



ANTI-CORRUPTION COMMISSION

# Strategic Action Plan 2020-2024

Anti-Corruption Commission

Republic of Maldives





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Anti-Corruption Commission

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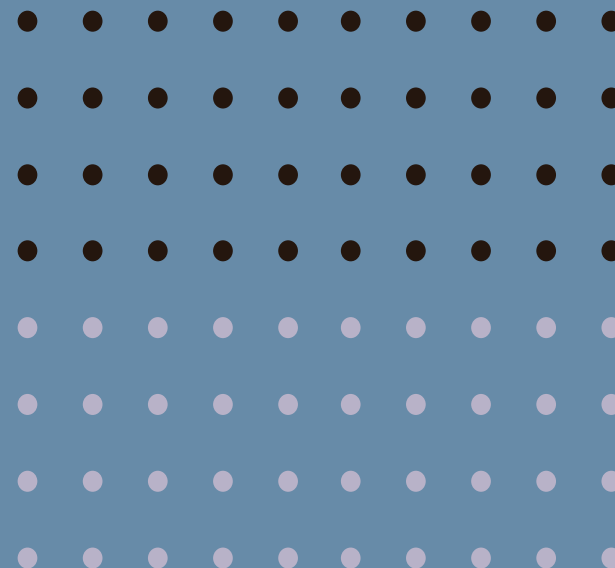
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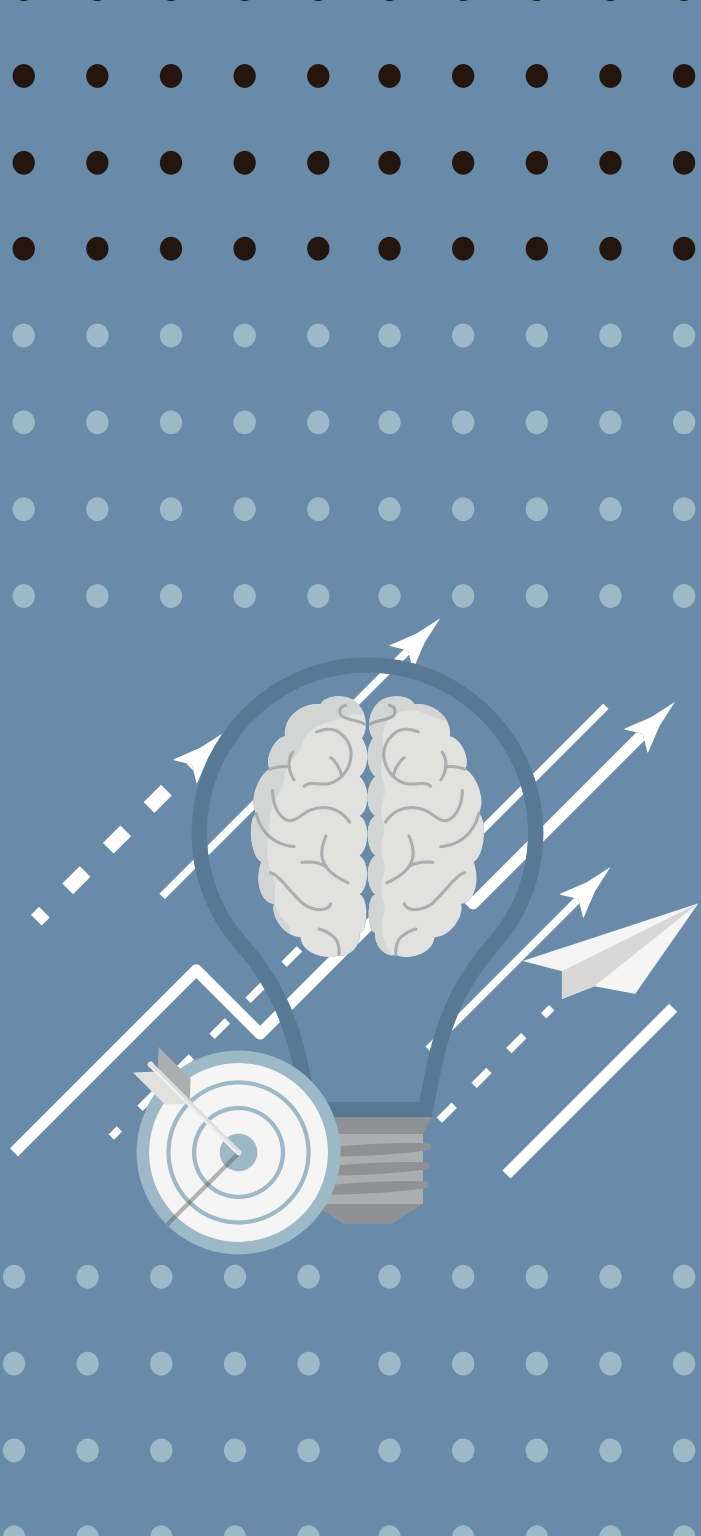
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# Vision

