Ministry of Finance, Planning & Economic Development (MoFPED), Government of Uganda

Mission Report



By:

Mr. CS Reddy, CEO, APMAS &
Dr. Janardhan Reddy Busireddy, IAS (Retd.)

14th to 22nd July 2024

Table of Contents

1	Visit Schedule	3
2	Keynote address by CS Reddy, CEO, APMAS	4
	2.1 SHG Movement in India – Some numbers	4
	2.2 SHG Movement in India – Key messages	4
	2.3 Uganda – there is tremendous potential	5
	2.4 Five big recommendations to Government of Uganda	6
3	Address by Dr. Janardhan Reddy Busireddy IAS (Retd.)	6
	3.1 Savings Groups as Strategy for Poverty Elimination in Urban Areas	6
	3.2 Suggested Approach to Poverty Elimination in Urban Areas	7
	3.3 Possible Activities through Urban Poverty Mission	7
4	Feedback on the 2-day National Conference on Microfinance & Savings Groups 2024 during 17th & 18th July	8

Presentations attached:

1. CS Reddy India International Experience - Lessons for Uganda Savings Groups.pdf

2. ndia Urban POVERTY MISSION BJR.pdf

Ministry of Finance, Planning & Economic Development (MOFPED), Govt of Uganda

Mission of Mr. CS Reddy & Dr. Janardhan Reddy Busireddy during 14th to 22nd July 2024

A Brief Mission Report

Visit Schedule of International Consultants team:

Date	Major Activities	Comment
14th July 2024	Arrival in Entebbe, Kampala	MOFPED & CARE welcomed
15th July 2024	Meeting with Mr. Moses Ogwapus, Commissioner of Financial Services & his Team & CARE Team Meeting with Mr. Lance Kashigyera, Coordinator, FISU, MOFPED and his team	Briefing on the National Conference on Microfinance & Savings Groups and how the International Experience can benefit Uganda
16th July 2024	Meeting with Conference Organisers: MOFPED, CARE & MUBS Visit to 2 Savings Groups of Adolescents (female & male) in the suburbs of Kampala	Background work for the preparation of the Keynote Address and Special Address in the National Conference Understanding Savings Groups
17th & 18th July 2024	Attending the 2-day Conference Discussions with Key Stakeholders Presentations in the Conference Discussions with the MOFPED Minister for Microfinance Honourable Mr. Kasolo Haruna and the Honourable Minister of the Presidency and several high officials of the Bank of Uganda & MOFPED and Collaborators	Based on the understanding of the Uganda Microfinance & Savings Groups status & context, made presentations with specific policy recommendations for the consideration of MoFPED
19th July 2024	Meeting with Mr. Apollo B. Gabazira, CARE Uganda Country Director and the Savings Groups Team to discuss about long-term collaboration – Action Points Debriefing with the Commissioner and the Senior Officials of the Ministry on the Follow up Actions and the ideas for long-term collaboration between MoFPED & APMAS along with CARE Uganda and MUBS	Very Productive Meetings with clear Action Points for the future. More details in the report.
20th & 21st July	Understanding the rich culture, heritage and natural resources of Uganda	
22nd July 2024	Return Journey from Entebbe to India	

Congratulations on the massive success of the National Conference on Microfinance & Savings Groups!! The organisers of the conference led by the Commissioner of the Ministry of Finance, Planning & Economic Development, Govt of Uganda, ably supported by Core Organising Agencies such as CARE, UMRA, AMFIU, and the Conference Organising Committee, did a splendid job of conceptualising, designing, organising and executing the event!! BIG shout out for you all!!

Keynote Address by CS Reddy, Day 1 (17th July 2024):

Based on 33 years of experience in the Self Help Groups (SHGs), SHG federations, Financial Cooperatives in India and understanding the Savings Groups & SACCOS in developing countries, 23 years of conducting training of trainers programs on Savings Groups / SHGs, over 10 years of being a visiting professor at Coady International Institute which is located in StFX University, Antigonish, Nova Scotia, Canada and a deep understanding of the microfinance & savings groups in Uganda, a presentation was prepared with futuristic recommendations for Uganda.

The table below is over 30 years of the Self Help Groups (SHGs) Movement in India.

