tajudeen (Pexels)

Operation and maintenance of water supply and sanitation assets and infrastructure, including leakage control

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Operation and maintenance of water supply and sanitation assets and infrastructure, including leakage control	Strong	Strong	Strong	Moderate	Moderate

Rules, processes, standards

Section 47 of the *Water Act* (1997) makes provisions for operation and maintenance of water supply and sanitation assets. This responsibility is bestowed on the water authorities. The *NWSC Act* under section 4 also provides for operation and maintenance of water supply and sanitation assets. It states NWSC is responsible for operating with sound commercial practices and for ensuring that its revenues are sufficient to provide for all operation and maintenance costs.

As per section 48 of the *Water Act*, NWSC and Umbrella Authorities carry out O&M on their systems in line with their performance contracts with MWE. These establish more detailed responsibilities for O&M including:

- Maintaining (preventive and regular) and keeping in good repair and working condition all assets;
- Ensuring that the water supply system operates effectively at all times;
- Taking appropriate actions within reasonable time of any failure in any part of the water supply system, and;
- Planning and acquisition of additional water assets.

The performance contracts also include clauses on performance targets and evaluation methodology.

The *National Framework for Operation and Maintenance of Rural Water Infrastructure in Uganda* (2020), makes provisions for the operation and maintenance of rural water sources. The objectives of the framework include:

- Harmonising the operation and maintenance of water systems in rural areas;
- Creating awareness on the need to plan and balance funding for O&M with investments in new facilities;
- Improving mechanisms for resource mobilisation and attainment of sustainable financing for operation and maintenance of rural water facilities;
- Guiding planning, financing, implementation and monitoring O&M activities, and;
- Operationalising the water sector indicators on O&M of rural water facilities.

### Demand management

Under section 82 of the Water Act (1997), a water authority can restrict the quantity of water or discontinue the supply of water to any person if: the water authority is unable to supply the quantity of water which would otherwise be supplied to the person and; the water authority believes that the reduction or discontinuance is necessary to avoid future water shortages.

### **Roles, responsibilities**

Water authorities are responsible for:

- Hiring staff to operate and manage water facilities;
- Conducting curative and preventive maintenance and repairs;
- Using control and safeguarding system installations; and
- Liaising, coordinating and collaborating with stakeholders in the regulation system.

In other rural areas, under the *National Framework for O&M of Rural Water Infrastructure in Uganda* (2020), the MWE (through its Rural Water Supply and Sanitation Department (RWSSD)) has the responsibility for:

- Strategic planning for O&M issues and policy development for asset analysis and monitoring;
- Providing technical assistance for O&M or support access to technicians and other specialised support;

- Developing a functional O&M Management Information System (MIS) including as asset registry, and;
- Ensuring that transparency and accountability are embedded within the established management structures.

Under the same framework, District Local Governments have as main responsibilities planning and budgeting for O&M as well as capacity building to lower local government staff for O&M. They nominate members of the District Water Supply Services Boards (DWSSB) (which must include representatives of Sub-County Water and Sanitation Boards (SCWSSB) who are themselves representatives of Water User Committees), mobilise resources for DWSSB activities, and facilitate DWSSB procurement. In turn, the DWSSB is meant to contract and oversee Area Service Providers (ASP) who carry out preventive maintenance and repairs and collect user fees.

### Performance monitoring

MWE's WURD monitors performance on O&M of water authorities. It manages the Utility Performance Monitoring System (UPMIS) and publicly reports on relatively few indicators related to O&M: Non-Revenue Water, metering and metering coverage, and continuity of water supply.

Standard sector and budget reporting and monitoring are other means of performance monitoring on O&M.

Under the *National Framework for O&M of Rural Water Infrastructure in Uganda (2020)*, MWE is also specifically responsible for monitoring the framework objectives and tracking progress in rural areas. The mechanisms for monitoring performance (including asset management) are then primarily implemented at regional level via the Regional Water Supply Centres. District Local Governments are expected to organise and host quarterly district forums as one of the mechanisms to bring together stakeholders for monitoring and experience sharing. The sub-counties are expected to organise and host quarterly forums to bring together all the Water User Committees for experience sharing.

The Framework includes provisions for mid-term evaluation of its implementation after 3 years and a full evaluation after 2030. In 2025, it was unclear whether the mid-term evaluation had taken place.

### Corrective measures

MWE has powers to terminate performance contracts if NWSC or other water authorities are not in compliance with the provisions in their performance contracts. There are no clearly defined sanctions for non-compliance or poor performance of other provisions, including those in the *National Framework for O&M of Rural Water Infrastructure in Uganda (2020)*.



### De facto practice

One of the most significant issues in operations and maintenance is **persistently high levels of non-revenue water (NRW)**. NWSC has NRW levels above 38%. In Kampala and surrounding areas specifically, NRW stands at approximately 41%, which is very high. Some of the Umbrella Authorities also have high levels of NRW (Eastern Umbrella Authority has highest rate at 57.7%). (MWE, 2025)

This represents a considerable financial loss and has direct impact on the quality of services. Respondents have claimed that the issues are due to vandalism and pipe breakages, adding also that few people report broken pipes. MWE's WURD is more specific and attributes physical losses to *"leaks, delays or insufficient repairs, and poor infrastructure maintenance."* It attributes commercial losses to *"faulty or inaccurate meters, illegal connections and water theft, poor data management, or irregular meter readings"* (MWE, 2025).

There are important **links between NRW and corruption**, though not always direct. Corruption affects several aspects of water management, from infrastructure quality, to financing, to billing practices, and human resources. This has an impact on both physical and commercial losses and is intertwined with the weaknesses that WURD outlines. Corruption leads to diversion of financial resources. Corruption in construction and maintenance work often leads to substandard infrastructure or technology. Nepotism can lead to working with unqualified personnel or contractors, reducing the effectiveness of planning, maintenance, and NRW reduction initiatives. Rent-seeking behaviour can affect the way utilities deal with informality. Corruption also erodes trust between service providers and users, reducing willingness to pay and encouraging malpractice (WIN, 2024b). How poor integrity specifically affects NRW in different area and for different water authorities in Uganda will vary and **requires further investigation**.

Some water authorities are aware of the issues and have plans in place. The Mid-Western Umbrella has moved from reactive to preventive maintenance and has a combined approach to support and finance its strategy, focusing first on encouraging payment from users and procuring fittings in advance, and second on tracking NRW and developing incentives reduce it. This includes extra pay to mechanics and plumbers who report leakages and who respond on time. They also have plant maintenance teams stationed in different areas of operation and some who work on several water systems, so they can respond quickly in case of emergency.

Another major concern for water system operations has emerged from parallel research on sexual corruption in Bunyangabu, Kabarole, and Lira by WIN, ANEW, UWASNET (WIN, forthcoming). Sexual corruption, or 'sextortion', is a form of corruption where sex (rather than money) is the currency of a bribe. It occurs when someone in a position of power abuses that power to get sexual acts in exchange for a service, opportunity, or benefit. Surveys in the three districts revealed a widespread but hidden problem threatening women's access to services, with up to **16.7% of respondents noting they were affected or were aware of other women affected by sexual corruption**. The research shows that sexual corruption in access to water services is driven by poverty, water insecurity, long travel times, and local governance gaps, not individual traits and behaviour. **There are significant differences between districts. Sexual corruption patterns also differ starkly from patterns related to broader gender-based violence.**

Sexual corruption is not recognised specifically (as a corruption and gender-based violence issue) in the Ugandan legal framework. There are no formal monitoring processes and reporting is stymied by social stigma and impunity. **To respond and stop sexual corruption, formal recognition and awareness of the practice are a top priority, followed by continued investment in safe and close to home water infrastructure.**

Umbrella Authorities, as well as service providers and stakeholders in more rural areas face additional challenges for operations and maintenance. First, there are resource challenges. Some Umbrella Authorities claim they cannot generate sufficient revenue from users to cover operational costs and that while the collected revenue may cover staff salaries and energy expenses, it is insufficient for capital investments, such as service extensions or major repairs. These Umbrella Authorities therefore rely on support and subsidies from MWE to keep operating. It was not possible in this study to assess the process for requesting or attributing these specific subsidies.

Resource issues were also mentioned as factors hampering adequate operations and maintenance of smaller systems. Insufficient funding to District Water Offices and communities unwilling to contribute fees for maintenance were mentioned specifically. There are substantial changes occurring on maintenance arrangements under the *National Framework for O&M of Rural Water Infrastructure in Uganda*. It was not yet possible for this study to fully assess scale, effectiveness, and integrity of agreements with new Area Service Providers.