An integrous society free from corruption

# Mission

1. To take impartial legal action against all perpetrators of corruption
2. To ensure an administrative system that is free from corruption risks
3. To protect rights of citizens infringed due to corruption
4. To collaborate in corruption prevention efforts
5. To foster integrity in society



# Core Values



## Integrity

To uphold truthfulness, honesty and sincerity at all times



## Fairness

To impartially investigate all allegations of corruption, and enforce law without any discrimination



## Accountability

To be responsible and answerable to the public



## Transparency

To uphold transparency in service delivery



# Foreword by President of the Commission



The Anti-Corruption Commission's Strategic Action Plan 2020-2024 is presented at pivotal time for the institution. This plan was developed at a time of change at ACC – change in leadership, and change in policy and practices of the institution. To formulate this plan, we consulted various stakeholders including government agencies, civil society and as part of the process, we also ensured that there was honest inward reflection and review of our own internal processes and procedures and performance over the years.

Since its formation in 2008, ACC has been subject to criticism for its effectiveness in curbing corruption in the Maldives, especially with the disappointing score and rank of the Maldives on the Corruption Perception Index, the everyday coverage of corruption allegations in the public sector in the Maldives, and the overall loopholes within the anti-corruption framework of the country. This plan was developed to address these concerns and to respond to increasing demands to reform the institution to effectively counter corruption in the Maldives.

As such we have prioritized four areas covering the change we wish to see within the institution and in the external anti-corruption environment. The strategic priority areas are developed along with further breakdown of objectives and activities in order for us effectively operationalize the plan. Unlike previous strategic plans of ACC, we have also developed a comprehensive monitoring and evaluation plan to capture and report ACCs overall performance in the next 5 years.



# Introduction

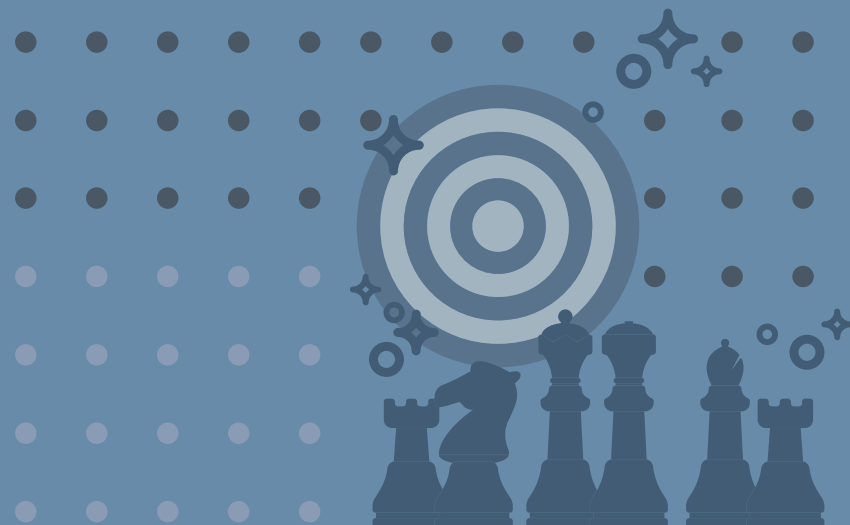
The Maldives has achieved the status of ‘developing country’ in the global economy by the standards of the International Monetary Fund, however, sustainable and meaningful development continues to be hindered by the prevalence of corruption and abuse of power. This is reflected in Transparency International’s Corruption Perception Index, which in 2016 ranked the Maldives as 95th with a score of 36, and by 2019 the country’s ranking declined to 130th with a score of just 29. Local research corroborates the findings from international indices with empirical evidence, whilst the Commission’s own statistics on corruption investigation and post investigation recommendations further substantiate these findings.