SHG Movement in India: Some numbers

Particulars FY 2023	# SHGs (in Millions)	Amount Billion USD
SHGs saving linked having bank balances	13.4	7
Total Savings of women in SHGs		21
SHGs Obtained Bank Loan during the year	4.3	17
SHGs having loans outstanding	7.00	22

Position by end March 2023	
Number of households covered	162 Million
SHG members as % of adult women in the country	45%
Proportion of BANK linked groups (SHGs having a loan outstanding)	52%
Average loan disbursed per SHG by Banks	4,000 USD
Non-Performing Assets (NPAs)	2.8%
Government of India support to SHGs & SHG federations	8 Billion USD

What made the massive women SHG movement possible in India?

SHG Movement in India – Key Messages

- Evolved over three decades with a Strong Enabling Policy by Government of India, India's Central Bank (RBI) & NABARD
- Interventions at multiple levels and multiple areas… building on the experiences and potential to leverage
- **SHG-Bank Linkage Programme – critical milestone in the evolution**
- Potential for SHG for many types of impacts and scale – realised over time, and as the movement matured addressing multidimensional Poverty – initiated by NGOs and in later years led by Government!!
- Complete ecosystem developed around SHGs to make it work, and realise its potential – Bank Linkage, SHG federations, Digitization
- National level intent and framework, with flexibilities for state governments to customise and evolve

The understanding of the Keynote Speaker of Uganda's Financial Inclusion & Savings Groups Movement is summarized in the table below:

Uganda – There is Tremendous Potential

A Transformed Uganda Society from a Peasant to a Modern Prosperous Country with 30 years!!

- 76% of Ugandans have National Identity Card
- **National Financial Inclusion Increased to 66%, overall financial inclusion (both formal & informal) increased to 81% !!!**
- **VSLAs / Savings Groups as informal Financial Inclusion for 42%**
- **Over 72% Ugandans own Mobile Phones**
- **Diverse Stakeholders Supporting Savings Groups – International Agencies, NGOs, Government & Other Development Organisations.**
- Over 64% practice digital transactions in Uganda – some gender disparities
- 10,594 SACCOS under PDM – Savings Groups / VSLAs have members!!
- 6,644 Embyoga SACCOS to promote enterprises

The Keynote Speaker Summarised the following five (5) BIG Recommendations for the consideration of the Ministry of Finance, Planning & Economic Development (MOFPED), Government of Uganda and other important stakeholders for accelerating the universalisation of financial inclusion & inclusive growth in Uganda:

Five BIG Recommendations to Govt of Uganda

1. Central Bank Policy Interventions: Facilitate Bank Loans Savings Groups / VSLAs – this must be done in a mission mode – African Model Developed
2. **Promote Formal Federations of Savings Groups / VSLAs: Explore the possibility of VSLAs / Savings Groups promoting their own SACCOS!! Savings Group Federations: Self-Regulation, Livelihoods promotion & Climate Change!**
3. **Uganda Financial Inclusion Strategy to focus on addressing Complex Urban Poverty in a Mission Mode through Savings Groups & their federations**
4. Savings Groups / VSLAs to promote their own "BANK" through their formal Federations as shareholders in the BANK – Stree Nidhi model in India – 12 years
5. **National Savings Groups Policy shall be an enabling ecosystem development framework for universalization of VSLAs / Savings Groups, their sustainability and integrating into the Financial Sector of Uganda!!**

