

2015 - 2019



Anti-Corruption Commission

# Strategic Action Plan

(Unofficial Translation)



# Anti-Corruption Commission's Strategic Action Plan

2015-2019

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Anti-Corruption Commission  
Second Floor, Huravee Building  
Ameeru Ahmed Magu, Male' 20114  
Maldives  
Phone: 3015200 / 3015257  
Fax: 3317182  
Email: [info@acc.gov.mv](mailto:info@acc.gov.mv)  
Website: [ww.acc.gov.mv](http://ww.acc.gov.mv)

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## Foreword

The Anti-Corruption Commission's Strategic Action Plan (2015-2019) is the second long term Strategic Plan that has been formulated in the short history of the Commission. It comprises of detailed activities covering mandatory functions and responsibilities laid out in the laws and regulations of the Commission. The work on the Strategic Action Plan (SAP) began in November 2014. Devise and implementation of this plan in such a short period of time determines the commitment of the Commission's drive to progressive change management in delivering its services effectively and efficiently.

The Anti-Corruption Commission (ACC) was formed as an independent commission under Article 199 of the new Constitution of the Maldives in 2008. Subsequently, the Commission's first Strategy (2009-2014) was formulated during the transition period of the Commission's establishment. This Strategy was mainly based on three policy areas; i.e. Enforcement, Prevention and Public Awareness which encompassed 26 thrust areas as projects. The Commission carried out most of these thrust areas during the first term of its establishment. However, multiple challenges were experienced during the Commission's infancy stage such as limitations in budget, other resource constraints and shortage of a long term implementation plan to lead the projects caused some delays. Nevertheless, the new SAP is primarily built on eight policies consisting 98 key activities.

The policies and strategies introduced under SAP are designed to strategically reinforce the mandate of the Commission, elevate integrity in public sector and to reduce corrupt practices in the society. These would be progressed through an implementation process drawn to achieve a result oriented strategy with set objectives to long term planning, organizing and prioritizing of activities. Hence, the Commission would actively play a key role in the development process of the country through ascertaining a corruption free democracy and working towards building trust and confidence in the Maldivian society

The successful formulation of SAP was carried out due to conscientious contribution made by the Commission's staff. Furthermore, sincere gratitude is expressed to all the Commission members, Secretary General and all the staff who participated in the process. It is my humble prayer to the 'Almighty Allah' to bless us with the successful implementation of this plan.

Hassan Luthfi

President of Anti-Corruption Commission

15<sup>th</sup> March 2015

## Introduction

The emergence of a government agency named as Anti-Corruption Board (ACB) was initiated to investigate allegations of corruption in the Maldives under a Presidential decree on 21<sup>st</sup> April 1991.

The importance for an independent Anti-Corruption Commission arised from the series of debates engaged through the reform movement in 2004. With significant strides in political dialogues, remarkable transformation occurred in the political and constitutional landscape of the Maldives embodying democratic principles under the new Constitution of 2008 that prescribed separation of powers, institutionalized checks and balances and formed an independent commission with statutory mandates to prohibit and prevent corruption for the first time in the history of the Maldives.

The Anti-Corruption Commission was established on 16 October 2008 as an independent statutory body mandated to combat corruption under Article 199 (a) of the new Constitution of Maldives that was ratified on 7th August 2008. The functional affairs of the Commission are promulgated under the Act No. 13/2008 (Anti-Corruption Commission Act) enacted on 24th September 2008. The corruption offences are stipulated under the Act No: 2/2000 (Prevention and Prohibition of Corruption Act) enacted on 31st August 2000. Similarly, the Commission has developed rules and regulations to execute its laws. The Anti-Corruption Commission's General Regulations No: 2010/R-18 has been gazetted and implemented. The administrative regulations were revised and its implementation is effective since 16 May 2013.

In order to implement the mandates stipulated under the Act No. 13/2008 (Anti-Corruption Commission Act) and to execute the policies it became important to embark on a SAP. The main objective of this plan is to accomplish the vision and objectives under the policies of the Commission. This document presents details on the constitutional functions, vision and mission, core values, introduction to the first

strategy of the Commission and detailed background of the current Strategic Plan in the forthcoming sections.