Curbing corruption remains a priority for successive governments but the main agency entrusted and mandated to prevent and investigate corruption is the

Anti-Corruption Commission (ACC). The ACC is an independent constitutional body established on 16 October 2008 under Article 9 of the Constitution of the Maldives; and is governed by the Anti-Corruption Commission Act 2008 (ACC Act).

The main purpose of the Strategic Action Plan 2020-2024 is to establish a clear roadmap to achieve the vision and mission of the Commission. The five-year Strategic Action Plan (2020-2024) is premised on the following priority areas:

1. Employee Engagement
2. Proactive Prevention
3. Investigative Excellence
4. Policy, Behavior and Attitude Reform



These priority areas are drawn from the Commission's mandate, its obligations, public and staff consultations and lessons learnt. The priority areas were developed as guides to our future action; striving to be forward thinking, public service oriented and results-based.

Broad objectives are identified for each priority area and actions based on different strategies are listed

under each of the broad objectives, with intended year of implementation. The strategic action plan (SAP) is supported by a monitoring and evaluation framework, which includes indicators and targets at both action and objective level. Details of the SAP preparation process and the monitoring and evaluation framework are detailed in later sections.

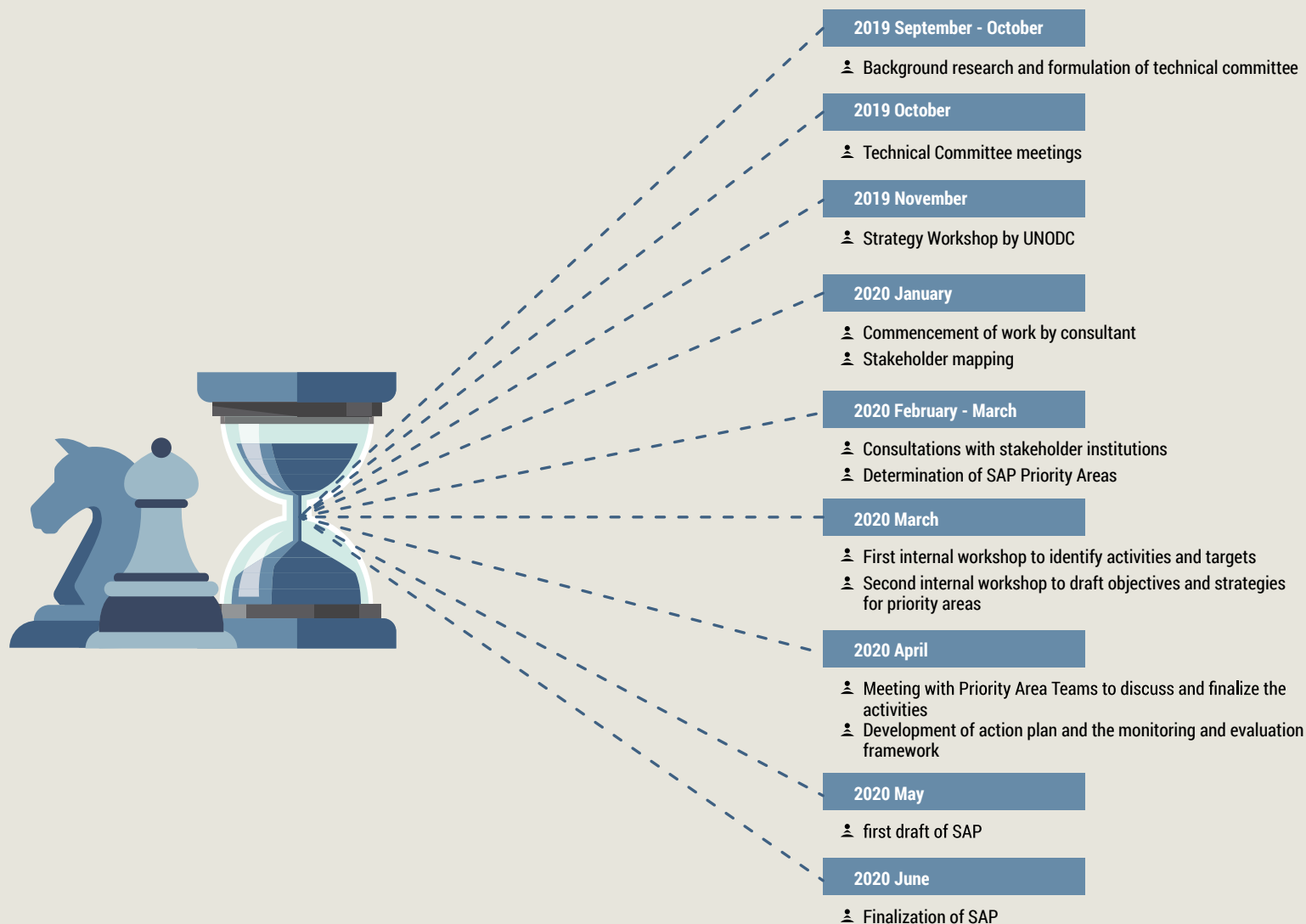
## Challenges to overcome

In the process of formulating this strategic action plan, the Commission also acknowledges the challenges it faces. Resource limitations presents challenges in carrying out broader and meaningful preventative work; and a high turnover of investigative staff combined with the need to increase expertise within ACC's investigative department make it challenging to reach its target.

The Commission is also challenged by the shortcomings in the national anti-corruption legal framework, namely the narrow definition of corruption and the conflicting clauses in different legislation such as between the Prevention and Prohibition of Corruption Act 2000 and the Penal Code.

# Strategic Action Plan 2020 – 2024

## Process of preparation



## Implementation

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The priority areas identified in the strategic action plan are crosscutting and will require synergy and the contribution from different departments. To see meaningful change, the Commission will ensure that its objectives, actions and results are also reflected and correspond with the performance of the Commission's staff.

As such, job descriptions, employee targets and responsibilities will be streamlined to the strategic action plan. As part of performance management of

employees, clear, prioritized and measured targets will be set for each employee at the beginning of each year.

Furthermore, the strategic action plan will be complimented by annual work plans, and goals and targets will be set for each department within the Commission. For each action in the plan, relevant units will ensure that the output indicators are achievable and a specific section/unit will lead the coordination of the action.