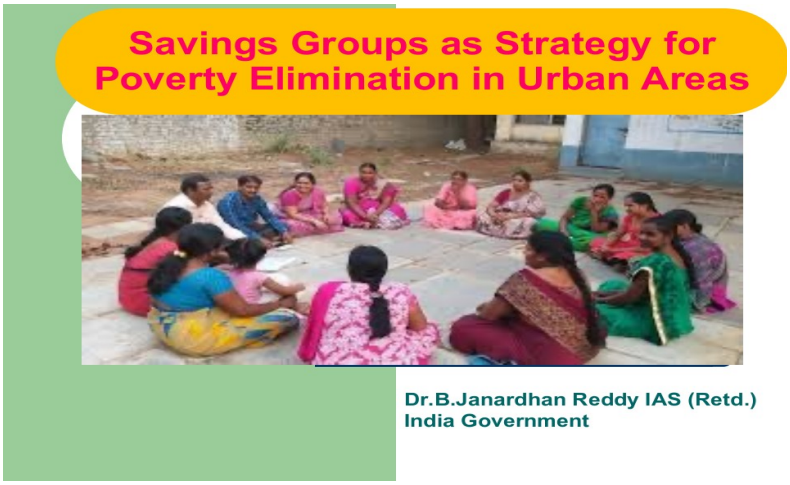
In Uganda, the interest rates charged by the commercial MFIs / MDIs is still very high which makes it difficult for the livelihoods / enterprises of the poor to be viable. Therefore, there is a need for a policy intervention for the Bank of Uganda to issue policy guidelines to all the Banks & other financial institutions to lend to informal Savings Groups & VSLAs without collateral and at reasonable rates of interests. India's more than three decades (30 years) experience will enable Uganda to formulate appropriate policy guidelines for the Banks and other FIs to follow. CARE International has also piloted the linkage banking model for the VSLAs in many African countries in partnership with Barclays Banks and the lessons learnt from that are also available for the consideration of Government of Uganda to formulate appropriate policy guidelines by Bank of Uganda. Promoting Linkage Banking model for the savings groups / VSLAs will boost the number of savings groups in Uganda and can facilitate a near universalisation of membership of the poor households in the savings groups. It will also make these informal savings & credit groups stronger and more sustainable to serve as platforms to address all sorts of poverty.

Federating the informal Savings Groups / VSLAs into formal institutions by registering their federation as a Cooperative / SACCO will ensure quality & sustainability of the savings groups movement in Uganda. These federations could also focus on self-regulation of their member groups (SGs / VSLAs) in terms of annual audit, annual rating and in transforming the annual cash-out groups into the accumulating savings & credit groups with their fund increasing over a period of time to meet the ever-growing credit needs of the members of the SGs /VSLAs. Promoting & sustaining the formal federations of SGs/ VSLAs could also enable

The savings groups establishing their own bank could also be explored after conducting a systematic feasibility & viability analysis and preparing a proper business plan for such a financial institution own by the poor of Uganda (both rural & urban). Again, there is considerable experience from India and other developing countries of federating informal groups into formal cooperative organisations and also informal groups promoting their own banks like Stree Nidhi in India. Learning from SEWA Bank, Mandeshi Bank, etc., can also be useful for the MOFPED to undertake a systematic approach to conduct feasibility and viability study and to

prepare a business plan for the bank (quasi-bank!!) of the Savings Groups / VSLAs. Experience from Germany (DGRV), Netherlands (Rabo Bank), etc can also be examined while Govt of Uganda making plans to promote one or more Banks of the SGs / VSLAs. Such an innovative initiative is also now possible more easily due to the available mobile technology and the use of digital banking by many of the Ugandans as the citizens now have their national identity. South-South Cooperation.

Dr. Janardhan Reddy Busireddy IAS (Retd.), former Chairman of the Telangana Public Service Commission delivered talk on "Policy Frameworks and Strategic Partnerships for Savings Groups: Leveraging Collaborative Advantage for Sustainable Impact" with a special focus on **the need for Urban Poverty Reduction Strategy through Savings Groups – India's Experience**



Dr. Janardhan Reddy highlighted the importance of an exclusive Urban Poverty Reduction strategy by establishing a Mission for Urban Poverty Reduction in Uganda. As the urban population is on the rise and even in Uganda there is increasing urbanisation and increasing urban poverty Mission for Urban Poverty Reduction is the need of the hour. Savings Groups / VSLAs in urban areas have proved to be effective in addressing several dimensions of the urban poverty and improving the quality of life of the vulnerable households.



To address Urban Poverty, a number of initiatives can be taken up in a mission-mode through the self-help groups (SHGs) / Savings Groups /VSLAs. Dr. Reddy highlighted the need to focus on skill development & enterprise promotion as there is great scope for that. The need to address issues of housing, health, nutrition and WASH is greatest in urban slums. Through the savings groups, gender aspects and food security and climate change related issues can also be addressed. There is tremendous scope for the urban Savings Groups / VSLAs to many social issues. National Urban Livelihoods Mission (NULM) and Mission for Elimination of Poverty in Municipal Areas (MEPMA) in Telangana can support Government of Uganda.