Another issue is energy. Many areas rely solely on solar energy for pumping systems and limited pumping hours mean limits on water supply. Finally, training and capacity were also mentioned as concerns. It appears teams are sometimes not well trained to conduct routine maintenance. *"It's not always effective to wait for a system to break down before addressing issues; a proactive approach with preventive measures is much more efficient. Even though we provide ongoing training, it's something that needs to be done regularly, and this also comes with associated costs,"* a respondent noted.

## Sanitation provision

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Sanitation provision	Moderate	Strong	Moderate	Moderate	Moderate

### Rules, processes, standards

The *Water Act (section 50)* provides for the formation of water user groups and water and sanitation committees and gives them responsibility for sanitation and hygiene in their respective areas.

Act The *Public Health Act 2000* prohibits any behaviour that is injurious or dangerous to health of the public. In addition, *Uganda Public Health Services Protocols (2016)*, make provisions for improving the living conditions of the people of Uganda through community owned public health interventions including sanitation and hygiene. The *National Environment Act* addresses some environmental aspects.

There are *National Sanitation and Hygiene Guidelines* (2017) with provisions for local implementation. There is also an *Integrated Sanitation and Hygiene Financing Strategy* (2018-2030).

Section 4 of the *NWSC Act* lists one of the objectives of NWSC as managing sewerage services, in any area in which it may be appointed to do so under this Act or the *Water Act*, to the extent and standards that may be determined by its corporate plan, any performance contract, and regulations made under the Act or the *Water Act*.

There appears to be an ongoing process led by the Ministry of Health (MoH) in collaboration with MWE to review current frameworks and develop a National Sanitation and Hygiene Policy (MWE, 2025).

### Roles, responsibilities

The definition of roles and responsibilities for sanitation is unclear, especially at district level.

MWE's Urban Water Supply and Sewerage Department (UWSSD) is responsible for:

- Monitoring and supervising NWSC and Umbrella Authorities to ensure their compliance to sanitation provisions; Conducting sanitation and hygiene campaigns in all urban areas;
- Maintaining a Management Information System on key performance indicators in all operational small towns supply;
- Conducting quarterly monitoring and supervision of water supply and sanitation facilities in all water authorities, including Umbrella Authorities and independent Private Water Operators.

This mandate is exercised in close collaboration with the Water Utility and Regulation Department (WURD).

NWSC is responsible for acquiring, constructing, and operating works to provide sewerage services including disposing off and treating sewage. They are also responsible for preventing the escape of sewage or the pollution of any water. Umbrella Authorities manage sludge handling facilities in their areas of operation. Private service providers also play a significant role in sanitation.

### Performance monitoring

There appear to be limited dedicated performance monitoring mechanisms.

### Corrective measures

There appear to be limited dedicated corrective measures or sanctions in place.

### De facto practice

NWSC is currently operating centralised, partially decentralised, and decentralised sewerage systems in 18 towns and Faecal Sludge Treatment Facilities in seven towns, as per their Corporate Plan 2024-2027. The Corporation treats approximately 40 million litres of wastewater daily.

In 2023, the total number of new sewer connections made was 237, against the annual target of 250 connections. This brought the number of total sewer connections to 28,703, with 12.6% of these being inactive. Sewerage service coverage is still limited due to the large investment requirements and high preference for onsite sanitation facilities like septic tanks and latrines by the largest portion of Uganda's population (MWE, 2023). NWSC also has emptier trucks and it constructs public toilets around major urban centres in Uganda, in a bid to promote sanitation.

NWSC has undertaken a number of capital projects aimed at improving sanitation in the various areas including:

- Completion of the Kampala Sanitation Project which aims at improving the sewerage and sanitation situation in Kampala and the surrounding areas;
- Building of a Compact Sewerage Treatment Plant for Kiruddu Referral Hospital which aims at improving wastewater management at Kiruddu Referral Hospital;
- Implementation of the Kampala Sanitation Project which aims at the expansion of Tertiary and Secondary Sewer Networks and the development of Gaba and Mukono Wastewater Treatment Systems.

Maintenance of the existing wastewater treatment infrastructure is still inadequate. This affects the effectiveness of the treatment process, and the life span of the treatment infrastructure.

According to the Auditor General (2015), analysis of sample monthly test results conducted by NWSC on the quality of effluent discharged from the areas visited confirmed that the effluent consistently failed to meet quality parameters. This is an indication that there are inefficiencies in the treatment processes that have persisted over time or that the wastewater treatments plants were not designed to or are no longer able to manage the levels of certain contaminants.

The Auditor General's report for 2023/24 provides updates on implementation of previous value-for-money audit recommendations to NWSC on the management of sewerage in urban areas. The report reveals the **17% of the recommendations related to effluent discharge permits are still pending implementation**. Some of the successes that were registered include:

- Restructuring of NWSC's Department of Sewerage Services into a full directorate charged with the management of sewerage services in the country;
- Expansion of the sewerage services infrastructure and increase in connections;
- Improvement in desludging of the pond systems and maintenance of the sewage facilities, and;
- Obtaining sewage discharge permits for 17.6% of the treatment plants.

Pending challenges according to the report include:

- Effluent discharge from three sewage treatment plants (Mbarara, Masindi and Hoima) not meeting the standards for faecal coliforms;
- NWSC being unable to secure valid effluent discharge permits for fifteen (83%) sewage treatment plants, and;
- Land encroachment and vandalism of sewerage infrastructure.

There are significant challenges in sanitation management overall, with significant integrity implications. Only about 21% of Ugandan households have access to “at least basic” sanitation facilities. Sewerage systems and improved sanitation facilities are concentrated in urban areas (WHO/JMP, 2025). There is however growing awareness of the need to address weaknesses of current policy and institutional framework, especially for urban areas (MWE, 2025).

**There are very limited provisions for non-sewered sanitation.** A detailed assessment was beyond the scope of this study. Importantly however, regulation and implementation of non-sewered sanitation is related to significant integrity risks, from undue influence in planning, to extortionary prices, data manipulation, and exploitation of (informal) sanitation workers, as noted in regulatory assessments focusing on sanitation in the region (WIN, 2024a; WIN and Aguaconsult, 2024). Further investigation of risks in the Uganda context, and possible responses, would be relevant for inclusion in new policy.

## Customer service, complaints, and grievance mechanisms

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Customer service, complaints, and grievance mechanisms	Moderate	Strong	Weak	Weak	Moderate

### Rules, processes, standards

The *Environment and Social Safeguards Policy* (2018), states that MWE shall establish grievance handling mechanisms for all projects and programmes active at all levels. The mechanism is expected to be prompt, accessible, fair, transparent, and constructive. The mechanism does not impede the access to judicial or other administrative remedies that may be available through the country systems.

MWE Clients Charter (2018), spells out the commitments and standards clients should expect from the ministry. The charter lists key principles and values including accountability, transparency, integrity, professionalism, and anti-corruption. The Clients Charter provides communication channels for reporting and managing complaints and appeals. The charter also provides for escalation of complaints up to the Permanent Secretary.

The NWSC Customer Service Charter (2023) also provides for grievance and complaints redress from Area Offices to Head Office. The Charter states that NWSC will respond to complaints within a day and will protect and maintain the privacy and confidentiality of complainants, and especially of informers of unauthorised water use, illegal sewer connections, and vandalism. It does not mention corruption specifically or provide dedicated channels for users reporting on corruption. Umbrella Authorities also have complaint mechanisms but there is relatively little documentation.

The *National Framework for Operation and Maintenance of Rural Water Infrastructure in Uganda* (2020), gives MWE's Rural Water Supply and Sanitation Department (RWSSD) responsibility for ensuring that transparency and accountability are embedded within the established management structures for water supply in rural areas. Examining specific grievance mechanisms at that level was not possible in the scope of this study.

Article 223 of the *Constitution* establishes the office of the Inspector General of Government with a wide mandate including receiving public complaints related to service delivery and administration.

### Roles, responsibilities

Water authorities manage their own complaint and grievance mechanisms.

The NWSC, in particular, is responsible for:

- Protecting the privacy of customers and employees; protecting and maintaining the security of individuals' personal information;
- Protecting the privacy and confidentiality of informers for unauthorised water use, illegal sewer connections and vandalism of fixtures and;
- Availing customers with information free of charge through the website, newsletters and other official channels.

### Performance monitoring

WURD does not report on any indicators related specifically to complaints or grievance mechanisms in its Annual Regulator's Report. It does report on a Customer Satisfaction Index but only for NWSC and Buikwe District Local Government, not the Umbrella Authorities (MWE, 2025).

### Corrective measures

The current legal framework does not appear to provide sanctions or any other corrective measure, in case of non-performance or poor performance of these roles and responsibilities.

### De facto practice

It is difficult to ascertain whether the mechanisms for reporting and managing complaints or grievances of either MWE or NWSC are working as intended.