## Monitoring and Evaluation

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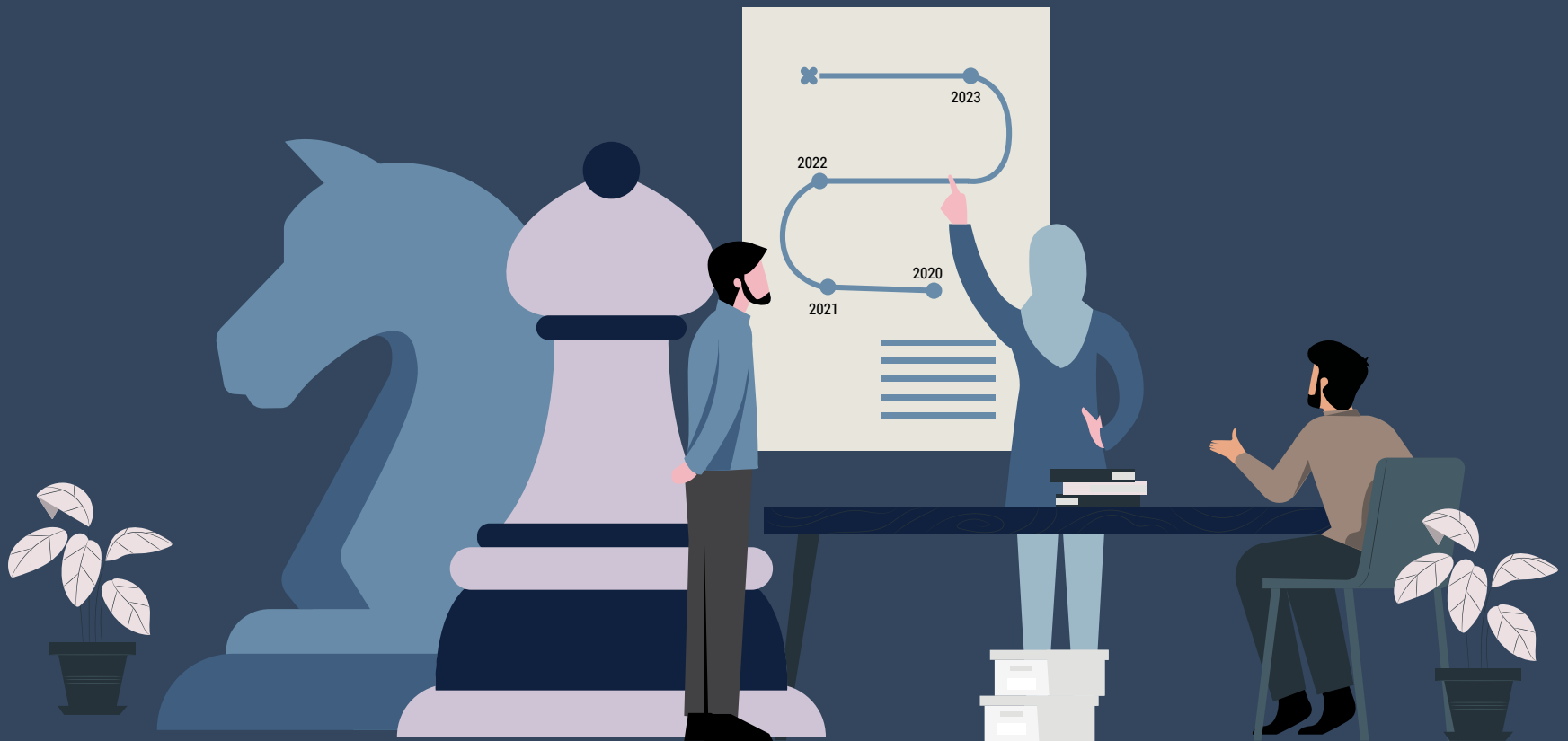
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# Priority Areas



# Action Plan





## Priority Area 1: Employee Engagement

One of our foremost priority over the next five years will be to value and develop our employees through increased engagement and by investing in capacity building of our staff. Our aim is to ensure expertise in all anti-corruption areas within the Commission and to create a coveted and professional workforce that commands public trust. Each unit will work for the common goals of the Commission and assist each other to overcome challenges

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## **Objective 1.1: Create a value-based culture within employees and ensure a robust organizational framework**

### **Strategy 1: Bring the Commission's mission to life through increased employee engagement**

- ⌚ Promote the core values of the Commission by conducting in-house seminars/workshops
- ⌚ Operationalize an internal Ethics Committee
- ⌚ Organize periodic employee satisfaction and engagement surveys
- ⌚ Revise the current orientation/induction program for new employees
- ⌚ Tailor and develop a robust anti-corruption course as an in-house training tool
- ⌚ Frequent dialogue and exchange between management and staff, and across departments

### **Strategy 2: Strengthen organizational framework**

- ⌚ Consultative review of Human Resource Management tools
- ⌚ Undertake Skills Need Analysis
- ⌚ Develop a 5-year Human Resources Development Plan
- ⌚ Lobby with relevant stakeholders to improve employees' remuneration and working conditions
- ⌚ Develop and implement internal policies such as:
  - i. Conflict of Interest Policy
  - ii. Health and Safety Policy
  - iii. Gender Equality Policy
  - iv. Document Management and Archiving Policy
  - v. Grievance Policy
  - vi. Recruitment Policy