Feedback on the 2-day National Conference on Microfinance & Savings Groups 2024 during 17th & 18th July:

Congratulations on the massive success of the 2-Day National Conference on Microfinance & Savings Groups during 17th & 18th July 2024!! The organisers of the conference led by the Commissioner of Financial Services of the the Ministry of Finance, Planning & Economic Development (MOFPED), Govt of Uganda, ably supported by Core Organising Agencies such as CARE, UMRA, AMFIU, and the Conference Organising Committee, did a splendid job of conceptualising, designing, organising and executing the event!! BIG shout out for you all!!

Day 2 having the exhibition of the products of the savings groups and SACCOS was a great idea!! Many of the representatives of Savings Groups & SACCOS being there sharing their excitement and success stories with very positive testimonials was truly inspirational!! Many had goosebumps at times!!

Almost all the key Ministers, Officials and participants were there in the conference!! The speeches by **The Minister of State for MoFPED & Microfinance was powerful & thought provoking!!** He was there all through conference & also donated blood!!

The Speech of the Permanent Secretary was emphatic and futuristic with great clarity!! All the senior officials spoke with passion & drive!!

It was particularly impressive that the Minister for the Presidency was there for the Valedictory Function, visited all the stalls in the exhibition giving huge motivation to the Savings Groups & SACCOS and Honourable Minister read out a powerful speech of the Honourable President of Uganda!!

We have attended several national & international conferences and workshops in different parts of the world. We also have considerable experience in conceptualising, designing and conducting large-scale National Conferences and Summits and have also instituted awards for the best performing SHG federations. The following is our constructive feedback for improving the future events:

1. Time management & session moderation could have been done better!!

2. Synthesising after each session would have given clear messages for the participants!!

3. Maybe you can attend some of the international conferences to get ideas on how to improve on the design & conduct of the conference!! You are most welcome to attend Global Microfinance Summit in India during 11th & 12th December 2024. In addition to observing the Summit / Conference, you will also be able to witness the microfinance awards that will be presented during the conference.

4. National Savings Groups Policy could have been released formally at the 2-day National Conference on Microfinance & Savings Groups 2024!!

5. Some of the Status Reports / Publications on Savings Groups / Microfinance could have been released during the 2-day National Conference.

For future National Conference, we have at least three (3) suggestions for your consideration with a view to make the 2025 National Conference a grand success:

i) Introduce National Awards for Best SACCOS, Savings Groups, VSLAs and MFIs/ MDIs!! That will promote best practices and healthy competition among the important sector players!! There can be a credible jury for the awards and the entire process can be initiated 6 months in advance!!

ii) Release the State of the Microfinance & Savings Groups Report (Uganda State of the Sector Report) at the conference to take stock of the situation and future planning!! The deliberations of the 2-day conference can be based on that.

iii) Invite more International Speakers for sharing Innovations & Best Practices relevant for Uganda Microfinance & Savings groups sector!! You can have parallel sessions during the conference to cover more topics on the 3 themes: Microfinance, SACCOS & Savings Groups / VSLAs. For the three (3) themes, can be can 2-3 parallel sessions to cover relevant topics indepth. The participants that have interest in any one of these themes would attend those parallel breakout sessions. The plenary sessions of the conference can be in the forenoon on day 1 of the conference and in the afternoon on day 2 of the conference. With that design

change, you can possible have another 6 sessions and have many more speakers who would have a chance to share their experience & learning. In the Conference there can be a theme on “Impact of Microfinance & Savings Groups” which would give us some ideas about what is working and what is not working.

As a follow up of the Conference, it could possible for APMAS to work together with Uganda by having a formal partnership (MoU) with Business School of Mekere University or with MOFPED or any other agency for Policy Guidance, Training & Capacity Building and Technical Assistance (South-South Cooperation) to develop SACCOS & SGs into vibrant organisations:

APMAS could undertake a quick study of SACCOS & Savings Groups (VSLAs) in Uganda to customise & design impactful training programmes & technical assistance over the next three years!! We could also have monthly virtual meetings with you on thematic topics to continually provide technical assistance. We can also design a training of trainers (ToT) for participants of Uganda (drawn from the sector to conduct decentralised training for SACCOS & VSLAs) and conduct in Kampala as per the requirements of the cooperative organisations in Uganda.