Water authorities like the Mid-Western Water Umbrella Authority have toll-free lines for citizens to report grievances including instances of bribery and extortion. All Umbrella Authorities have customer relations departments or offices. Umbrella Authorities generally have complaint books, where all customer complaints are registered. The Customer Relations Officers then follow up on these complaints and provide feedback. All the complaints are handled administratively within the organisations. It appears from interviews that **action has indeed been taken in response to complaints, including warnings to staff, paying back money obtained illegally, and even reimbursing customers.**

Community meetings are sometimes held to address issues emerging from user communities. Some communities have also started WhatsApp groups as a channel for sharing their grievances and demanding better services.

The Inspectorate of Government mostly relies on whistleblower and citizen reports to investigate and prosecute corruption and has also examined the water and sanitation sectors for its report on the cost of corruption (IG, 2020). However, it is not clearly perceived as proactive for water sector stakeholders. Some stakeholders have also raised concerns about the **limited follow through of IG recommendations**.



Photo: Rajesh S. Balouria (Pexels)



## Corporate Governance and Management

### Governance and oversight

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Governance and oversight	Moderate	Strong	Moderate	Moderate	Moderate

#### Rules, processes, standards

Section 7 of the *NWSC Act* provides for a Board of Directors for NWSC, stating its composition, functions, and the rules on declarations of conflicts of interest and board meeting documentation. It also states the required qualifications for appointments.

Umbrella Authorities are also expected to have Boards of Director as per the Companies Act (2012).

*The Water Act* (1997) gives the Minister supervisory powers over NWSC and Umbrella Authorities and the authority to appoint the directors. Section 105 of the Water Act (1997) mandates the Minister to appoint an inspector to investigate the affairs of each water authority and to report to the Minister in such manner as he or she directs. This includes access to books of account, records, other documents, and other sources of information available to the water authority.

Under section 29 of the *NWSC Act*, the corporation is expected to prepare an annual report containing a report of its operations during the financial year and submit the report to the Minister no later than the 31st of October of the following financial year. Section 31 mandates the Minister to give written directions to the Board of NWSC on matters of general policy, and the Board is obliged to comply.

#### Roles, responsibilities

The NWSC Board appoints, supervises, and assesses the Managing Director of NWSC. The Board is also responsible for deciding the policies and strategies to be followed by the corporation as well as ensuring that NWSC and the Managing Director perform their functions and exercise their respective powers in a proper, efficient, and economical manner.

MWE is responsible for conducting quarterly monitoring and supervision of water supply and sanitation facilities in all water authorities, including Umbrella Authorities and independent Private Water Operators. This information also feeds the ministry's annual programme reports.

### Performance monitoring

NWSC prepares 3-year corporate plans. These are implemented mainly through annual action plans. In addition, each year, Business Streams, Divisions, Directorates, Departments, and other Business Units prepare their respective annual action plans. These plans have actions, milestones and deliverables anchored on Strategic Focus Areas in the Corporate Plan.

The performance contracts with water authorities include terms of reference for rights and obligations, operations and the exercise of their functions, and any other information or matter that the Minister and the authority may find necessary for the better operations of the authority. The contracts also outline the key performance targets and indicators as well as evaluation methodologies that will be used. By signing these contracts regularly, the Minister can hold water authorities accountable on their roles and responsibilities. MWE's WURD publishes the Annual Regulator's Report which provides information on the performance of water authorities against a set of KPIs for operational efficiency, commercial efficiency, and technical efficiency.

Parliament also has oversight over NWSC, as all public bodies, through appropriation and through receiving, reviewing, and making recommendations based on the Auditor General's reports.

### Corrective measures

Under section 16(7) of the NWSC Act, the Board can remove the Managing Director from office for incompetence, impropriety or lack of appropriate care or attention to the discharge of the duties of his or her office.

More broadly, the Minister has powers to cancel performance contracts in case of non-performance or non-compliance. The Minister also has powers to remove directors from a Board.

### De facto practice

The process of selecting Board members for NWSC is a political process. The criteria for minimum requirements are very broad, which means there could be a risk that the process be used for patronage and reward, at the expense of expertise and service delivery.

The NWSC accounts are audited by annually by the Auditor General and the findings discussed by the Committee on Commissions, Statutory Authorities and State Enterprises, before adoption by the entire house. There are however **delays in discussing and adopting Auditor General's recommendations by Parliament. These delays also extend to production and audit of the treasury memoranda.** Delays in these processes mean that it is at times hard to ascertain whether the Auditor General's recommendations for MWE and NWSC are implemented, except for cases where the Auditor General publishes follow-up reports. This was the case in 2024 for example, with the Follow up Report on the Status of Implementation of Audit Recommendations on the Value for Money audit on the Management of Sewerage in Urban Areas by NWSC.

Boards have recently been appointed for Umbrella Authorities. All water authority boards now exercise their oversight mandate, though there still is **little public documentation on their decision-making**.

Respondents were aware of regular MWE supervision. *“For every quarter, we are supposed to submit our performance. So, they review our performance and contracts are renewed annually. Where they find we have underperformed—then there are reasons as to why we have underperformed. So, in a way, we are being supervised.”* noted a respondent from one of the Umbrella Authorities.

## Human resources

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Human resources	Strong	Strong	Weak	Weak	Moderate

### Rules, processes, standards

The *NWSC Act* sets minimum requirements for top management at the Corporation including the Managing Director and Directors. The Ministry of Public Service sets minimum requirements and standards for public servants.

The *National Framework for O&M of Rural Water Infrastructure in Uganda* (2020), aims at streamlining operation and maintenance of rural water sources. It provides for a woman holding one of the three positions (Chairperson, Treasurer and Secretary) on a Water User Committee. It further states that half of the water point attendants and handpump mechanics should be women and that training should target women as well as male colleagues.

### Roles, responsibilities

The Ministry of Public Service is responsible for setting minimum qualifications for public servants and the Public Service Commission is responsible for recruiting public servants including employees of MWE. The Public Service Standing Orders for Uganda provide for selection based on merit and academic suitability.

### Performance monitoring

There appear to be limited dedicated performance monitoring mechanisms.

### Corrective measures

Technical staff can be dismissed for poor performance and/or in public interest in case of malfeasance.

De facto practice

It was not possible to ascertain in detail compliance and adequacy of appointments, recruitment, performance assessments, and general human resources practices.

In terms of staffing at MWE, women constitute only 30% of the entire labour force. Data from districts shows that out of 135 districts, only five have female District Water Officers, or about 4%. Women representation at NWSC is at 31% (MWE, 2023). This shows that large gender gaps still exist, even though policies have been enacted and implemented on discrimination, representation, and affirmative action.

The Auditor General, in 2024, found high overpayments to pensioners in several agencies, notably at the Ministry of Water and Sanitation. The OAG Report for 2024 highlights that, though some of these overpayments were errors, some were intentional. The report further notes that *‘a forensic investigation was carried out on some of the overpayments in Ministry of Water and Environment and a separate report issued to the Criminal Investigations Directorate of Uganda Police and the Inspector General of Government.’* No other Ministry, Agency, Department or Local Government is explicitly mentioned. It will be important to **follow up on the recommendations of the OAG** on this issue.

Corruption prevention, detection, and control

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Corruption prevention and control	Moderate	Moderate	Weak	Weak	Weak

Rules, processes, standards

There are no sector specific anti-corruption measures. Corruption is addressed within the existing anti-corruption laws in Uganda. Article 50(2) of Uganda’s *Constitution* 1995 allows any person or organisation to bring an action against the violation of another person’s or group’s human rights.

Section 9 of the *Anti-Corruption Act* (2009) criminalises conflict of interest. Section 10 of the *Leadership Code Act* (2002) also bars leaders from putting themselves in a position in which their personal interests conflict with their duties and responsibilities. Conflicts of interest are mentioned in the NWSC Act in the section on provisions for the Board. Board members must declare interests and cannot vote on matters where there may be conflicts.

Corruption risk assessments are not expressly provided for in the legal framework although they are sometimes conducted by non-state actors.

The Auditor General is mandated to audit all public institutions. However, the current framework does not expressly provide for Random Integrity Audits, although these have been used by the Inspectorate of Government on a few occasions.

Uganda has a *Whistleblowers Protection Act* (2010). The Act provides for the procedures by which individuals in both the private and public sector may in the public interest disclose information that relates to irregular, illegal or corrupt practices. The Act also provide for the protection against victimisation of persons who make disclosures. Under section 2 of the *Whistleblowers Protection Act* (2010), any person can make a disclosure of information where that person reasonably believes that the information tends to show that a corrupt, criminal or other unlawful act has been committed, is being committed or is likely to be committed.

External disclosures of impropriety can be made to institutions including the Inspectorate of Government (which is also mandated to receive complaints under the Inspectorate of Government Act (2002)), Directorate of Public Prosecutions, Uganda Human Rights Commission, Directorate for Ethics and Integrity, Office of the Resident District Commissioner, Parliament of Uganda, National Environment Management Authority and Uganda Police Force. An authorised officer at any of these agencies is expected to make a record of the time and place where the disclosure is made; give to the whistleblower an acknowledgment in writing of receipt of the disclosure; and keep the writing in which the disclosure is made confidential, and in safe custody pending investigation of the impropriety.

