

Applicant: **Fenner, Gretta**
Organisation: **Basel Institute on Governance**
Funding Sought: **£454,437.00**

IWTR7S2\1014

Holding Uganda-based transnational wildlife criminals accountable by empowering financial investigations

The project will help Uganda's wildlife enforcement bodies leapfrog the hurdles to catching and convicting transnational wildlife traffickers by: a) scaling up financial investigations at the Natural Resource Conservation Network (NRCN) and its partners Uganda Wildlife Authority (UWA) and Uganda Revenue Authority (URA); b) upgrading financial network analysis skills, including open-source intelligence, mobile payments and cryptocurrencies; c) advancing IWT cases by building prosecutorial skills to argue financial aspects in court; d) facilitating information flows to/from transport and financial firms.

Section 1 - Contact Details

PRIMARY APPLICANT DETAILS

Name Gretta
Surname Fenner
Organisation Basel Institute on Governance
Website (Work) www.baselgovernance.org
Tel (Work) [REDACTED]
Email (Work) [REDACTED]
Address [REDACTED]
[REDACTED]
[REDACTED]
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CONTACT DETAILS

Title Mr
Name Juhani
Surname Grossmann
Organisation Basel Institute on Governance
Tel [REDACTED]
Email [REDACTED]
Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

GMS ORGANISATION

Type	Organisation
Name	Basel Institute on Governance
Phone	[REDACTED]
Email	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Section 2 - Title, Dates & Budget Summary

Q3. Project title:

Holding Uganda-based transnational wildlife criminals accountable by empowering financial investigations

What was your Stage 1 reference number? e.g. IWTR7S1\100123

IWTR7S1\1251

Q4. Country(ies)

Which eligible country(ies) will your project be working in? Where there are more than 4 countries that your project will be working in, please add more boxes using the selection option below.

Country 1	Uganda	Country 2	No Response
Country 3	No Response	Country 4	No Response

Do you require more fields?

No

Q5. Project dates

Start date: 01 April 2021	End date: 31 March 2023	Duration (e.g. 2 years, 3 months): 2 Years
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Q6. Budget summary

Year:	2021/22	2022/23	2023/24	Total request
Amount:	£210,919.00	£243,518.00	£0.00	£ 454,437.00

Q6a. Do you have proposed matched funding arrangements?

Yes

What matched funding arrangements are proposed?

The NRCN will provide working space for the embedded advisors.

URA and UWA will provide in-kind support to the programme (premises, staff, training facilities, etc).

The Green Corruption Team Leader position is co-funded through PMI Impact, USAID, and the Basel Institute's core funding.

TNRC/USAID will fund research on political economy analysis and blockages/risks to IWT enforcement actions which will inform our ongoing investigations.

Q6b. Proposed (confirmed and unconfirmed) matched funding as % of total Project cost (total cost is the IWT Challenge Fund request plus other funding required to run the project).

Section 3 - Project Summary & Objectives

Q7. Summary of project

Please provide a brief summary of your project, its aims, and the key activities you plan on undertaking. Please note that if you are successful, this wording may be used by Defra in communications e.g. as a short description of the project on GOV.UK.

Please write this summary for a non-technical audience.

The project will help Uganda's wildlife enforcement bodies leapfrog the hurdles to catching and convicting transnational wildlife traffickers by: a) scaling up financial investigations at the Natural Resource Conservation Network (NRCN) and its partners Uganda Wildlife Authority (UWA) and Uganda Revenue Authority (URA); b) upgrading financial network analysis skills, including open-source intelligence, mobile payments and cryptocurrencies; c) advancing IWT cases by building prosecutorial skills to argue financial aspects in court; d) facilitating information flows to/from transport and financial firms.

Q8. What will be the Outcome of the project?

This should be an action orientated statement e.g. training provided to the judiciary results in increased successful prosecutions of poaching.

This should be the same as the Outcome statement in the logframe uploaded at Question 34.

Ugandan IWT enforcement officers increasingly use financial investigation and public/private intelligence-sharing techniques to detect and take action against illicit financial flows from IWT.

Q9. Which of the four key IWT Challenge Fund objectives will your project address?

Please tick all that apply.

Strengthening law enforcement

Q10. Which of the commitments made in the London Conference Declarations, the Kasane Statement and/or the Hanoi Conference does this project support?

Please provide the number(s) of the relevant commitments and some brief information on how your project will contribute to them. There is no need to include the text from the relevant commitment.

London Declaration (2014)

- Action A – Item I: The project supports actions to eradicate the supply of IWT products by weakening organised criminal networks operating in Uganda (an IWT transit hub).
- Action B – Items X and XII: The project supports law enforcement by analysing information and evidence via financial investigations that target the organisers of IWT. Furthermore, the project recognises the central role that corruption plays in IWT and supports zero tolerance policies that target IWT-associated corruption.
- Action C – Items XIII, XV, and XVI: The project supports wildlife enforcement bodies by upgrading financial network analysis skills, building prosecutorial skills, and facilitating information flow to/from transport and financial firms. In addition, the project involves a range of investigative techniques and tools that have been successfully deployed against other forms of corruption.

Kasane Statement

- Action A – Item 5: The project supports law enforcement by analysing and developing information and evidence as well as building capacity to effectively prosecute financial crimes associated with IWT.
- Action D – Item 12: The project facilitates the information flow to/from transport and financial firms to tackle IWT.

London Declaration (2018)

- The project aligns with the commitments made in the 2018 London Declaration and supports items 10, 12, and 14 in particular since it involves financial investigation, strengthening anti-corruption activities associated with IWT, and capacity building for wildlife management departments.

Q11. Global Goals for Sustainable Development (SDGs)

Please detail how your project will contribute to the Global Goals for Sustainable Development (SDGs).

Helping countries trace stolen resources, including the illicit proceeds of the trafficking and sale of their natural resources, is anchored in SDG 16.4 (significantly reduce illicit financial flows) as well as SDG 16.5 (reduce corruption and bribery). Successful investigations that take advantage of financial intelligence and asset tracing will not only result in convictions of higher-level criminals but also help to recover these funds. This represents an opportunity for mobilising important resources to finance development, health, conservation and poverty reduction efforts.

Identifying the key players in transnational criminal networks and bringing them to account (SDG 16.3) through financial investigations plays a critical role in strengthening the key foundations of sustainable development, such as the rule of law and strong, transparent and accountable institutions.

More indirectly, strengthening Uganda's ability to respond effectively to sophisticated criminality will increase productive economic engagement and decrease poverty. Decreasing IWT increases biodiversity (SDG 15), making Uganda more attractive for tourism and job creation. Mitigating the risk of another major zoonotic disease outbreak by limiting IWT, especially in transit countries like Uganda, is crucial for good health (SDG 3) and preventing a repeat of the economic crisis that has already eradicated hard-fought poverty reduction gains (SDG 1).

Section 4 - Lead Organisation Summary

Q12. Lead organisation summary

Has your organisation been awarded an IWT Challenge Fund or Darwin Initiative award before (for the purposes of this question, being a partner does not count)?

No

If no, please provide the below information on the lead organisation.

What year was your organisation established/ incorporated/ registered?	01 January 2003
What is the legal status of your organisation?	<input checked="" type="radio"/> Other (if selected, please explain below)
Other explained	Legally registered as a foundation under Swiss law, with the full characteristics of a non-governmental organisation
How is your organisation currently funded?	<p>The Institute receives core funding from five countries (Jersey, Liechtenstein, Norway, Switzerland and the United Kingdom (FCDO)) for the implementation of the programme of work on asset recovery.</p> <p>Several dedicated country programmes receive additional earmarked support from our core donors' country offices, e.g. in Kosovo, Malawi, Mozambique, Kenya, Peru, Tanzania and Ukraine.</p> <p>Other direct income comes from a variety of corporate foundations and initiatives, development agencies and research grant facilities, as well as through the provision of advisory services to private-sector entities.</p>

Describe briefly the aims, activities and achievements of your organisation. Large organisations please note that this should describe your unit or department.

Aims	Our core mission is to help public and private partners around the world prevent and combat corruption and related financial crimes, including those associated with organised crimes such as IWT. Programmes focus on strengthening governance structures, enabling a solid law enforcement response and promoting public-private partnerships.
Activities	Hands-on mentoring and capacity building in investigating financial crimes; facilitation of international judicial cooperation and intelligence sharing; analysis of and development of systems to counter financial crime-, behavioural and community-level root causes of crime; facilitation of private-public partnerships to raise standards and reduce bribery and related financial crimes.