There is a need to build formal linkages between SACCOS & VSLAs for the SACCOS to become autonomous & independent business organisations serving the marginalised communities of Uganda, particularly women. Facilitating the process of federating savings groups, linking savings groups with banks & MFIs and exploring the feasibility of setting up bank of savings groups can all be explored. For savings groups to become vibrant organisations, a system of self-regulation to be promoted - annual rating of groups, annual audit & computerisation of all the groups to have a dashboards for decision making!

As discussed, a Policy Delegation of Uganda policy makers and practitioners can be planned later in the year to India under “**South-South Cooperation**”. The Uganda Policy Delegation (10 to 20 participants) would arrive in Hyderabad on 1st or 2nd December 2024, spend a week understanding the following & then travel to Delhi to attend the Global Inclusive Finance Summit:

1. Saving Groups (SHGs) Bank Linkage: visit field areas and also talk to Government officials & Central Bankers!!

2. Micro enterprises of women from Savings Groups - market linkages

3. Understand Role & Functioning of Federations of Savings Groups (SHGs) as formal cooperative institutions ensuring Self-Regulation & Self-Supervision of SHGs

4. Understanding Stree Nidhi Cooperative Apex Financial Institution (bank of savings groups with SHG Federations as Shareholders) providing supplementary financial services to SHGs. Use of technology by savings groups & their federations

5. Understanding Financial & Agriculture Cooperatives (called as Primary Agriculture Cooperative Credit Societies - PACS) and Farmers Producer Organisations (FPOs) - agriculture value chain development services to smallholder

farmers!! These are supported & supervised by National Bank for Agriculture & Rural Development (NABARD) in India.

Feedback on the Draft National Savings Groups Policy:

We have had a chance of reviewing the draft National Savings Groups Policy & the following is our feedback for your considerations and for sure the National Savings Policy Document requires significant revisions & we can have a virtual meeting:

- The status of the Savings Groups in Uganda, both quantitative & qualitative, must be presented in the policy, including the issues & challenges faced by Savings Groups / VSLAs. How the policy addresses those issues & challenges faced by the Savings Groups / VSLAs to be a part of the policy.
- The policy document must be a high level framework document to create an enabling ecosystem for the savings groups / VSLAs to sustain & thrive in Uganda benefiting the members. There is no need to have all the details that can be a part of the "Operational Guidelines of Savings Groups" in the policy document. Please have the policy document to be 10-15 pages!
- Central Bank of Uganda to issue policy guidelines enabling Savings Groups access Bank loans & loans from other financial institutions like MDIs & MFIs. This is an important component and can be included in the National Savings Groups Policy Document in some detail.
- While there can a web-portal to have data of the Savings Groups on a real-time basis with dashboards, there is no need to have registration fee and any complications thereafter. Savings Groups being informal self-help organisations based on cooperative values & principles, the policy must allow them to come up and function with total autonomy and independence. There cannot be any interference or control on such organisations. Savings groups can have their own system of self-regulation or what we call as "Sector Own Control" to have annual audits, ratings & monitoring of the savings groups.
- Federations of Savings Groups / VSLAs and these federations promoting a "Bank" of Savings Groups to be a part of the Savings Groups Policy.
- The National Savings Groups Policy can present a vision of universalisation of Savings Groups for financial inclusion. The vision & mission of the policy needs to be audacious and inspirational with targets for 2030!! The National Savings Groups Policy should also have measurable goals & indicators and milestones are have been included in the National Financial Inclusion Strategy of Government of Uganda.
- There can be a comprehensive flow-chart in the policy document orchestrating the entire ecosystem depicting the inter-connectedness of savings groups / VSLAs with or financial inclusion players like SACCOS, MDIs / MFIs, etc., for an orderly growth of the financial inclusion sector in Uganda.