Investigation based whistleblower information and audit reports are both provided for in the *Whistleblowers Protection Act* (2010), *Inspectorate General of Government Act* (2000), *National Audit Act* (2008), *Leadership Code Act* 2002 (as amended), and other pieces of legations.

Both MWE and NWSC have client charters. The NWSC charter does not, however, specifically mention corruption. NWSC and Umbrella Authorities do not appear to have anti-corruption or whistleblower protection policies in place.

### Roles, responsibilities

Under the *Anti-Corruption Act* (2009) the Inspectorate of Government and the Office of the Director of Public Prosecutions have a joint mandate to investigate and prosecute cases of corruption, abuse of authority and public office, and conflicts of interest involving public officials.

The Auditor General is mandated to conduct a wide range of audits including financial, value for money, thematic and forensic audits.

The Directorate for Ethics and Integrity provides political leadership and coordinates national efforts to combat corruption and promote moral values. It leads policy development and manages partnerships for ethics and governance, particularly with faith-based organisations.

### Performance monitoring

The current legal and policy framework does not provide for performance review and monitoring of codes of conduct, conflict of interest policies, client charters, whistleblowing mechanisms, or whistleblower protection policies.

WURD's Annual Regulator's Report includes one indicator for Transparency and Governance, related to level of implementation of audit recommendations but with little additional information. It is only applied to NWSC and not the other water authorities (MWE, 2025).

The Office of the Auditor General is expected to produce annual reports on all audited government entities. The Inspectorate of Government is expected to produce bi-annual reports on execution of their mandates. Both these reports are presented before Parliament for discussion and adoption.

### Corrective measures

Under section 14 of the *Whistleblowers Protection Act* (2010), a person who unlawfully discloses, directly or indirectly, the identity of a whistleblower, commits an offence and is liable on conviction to imprisonment not exceeding five years or a fine not exceeding one hundred and twenty currency points or both.

Under the *Anti-Corruption Act* (2009) a person who commits an offence of conflict of interest is liable on conviction to a term of imprisonment not exceeding twelve years or a fine not exceeding five thousand currency points or both.

The current legal framework does not provide sanctions or any other corrective measure, in case of poor or non-performance of these roles and responsibilities by both the Office of the Auditor General and the Inspectorate of Government.

Under section 26 the Anti-Corruption Act 2009 (as amended), a person convicted of bribery is liable on conviction to a term of imprisonment not exceeding ten years or a fine not exceeding two hundred and forty currency points or both.

Under section 154 of the National Environment Act (2019), an officer who directly or indirectly asks for, takes or accepts, in connection with any of his or her duties, any payment or other reward whatsoever, whether pecuniary or otherwise, or any promise or security for any such payment or reward, not being a payment or reward which he or she is lawfully entitled to claim or receive; or enters into or acquiesces in any agreement to do, abstain from doing, permits, conceals, or connives in, any act or thing which is contrary to the Act or the proper execution of his or her duty commits an offence and is liable, on conviction, to a fine not exceeding ten thousand currency points or imprisonment not exceeding ten years or both. In the same way, under section 154(2), anybody who offers a bribe to an officer is liable to suffer the same consequences upon conviction.

### De facto practice

Although both MWE and NWSC have Client Charters, it is not clear whether these charters are periodically reviewed to see whether they are serving the intended purposes.

Implementation of whistleblower protection policies in Uganda has been constrained by the absence of an independent institution with an explicit mandate to protect or oversee protection of whistleblowers, weak or inconsistent resourcing of oversight and enforcement bodies, and the absence of a statutory witness protection law.

Reports from the OAG are discussed in the relevant parliamentary committees. The IG produces bi-annual reports on execution of their mandates. However, these reports are produced late and sometimes not accessible online. Unlike Auditor General's reports, **IG reports are not discussed in committees or even the whole house. Findings from the OAG and IG do not seem to be used or followed up by CSOs working in WASH.**

It appears **audit queries for projects in the water sector are sometimes kept under wraps, often handled in boardrooms, with little information in the public domain.** *"In terms of sector audits or project audits, there have been instances where serious issues were raised by donors. Some of these findings have been troubling including clear evidence of corruption, document forgery, and even bizarre cases like someone receiving per diem for 495 days—essentially claiming to have worked for an entire year. Another scenario involved procurement of pick-up motorcycles with 80-litre fuel tanks, which is highly unusual," noted one of the respondents. "In Bududa district, there was a large water project which was supposed to use pipes with a 65-centimetre thickness, but they received pipes that were only 50 or even 40 centimetres thick. These kinds of specific project-related issues are common, but you won't typically find such reports readily available on the table," the respondent added.*

CSOs working on WASH could exercise a more proactive watchdog role and make this information publicly available. Partnerships with media houses and investigative journalists can be crucial to exposing these forms of corruption and for demanding action.

Respondents have shared some concerns about factors that might facilitate corrupt practices, including institutional culture and sector technicality. One respondent noted for example, that: *"In the Ministry of Water and Environment, whether one is working in Luzira or the regional offices, everyone works in close proximity. They know each other well and often protect each other—it is a very close network. For me, the whole system is flawed. When the auditor points out that someone is implicated in a significant financial loss, you never hear about any real action being taken,"* one respondent noted.

There are reports of persistent integrity challenges in public procurement in the water and sanitation sectors. In 2025, MWE officials were questioned by Parliament over an unauthorised extra expenditure of UGX 25.3 billion in the "Strategic Towns Water Supply and Sanitation Project" (Parliament of Uganda, 2025). In Kabale District, a procurement process for livelihood and WASH-related items valued at over UGX 1.4 billion was suspended following whistleblower allegations of fraud and non-transparency, while the Inspectorate of Government recently dismissed a NWSC engineer for diverting hundreds of water pipes intended for public works to a private contractor (Asiimwe, 2025). Further, interviewees from Umbrella Authorities have also identified procurement specifically as one of the top three priority integrity risks for their operations. Such procurement risks, including collusion and bid-rigging among suppliers, favouritism in tender evaluation, diversion of materials, weak contract supervision, and undue political interference, can contribute to resource leakage and undermine service delivery. There are estimates that up to 26% of WASH investment may be lost to corruption, reinforcing the urgent need for stronger compliance monitoring, open contracting, and protection for whistleblowers within the sector (WIN, 2024c).





Photo: Keith Kasaija on Unsplash

## Environmental Protection

### Environmental standards, wastewater management standards, and pollution control

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Environmental standards, wastewater management standards, and pollution control	Strong	Strong	Moderate	Strong	Weak

#### Rules, processes, standards

Section 31 of the *Water Act* [1997] specifically prohibits pollution. A person commits an offence who, unless authorised under the Act, causes or allows waste to come into contact with any water; allows waste to be discharged directly or indirectly into water; and allows water to be polluted.

Sections 28 and 29 of the *Water Act* (1997) make provisions for the management of wastewater. A person wishing to discharge wastewater can apply to MWE's Water Resource Planning and Regulation Department for a waste discharge permit. Upon receipt of the application, MWE must give public notice of the application. Members of the public are allowed to raise objections before a permit is issued. After consultations, MWE can grant a permit on such terms and conditions as it sees fit. In particular, a waste discharge permit may:

- Specify, restrict or prohibit certain types, volumes or concentrations of waste which may be produced, stored, discharged or deposited;
- Specify how waste is to be stored, treated, discharged or otherwise dealt with;
- Require the holder, at his or her own cost, to install and operate pollution control or waste treatment equipment of a type specified by MWE;
- Require the holder to take measures specified by MWE for the purpose of minimising the possibility of pollution resulting from activity conducted or proposed to be conducted on land owned or occupied by the holder;
- Require the holder, at his or her own cost, to provide monitoring equipment specified and carry out a monitoring programme, and;
- Require the holder to provide the director with information and data relating to the characteristics, volume and effects of waste being produced, stored, treated, discharged, deposited or otherwise disposed of.

The standards for wastewater discharge are stated in the *National Environment Standards for Discharge of Effluent into Water or Land Regulations* (2020).

Section 78 of the *National Environment Act* (2019) also prohibits pollution. Section 78(1) states that a person shall not cause pollution or initiate anything that may occasion a risk of pollution. Section 78(2) states that a person whose activities are likely to cause pollution shall put in place measures to prevent the pollution from occurring, including by use of best available techniques and best environmental practices.

The *National Environment Management Policy* (2014), sets out strategies for broader environmental management, including:

- Promoting catchment based integrated water resources planning, management planning and development;
- Promoting stakeholders' participation in water resources development and management;
- Promoting creation of synergy and efficient use of resources, and;
- Developing local capacity for community management and maintenance of water catchment areas and water source points.