Achievements

We helped return tens of millions of dollars in stolen assets to victim countries. We broke new grounds in implementing tailor-made interventions built on the analysis of informality and behavioural norms as drivers of corruption. We drive pioneering private-sector initiatives that level the playing field in major sectors and economies.

Provide details of 3 contracts/projects previously undertaken by the lead organisation that demonstrate your credibility as an organisation and provide track record relevant to the project proposed.

These contacts should have been held in the last 5 years and be of a similar size to the grant requested in your IWT Challenge Fund application.

Contract/Project 1 Title	Assistance to Natural Resource Conservation Network in Transnational Investigations Related to the Illegal Wildlife Trade
Contract Value/Project budget (include currency)	USD [REDACTED]
Duration (e.g. 2 years 3 months)	16 months
Role of organisation in project	The Basel Institute led the implementation of the programme.
Brief summary of the aims, objectives and outcomes of the project	<p>This project embedded an expert – Virgil Ballakistan – with the Natural Resource Conservation Network (NRCN) in Uganda.</p> <ul style="list-style-type: none">- NRCN now taking financial investigations into account in their cases, leading to 10 significant IWT cases enhanced with financial intelligence and supplied to the prosecuting agency and international agencies.- Standard operating procedures for financial investigations and seizure of digital data devices adopted.- 8 training sessions held for NRCN staff and partners.- 19 people have been mentored during the project period- Agreement reached by which the NRCN can both receive and send intelligence to the Financial Intelligence Authority.
Client/independent reference contact details (Name, e-mail)	Araluen Shunmann, Counter-Wildlife Trafficking Programme Manager, Elephant Crisis Fund, [REDACTED]

Contract/Project 2 Title	Stop corruption from fueling Illicit Wildlife Trafficking (IWT) along the East Africa-Southeast Asia trading chain
Contract Value/Project budget (include currency)	USD [REDACTED]
Duration (e.g. 2 years, 3 months)	2 years, 3 months


Role of organisation in project	The Basel Institute is leading the implementation of the programme.
Brief summary of the aims, objectives and outcomes of the project	<p>The programme addresses IWT through a three-pronged integrated approach: financial investigation; analysis of corruption and other behavioural/contextual drivers of IWT; and strengthening private-sector preventive efforts to detect and reduce misuse of financial and transport infrastructure by traffickers.</p> <p>This ongoing programme has so far resulted in the integration of financial analysis in over a dozen live cases; the facilitation of targeted information sharing between finance and transport companies and enforcement agencies; the creation of a regional public-private taskforce for East Africa; guidance for anti-corruption interventions in IWT-affected communities; and three customised online training modules for finance and transport sector compliance officers.</p>
Client/independent reference contact details (Name, e-mail)	Tatiana Stratila, [REDACTED]
Contract/Project 3 Title	Strengthening Uganda's Anti-corruption Response technical advisory facility (SUGAR TAF)
Contract Value/Project budget (include currency)	GBP £ [REDACTED] GBP (total project value) GBP [REDACTED] [REDACTED] (Basel Institute share of project)
Duration (e.g. 2 years, 3 months)	4 years
Role of organisation in project	The Basel Institute on Governance led the Asset Recovery component of SUGAR TAF, providing investigative, prosecutorial and financial intelligence analysis expertise to Government of Uganda law enforcement agencies, including the Financial Intelligence Authority, the Inspectorate of Government, the Office of the Director of Public Prosecutions (ODPP) and the High Court.
Brief summary of the aims, objectives and outcomes of the project.	SUGAR TAF supported the fight against corruption in Uganda, primarily by working with government anti-corruption institutions to develop tools and strategies to increase their effectiveness. Outcomes of the Basel Institute on Governance work included: increased utilisation of financial intelligence to inform investigation strategies at the Inspectorate of Government and intelligence from the Financial Intelligence Agency led to the identification of £1.4 million in tax evasion which was earmarked for recovery in 2018.
Client/independent reference contact details (Name, e-mail)	FCDO Senior Responsible Owner, Joyce Ngaiza [REDACTED]


Have you provided the requested signed audited/independently examined accounts? If you select "yes" you will be able to upload these. Note that this is not required from Government Agencies.


Yes


Please attach the requested signed audited/independently examined accounts.


 [Basel Institute Annual Report 2019](#)


 10/11/2020


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 [Basel Institute Annual Report 2018 BW](#)


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 [Annual Financial Audit 2019 B Notes to Financial Statement](#)


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 [Annual Financial Audit 2019 A](#)


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Section 5 - Project Partners

Q13. Project partners

Please list all the partners involved (including the lead organisation) and explain their roles and responsibilities in the project. Describe the extent of their involvement at all stages, including project development.

This section should illustrate the capacity of partners to be involved in the project, and how local institutions, local communities, and technical specialists are involved as appropriate. Please provide Letters of Support for the lead organisation and each partner or explain why this has not been included.

N.B: There is a file upload button at the bottom of this page for the upload of a cover letter (if applicable) and all letters of support.

Lead Organisation name: Basel Institute on Governance

Website address: www.baselgovernance.org

Details (including roles and responsibilities and capacity to engage with the project):

The Basel Institute will lead this project and provide its core staff. This includes an IWT Financial Investigation Specialist to mentor and provide hands-on training to investigators and prosecutors of the Natural Resource Conservation Network (NRCN), Uganda Wildlife Authority (UWA) and Uganda Revenue Authority (URA).

Mentoring by two highly qualified financial investigators bringing complementary expertise (organised crime and customs/tax) will focus on the use of intelligence and financial investigation techniques in support of illicit commodity interdictions, asset forfeiture and complex transnational cases against higher-level IWT facilitators.

Two Basel-based Intelligence Analysts specialised in IWT intelligence and in open-source intelligence will support the team on the ground by compiling, analysing and managing intelligence on IWT target networks, dynamics, trends and typologies. These intelligence packages will enable the project partner agencies to take a more proactive and financial intelligence-driven approach to tackling criminal IWT networks in Uganda and, through facilitated international cooperation, globally.

The Team Leader will ensure alignment with the priorities of Ugandan authorities and synergies with the efforts of other IWT and financial crime projects at the Basel Institute and its partner organisations. A Project Officer (10%) will be responsible for monitoring and evaluation.

Have you included a Letter of Support from this organisation? (Note: this can be uploaded at the bottom of the page)

Yes

Have you provided a cover letter to address your Stage 1 feedback? (Note: this can be uploaded at the bottom of the page)

Yes

Do you have partners involved in the Project?

Yes

1. Partner Name:

Natural Resource Conservation Network

Website address:

<https://nrcn.org/>

Details (including roles and responsibilities and capacity to engage with the project):

NRCN is a specialised Ugandan NGO mandated by the UWA to support the investigation and prosecution of IWT cases. NRCN investigators and prosecutorial staff have been instrumental in setting up a Specialised Wildlife Crime Unit within UWA. It is now working closely with this unit, which will further boost the two organisations' ability to conduct effective wildlife trafficking investigations in Uganda.

NRCN management will provide office space and support materials to the embedded Basel Institute Financial Investigation Specialist as well as, crucially, access to case files and staff. They welcome the project to continue the mentoring of staff on investigations and the training sessions and advice provided on institutional development (e.g. case database), as per our current engagement with them and their letter of support.

Of note, NRCN's leadership has excellent political connections, which it frequently uses to advocate for IWT-related reform and the project expects to benefit from this during its implementation. The cooperation with the NRCN is governed by an existing Case Consultancy Agreement with the Basel Institute.

Have you included a Letter of Support from this organisation? Yes

Do you have more than one partner involved in the Project?

Yes

2. Partner Name: Uganda Revenue Authority

Website address: www.ura.go.ug

Details (including roles and responsibilities and capacity to engage with the project):

The URA is in charge of tax collection and customs administration in Uganda. It has access to relevant databases and is, by virtue of its role, a key player in detecting and combating IWT. This has been recognised in the Ugandan Government's IWT strategy 2020-2029. URA is also an active member of the country's National Wildlife Crime Coordination Taskforce (NWCCTF) and has expressed a keen interest to partner with the Basel Institute in this project.

A recent review of a sub-set of URA cases has clearly shown that in a significant portion of cases, the predicate offence was IWT-related. It also showed the great potential of revealing, through the enforcement powers of URA, companies that are "fronts" for IWT. There is also great potential to use its control over borders as the customs agency more effectively to combat IWT.