More specific comments on the Draft National Savings Groups policy are given below for your ready reference:

1. Present status is not described in a quantifiable manner. Next step should be -to fix timelines and build a robust baseline data .
2. The data should capture: number of savings groups / VSLAs in rural and urban areas; total number of members covered; debt burden of each group /member; and extent of debt obtained from informal/private money lenders
3. rates of interests charged on the private debts
4. extent of loans obtained from formal institutions
5. Extent of population covered under life insurance and health insurance
6. literacy and skill status and requirement of areas of skill
7. Exclusive urban poverty reduction strategy
8. A mission approach for universalisation of financial inclusion to achieve inclusive growth in Uganda, including a separate strategy for Urban.
9. Dedicated, autonomous bodies for rural and urban areas as a strong sensitive support system which can work in mission-mode.
10. Facilitating/regulating strategy for establishing Microfinance/ institutions
11. policy facilitation through central bank to mandate banks to lend to Saving groups / VSLAs
12. Considering to change nomenclature from saving groups to self-help groups
13. Devising mechanisms to hugely incentivise good repayment behaviours by interest subvention mechanisms
14. Establishing institutions/partnering with institutions for continuous capacity building at various levels
15. Forming robust mechanisms for grading, monitoring and evaluation and course corrections
16. building the capacities of civil society organisations/NGOs
17. Earmarking of certain budget for the development of savings groups.
18. No fee to be prescribed for registration and renewal
19. Third party/social audit systems for self improvement of the SGs

The International Experts are thankful to all the senior officials of MoFPED, CARE Uganda, AMFIU, UMRA, etc for inviting us for the Conference, for your warmth & hospitality and for your keen interest in our collaboration.






NATIONAL MICROFINANCE
AND SAVINGS GROUPS
CONFERENCE 2024

Annex: Mail sent to Mr. Ogwapus from CS Reddy on 15th July 2024

Dear Mr. Ogwapus:

Greetings from APMAS India!

We had an extremely useful meeting yesterday in your chambers at the Ministry of Finance, Planning & Economic Development (MOFPED), Govt of Uganda! Both Dr. Janardhan Reddy & I were delighted that we are able to listen to your ideas and share our experience & learning on Savings Groups (SHGs /VSLAs)! **We want to acknowledge and appreciate your visionary leadership and the tremendous work done by MoFPED over the years through the National Financial Inclusion Strategies (1 & 2) and many other policy initiatives to create enabling ecosystem for the diverse financial inclusion models to thrive in Uganda led by Commercial Banks, MDIs, SACCOs, Savings Groups / VSLAs and MFIs.** The National Conference on Microfinance & Savings Groups seems to be providing the perfect platform for the important stakeholders to come together to reflect, celebrate and move forward in a mission mode to universalise financial inclusion in Uganda for the economic prosperity of the citizens, particularly the most disadvantaged and vulnerable sections of the society.

Through this email, I synthesize our discussions yesterday (15th July 2024) & some of the ideas for your consideration as you finalise the National Savings Groups Policy for Uganda to create an enabling ecosystem in the country:

1. **There is an urgent need for the Central Bank of Uganda to issue policy guidelines for Banks and other Financial Institutions to facilitate Savings Groups - Bank linkage for the SHGs /Savings Groups to leverage their savings for the prosperity of the members of the Savings / Groups / SHGs / VSLAs.** We have more than 30 years' experience in India with Banks lending to SHGs with current loans outstanding of over USD 20 Billion led by Reverse Bank of India (RBI) enabling policy guidelines issued in the year 1992. Similar experiences of VSLA - Bank linkage exists from various countries in Africa. Even MDIs, MFIs and SACCOS can also lend to Savings Groups. Necessary policy formulation & implementation support can be extended by APMAS
2. **Savings Groups / SHGs/ VSLAs being informal savings & credit groups, for their growth & long-term sustainability there is a need to promote Federations of Savings Groups / SHGs at appropriate level.** These federations can be registered as formal organisations under appropriate cooperative laws. The federations of the Savings Groups / SHGs / VSLAs can take up self-regulations (annual audit, rating, training) as service functions for the Savings Groups to become sustainable and vibrant. APMAS has been working with DGRV Germany for over 16 years to implement Sector Own Control (SOC - Self Regulation) of the SHGs through their federations in India with considerable success. There are a number of training modules, manuals and videos developed which can be adapted to Uganda context. There are over 500,000 SHG federations in India working successfully. APMAS, DGRV, GIZ and agencies like CARE can support MOFPED in this endeavour based on global experience & learning.
3. **Savings Groups / SHGs / VSLAs must consider promoting their own Bank through their federations.** In India, almost 12 years ago, Stree Nidhi has been promoted as a Cooperative Apex Organisations with SHG federations having their share capital and leveraging the bulk loans from Banks & other Financial Institutions for on-lending to Savings Groups / SHGs / VSLAs. As a "Bank of Savings Groups", Stree Nidhi is currently having a loan outstanding of over one billion USD serving nearly 1.5 million