However, it does not clearly specify responsibilities for leading implementation.

### **Roles, responsibilities**

Under NDP III, agencies including MWE, Local Governments, NEMA, the National Forestry Authority (NFA), the Ministry of Energy and Mineral Development (MEMD), and the Ministry of Foreign Affairs are responsible for:

- Developing and implementing integrated catchment management plans for water resources catchment areas;

- Demarcating and gazettement conserved and degraded wetlands, and;
- Ensuring efficient use of water resources information for early warning and decision-making.

The Policy Committee on Environment is responsible for providing guidance in the formulation and implementation of environmental and climate change policies, plans and programmes.

The Water Policy Committee is mandated under section 29(5) of the *Water Act* to prepare guidelines concerning waste discharge permits and recommend them to the Minister for Water and Environment.

Under the *National Environment Act* (2019), MWE is responsible for overseeing environmental planning and ensuring mainstreaming and integration of environmental concerns into sector policies, plans and programmes. The Minister is also responsible for spearheading the development of a *National Environment Action Plan*.

MWE has the duty to ensure that anyone applying or issued with a waste discharge permit, puts in place necessary measures to protect the environment and to prevent pollution of any water (as per the *Water Act*).

The National Environment Management Authority (NEMA) is responsible for setting environmental standards, targets, and objectives as well as coordinating, monitoring, and regulating all actors working on issues of the environment. Under section 78(5) of the *National Environment Act*, NEMA can issue a licence for the control of pollution, for activities likely to cause pollution. NEMA also has powers to order any person to stop activities causing pollution, revoke a licence if the activity is licensed, and carry out any other measures the Authority deems necessary.

At local level, the District Environment and Natural Resource Committees are responsible for:

- Preparing district environment action plans;
- Ensuring that environmental concerns are integrated in all plans and projects, and;
- Monitoring all activities within their local jurisdiction to ensure that such activities do not have any significant impact on the environment.

Water authorities are responsible for providing water and sewerage services in a socially and environmentally responsible manner (as per the *Water Act*, section 47). This includes responsibility for:

- Protecting raw water sources to guard against pollution from human activities;
- Protecting raw water to ensure sustainability of the quality and quantity of raw water, and;
- Developing and implementing source protection plans for new water projects.

Every industry or establishment is required to install at its premises, anti-pollution equipment for the treatment of effluent chemical discharge emanating from the industry or establishment. Anti-pollution equipment installed is expected to be based on environmentally sound practice, as per the National Environment Standards for Discharge of Effluent into Water or Land Regulations (2020).

### Performance monitoring

Performance monitoring occurs through standard programme and institutional reporting and oversight processes (programme reports, audits).

MWE's Water Quality and Management Department monitors the quality of municipal and industrial wastewater discharged into water or land against the National Environment Standards for Discharge of Effluent into Water or Land Regulations, 2020. The monitoring indicator used is 'percentage of water samples taken at the point of discharge complying with National Standards for discharge of effluent into water or land Regulations (2020)'.

### Corrective measures

Under Article 165 of the *National Environment Act* (2019), any person who contravenes any environmental standards prescribed under the Act commits an offence and is liable, on conviction, to a fine not exceeding 10,000 currency points or imprisonment not exceeding seven years, or both. A person who engages in activities that result in aggravated pollution also commits an offence and is liable, on conviction, to a fine not exceeding 50,000 currency points or imprisonment not exceeding fifteen years, or both. The Act adds that a convicted person could also be ordered to pay compensation for loss or damage not exceeding five times the value of the loss or damage caused. The convicted person may also be ordered to pay up to ten times the amount of any fees, royalties, or other payments which, had the act constituting the offence been authorised, would have been payable in respect of the authorised act. In addition to any sentence imposed upon a polluter, the court may direct that person to pay the full cost of cleaning up the polluted environment and of removing the pollution, clean up the polluted environment, and remove the effects of pollution to NEMA's satisfaction.

Under the same Act, NEMA also has powers to levy fees, fines, penalties, and charges on anyone acting in contravention of the Act. In addition, NEMA has powers to cancel or suspended a certificate, licence or other approval granted under the Act for contravention of any provision of the Act.

The act does not provide for sanctions or any corrective measures in case of poor or non-performance of roles by the mandated agencies especially NEMA and MWE.

Under section 25 of the *Water Act*, MWE has powers to cancel a water permit in case of any violations including pollution.

Section 31 of the *Water Act* (1997) criminalises pollution. The offence of pollution is when waste is allowed to come into contact with water, when waste is discharged directly into water or when water is polluted directly. A person or public authority that causes pollution is liable to pay the cost of remedying the damage caused and reinstating the environment, as far as is possible, to the condition that would have existed if the damage were not caused.

The Minister has powers to apply to court for enforcement of compliance or to enter any land and take such measures as may be necessary to ensure compliance with the provisions. Under Section 31(6) of the *Water Act* (1997), the court may, on application by the Minister, require that a person or authority responsible for pollution pay into court a sum not lower than 80% of the cost estimated by the Minister for remedying the damage caused and reinstating of the environment.



Any person who contravenes the *National Standards for discharge of effluent into water or land Regulations (2020)* commits an offence and is liable, on conviction, to imprisonment for a term not exceeding eighteen months or to a fine not lower than 180,000 shillings and not higher than 18 million shillings or both. The regulations also empower the Executive Director of NEMA to give directions as to steps to be taken to mitigate the damage caused as a result of the contravention of the regulations.

### De facto practice

Enforcement measures have been taken including eviction of encroachers from wetlands, forest reserves and other protected areas, confiscation of equipment used to dump murrum in wetlands or making noise, and arrest and prosecution of suspects (Akello, 2007).

In FY 2022/23, a total of 259 wastewater samples were collected and analysed. Analysis of the results of wastewater quality showed an overall compliance level of 47%, lower than the desired target of 68%. The overall compliance of drinking water supplies in the rural area with respect to E. coli was 55% against a target of 80%. The overall compliance of urban water supplies to E. coli was 71%. The poorly treated wastewater discharged into water bodies continues to affect the quality of the water resources, resulting in algal blooms and occasional fish kills. The main sources of water pollution include meat products processing, textiles processing, sugar processing, milk products processing, and municipal wastewater. Reduction in funding for water quality sample collection is highlighted as a key challenge. (MWE, 2023).

This notwithstanding, **enforcement of environmental standards in Uganda is still a challenge. This is mainly due to limited funding and personnel at the NEMA, limited capacity at local government level, insufficient capacity of law enforcers** (both in terms of skill and knowledge of environmental law and resources like equipment), and increasing urbanisation. There are also claims that there are inconsistent political positions and statements made on the environment, especially during elections, which undermine policy enforcement (Akello, 2007).

**Serious allegations have been made about undue political interference**, including that politicians might encourage or turn a blind eye to environmental degradation in exchange for political support. Further investigation and clear responses to such allegations are important, as implementation and monitoring of environmental standards in water and sanitation environmental is an area of significant and high-impact integrity risks in many countries (from bribery or data manipulation to undermining of state capacity for inspections or law enforcement).

## Social and environmental impact assessments

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Social and environmental impact assessments	Strong	Strong	Moderate	Weak	Moderate

### Rules, processes, standards

Section 114 of the *National Environment Act* (2019) provides for NEMA requiring environmental risk assessments. Section 114(3) states that an environmental risk assessment shall include hazard identification, vulnerability analysis, risk analysis, and risk response action.

The *Environment and Social Safeguards Policy* (2018), provides for screening of all projects and programmes to identify risks and ensure that they do not cause environmental or social harm and provides principles for such assessments.

### Roles, responsibilities

Under section 9(2)i of the *National Environment Act* (2019) NEMA is responsible for reviewing and making decisions on environmental and social impact assessments and environmental audits.

In addition, under the *Environment and Social Safeguards Policy* (2018), MWE is responsible for ensuring that all projects/programmes that have the potential to cause environmental or social harm, that the implementing entity should prepare an environmental and social assessment that identifies any environmental or social risks. The assessment also includes measures to avoid, minimise, or mitigate environmental and social risks of the proposed project or programme.

### Performance monitoring

The *Environment and Social Safeguards Policy* (2018), states that environmental and social risks identified during project or programme assessment, design, and implementation, will be addressed in the Ministry's and project specific Monitoring and Evaluation systems. It further states that project or programme performance reports shall include a section on the status of implementation of any environmental and social management plans, including those measures required to avoid, minimise, or mitigate environmental and social risks. The mid-term and terminal evaluation reports should also include an evaluation of the project or programme performance with respect to environmental and social risks.

### Corrective measures

There appear to be limited dedicated corrective measures or sanctions in place.