Initial test cases have confirmed this potential and a formal agreement to provide access to sensitive data and URA staff is currently being finalised. Similar to NRCN and UWA, URA's role would be to engage with mentoring and training activities as well as support in international cooperation matters through the Basel Institute embedded expert.

Have you included a Letter of Support from this organisation?

Yes

3. Partner Name:

Uganda Wildlife Authority

Website address:

www.ugandawildlife.org

Details (including roles and responsibilities and capacity to engage with the project):

The UWA's statutory role is to conserve, develop and sustainably manage the wildlife and protected areas of Uganda in partnership with neighbouring communities and other stakeholders. The UWA works closely with the NRCN under a 10-year Memorandum of Understanding (MOU), under which the UWA is seconding staff to the NRCN. One of the UWA's roles is to manage the national parks, a function through which it is able to collect vital intelligence on IWT. The UWA's investigation and intelligence unit, with which the Basel Institute has recently commenced work, has recognised that the follow-the-money approach has been absent from cases, thereby hindering them from effectively implementing their role within the NWCCTF to support financial investigations aimed at IWT organisers.

The UWA also distributes revenue from park fees to the neighbouring communities. Significant incidents of theft and corruption lead to substantial revenue losses and may be incentivising some park rangers to turn a blind eye to IWT in the parks. The resulting reduced revenue available for disbursement changes the cost-benefit ratio with which local communities view the presence of wildlife in their midst. The Institute has been asked, additionally, to assist the UWA to address these challenges.

Have you included a Letter of Support from this organisation? Yes

4. Partner Name: *No Response*

Website address: *No Response*

Details (including roles and responsibilities and capacity to engage with the project): *No Response*

Have you included a Letter of Support from this organisation? Yes
 No

5. Partner Name: *No Response*

Website address: *No Response*

Details (including roles and responsibilities and capacity to engage with the project): *No Response*

Have you included a Letter of Support from this organisation? Yes
 No

6. Partner Name: *No Response*

Website address: *No Response*


Details (including roles and responsibilities and capacity to engage with the project): *No Response*


Have you included a Letter of Support from this organisation? Yes
 No


If you require more space to enter details regarding Partners involved in the Project, please use the text field below.


No Response

Please provide a cover letter responding to feedback received at Stage 1 if applicable and a combined PDF of all letters of support.

 [cover and support letters IWT CF Uganda 10N ov20](#)

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Section 6 - Project Staff

Q14. Project staff

Please identify the core staff on this project, their role and what % of their time they will be working on the project. Further information on who should be classified as core staff can be found in the guidance.

Please provide 1 page CVs for these staff or a 1 page job description or Terms of Reference for roles yet to be filled. These should match the names and roles in the budget spreadsheet. If your team is larger than 12 people please review if they are core staff, or whether you can merge roles (e.g. 'admin and finance support') below, but provide a full table based on this template in the PDF of CVs you provide.

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
Juhani Grossmann	Project Leader	30	Checked
Gretta Fenner	Managing Director	5	Checked
Virgil Ballakistan	Financial Investigation Specialist	100	Checked
Jovile Mungyereza	Financial Investigation Specialist	100	Checked





Do you require more fields?

Yes

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
Manuel Medina	Intelligence Analyst (investigations)	50	Checked
Patricia Raxter	Intelligence Analyst (IWT)	30	Checked
Monica Guy	Project Officer (M&E)	20	Checked
Simon Marsh	Senior Financial Investigation Specialist	10	Checked
Stephen Ratcliffe	Senior Financial Investigation Specialist	10	Checked
Joe Spicer	Senior Asset Recovery Specialist	10	Checked
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>	Unchecked
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>	Unchecked

Please provide 1 page CVs (or job description if yet to be recruited) for the project staff listed above as a combined PDF.

Ensure the file is named clearly, consistent with the named individual and role above.

-  [Combined CVs Uganda IWT CF proposal 09Nov 20](#)
-  10/11/2020
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-  pdf 167.52 KB

Have you attached all project staff CVs?

Yes

Section 7 - Species & Project Statement

Q15. Species project is focusing on

Where there are more than 4 species that will benefit from the project's work, please add more fields using the selection option below.

Elephant	Rhinoceros
Pangolin	<i>No Response</i>

Do you require more fields?

No

Q16. Problem the project is trying to address

What specific aspect(s) of the illegal trade in wildlife will your project address? Please describe the level of threat to the species concerned.

Please also explain which communities are affected by this issue, and how this aspect of the illegal trade in wildlife relates to poverty or efforts of people and/or states to alleviate poverty. Please cite the evidence you are using to support your assessment of the problem (references can be listed in your additional attached PDF document which can be uploaded at the bottom of the next page).

Uganda is known to be a major IWT transit hub for East Africa. Trafficking through Uganda exacerbates the threat to species in Uganda and across Central and East Africa including pangolin, forest and savannah elephant and rhinoceros. Pangolins are the most trafficked mammal globally, with all eight species under threat of extinction. Forest elephant populations declined by at least 60% in the region in the last two decades due to intense poaching, and savannah elephants remain a target. Uganda houses fewer than 5,000 elephants and its rhino population was poached to extinction. While the gradual reintroduction of rhinos in Uganda is a welcome development, it also poses a new mid-term risk of renewed poaching. Rhino horn also continues to be trafficked through Uganda, as highlighted by a recent investigation we supported, with the commodity primarily sourced in Southern Africa.

Uganda is also a source country and heavily poached areas often experience high levels of criminality, violence and corruption, creating insecurity for local communities and limiting opportunities for the development of tourism and other legal and sustainable industries which increase employment opportunities. At the national level, revenue losses due to environmental crime reach into the millions. IWT organisers use people from communities living near wildlife habitats to perform the risky activity of transporting IWT products across borders, meaning they are disproportionately arrested and imprisoned. This leads to an exacerbation of poverty and an increase in destitute families, where women are typically forced into dangerous situations to try and support their families. Ultimately local populations can come to see wildlife negatively, as it exacerbates their poverty whilst very clearly increasing the wealth of a few who act with impunity.

These poaching and trafficking activities, with their significant impacts on economic growth, social cohesion and environmental sustainability, are organised by high-level intermediaries and kingpins which are known to operate out of Uganda, often protected by powerful and well-connected networks with access to Government. The organisation of IWT, as with any other illegal trade, requires considerable resources and generates significant illicit proceeds. As a consequence, it is now widely acknowledged that in order to interrupt these criminal networks, enforcement needs to hit where it hurts most, namely their finances. However, IWT enforcement activity in Uganda continues to primarily target the low-level poachers and transporters. As these can be easily replaced, this enforcement approach has a minimal impact on disrupting networks, unlike the proposed follow-the-money enforcement approach.

This is the problem that this project seeks to address, with a view to enabling Ugandan law enforcement authorities to more successfully weaken organised criminal networks operating from and in Uganda, thereby making IWT a more risky and less attractive business for the high-level criminals.

Section 8 - Method, Beneficiaries & Exit Strategy

Q17. Methodology

Describe the methods and approach you will use to achieve your intended Outcome and Impact.

Provide information on:

- How you have analysed historical and existing initiatives and are building on or taking work already done into account in project design (either by your organisation or others). Please cite evidence where appropriate.
- The rationale for carrying out this work and a justification of your proposed methodology.
- How you will undertake the work (materials and methods).
- How you will manage the work (roles and responsibilities, project management tools etc.).

Please make sure you read the [Guidance Notes](#), particularly **Section 3, before answering this question.**

There is a consensus – supported by international bodies including UN General Assembly, Interpol, FATF and OECD – on the importance of the follow-the-money approach to disrupt trafficking. This method, successfully used against other forms of illegal trafficking, allows law enforcement to target higher-level criminals who organise IWT instead of “only” catching low-level criminals. It builds on the fact that the motive for organised IWT is financial gain.

However, IWT enforcement agencies continue to focus on seizure and arrest. Investigations into the financial aspects of IWT crimes remain rare, and relevant and effective capacity-building programmes are few and far between, despite the fact that our programme so far shows that impact can be significant. For example:

- Through an embedded Financial Investigation Specialist at NRCN (funded until mid-2021): Augmented 12+ cases with financial data, allowing to widen the scope of several transnational investigations, identify previously unknown ties between Malian and Chinese syndicates operating in Uganda, deepen the investigation into IWT “kingpin” Kromah, and trigger proactive investigations unlocking evidence on transport companies facilitating IWT in northern Uganda and the region.
- Through our regional IWT programme in East Africa: A multi-agency training course for financial investigators assigned to NWCCTF member agencies revealed that most of them had never actually conducted financial investigations, leading to requests by participants for mentoring to obtain the practical skills, experience and confidence.
- Cooperation with the United for Wildlife initiative, where over the last two years we have developed over

50 intelligence products and facilitated the sharing of information between law enforcement, banks, transport companies and NGOs in dozens of investigations.