SHGs in the Southern Indian States of Andhra Pradesh & Telangana. If Government of Uganda decides to set up such a Bank of Savings Groups, Stree Nidhi and APMAS can support! Stree Nidhi Cooperative Apex of the SHG federations is a technology driven institution.

4. Urban population is on the rise in Uganda & so is the Urban Poverty. To address urban poverty, there is a need to have a focused strategy of financial inclusion in Cities & Towns of Uganda through the Savings Groups & their federations as there are tremendous economic opportunities for Micro enterprises in urban areas. **Within the National Savings Groups Policy, there should be a separate chapter on urban poverty reduction through the savings groups & their federations to limit the exploitation of the commercial microfinance institutions.** India's experience can be of create value in this regard and APMAS and Mission for Elimination of Poverty in Municipal Areas (MEPMA), Government of Telangana / Andhra Pradesh, India can extend technical and capacity building support in this regard.
5. There is a tremendous scope to facilitate synergies & linkages between Savings Groups / VSLAs, SACCOS, MDIs / MFIs and also the agriculture cooperatives engaged in value-chain development to make agriculture profitable. To build resilience and to address climate change, community institutions such as Savings Groups, federations of savings groups and Agriculture Cooperatives to take up agroecology. The same can become an integral part of the National Savings Groups Policy of Government of Uganda.
6. **During our meeting we discussed about the possibility of you (MOFPED) leading a Policy Delegation to India to further understand some of the ideas that I mentioned above.** APMAS will be more than happy to facilitate such Policy Delegation visit o India in the later part the year 2024 with the support of Govt. of India, RBI, NABARD, Stree Nidhi and MEPMA Andhra Pradesh / Telangana. For revising & operationalising the National Savings Groups Policy, APMAS will be happy to extend its assistance, training & technical support to MOFPED. **We (MOFPED & APMAS) could possibly sign a "Letter of Intent" or "Memorandum of Understanding" ASAP.**

We have had a chance of reviewing the draft National Savings Groups Policy & the following is our quick feedback for your considerations and for sure the National Savings Policy Document requires significant revisions:

- The status of the Savings Groups in Uganda, both quantitative & qualitative, must be presented in the policy, including the issues & challenges faced by Savings Groups / VSLAs.
- The policy document must be a high level framework document to create an enabling ecosystem for the savings groups / VSLAs to sustain & thrive in Uganda benefiting the members. There is no need to have all the details that can be a part of the "Operational Guidelines of Savings Groups" in the policy document.
- Central Bank of Uganda to issue policy guidelines enabling Savings Groups access Bank loans. This is an important component and can be included in the National Savings Groups Policy Document in some detail.
- While there can a web-portal to have data of the Savings Groups on a real-time basis with dashboards, there is no need to have registration fee and any complications thereafter. Savings Groups being self-help organisations based on cooperative values & principles, the policy must allow them to come up and function with total autonomy and independence. There cannot be any interference or control on such organisations. Savings groups can have their own system of self-regulation or what we call as "Sector Own Control"

- Federations of Savings Groups / VSLAs and these federations promoting a "Bank" of Savings Groups to be a part of the Savings Groups Policy.
- The National Savings Groups Policy can present a vision of universalisation of Savings Groups for financial inclusion. The vision & mission of the policy needs to be audacious and inspirational with targets for 2030!!
- There can be a comprehensive flow-chart in the policy document orchestrating the entire ecosystem depicting the inter-connectedness of savings groups / VSLAs with or financial inclusion players like SACCOS, MDIs / MFIs, etc., for an orderly growth of the financial inclusion sector in Uganda.

The year 2025 is declared as UN International Year of Cooperatives!! Savings Groups / VSLAs being cooperative organisations, there can be series of events (workshops, seminars and trainings) to launch & implement the National Savings Groups Policy in 2025!

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Best Regards,

CS Reddy