### De facto practice

According to the Natural Resources, Environment, Climate Change, Land and Water Management annual programme performance report (2023), several safeguard activities were implemented under the Integrated Water Management and Development Project (IWMDP). These include Social Impacts Assessment (ESIA), Resettlement Action Plans (RAP), and Source Protection Plans (SPPs). In 2023 for instance, six projects completed the Environment and Social Impact Assessments (ESIAs), the Resettlement Action Plans (RAPs), and Source Protection Plans (SPPs) reports.

The report further notes that MWE carried out field monitoring of implementation of the environment and social safeguards for several projects done by contractors. **MWE notes that compliance to environmental and social safeguards has generally improved. However, not all projects that have the potential of harming the environment actually conduct Environmental and Social Impact Assessments.** Even in instances where these assessments are conducted, the reports are not public, making scrutiny and independent follow-up challenging. In addition, **NGOs working in WASH are not engaged in monitoring compliance to environmental and social impact assessments.** This limits the level of external oversight on these processes as well as their enforcement.

This is in part due to capacity issues. Neither CSOs nor local governments have capacity to conduct or monitor Environmental Impact assessments. The general thinking is that Environmental Impact Assessments are costly and are only required for large-scale projects, such as those by NWSC or projects that have a high potential for environmental degradation, like oil and gas developments. Respondents opined that smaller-scale activities like constructing a borehole or connecting a health facility should not require Environmental Impact Assessments.

## Water ecosystem designation, monitoring, and protection

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Water ecosystem designation, monitoring, and protection	Moderate	Weak	Moderate	Weak	Moderate

### Rules, processes, standards

Section 81 of the Water Act (1997), mandates NWSC and other water authorities to establish protected zones on land adjacent to any water, borehole, treatment system, or other works forming part of a water supply or from which a water supply is drawn. In addition, the *National Standards for discharge of effluent into water or land Regulations* (2020) provide for protection of ground and surface water sources from pollution and waste contamination.



### Roles, responsibilities

NWSC and other water authorities are obligated to erect and maintain fences on or enclose the land under the protected zone. They can prohibit activities within the protected water zones.

### Performance monitoring

NWSC has internal mechanisms for periodic review and performance assessment. NWSC's three-year Corporate Plan provides an overview of performance in the previous period as well targets for the ensuing period. Internal monitoring is done through quarterly and annual reviews of compliance to the NDP requirements, NRM Manifesto commitments performance contracts. The Board has oversight.

### Corrective measures

Neither the *Water Act* (1997) nor the *Uganda Water Policy* (1999) provide sanctions or any other corrective measure, in case of non-performance of these roles and responsibilities.

MWE can cancel or make provisions in performance contracts with water authorities, and can cancel permits, to enforce these provisions.

### De facto practice

The NWSC Corporate Plan 2024-2027 includes environmental safeguards in operations and investments under section 8 and there is some evidence that it does have source protection programmes.

The plans of Umbrella Authorities for ecosystem management as well as monitoring and performance review mechanisms are harder to access and assess.

It is also not clear whether performance contracts between MWE and water authorities have safeguards for ecosystem designation, monitoring, and protection.

The increase in population and poor farming practices are some of the challenges, water authorities face in their plans for ecosystem designation and protection. One respondent noted, *"In one of the districts, there is a system we are managing. It has been in existence for over 20 years. It was done way back. It's a river intake, and it gets water from a river. By then, the settlements were very few. There were not as many people as we have now. Today the population has increased. People cultivate around the river areas, and whenever it rains, there is a lot of erosion. When this erosion happens, downstream, you find people getting water that is not clean. However much you try to treat it, it becomes very difficult to meet the standards."*



Photo: Community members in Kawempe (Uganda) discussing the results of their resource map to track water and sanitation expenditure and resource allocation equity. (Photo by James Kiyimba submitted to the WIN photo competition 2011).

## Sector Oversight

### Joint sector review, participatory oversight

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Joint sector review, participatory oversight	Strong	Strong	Moderate	Moderate	Strong

#### Rules, processes, standards

The NDPIII, the *National Water Resources Strategy* (2018) and the National Framework O&M of Rural Water Infrastructure in Uganda (2020), all provide platforms for joint sector reviews and participatory oversight.

### Roles, responsibilities

MWE is responsible for ensuring engagement with stakeholders.

The *National Water Resources Strategy* (2018) provides for the Joint Sector Review (JSR) as a forum for performance assessment, budgeting, and policy guidance. This platform allows a broad spectrum of stakeholders to get an insight into, discuss, and influence sector developments.

The *National Framework for O&M of Rural Water Infrastructure in Uganda* (2020), provides for the establishment and strengthening of thematic working groups. It also provides for an annual consultative meeting on O&M with the implementing agencies, development partners, and NGOs to share lessons, benchmark, and share strategic direction on O&M issues. In addition, it further provides for:

- National learning forums hosted by MWE's RWSSD;
- the Uganda Water and Sanitation Network (UWASNET) O&M working group, which brings together NGOs to discuss O&M issues;
- annual Joint Sector Reviews/Joint Technical Reviews incorporating O&M strategic issues, and;
- an annual District Water Officers' meeting.

There is also a National Sanitation Working Group.

The Joint Assessment Framework (JAF) is the framework for the Government of Uganda and Development Partners general budget support and sector budget support.

The Water and Environment Sector Working Group (WESWG) is a forum that comprises the Ministry of Water and Environment, line Ministries, development partners, representatives of NGOs and private sector active in the sector. It is responsible for sector coordination, as well as monitoring and approval of the sector budgets.

NGOs involved in the water sector are coordinated under UWASNET. The network provides a platform for constructive engagement with government and donors in the water sector and serves to promote the sharing of experience between its members.

### Performance monitoring

There appear to be no dedicated performance monitoring systems of joint sector review and participatory oversight processes.

### Corrective measures

The current legal framework does not provide sanctions or any other corrective measure, in case of poor or non-performance of these roles and responsibilities by the respective government agencies and officials.

### De facto practice

MWE has operationalised some of the performance review platforms including the joint annual programme review, technical working meetings, and annual programme performance reporting. The annual programme review and reporting, for instance, brings on board non-state actors like CSOs to be part of the review and reporting process. The Annual Programme Performance Report includes some indicators that help the water sector to be more accountable, to set parameters for performance as well as incorporating work done by non-state actors.

However, some of the joint sector review platforms are not active as envisaged.

In 2006, MWE established a Good Governance Working Group, which is no longer active. The purpose of this group was to make specific recommendations to promote and monitor transparency, accountability, and good governance in Uganda's water sector. The Group supported the development of governance indicators for the water sector. **Such a group could be revived or institutionalised to showcase sector actors' willing to promote transparency, accountability, and good governance in the water sector.**

On the civil society side, UWASNET has a thematic working group focused on WASH good governance. This group convenes leadership meetings, learning exchanges, and discussions at the Annual WASH CSO Forum. CSO platforms like this focus on issues like managing water supply systems, governance structures including Board governance, and adoption of technology in financial management, including digital banking to reduce cash transactions.

At the district level, the Water and Sanitation Coordination meetings bring together all actors in the water and sanitation sectors, on a quarterly basis, to plan and deliberate on emerging issues. These **Water and Sanitation Coordination meetings are however not active in all districts.**

Umbrella Authorities also have platforms that bring together their stakeholders from different offices and departments. These are platforms for planning, sharing experiences from different operations and joint coordination.

### Other oversight mechanisms

	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation
Other oversight mechanism	Moderate	Moderate	Moderate	Weak	Moderate

### Rules, processes, standards

Article 50(2) of Uganda's *Constitution* 1995 allows any person or organisation to bring an action against the violation of another person's or group's human rights. Article 223 establishes the office of the Inspector General of Government as the Ombudsman.

In addition to this, Article 41 of the Constitution grants every citizen the right of access to information in the possession of the State or any other organ or agency of the State except where the release of the information is likely to prejudice the security or sovereignty of the State or interfere with the right to the privacy of any other person.

The *Access to Information Act* (2011) provides for classes of information that can be accessed and the procedures for accessing information. The *Access to Information Regulations* (2011) provide for fees and requisite forms while accessing public information.

Section 26 of the *National Climate Change Act* (2021), allows any person to apply to the High Court for relief against the Government, an individual or a private entity whose action or omission threatens or is likely to threaten efforts towards adaptation to or mitigation of climate change.

### Roles, responsibilities

Anybody or organisation can raise any complaint in courts of laws concerning the rights violations by any public officer or agency.

The Inspector General of Government is mandated to investigate any act, omission, advice, decision or recommendation by a public officer or any other authority given or done in exercise of administrative functions.

Under the *Access to Information Act*, information officers are obligated to receive information requests and provide a response within 21 days.

### Performance monitoring

The Inspector General of Government produces bi-annual reports showcasing performance and highlights received ombudsman complaints and actions taken.