Complementary initiatives include:

- IWT073 (support to NWCCTF).
- IWT032 (targeting higher-level convictions);
- IWT029 (integrated intelligence networks);
- IWT036 (poverty and poaching).

Uganda's national Action Plan to enhance compliance with FATF recommendations identifies as priorities a) strengthening financial investigation skills in the area of IWT; and b) building analytical IWT capacity in the Financial Intelligence Authority (FIA). The latter is supported by the FIA's Executive Director and the Director of Public Prosecutions, who seeks to increase the number of IWT prosecutions (see support letters from both agencies).

While we have made progress in encouraging the use of financial investigations in IWT, more needs to be done to mainstream the practice and embed it sustainably. We have reviewed the initial phase of our engagement in Uganda and made adjustments which we believe will yield significant improvements:

- 1) Mentoring team expanded from one international financial investigation specialist to include a local financial investigation specialist, allowing us to offer a broader range of skill-mentoring and delivering a more sustainable engagement;
- 2) Widening scope of agencies involved to: a) ensure synergies and inter-agency cooperation through the NWCCTF, as recommended by the WCS, a IWT Challenge Fund grantee – hence inclusion of URA in addition to NRCN and UWA; b) maximise the investigative opportunities arising from FIA-generated intelligence, building on the SOPs regarding specific intelligence requirements that we have drawn up with URA and FIA – hence inclusion of FIA and Basel IWT intelligence specialists; c) be able to support cases through to prosecution – hence inclusion of DPP and support from the Institute's prosecution specialists in East Africa and Switzerland;
- 3) Widening scope of techniques included in the mentoring practice to augment the financial evidence uncovered and generate more comprehensive case files by adding advanced open-source intelligence and IWT analysis;
- 4) Ensuring a strategic approach by incorporating analytical work conducted by the Basel Institute (with separate funding) about blockages to IWT in Uganda arising from the country's political economy and informal governance structures as well as corruption risks in IWT enforcement;
- 5) Providing additional training opportunities through courses offered by the wider Institute's team, including on cryptocurrencies, financial investigations, asset recovery and mutual legal assistance.

Utilising the access, trust and high-level contacts built during previous programmes, the two embedded advisors, with support from the Basel-based intelligence and IWT analysts and prosecution specialists, will assist investigators and prosecutors to expand cases to include financial analysis and investigation.

The program will be led by the Green Corruption Team Leader, who has 17 years' experience managing complex development programmes. He will ensure that programming is aligned with the project's theory of change and that the project can reap full benefits from being part of a larger ecosystem of IWT-related programmes, including an Andean region IWT Challenge Fund programme (awaiting funding decision), a PMI Impact-funded IWT research and training programme, and a USAID-funded programme on corruption risks in Uganda's IWT enforcement actions.

Q18. Beneficiaries

- **Who will benefit from the work outlined above, and in what ways?**

- How will this contribute to sustainable development for the reduction of poverty?
- How many people are likely to benefit from this intervention e.g. number of households?
- How do you intend to monitor the benefits they accrue?

If your project is working in an Upper Middle Income Country, please explain how benefits will be delivered to people living in poverty in Low and/or Low Middle Income countries.

Include, where possible, information on whether and how there are ways to support the most vulnerable communities, including women.

Demand reduction projects should clearly demonstrate their indirect links to poverty reduction, for example, by identifying impacts in the source countries for the products concerned.

The project will primarily benefit communities located around wildlife habitats.

Poaching and IWT are crimes undertaken for financial gain. Even at the minimum level, this income exceeds the survival needs that 8-10 million Ugandans struggled with even before the coronavirus pandemic and resulting lockdown and economic fallout. Our recent behavioural research on wildlife trafficking in Uganda pointed to particularly high levels of poverty in areas in which the country's main wildlife habitats are found. This makes local communities vulnerable to exploitation by wildlife trafficking networks. Income from engaging in organised crime that destroys natural resources is incompatible with any form of sustainable development.

The poor are also disproportionately impacted by existing law enforcement responses, such as the usage of paid informants. Too often the 'rewards' made available to informants result in them acting as an 'agent provocateur,' often at tremendous risk to a low-income individual with little prior involvement in IWT. A recent such case (in which we were not involved) saw an informant killed in Uganda. These are tactics that typically lead to low-level perpetrators who might be involved in driving a vehicle with animal parts or caught unloading such goods. If anybody gets arrested and sentenced, it is these low-level perpetrators. Those involved in the organisation of IWT are rarely caught. Accordingly, current successful law enforcement actions frequently leave behind families who are destitute and immensely vulnerable to exploitation. This can lead to a cycle of environmental destruction, where the remaining family is much more likely to enter protected areas seeking firewood and thatch for roofing. Children may enter the parks to seek bushmeat to help the family survive, leave school and risk incarceration, almost guaranteeing inheritance of poverty by the next generation.

Our work targeting the finances and international connections of the organisers of IWT is important to re-balance the benefits and disadvantages of living nearby wildlife. The imprisonment of IWT leaders and the confiscation of their assets will decrease the pressure for the increasingly militarised police/ranger operations in villages in and around national parks. This would also include a reduction in the use of informant-led operations, which in itself has a positive effect for trust-building inside communities around wildlife areas.

Separately, we are starting work with UWA on a particular angle of financial investigations: "revenue leakage". This involves the embezzlement of park fees, which undermines the substantial efforts put into developing equitable systems to distribute the benefits of wildlife to surrounding communities through jobs, special projects or direct transfers. These income streams are often a crucial driver for poverty reduction. Previous IIED-led research (also funded by the IWT Challenge Fund) showed that while poverty can be a driver of poaching, many people poach because they are angered by human-wildlife conflict or because there are no other ways of earning money. As we have witnessed in Tanzania, plugging these leaks

by tracing the loss of funds through financial investigations would increase community benefits as soon as tourists are able to return.

Q19. Gender Equality

All applicants must consider whether and how their project will contribute to reducing inequality between persons of different gender. Explain how your project will collect sex disaggregated data and what impact your project will have in promoting gender equality.

Research shows that men benefit primarily from financial crime associated with IWT, while male-dominated criminal networks that exploit natural resources also reproduce negative masculinities and exploit women. For instance, vulnerable women and girls affected by poverty and lack of opportunity/social mobility are often forced or tricked by organised criminal networks into smuggling wildlife products. Power imbalances associated with gender in IWT are pervasive, which means that vulnerable females are disproportionately exposed to the risks associated with this type of crime.

By making enforcement action more effective to expose and disrupt male-dominated IWT networks through a follow-the-money approach, the project expects to contribute to reducing further exploitation of vulnerable women and girls.

In parallel, and as women remain severely under-represented in law enforcement, the project seeks to work through a gender-balanced team of mentors in Uganda in the expectation that a female investigator can not only break through masculinities inherently present in current law enforcement practice but also serve as a role model for other aspiring female law enforcement officers. The Basel Institute itself is a leader in gender equality: 5 out of 7 members of the management team are women. Overall, 44% of the Institute's staff are women.

The programme will also benefit from the Institute-wide effort to consider new approaches to promoting gender balance in its law enforcement approaches, including its new strategic plan which features gender-related indicators. Sex-disaggregated data on training and mentoring for law enforcement officers, as well as new applications by females to law enforcement roles in this area, will help to analyse the effectiveness of the approach in promoting gender equality.

Q20. Impact on species in focus

How will the species named in Question 15 benefit from the work outlined above? What do you expect the long-term impact on the species concerned to be?

Elephants, rhinos, and pangolins face existential threats to their survival across the region, with populations for each of these species declining precipitously due to poaching pressure. However, evidence suggests that when IWT networks are disrupted and poaching declines, species can rebound, sometimes quickly. Areas in Southern Africa heavily poached in previous eras now host some of the largest populations of elephants and rhinos in the world, a pattern already playing out in heavily poached zones in East and Central Africa where population losses are being reversed.