## **Objective 1.2: Optimize workforce through building commitment and skill set**

### **Strategy 1: Provide opportunities for career advancement and professional development**

- 👤 Organize internal and collaborative trainings with partner institutions
- 👤 Conduct knowledge and experience sharing sessions between Department/Units
- 👤 Assess effectiveness of all trainings and capacity building sessions

### **Strategy 2: Provide a healthy, safe, and productive work environment**

- 👤 Implement standards applicable to all employees for an ergonomic workplace and a healthy work-life balance
- 👤 Organize in-house health and wellness programs
- 👤 Establish an in-house Security and Psychosocial Support Services for employees
- 👤 Organize community engagement activities among employees to promote volunteerism and teamwork
- 👤 Utilize Commission's social media platforms to highlight achievements/milestones of both individual employees and of sections
- 👤 Conduct a physical resource needs assessment and develop a Resource Allocation Plan



## **Objective 1.3: Strengthen accountability and increase performance**

### **Strategy 1: Strengthen the performance management system**

- 👤 Revise staff performance appraisal policy
- 👤 Provide training/refresher trainings to supervisors on performance management
- 👤 Increase ICT inclusion in Human Resource Management
- 👤 Conduct effective and regular meetings between Unit Heads and Team leaders, and with supervisors and Commission Members

- ⚙️ Appoint a Compliance Officer to facilitate effective reporting on compliance with laws and instructions from parliament standing committee, and findings of external and internal audits
- ⚙️ Review compliance of Commission's internal policies and procedures in line with national and international anti-corruption treaty/convention requirements
- ⚙️ Develop a central monitoring and evaluation plan to monitor and evaluate performance across the Commission



## Priority Area 2: Proactive Prevention

We will work to consolidate and strengthen integrity principles and good governance standards in all state institutions. We will combine efforts with other regulatory bodies to understand trends and underlying causes of corruption, identify loopholes to prevent systemic corruption; and roll out streamlined actions. We will work with institutions to implement recommendations that are based on research and investigations



## **Objective 2.1: Conduct empirical research on corruption risks and effectiveness of measures taken to fight corruption**

### **Strategy 1: Conduct research on systemic risks and corruption trends**

- ✎ Conduct joint research with relevant oversight institution to identify corruption risks
- ✎ Undertake analysis and publish papers on various areas of corruption
- ✎ Periodically assess and evaluate Codes of Conduct, standard operating procedures (SOP), laws and regulations to identify corruption risks
- ✎ Conduct regular risk assessments considering different types of corruption, such as grand corruption and systemic corruption in different sectors
- ✎ Conduct surveys focused on specific thematic areas related to corruption

### **Strategy 2: Promote and advocate research findings through evidence-based publications, and engaging in discourse**

- ✎ Develop key messages supported by research in all dialogue for legal amendments, general awareness and prevention education programs
- ✎ Publish timely research on anti-corruption trends and implications in Maldivian context
- ✎ Organize trainings to media personnel on investigative journalism and reporting on corruption
- ✎ Conduct thematic conferences and seminars on anti-corruption and good governance



## **Objective 2.2: Strengthen policies and procedures to reduce risk and prevalence of corruption in all arms of the State**

### **Strategy 1: Improve policies and standards in institutions**

- ✎ Develop SOP and training materials for Integrity Committees and Integrity Officers
- ✎ Issue general recommendations on document management and storage
- ✎ Publish anti-corruption minimum standards required for policies and procedures such as recruitment, leasing of public property and procurement
- ✎ Evaluate selected public institutions to assess adherence to anti-corruption standards

## **Strategy 2: Encourage and enable all state offices to implement preventative measures**

- ⚙️ Develop a National Anti-Corruption Policy (NACP)
- ⚙️ Work in collaboration with Privatization and Corporatization Board and Parliament Committee on State Owned Enterprises (SOE) to revise policies and procedures of SOEs to harmonise with anti-corruption standards and monitor enforcement of these standards
- ⚙️ Collaborate with other relevant offices to establish a robust asset declaration regime
- ⚙️ Develop self-assessment tools and guide institutions to conduct corruption risk self-assessments, and to formulate mitigation plans