Under section 43 of the *Access to Information Act* (2005), the Minister responsible for Information is obligated to submit an annual report to Parliament on requests for access to information made by the public. This information is supposed to be contained in the annual ministerial policy statement.

### Corrective measures

The current legal framework does not provide sanctions or any other corrective measure, in case of non-performance of these roles and responsibilities by the respective government agencies and officials.

### De facto practice

Unlike sectors like Health, Education, and Extractives where citizens and organisations have sued government for rights violations, civil litigation has not been applied in the water sector. No respondents were aware of any case where water providers have been sued for non-compliance, poor performance, or rights violation.

The IG reports for FY2022/23 show that 14 and 11 complaints were registered against NWSC and MWE respectively. The IG received a total of 772 ombudsman complaints. The report does not show the nature of cases reported or actions taken. CSOs engaged in WASH could follow-up on these cases.

Although Uganda has enacted laws on access to information, several challenges still hinder citizens from accessing public information. These include broad range of exemptions, lack of internal appeal mechanisms, secrecy in Uganda's public service, exorbitant access fees, and technicalities based on access forms. Even websites provided for easing access to information are rarely updated and information requests often go unanswered.

More so, although Article 29 of Uganda's *Constitution* provides for freedom of speech, the enjoyment of this right has often been hindered by application of repressive laws like defamation and libel laws under the Penal Code Act and draconian provision under the *Computer Misuse Act, 2011* (as amended).

Increasingly, the media is also in a state of self-censorship due to threats from government including denial of business and cancellation of operating permit. Journalists are also increasingly under attack, which has severely affected their capacity to report objectively on issues of concern like corruption.



## SUMMARY OF KEY FINDINGS PER ASSESSMENT AREA

	De jure situation (assessment of legislation, policy and regulatory framing)				De facto situation	
	Rules, processes, standards	Roles, responsibilities	Performance monitoring	Control, corrective measures	Implementation	Possible areas of improvement and further investigation
<b>Investment and Resource Planning</b>						
Planning for water provision	Strong	Strong	Strong	Moderate	Moderate	<p>Completing plans and increasing capacity for resource monitoring.</p> <p>Addressing data governance challenges and ensuring higher accuracy especially of data on resource levels and service coverage.</p> <p>Increasing levels of citizen engagement for district-level planning and planning of water authorities.</p>
Climate change emergency response, planning and implementation	Strong	Strong	Moderate	Weak	Weak	<p>Raising awareness at district level for climate change plans and processes.</p> <p>Pursuing update and operationalisation of climate change regulations.</p> <p><b>Monitoring climate change planning of water authorities.</b></p>
Water resource use regulation, abstraction, and drilling permitting	Strong	Strong	Moderate	Moderate	Moderate	Increasing capacity for monitoring and dissemination of guidelines and best practices.
Access to information on water resource management	Strong	Strong	Weak	Weak	Moderate	Monitoring responses and response times for access to information requests.



Financing						
Setting, collection, reviewing and management of levies and user fees	Moderate	Strong	Moderate	Weak	Moderate	<p>Assessing procurement practices of stakeholders in rural, urban, and peri-urban settings.</p> <p>Improving financial management practices of water authorities and Water User Committees.</p> <p>Monitoring approval, implementation, and impact of new tariff policy.</p> <p>Following up on OAG inputs on non-payment of water bills by public institutions.</p>
Operations and Service Delivery						
Water quality monitoring and control	Strong	Strong	Moderate	Moderate	Moderate	<p>Assessing and addressing risks in water quality testing in rural areas, focusing on enforcement capacity, procurement for testing and parts, overlaps or unclarity in responsibilities, and low awareness.</p>
Operation and maintenance of water supply and sanitation assets and infrastructure, including leakage control	Strong	Strong	Strong	Moderate	Moderate	<p>Investigating possible corrupt practices contributing to NRW.</p> <p>Strengthening capacity of NRW response teams to address integrity risks.</p> <p>Evaluating implementation of National Framework for O&amp;M of Rural Water Infrastructure.</p> <p>Expediting effective implementation of open procurement requirements in all water sector institutions</p> <p>Raising awareness on sexual corruption as both a corruption and gender-based violence issue hampering service delivery, and training staff accordingly.</p>
Sanitation provision	Moderate	Strong	Moderate	Moderate	Moderate	<p>Monitoring development and implementation of new sanitation policy.</p>

						Assessing integrity of planning processes for sanitation infrastructure. Assessing non-sewered sanitation planning, responsibilities, and monitoring processes.
Customer service, complaints, and grievance mechanisms	Moderate	Strong	Weak	Weak	Moderate	Monitoring customer grievance mechanisms of water authorities.
<b>Corporate governance and management</b>						
Governance and oversight	Moderate	Strong	Moderate	Moderate	Moderate	Increasing accessibility of board decisions and of information on status of follow-up of OAG recommendations.
Human resources	Strong	Strong	Weak	Weak	Moderate	<b>Monitoring processes related to payroll.</b>
Internal corruption prevention and control	Moderate	Moderate	Weak	Weak	Weak	Increasing accessibility and follow-up of project audit reports in water and sanitation. Increasing capacity of water authorities to monitor integrity risks and institutionalising corruption detection systems. Monitoring and incentivising integrity practices of water authorities.
<b>Environmental protection</b>						
Environmental standards, wastewater management standards, and pollution control	Strong	Strong	Moderate	Strong	Weak	<b>Strengthening monitoring and capacity for enforcement of environmental standards.</b>
Social and environmental impact assessments	Strong	Strong	Moderate	Weak	Moderate	Clarifying criteria for obligatory Environmental Impact Assessments. <b>Monitoring implementation of Environmental Impact Assessments.</b>

Water ecosystem designation, monitoring, and protection	Moderate	Weak	Moderate	Weak	Moderate	Increasing awareness on water system protection needs and processes.
<b>Sector Oversight</b>						
Joint sector review, participatory oversight	Strong	Strong	Moderate	Moderate	Strong	Including integrity as standing item in work of joint sector review platforms and working groups. Reviving Good Governance Working Group to monitor and encourage integrity action.
Other oversight mechanism	Moderate	Moderate	Moderate	Weak	Moderate	Supporting civil society and media, also to access information, monitor, and act on corruption allegations and cases.

# WATER INTEGRITY STRENGTHS, OPPORTUNITIES, WEAKNESSES, AND THREATS

## Strengths

- Coherent legal framework for water sector governance, which provides for: clear rules, processes and standards, roles and responsibilities of different actors, and platforms for performance review and monitoring.
- Detailed institutional framework for water governance from the local to national level, also incorporating state and non-state actors at various levels.
- National planning, coordination, review and reporting mechanisms that encourage information sharing and recognise the work and contribution of non-state actors.
- Systems in place for new connections, billing, revenue collection, detecting and managing water leakages at NWSC and the Umbrella Authorities.
- Platforms at the national level to support coordination, planning, review and reporting between stakeholders.
- Available pool of competent staff (engineers, surveyors, accountants, technicians, etc.) to draw from in country.
- Legal framework for anti-corruption and whistleblower protection and active anti-corruption agencies, with insight on water and sanitation.

## Weaknesses

- Generally weak dissemination and low levels of awareness on laws and policies governing the water sector, especially on critical aspects like pollution control, climate change mitigation, and regulation.
- No or limited measures for promoting integrity, transparency, accountability and anti-corruption at sector level.
- Inadequate capacity among water authorities in terms of tools, equipment, software and other resources, which affects water service delivery planning, service expansion to underserved communities, and reporting.
- Some weaknesses in financial management of umbrella authorities, limited skills in record-keeping and financial management at community level.
- Limited capacity of water sector civil society to engage in and monitor budget processes and work of Office of Auditor General.
- Limited uptake of approaches like civil litigation and investigative journalism to detect and address malpractice, unlike in sectors like Health, Education and Extractives.

## Opportunities

- International and national development frameworks (SDGs, Africa Agenda 2063, Uganda Vision 2040, and NDP III) providing clear standards and targets for the WASH sector.
- Update of water-related databases and improved data management and accessibility to support planning, budgeting, monitoring, and identification of red flags and integrity risks.
- Financial, technical and other support from development partners, which has contributed to the extension of water services to communities and to accountability efforts.
- Growing awareness by communities of roles and responsibilities, willingness to participate, and demand transparency, accountability, and anti-corruption initiatives, as well as better services.
- Uptake and use of digital technologies in the delivery of water services including managing billing and payments as opportunity for promoting transparency, accountability, participation and anti-corruption.

## Threats

- Mismanagement and corruption cases, as well as impunity and limited action on audit findings, which is diminishing trust in sector institutions at all levels, including from users and donors.
- Instances of undue political interference undermining compliance, especially of environmental standards.
- Climate change and related difficulties in planning, as well as increase in climate-related disasters.
- General decline in funding to the sector over the years, despite increasing demand from growing population.