The ability of pangolins to recover is less well understood, placing an even heavier burden on disruption efforts. Pangolins are reclusive, slow breeding animals notoriously difficult to rear in captivity. The survival of pangolins depends on their ability to live safely in the wild, only possible with an immediate cessation of large-scale poaching and trafficking. As pangolin numbers decline, local poaching networks will turn to other high-value, easily collected wildlife such as snakes, turtles, tortoises and primates, suggesting that disrupting pangolin-trafficking networks may have positive knock-on effects for a range of species.

Q21. Pathway to change

Please outline your project's expected pathway to change. This should be an overview of the overall project logic and outline how you expect your Outputs to contribute towards your overall Outcome and, longer term, your expected Impact.

Through case-based mentoring and capacity building, and by enriching investigation practices with financial and IWT intelligence, we will empower specialised financial investigators in NRCN, UWA and URA to make their cases more effective with respect to interrupting criminal networks. In particular, they will be able to develop cases that go beyond the low-level poachers to focus on kingpins and intermediaries.

By associating key institutions (DPP and FIA) along the IWT criminal justice chain, we expect to strengthen the effectiveness of the highly underused Ugandan multi-agency enforcement strategy against IWT and build a common understanding of the follow-the-money approach to IWT. This will pave the way for money laundering charges and asset confiscation in IWT cases, making IWT a higher-risk endeavour. This will lead to a decrease in industrial-scale poaching and trafficking and weaken affected criminal enterprises, which in turn will lead to greater biodiversity and associated economic and cultural benefits for communities.

Q22. Exit Strategy

State how the project will reach a stable and sustainable end point, and explain how the outcomes will be sustained, either through a continuation of activities, funding and support from other sources or because the activities will be mainstreamed in to "business as usual". Where individuals receive advanced training, for example, what will happen should that individual leave?


Realistically, capacity gaps will remain and more need for technical assistance will be required at the end of a two-year project dealing with a topic that is highly complex and not well understood even in far more advanced jurisdictions. Our approach seeks to minimise these gaps:


Two decades of work in many countries have led us to our focus on case-based, long-term mentoring through embedded experts, rather than fly-in, fly-out trainings. This approach been highlighted in external donor reviews, including FCDO, as unique and effective, allowing countries to grow out of dependency from technical assistance.


To minimise over-reliance on any agency and to promote collaboration we propose a multi-agency approach. We will continuously review the allocation of investigative resources in support of those partner agencies, assessing them based on: a) ability to move cases forward; b) willingness to invest human, financial and leadership resources; and c) willingness to build sustainable systems (policies, budget allocation, recruitment and/or assignment of dedicated staff).

Ms Jovile Mungyereza, our Ugandan financial investigator, will have access to all of our capacity building resources and will return to the government at the conclusion of the project, carrying on with mentoring and case work beyond the project's lifetime.

If necessary, please provide supporting documentation e.g. maps, diagrams, references etc., as a single PDF using the file upload below:

 [LATEST Reference List \(Uganda\)](#)

 10/11/2020

 13:37:14

 pdf 117.4 KB

Section 9 - Funding and Budget

Q23. Budget

Please complete the appropriate Excel spreadsheet, which provides the Budget for this application. Some of the questions earlier and below refer to the information in this spreadsheet.

Note that there are different budget templates for grant requests under £100,000 and over £100,000.

- [Budget form for projects under £100,000](#)
- [Budget form for projects over £100,000](#)

Please refer to the [Finance for Darwin/IWT Guidance](#) for more information.


N.B: Please state all costs by financial year (1 April to 31 March) and in GBP. The IWT Challenge Fund cannot agree any increase in grants once awarded.

Please upload your completed IWT Budget Form Excel spreadsheet using the field below.

 [Uganda IWT CF Budget Basel 03Nov20 FINAL V](#)

[ALUES](#)

 10/11/2020

 13:43:32

 xlsx 68.73 KB

Q24. Funding

Q24a. Is this a new initiative or a development of existing work (funded through any source)?

- Development of existing work

Please provide details:

This project builds on existing similar work over the last 1.5 years, funded by a combination of sources. In 2020, this has included start-up funding from the Elephant Crisis Fund and the Institute's own core funding. In addition, we have funding for the financial investigator position until mid-2021 from PMI Impact, as part of a two-year cross-divisional programme aimed at tackling corruption along the East Africa-Southeast Asia IWT trading chain.

Q24b. Are you aware of any other individuals/organisations/projects carrying out or applying for funding for similar work?

- Yes

If yes, please give details explaining similarities and differences, and explaining how your work will be additional to this work and what attempts have been/will be made to co-operate with and learn lessons from such work for mutual benefits:

The United Nations Office on Drugs and Crime (UNODC) has a related project in Uganda, slated to end in November 2020. The Basel Institute coordinated closely on a weekly basis with the UNODC to avoid duplication and learn from each other's approaches to beneficiary agencies.

Q25. Co-financing

Are you proposing co-financing?

Yes

Q25a. Secured

Provide details of all funding successfully levered (and identified in the Budget) towards the costs of the project, including any income from other public bodies, private sponsorship, donations, trusts, fees or trading activity, as well as any your own organisation(s) will be committing.

Donor Organisation	Amount	Currency code	Comments
PMI Impact	[REDACTED]	GBP	Out of the overall grant of [REDACTED] [REDACTED] is allocated as co-funding. This funding paid for the development of training courses on financial investigations and open-source intelligence and for the placement of the Financial Investigator to date. It will pay for the open-source intelligence course at the outset of the IWT Challenge Fund programme.



The Basel Institute's core funding (donated by the Governments of Jersey, Liechtenstein, the UK, and Switzerland) pays for a senior prosecution advisor based in Uganda, who will contribute to IWT cases that graduate from the investigation stage under the IWT Challenge Fund programme.

Core funding pays for an experienced senior financial investigator based in Nairobi, who will assist in trans-national cases.


Core funding maintains two Switzerland-based Senior Asset Recovery/Financial Investigation Specialists who will advise on IWT cases in Uganda that have overseas asset recovery elements.

Core funding co-funds the estimated time allocation of the Team Leader to the IWT Challenge Fund programme.

USAID (through WWF US)



GBP

The overall grant is USD  (covering 3 countries). This share of the funding supports research and analysis on corruption in IWT enforcement efforts, and will provide important information to manage the risks of the IWT Challenge Fund programme (both programmes run in roughly the same time frame).

NRCN



GBP

Office Space

Do you require more fields?

No

Q25b. Unsecured

Provide details of any co-financing where an application has been submitted, or that you intend applying for during the course of the project. This could include co-financing from the private sector, charitable organisations or other public sector schemes. This should also include any additional funds required where a donor has not yet been identified.

Date applied for	Donor Organisation	Amount	Currency code	Comments
<i>No Response</i>	<i>No Response</i>	0	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	0	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	0	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	0	<i>No Response</i>	<i>No Response</i>

Do you require more fields?

No

Section 10 - Capital Costs, Value for Money & Ethics

Q26. Outputs of the project and Open Access

Please describe the project's open access plan and detail any specific costs you are seeking from the IWT Challenge Fund to fund this.

We publish all relevant findings freely on our website, often in the form of working papers or policy briefs (which are listed in the ROAD Directory of Open Access Scholarly Resources). The nature of law enforcement and intelligence means exact details cannot be shared publicly, but we regularly use case studies and lessons learned from our on-the-ground experience to contribute to global forums and dialogue of best practices. We do not seek any funding from the IWT Challenge Fund for this.

Q27. Financial Risk Management

This question considers the financial risks to the project. Explain how you have considered the risks and threats that may be relevant to the successful financial delivery of this project. This includes risks such as fraud or bribery, but may also include the risk of fluctuating foreign exchange and internal financial processes such as storage of financial data.

The financial risks associated with this project have been assessed to be low and in line with the majority of projects managed by the Basel Institute. Minimal procurement and sub-contracting of third parties or handling of cash is expected, if any; currency exchange rate related risks are moderate to high, but again in line with the majority of other projects handled by the Basel Institute. As a consequence, the standard financial controls apply and are deemed sufficient. These are implemented under the oversight of the Basel Institute Board Audit Committee, and include the following: Cost centre accounting and quarterly review of books and records in the context of financial reporting; annual voluntary external review of internal control system; annual audit in line with Swiss GAP FEER 21; monthly review and documentation of cash flow; monthly review and documentation of compliance with hedging policy; quarterly financial risk review in the context of the Basel Institute's overall risk management procedure; application of Basel Institute procurement policy. The Basel Institute has passed all annual external audits in full compliance with the law and without any note of concern or reservation by the auditor.