## **Objective 2.3: Build a coalition of committed anti-corruption stakeholders**

### **Strategy 1: Strengthen mechanisms to monitor corruption**

- ⚙️ Conduct biannual review meetings with selected stakeholder institutions to identify challenges faced in implementing ACC recommendations
- ⚙️ Undertake analysis of implementation of ACC recommendations and publish findings of analysis and cross-cutting issues
- ⚙️ Develop a monitoring and accountability mechanism using ICT for capturing, analysing and sharing data on level of compliance with recommendations and standards
- ⚙️ Develop e-learning modules for integrity officers, and for general prevention and awareness purposes
- ⚙️ Publish all recommendations from ACC to institutions via a user-friendly platform, accessible to public



## Strategy 2: Strengthen partnership and collaboration with relevant authorities

- ⌚ Conduct regular sessions with staff from relevant stakeholders to strengthen partnership
- ⌚ Periodic engagement with Audit Office on combatting corruption
- ⌚ Establish collaboration with other public sector academic bodies to share knowledge on anti-corruption; conduct trainings in collaboration; and generate research on corruption
- ⌚ Establish MOUs and focal points with stakeholders, civil society and other partner institutions, and ensure effective implementation of existing MOUs
- ⌚ Strengthen communication and cooperation with international partners on corruption prevention and investigation
- ⌚ Invite regional anti-corruption organizations and international ACAs on exchange programs and study tours
- ⌚ Develop a quarterly newsletter in English language to showcase best practices and milestones achieved by Commission, lessons learnt, and disseminate to multiple audiences including international partners



### Priority Area 3: Investigative Excellence

Commitment to fair and efficient justice is a core principle of the Commission. Over the next five years we will work to improve the quality and efficiency including the speed, of our investigations through strengthening the capacity of investigative staff and improving processes in all stages of investigation and duty prosecution. We will also work with other institutions to develop a successful mechanism for asset recovery



### **Objective 3.1: Acquire skills and expertise, effective tools and high-quality systems**

#### **Strategy 1: Acquire necessary investigative tools and systems**

- ✎ Design and develop an integrated Case Management System (CMS)
- ✎ Design an electronic archiving (e-archiving) module
- ✎ Acquire the necessary technical equipment, gadgets and software
- ✎ Establish basic digital forensic service

#### **Strategy 2: Strengthen investigative capacity through specialised trainings**

- ✎ Establish attachment programs with other law enforcement bodies
- ✎ Engage with Department of Judicial Administration to share technical knowledge between judiciary and ACC
- ✎ Conduct training on digital evidence analysis



### **Objective 3.2: Process complaints received by the Commission in a transparent and efficient manner**

#### **Strategy 1: Improve case evaluation, prioritization and allocation**

- ✎ Review and publish the criteria for complaint filtration
- ✎ Conduct periodic review of existing case evaluation policy and process
- ✎ Identify cases to be investigated based on research and risk assessments, audits, media, and other sources
- ✎ Develop and enforce a policy on case prioritisation in line with core values
- ✎ Periodic review of case allocation issues
- ✎ Conduct review of mandates and engage in dialogue with other public institutions to identify overlaps in addressing public complaints

## **Strategy 2: Improve quality and efficiency of investigations**

- ⚙ Enhance Paloma portal
- ⚙ Periodically review the investigation manual with stakeholder input
- ⚙ Engage in dialogue with law enforcement agencies on joint investigation and providing mutual support
- ⚙ Develop an intelligence database with dissemination mechanism
- ⚙ Develop protocols to ensure the safety of investigators during work in field locations