## CONCLUSIONS AND RECOMMENDATIONS

This report has highlighted the main findings of the water sector integrity assessment for Uganda. The report analysed the status ‘de jure’, or ‘on paper’, in terms of policy, legislation, regulation and statutory guidance for good governance, integrity and accountability. The report also highlighted the sector’s performance in practice (‘de facto’).

Overall, Uganda has a comprehensive legal, policy and institutional framework governing the water sector. Though there is room for improvement, significant progress has been made in clarifying mandates, in monitoring processes and performance of water authorities, and in updating data platforms. **Processes to amend the water policy, the sanitation policy, the tariff policy and climate-related policies should be expedited and concluded with emphasis on clear integrity standards** for the sector and sector institutions, strong performance monitoring systems, and clear corrective measures for non-compliance.

The assessment shows that there are important risks, cases and allegations of malpractice and corruption in water and sanitation. **Such cases can hamper progress on sector targets, skew planning, and undermine trust in sector institutions. They must therefore be addressed swiftly and proactively.**

A key conclusion is that there is a significant **gap between strong rules and weak practice and enforcement**. A basis for stronger implementation and enforcement is detection and sanction of malpractice and non-compliance. The burden of enforcement is a collective responsibility that benefits from strong engagement with civil society. The burden can also be greatly reduced with **strong preventive measures** aiming to shift the norms that enable corruption, build capacity, and limit loopholes and opportunities for malpractice at all levels, including within sector institutions.

There are three immediate priorities:

### Priority 1: Clear sector positioning on integrity

#### **Highlight integrity in sector strategies, policies, and performance monitoring**

There should be clear standards and expectations for ethical behaviour at all levels. This means putting forward integrity principles in strategy and policy. It also should include formal recognition and awareness raising on different forms of corruption, including sexual corruption, and their impact on people and communities.

#### **Revive the Good Governance Thematic Working Group and ensure integrity is on the agenda of joint sector oversight platforms:**

The Good Governance Thematic Working Group for Water can motivate and direct integrity efforts, ensure multi-stakeholder collaboration on integrity issues (including with anti-corruption institutions and with stakeholders from other sectors, like health), follow up on audit recommendations and monitor implementation of gender and pro-poor policies.

**Monitor implementation of the Auditor General's recommendations for the sector:**

Civil society actors, including UWASNET, have an important role to play in monitoring and following up the implementation of the Auditor General's recommendations for water and sanitation, at district and national level. The focus should be on financial, thematic, and value-for-money audit recommendations. More transparency on project audits would be an important prerequisite in many cases. UWASNET and other NGOs should also develop collaboration frameworks with the national anti-corruption institutions—the IG, OAG, and PPDA—with clear channels for forwarding corruption cases and suggesting areas for audit.

**Support research into integrity weaknesses and investigate red flags:**

There are high-risk areas identified in this report and red flags or cases reported by national anti-corruption institutions that would benefit from in-depth assessments or follow-up. Priorities include for example: procurement practices, tariff setting, use of conditional grants and subsidies, sewerage and non-sewerage sanitation, water quality monitoring, evolutions of gazetted areas and implications for the financial viability and sustainability of water authorities and small systems, persistently high levels of NRW, payroll and human resource practices, and issues of non-payment of water bills by public entities and political stakeholders.

## Priority 2:

### Capacity building and corruption controls for integrity at institutional level

**Strengthen culture of integrity and support development of integrity policies and controls in water authorities:**

Water authorities need training for staff on integrity, clear integrity standards of behaviour (for example with codes of conduct), and tools or processes to identify integrity risks they face and develop robust anti-corruption systems. Regulators can incentivise and monitor the development of integrity policies and must adjust monitoring frameworks accordingly.

**Support Umbrella Authorities to digitalise all payment systems, improve financial management and procurement practices:**

Some payments are digital others are still cash based. Supporting the digitalisation of payments and improving billing and accounting processes and controls could reduce financial losses and reduce malpractice in collection of fees, including charging of exorbitant fees staff. Umbrella Authorities also need support for procurement, in particular for using the GGP and ensuring compliance with PPDA requirements.

**Support Umbrella Authorities to improve transparency and customer engagement:**

Umbrella Authorities publish relatively little information about their operations, services, complaint mechanisms, and fees. They also have no easily accessible service charters or plans, unlike NWSC which provide more information online in particular. This could include support for the publication and dissemination of information, for example through development of websites, use social media, platforms to engage with users in person, with care that communication channels are accessible to the people in their areas of operation.



**Develop financial guidelines for Water User Committees:**

Support Water User Committees with clear guidelines on financial management including sanctions for unethical behaviour, basic tools and training for budgeting and accounting, and processes for managing contractors or working with ASPs.

**Strengthen capacity and support to District Water Offices:**

District Water Offices need more resources for coordination with other sectors and water authorities, and for oversight and community engagement, especially as gazetted areas evolve. Support for water quality monitoring and integrity in water quality monitoring in rural areas is also key.

**Priority 3:**

### Accountability as grounding principle, through civil society engagement and transparent regulation

**Fund and support civil society, as accountability partners for the sector:**

Communities need clear channels to raise concerns, get feedback, or monitor performance. Civil society can ensure people's needs are heard, sector stakeholders act on their promises, support monitoring, track budgets and plans. They play a crucial role in support of sector regulation and policy.

**Strengthen capacity of MWE's regulation departments:**

Both WURD and the Water Resources Planning and Regulation Department need sufficient resources and personnel to exercise their mandates with integrity and ensure adequate outreach and community engagement activities. They also need the autonomy and capacity to better understand, incentivise, and proactively monitor integrity risks that undermine compliance. Training on integrity, new indicators for service provider monitoring, and data analysis are first steps. Adoption of better risk detection systems are next (for example integrity tools like the Water Integrity Risk Index or the Framework for Integrity in Infrastructure Planning, or by strengthening grievance mechanisms and whistleblower protection systems). New mandates, capacity, and systems to regulate sanitation service provision are also needed.

**Set clear criteria and rules for defining water service areas and system takeovers:**

There are concerns that takeovers of systems are politically motivated and some announced transfers have already led to tension or resistance, for example in Rwampara district. There are also reports of many systems falling between the cracks, for example in peri-urban areas and near rural growth centres. Overall, there is significant confusion in responsibilities between NWSC, Umbrella Authorities, system operators and service providers and district-level institutions, especially for these "in-between" systems. This complicates planning and undermines service delivery. Rules must take into account financial impact and viability of smaller water suppliers, set clear thresholds, allow for coordination, and include obligations on communication to users.

**Monitor enforcement of Environment Impact Assessments:**

NGOs working on WASH should monitor the enforcement of Environmental Impact Assessments to protect vital water sources and ecosystems, especially in relation to big projects like extractives and industrial projects.

In the longer term, there is need for a broad culture of integrity in the sector. Inclusive engagement and awareness are two foundational elements:

## Inclusive planning and resource management

### **Streamline processes for citizen participation in planning processes:**

The current framework does not provide expressly for citizens to participate in planning processes for water authorities, although some have water committees. There are also weaknesses in local level planning. Strengthening citizen engagement and feedback platforms can be a first step.

### **Enhance participation of women, youth, and persons with disabilities in water governance:**

Although some policies provide for the participation of women in leadership positions for Water Management Committees, the same is not true for youth, persons with disabilities and minorities. UWASNET and other CSOs should advocate for inclusion in water resource management, policy development, planning and budgeting. Regulators can support this process by further monitoring water authority practices for inclusion, as well as pro-poor service delivery and resource planning.

### **Increase community awareness on protection of vital water ecosystems:**

MWE, District Local Governments, CSOs and Umbrella Authorities should work together to sensitise communities on their roles in protecting vital water ecosystems and advocate for environmentally friendly farming practices.

## Awareness and follow up of corruption cases and red flags

### **Collaborate and share information with national anti-corruption institutions and organisations:**

Integrate important integrity initiatives in the water sector into country-wide anti-corruption processes and strategies. Learnings and best practices from one sector can contribute to a larger cause.

### **Champion public interest litigation in water service delivery:**

Water and sanitation sector NGOs could explore the use of civil litigation to ensure equity, equality, and fairness in the delivery of water and sanitation services, taking example from cases in education, health, and environment. However, this should be done in limited instances and not at the expense of dialogue, collaboration, and engagement.

### **Expose corruption scandals in the water sector:**

Corruption scandals and allegations in sectors like health, education, and at Parliament have been well documented and publicised. This is not as often the case for scandals in the water or sanitation sectors. Better detection and alert systems are crucial to better address issues and strengthen trust in sector institutions. Not impeding the work of civil society and the media is therefore crucial, as is more transparency on findings from forensic audits, financial reports, and decision-making.

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