Q28. Capital items

If you plan to purchase capital items with IWT funding, please indicate what you anticipate will happen to the items following project end. If you are requesting more than 10% capital costs, please provide your justification here.

1 laptop and peripherals will be purchased for the financial investigator. It will be given to NRCN after the completion of the project.

Q29. Value for money

Please describe why you consider your application to be good value for money including justification of why the measures you will adopt will secure value for money.

Economy:

- The programme will be implemented by a team consisting of a regional and a Ugandan expert (significant cost savings over the deployment of Western experts).
- We will not incur office rental costs because we will be hosted by our partners.
- Other grants and the Institute's core funding will provide extensive cost share.
- Both HQ and consultant salaries have been reviewed by external advisers and were found to be appropriate as compared to peer organizations.

- The pandemic-necessitated move of many cooperative, management, and monitoring functions online decreases the needs for frequent travel from Basel.

Efficiency:

- We already have connections, country expertise, and training materials in Uganda, substantially compressing the start-up period and eliminating associated costs.
- Basel-based senior financial investigators, IWT, intelligence, and asset recovery experts will be on call from day one to support the field-based staff. This expertise is largely provided as cost share.

Effectiveness:

- The programme will adopt an adaptive management approach: We will initially engage on a wide number of cases with different agencies, evaluate progress and allocate resources towards those interventions that are effectively converting inputs into outputs, moving them through the investigative-prosecutorial chain.
- We will monitor the extent to which the outputs for our interventions are achieving the intended effect through our logframe.

Equity:

- By focusing on the higher end of the IWT value chain (mid and senior criminals), we will make everyone involved in wildlife crime pay, not just the low-level poachers.

Q30. Ethics and human rights

Outline your approach to meeting the IWT's key principles for ethics as outlined in the Guidance Notes.

Additionally, are there any human rights and/or international humanitarian law risks in relation to your project? If there are, have you carried out an assessment of the impact of those risks, and of measures that may be taken in order to mitigate them?

This project takes into account all legal and ethical obligations imposed by involved countries including those of the UK, Uganda and Switzerland. The Basel Institute's Code of Ethics (dated 16 October 2019) and Risk Management Policy provide the guiding principles behind our approach and are available upon request. The Basel Institute's Code of Ethics is premised on the general respect for human rights and these are additionally referenced in the section titled "Safeguarding, diversity, fairness and respect". The project is designed to enhance the capacity of our Ugandan partners to lead national and regional efforts to improve enforcement outcomes through advanced financial investigation techniques and cooperation with relevant public- and private-sector actors. This helps ensure that the perspectives, interests and well-being of affected Ugandan communities are fully understood and addressed, and that our partners' local knowledge is used to full effect alongside international best practice. Use of secure data-sharing systems and protocols will ensure that the rights, privacy and safety of involved individuals and communities are respected, and that inappropriate use of force is not encouraged even indirectly; our activity to support the NRCN in developing and implementing a standard investigations protocol is part of our efforts to ensure the systematic respect of these rights by all current and future staff

Q31. Corruption

This question specifically considers corruption. Explain how you have considered any risk of corruption that may affect the success of this project, and how you plan to manage this. This may include financial corruption, but may also deal with gifts or inducements, or other types of dishonesty or deceit.

The Basel Institute’s Code of Ethics (dated 16 October 2019) applies to and guides all aspects of the Basel Institute’s operational work, including project-specific work as presented in our proposal. Any form of corruption in the context of the Basel Institute’s work is inadmissible and immediate and commensurate action will be enacted in line with the Basel Institute’s Code of Ethics, including the Code’s Reporting procedures (see section “Implementation of the Code of Ethics”).

The Basel Institute’s staff, including consultants, are, by virtue of their professional occupation, highly alert to such risks and fully understand our strict zero tolerance policy. Regardless of the clarity of our rules and the high level of awareness of such matters among staff of a dedicated anti-corruption organisation, it is clear that regular integrity training is important to continuously sharpen staff’s awareness, especially about instances of potential corruption which are less easily discernible. As a consequence, we regularly discuss such matters in the context of staff retreats and similar other staff events under the guidance of the Basel Institute’s Head of Compliance, and in particular encourage the discussion of scenarios which are potentially controversial or unclear.

Q32. Use of data

If your project involves data collection and/or analysis which identifies individuals (e.g. biometric data, intelligence data), please explain the measures which are in place and/or will be taken to ensure the proper control and use of the data. Please explain the experience of the organisations involved in managing this information in your project.

If any aspect of your project relates to informant network data please also explain what measures are in place to ensure it is properly controlled.

Where such data is collected in the context of law enforcement, collection, storing and analysis is done by the partner institutions. Whilst the Basel Institute will advise on the analysis of data, it will not itself store or collect data. Law enforcement-specific regulations of the concerned jurisdictions apply. In the context of intelligence sharing with private-sector entities, minimal data is expected to be collected, stored and disseminated by the Basel Institute as a facilitator of intelligence-sharing. In these cases, the Basel Institute is applying a data privacy and storage procedure which is in compliance with Swiss law and the GDPR. This procedure is regularly reviewed in light of new projects and activities, and any necessary amendments or new processes are documented in a centrally held data processing registry.

Q33. Safeguarding

Projects funded through the IWT Challenge Fund must fully protect vulnerable people all of the time, wherever they work. In order to provide assurance of this, projects are required to have appropriate safeguarding policies in place. Please confirm the lead organisation has the following policies and processes in place and that these can be available on request:





We have a safeguarding policy, which includes a statement of our commitment to safeguarding and a zero tolerance statement on bullying, harassment and sexual exploitation and abuse	Checked
We have attached a copy of our safeguarding policy to this application (file upload below)	Checked
We keep a detailed register of safeguarding issues raised and how they were dealt with	Checked

We have clear investigation and disciplinary procedures to use when allegations and complaints are made, and have clear processes in place for when a disclosure is made	Checked
We share our safeguarding policy with downstream partners	Checked
We have a whistle-blowing policy which protects whistle blowers from reprisals and includes clear processes for dealing with concerns raised	Checked
We have a Code of Conduct for staff and volunteers that sets out clear expectations of behaviours - inside and outside the work place - and make clear what will happen in the event of non-compliance or breach of these standards	Checked

Please outline how you will implement your policies in practice and ensure that downstream partners apply the same standards as the lead organisation.

The Basel Institute’s exposure to groups of vulnerable people in the implementation of the proposed projects is minimal. That said, as for any project implemented by the Basel Institute, the policy concerning Safeguarding applies to all staff and all downstream partners, if any. The Code of Ethics, and with it the provisions for safeguarding, form an integral part of the contractual agreement with any staff member and downstream partner. All safeguarding issues are covered in the Basel Institute’s Code of Ethics, which also contains the necessary protections and procedures for whistleblowers.

Please upload the lead organisation's Safeguarding Policy as a PDF

-  [safeguarding and ethics code](#)
-  09/11/2020
-  21:20:49
-  pdf 302 KB

Section 11 - Logical Framework





Q34. Logical Framework

IWT Challenge Fund projects will be required to monitor (and report against) their progress towards their expected Outputs and Outcome. This section sets out the expected Outputs and Outcome of your project, how you expect to measure progress against these and how we can verify this.

- [Stage 2 Logframe Template](#)

Please complete your full logframe in the separate Word template and upload as a pdf using the file upload below. Copy your Impact and Output statements and your activities below - these should be the same as in your uploaded logframe.

Please upload your logframe as a PDF document.

 [FINAL IWT R7 St2 Logical Framework Uganda
Basel Governance 09Nov20 IG](#)
 09/11/2020
 21:22:56
 pdf 55.78 KB

Impact:

Improved deterrence of IWT and stronger rule of law in affected communities in Uganda due to enhanced financial investigation-led law enforcement response against IWT networks

Outcome:

Please ensure that your Outcome statement has been copied from your logframe into Q8.

Project Outputs

Output 1:

IWT investigators and prosecutors are able to understand and have confidence to use essential financial investigation techniques.

Output 2:

IWT investigations and prosecutions are enhanced with intelligence, evidence reports and profiles developed with the help of embedded advisors and private-sector/ international cooperation.

Output 3:

No Response

Output 4:

No Response

Output 5:

No Response

Do you require more Output fields?

It is advised to have less than 6 Outputs since this level of detail can be provided at the Activity level.