## **Objective 3.3: Ensure no impunity for perpetrators and recover stolen assets**

### **Strategy 1: Increase prosecution and asset recovery rates**

- ⚙ Conduct periodic review of status of case handover, prosecution, and criminal proceedings, in collaboration with Prosecutor General's Office; and undertake analysis on areas for improvement in prosecution process
- ⚙ Conduct post investigation survey for investigative teams
- ⚙ Conduct multi-stakeholder review of state procedures for asset tracing, freezing, forfeiting and recovering of proceeds of corruption
- ⚙ Undertake research and training to strengthen capacity of the Commission in asset recovery

## Priority Area 4: Policy, Behaviour and Attitude Reform

We will build synergy and increase collaboration with relevant stakeholders to achieve meaningful change in curbing corruption. We will continue work to strengthen the national legal framework to prevent and combat all forms of corruption and sanction corrupt behaviour. We will work to create awareness on the detrimental impact of corruption and educate citizens and public officials to act against corruption





## **Objective 4.1: Gain confidence and trust of the public and state institutions**

### **Strategy 1: Lead by example in developing anti-corruption policies and SOPs**

- ⚡ Establish a conflict of interest registry and ensure yearly asset declaration of senior officials of the Commission
- ⚡ Improve the existing SMS mechanism used to send case updates to complainants
- ⚡ Conduct random survey amongst complainants to assess the quality of service and ease of the process
- ⚡ Redesign the Commission's website to a more user-friendly platform
- ⚡ Revise policy and SOPs to protect confidential information of informants and whistle-blowers

### **Strategy 2: Ensure regular and strategic communication with the general public and media**

- ⚡ Conduct quarterly press briefings
- ⚡ Maintain frequent public interaction through traditional media and existing social media platforms
- ⚡ Release regular press statements on the Commission's work, particularly on public interest and grand corruption cases
- ⚡ Publish a guideline on when ACC will recommend stopping or slowing down projects.
- ⚡ Engage in timely communication to inform measures and considerations taken into account by the Commission with regards to its interventions in projects or processes based on investigation findings
- ⚡ Disseminate information on concluded cases on social media platforms on a quarterly basis, with graphics and links to case details on website



## **Objective 4.2: Reform Anti-Corruption Legal Framework**

### **Strategy 1: Using evidence-based research, lobby for amendments to relevant laws**

- ⌚ Propose and lobby for amendments to the ACC Act
- ⌚ Identify and recommend necessary amendments to the Penal Code
- ⌚ Identify and recommend necessary amendments to Criminal Procedure Code, with supporting research
- ⌚ Propose and lobby for amendments to relevant laws for a strong asset recovery legal framework, inclusive of confiscation and mechanisms to rapidly freeze assets



## **Objective 4.3: Reward and recognize adherence to integrity principles and standards through advocacy and awareness raising**

### **Strategy 1: Recognize State institutions, NGOs and private sector institutions for anti-corruption measures undertaken**

- ⌚ Launch 'Integrity and Anti-Corruption Initiative of the Year'
- ⌚ Review and implement the corporate integrity seal
- ⌚ Recognize anti-corruption initiatives (including activism) from members of the public or private sector

### **Strategy 2: Conduct anti-corruption awareness in schools**

- ⌚ Conduct tailored programs for students, parents and teachers
- ⌚ Assess effectiveness of different approaches in anti-corruption awareness raising in the education sector



### **Strategy 3: Create general awareness in public sector on anti-corruption and integrity**

- 👤 Develop and deliver customized sessions for public offices and SOEs including issues identified from cases and illicit enrichment
- 👤 Incorporate sessions on integrity and ethics in the induction programmes for public officials
- 👤 Develop a web-based e-module for public officials on anti-corruption
- 👤 Develop an e-module on electoral integrity for candidates who run for political posts

### **Strategy 4: Create awareness on reporting corruption**

- 👤 Conduct innovative/new activities to increase awareness of public on why and how to report corruption with indicators to assess impact
- 👤 Create public awareness of ACC mandate and collaborate with other institutions to increase public awareness on registering public complaints to the relevant authority

### **Strategy 5: Engage with NGOs to promote integrity**

- 👤 Develop integrity values and social accountability tools for NGOs
- 👤 Train NGOs on social accountability to build their capacity to counter corruption at community level





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