No

Activities

Each activity is numbered according to the Output that it will contribute towards, for example, 1.1, 1.2, 1.3 are contributing to Output 1.

Each activity should start on a new line and be no more than approximately 25 words.

0. Utilise research on decision points and corruption risks in IWT enforcement actions to adjust detailed programming plan from previous phase.

- 1.1. Conduct training events for investigators and prosecutors on Financial Investigations in IWT (anticipated 2 events will be sufficient, subject to trainee availability) to develop and strengthen partner agencies' capacity.
- 1.2. Conduct specialised training on open-source Intelligence in IWT, investigations involving cryptocurrencies and mobile money for investigators and prosecutors (one event each) to hone partner agencies' abilities to handle more complex financial investigations.
- 1.3. Provide post-training mentoring to retain knowledge gained during trainings and increase confidence of trainees.
- 2.1. Provide hands-on case-based mentoring to trainees to develop and strengthen their capacity to investigate IWT crimes using financial investigation techniques in parallel to standard criminal investigation techniques.
- 2.2. Jointly select priority cases to work on with Ugandan law enforcement partner agencies.
- 2.3. Uganda-based investigators and Basel-based intelligence analysts jointly develop target "packages", enriching on-the-ground evidence with extensive open-source and IWT-specific analysis.
- 2.4. Facilitate exchange of information between Uganda's law enforcement agencies and partner agencies among the Basel Institute's network of countries.
- 2.5. Facilitate information exchanges with private firms in Uganda, Basel Institute presence countries (Kenya, Tanzania, Mozambique, Malawi) and United for Wildlife's 150+ Taskforce members.
- 2.6. Continuously review information/intelligence packages with partner agencies and provide refinements based on the needs of investigators and prosecutors.

Section 12 - Implementation Timetable


Q35. Provide a project implementation timetable that shows the key milestones in project activities

Provide a project implementation timetable that shows the key milestones in project activities.


Complete the Excel spreadsheet template as appropriate to describe the intended workplan for your project.


- [Implementation Timetable Template](#)

Please add/remove columns to reflect the length of your project. For each activity (add/remove rows as appropriate) indicate the number of months it will last, and fill/shade only the quarters in which an activity will be carried out. The workplan can span multiple pages if necessary.

 [FINAL IWT R7 St2 Implementation Timetable](#)

[Basel Uganda 08Nov20](#)

 10/11/2020

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 xlsx 12.62 KB

Section 13 - M&E and FCDO notification

Q36. Monitoring and evaluation (M&E) plan

Describe, referring to the indicators in your logframe, how the progress of the project will be monitored and evaluated, making reference to who is responsible for the project's M&E.

IWT Challenge Fund projects will need to be adaptive and you should detail how the monitoring and evaluation will feed into the delivery of the project including its management. M&E is expected to be built into the project and not an 'add' on. It is as important to measure for negative impacts as it is for positive impact. Additionally, please indicate an approximate budget and level of effort (person days) to be spent on M&E (see [Finance for Darwin/IWT](#)).

The Project Leader has 17 years' experience managing multi-million GBP development programmes with rigorous M&E frameworks. The same rigour will apply to this project:

- At the start, an all-team workshop will develop internal performance metric breakdowns from the logframe for each team member, ensuring buy-in into the M&E system.
- Financial investigations are rarely straightforward. There are always complications, inaccessible data, administrative blocks, political factors, jurisdictional or capacity issues, etc. This requires the entire team's diverse backgrounds and engagement (accounting, audit, investigations, open-source and IWT intelligence, resource management, etc).
- To avoid silos, weekly team calls will highlight progress and address challenges.
- Based on our experience handling complex corruption cases, on a monthly basis, an in-depth case status meeting will determine progress on cases and jointly allocate investigative resources for the following month. Bottlenecks such as case file access will thus be identified early and elevated to the Institute's leadership for resolution.
- These feedback loops will support an adaptive management approach, where team members feel comfortable experimenting with novel approaches, which are then evaluated for success/failure; successful approaches can be scaled up quickly.
- In regards to case progress, the team will adopt the Basel Institute's case monitoring tool, designed to transparently and systematically track step-by-step progress in cases of financial crime and asset recovery. The tool is being continuously improved in line with the specifications of the Institute's core donors, including the UK FCDO, and enables us to measure case progress quantitatively as well as qualitatively.
- While the entire team will be aware and engaged in M&E, a HQ-based project manager will coordinate the monitoring of the project's progress towards agreed indicators. The project manager works across the Basel Institute's various divisions, including environmental crime, compliance, and asset recovery, making it easier for us to quickly identify and address failings or negative impacts as well as opportunities for improvement.

One important element of adaptive management will be addressing the continued challenges that COVID-19 is likely to bring. While it is clear that in-person mentoring is the better option where possible, we are confident that we can implement the project even in light of protracted movement restrictions. This confidence stems from the adjustments that we have adopted over the last six months:

- To continue effective mentoring, in-person meetings can be minimised once trust and secure data-sharing systems are established. Collaborative case work is possible through online communications channels, interspersed with socially distanced meetings when feasible. Remaining in-country, as our foreign advisor has done throughout the pandemic, solidifies relationships with partners, even if in-person meetings are infrequent.
- In-person training is preferable, but we moved our highly interactive trainings online due to the pandemic, including the ones offered as part of this proposal.
- The in-country presence of two financial investigators minimises the need for international travel. Oversight, M&E and communications have already moved completely online and operate successfully.
- Analytical support from Basel-based analysts is being provided through secure online data-sharing systems.

Total project budget for M&E in GBP (this may include Staff, Travel and Subsistence costs) £ [REDACTED]

Number of days planned for M&E 132

Percentage of total project budget set aside for M&E (%) [REDACTED]

Q37. FCDO Notifications





Please state whether there are sensitivities that the Foreign Commonwealth and Development Office will need to be aware of should they want to publicise the project's success in the IWT Challenge Fund competition in the host country.

No

Please indicate whether you have contacted your Foreign Ministry or the local embassy or High Commission (or equivalent) directly to discuss security issues (see [Guidance Notes](#)) and attach details of any advice you have received from them.

Yes (click to attach)

Please attach details of any advice you have received.

-  [Confirmation of discussion with Kampala High Commission 06Nov20](#)
-  09/11/2020
-  21:45:08
-  pdf 117.48 KB

Section 14 - Certification

Q38. Certification

On behalf of the

trustees

of

Basel Institute on Governance

I apply for a grant of

£454,437.00





I certify that, to the best of our knowledge and belief, the statements made by us in this application are true and the information provided is correct. I am aware that this application form will form the basis of the project schedule should this application be successful.

(This form should be signed by an individual authorised by the applicant institution to submit applications

and sign contracts on their behalf.)

- I have enclosed CVs for key project personnel, letters of support, budget and project implementation timetable (uploaded at appropriate points in application).
- Our last two sets of signed audited/independently verified accounts and annual report are also enclosed.

Checked

Name	Gretta Fenner
Position in the organisation	Managing Director
Signature (please upload e-signature)	 grettasignature (1)  09/11/2020  21:48:34  jpg 5.42 KB
Date	10 November 2020

Section 15 - Submission Checklist

Checklist for submission

	Check
I have read the Guidance, including Guidance Notes for Applicants and Finance for Darwin/IWT	Checked
I have read, and can meet, the current Terms and Conditions for this fund.	Checked
I have provided actual start and end dates for my project.	Checked
I have provided my budget based on UK government financial years i.e. 1 April - 31 March and in GBP.	Checked
I have checked that the budget is complete, correctly adds up and I have included the correct final total at the start page of the application.	Checked
The application has been signed by a suitably authorised individual (clear electronic or scanned signatures are acceptable).	Checked
I have attached my completed logframe as a PDF using the template provided.	Checked
(If copying and pasting into Flexi-Grant) I have checked that all my responses have been successfully copied into the online application form.	Checked
I have included a 1 page CV or job description for all key project personnel identified at Question 14, including the Project Leader, or provided an explanation of why not.	Checked

I have included a letter of support from the Lead Organisation and main partner organisation(s) identified at Question 13, or an explanation as to why not.	Checked
I have included a cover letter from the Lead Organisation, outlining how any feedback received at Stage 1 has been addressed where relevant.	Checked
I have included a copy of the lead organisation's safeguarding policy, which covers the criteria listed in Question 33.	Checked
I have been in contact with the FCDO in the project country/ies and have included any evidence of this. If not, I have provided an explanation of why not.	Checked
I have included a signed copy of the last 2 annual report and accounts for the Lead Organisation.	Checked
I have checked the IWT website on GOV.UK immediately prior to submission to ensure there are no late updates.	Checked
I have read and understood the Privacy Notice on GOV.UK	Checked

We would like to keep in touch!

Please check this box if you would be happy for the lead applicant and project leader (if different) to be added to our mailing list. Through our mailing list we share updates on upcoming and current application rounds under the IWT Challenge Fund and our sister grant scheme, the Darwin Initiative. We also provide occasional updates on other UK Government activities related to the illegal wildlife trade and share our quarterly project newsletter. You are free to unsubscribe at any time.

Unchecked

Data protection and use of personal data

Information supplied in this application form, including personal data, will be used by Defra as set out in the latest copy of the Privacy Notice for Darwin, Darwin Plus and the Illegal Wildlife Trade Challenge Fund available [here](#). This Privacy Notice must be provided to all individuals whose personal data is supplied in the application form. Some information, but not personal data, may be used when publicising the Darwin Initiative including project details (usually title, lead organisation, location, and total grant value) on the GOV.UK and other websites.

Information relating to the project or its results may also be released on request, including under the 2004 Environmental Information Regulations and the Freedom of Information Act 2000. However, Defra will not permit any unwarranted breach of confidentiality nor will we act in contravention of our obligations under the General Data Protection Regulation (Regulation (EU) 2016/679).

Project Title: Holding Uganda-based transnational wildlife criminals accountable by empowering financial investigations

Project Summary	Measurable Indicators	Means of Verification	Important Assumptions
Impact: Improved deterrence of IWT and stronger rule of law in affected communities in Uganda due to enhanced financial investigation-led law enforcement response against IWT networks			
<p>Outcome: Ugandan IWT enforcement officers increasingly use financial investigation and public/private intelligence-sharing techniques to detect and take action against illicit financial flows from IWT.</p>	<p>0.1 No. of IWT investigations that progress with financial investigation techniques increases by 100% per year over 2020 baseline (baseline 2020 YTD = 5)</p> <p>0.2 No. of IWT cases brought to court that include financial evidence increases to 20% by the end of the project. (Baseline, 0%)</p> <p>0.3. Cases where assets are recovered or seized from wildlife traffickers increase from 0 to 2 by end of project.</p> <p>0.4 Exchange and use of transnational intelligence with private sector representatives (including United for Wildlife) in IWT investigations increases by 5 information requests per year from a 2020 baseline (Baseline 2020 YTD = TBD).</p>	<p>0.1 Cases recorded in Basel Institute case progress tool, cross-referenced against Ugandan law enforcement agency records (disaggregated by absence of presence of financial element and over time) and public records</p> <p>0.2 Comparison of cases recorded in Basel Institute case progress tool and partner institution case database and public records.</p> <p>0.3 List of legal actions as reported by partner institutions.</p> <p>0.4 Anonymised record of targeted and case-specific intelligence requests and sharing from and with private sector entities (including UfW Taskforce or individual members)</p>	<p>0.1 Partner institution keeps case database complete and up to date. 0.1 Supervisors allow inclusion of financial elements in cases</p> <p>0.2 Partner institution willing to share statistics with Basel Institute. 0.2 Supervisory prosecutors at DPP allow bringing of finance-related charges.</p> <p>0.4 Private-sector representatives including United for Wildlife Taskforce members provide required data to monitoring tool. 0.4 Information-sharing system set up by United for Wildlife remains operational.</p>

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	0.5 At least 1 partner institution adopts 2 or more sustainability measures that ensure financial investigations are a core function of its operating model by end of project.	0.5. Evidence of sustainability measures (dedicated staff, budget allocations, adopted SOPs on financial institutions, policies, executive level promotion of financial investigations, etc).	0.5. Agency leadership sees value of financial investigations.
<p>Outputs:</p> <p>1. IWT investigators and prosecutors are able to understand and have confidence to use essential financial investigation techniques.</p>	<p>1.1 20 IWT investigators (30% female) gain essential skills in financial investigation techniques and related mechanisms for international judicial cooperation by project end.</p> <p>1.2. Two prosecutors gain skills to prosecute IWT cases with financial evidence by designing legal strategies by project end (50/50 gender mix).</p> <p>1.3 20 Investigators and 2 prosecutors develop and maintain confidence to utilise financial investigations through mentorship by end of project.</p>	<p>1.1 Pre and post-training questionnaire comparison; Training tracer (follow-up) study assesses 6 and 12 months post-training with trainees whether knowledge a) has been retained (including details of applied case(s)). Data disaggregated by gender.</p> <p>1.2 Pre and post-training questionnaire comparison; Training tracer study assesses 6 and 12 months post-training with trainees whether knowledge a) has been retained (including details of applied case(s)). Data disaggregated by gender.</p> <p>1.3 Section in above 6 and 12 month questionnaires to ascertain whether a) confidence increases are sustained and b) the skills are applied in practice.</p>	<p>1.1 Trained staff remain in their positions for enough time to utilize the new skills and are willing to testify to their professional practice.</p> <p>1.2 Partner institution management decisions do not prevent trained staff from using the skills or mentor from assisting in live cases.</p> <p>Prosecutor priorities allow lawyers to be assigned to IWT cases</p> <p>1.3 Senior Management encourages the utilisation of financial investigation skills.</p>

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<p>2. IWT investigations and prosecutions are enhanced with intelligence, evidence reports and profiles developed with the help of embedded advisors and private-sector/international cooperation.</p>	<p>2.1 At least 8 structured case analyses or financial profiles (“packages”) in support of IWT investigations, arrests and seizures are produced and disseminated per year. (Baseline 2020 YTD = 2)</p> <p>2.2 At least 20% of the case analyses / financial profile packages are utilised in IWT investigations, arrests or seizures.</p> <p>2.3. At least 50% of cases utilise information requests to private sector (2020 Baseline TBD).</p> <p>2.4. At least 3 assisted IWT cases utilize cross-border law enforcement collaboration by project’s end (2020 baseline YTD = 1)</p>	<p>2.1 Copy of analyses/profiles.</p> <p>2.2 Verified through investigator feedback in interviews and questionnaires; use of case progress tool; documented analyses/profiles (lead suspect data broken down by gender).</p> <p>2.3. Anonymised information requests to private sector.</p> <p>2.4. Case summaries detailing international element.</p>	<p>2.1 Partner institution provides sufficient data to build a useful case analysis/financial profile.</p> <p>2.1 Financial data is able to be obtained from national/international institutions holding that data.</p> <p>2.2. Management or human resources decisions do not prevent staff from using their skills in this way.</p> <p>2.3. Investigators are able to establish which companies hold relevant information.</p> <p>2.4. Diplomatic relations continue to enable cross-border cooperation.</p>

Project Title: Holding Uganda-based transnational wildlife criminals accountable by empowering financial investigations

Activities (each activity is numbered according to the output that it will contribute towards, for example 1.1, 1.2 and 1.3 are contributing to Output 1)

0. Utilise research on decision points and corruption risks in IWT enforcement actions to adjust detailed programming plan from previous phase.
- 1.1. Conduct training events for investigators and prosecutors on Financial Investigations in IWT (anticipated 2 events will be sufficient, subject to trainee availability) to develop and strengthen partner agencies' capacity.
- 1.2. Conduct specialised training on open-source Intelligence in IWT, investigations involving cryptocurrencies and mobile money for investigators and prosecutors (one event each) to hone partner agencies' abilities to handle more complex financial investigations.
- 1.3. Provide post-training mentoring to retain knowledge gained during trainings and increase confidence of trainees.
- 2.1. Provide hands-on case-based mentoring to trainees to develop and strengthen their capacity to investigate IWT crimes using financial investigation techniques in parallel to standard criminal investigation techniques.
- 2.2. Jointly select priority cases to work on with Ugandan law enforcement partner agencies.
- 2.3. Uganda-based investigators and Basel-based intelligence analysts jointly develop target "packages", enriching on-the-ground evidence with extensive open-source and IWT-specific analysis.
- 2.4. Facilitate exchange of information between Uganda's law enforcement agencies and partner agencies among the Basel Institute's network of countries.
- 2.5. Facilitate information exchanges with private firms in Uganda, Basel Institute presence countries (Kenya, Tanzania, Mozambique, Malawi) and United for Wildlife's 150+ Taskforce members.
- 2.6. Continuously review information/intelligence packages with partner agencies and provide refinements based on the needs of investigators and prosecutors.