This SAP, would provide special importance to review the organizational structure of the Commission, strengthen and develop functional procedures and implement those with integrity and independence, and to gain public confidence through equipping the Commission to achieve results.

This plan focuses on an exhaustive list of activities that is incorporated under specified policies; some of those include undertaking relevant governance mechanisms to enhance the Commission to provide efficient and effective services to citizens, human resource and capacity building for the Commission, to plan and organize work systematically, to propose amendments to relevant laws and regulations, to encourage the adoption of corruption prevention methods, and fostering integrity in the society. Hence, the SAP provides clear details of the Commission's policies, strategies and activities endorsed to be implemented for the current five year term through 2015 -2019.



## Mandatory Functions

The following are the responsibilities of the Commission mandated under Anti-Corruption Commission's Act 13/2008 as stated in clause 21 and its sub sections.

(a)

- To inquire into, investigate all allegations of corruption; any complaints, information, or suspicion of corruption must be investigated.

(b)

- To recommend further inquiries and investigations by other investigatory bodies, and to recommend prosecution of alleged offences to the Prosecutor General, where warranted.

(c)

- To carry out research on the prevention of corruption and to submit recommendations for improvement to relevant authorities regarding actions to be taken.

(d)

- To promote the values of honesty and integrity in the operations of the state, and to promote public awareness on the dangers of corruption.

(e)

- To conduct seminars, workshops and other programs on prevention and prohibition of corruption to further public awareness, to carry out researches and to publish them.

(f)

- To carry out everything necessary to undertake the responsibilities of the Commission

(g)

- To implement Act No. 2/2000 (Law on Prevention and Prohibition of Corruption) and to formulate regulations under that Act.

## Vision

The Maldivian society be free from corruption and foster a culture of integrity in the society.

## Mission

The Following are the Mission statements of the Anti-Corruption Commission.

1. To impartially subject all perpetrators of corruption to legal action, in accordance with the law

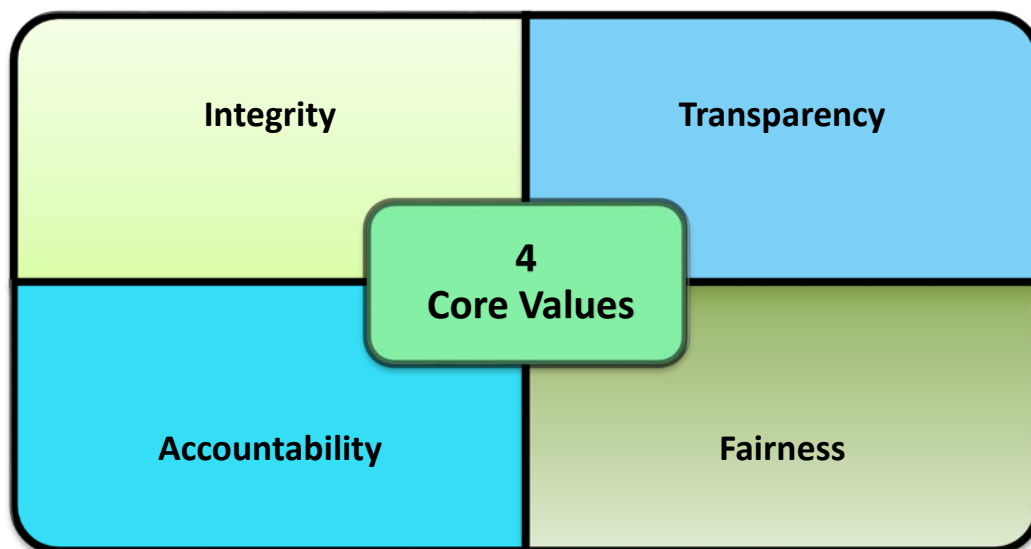
2. To ensure an administrative system that is free from corruption risks

3. To recover and protect loss of rights suffered by the State or the individuals due to corruption

4. To collaborate in the efforts of corruption prevention

5. To foster integrity in the society

## Core Values



Integrity:	To uphold truthfulness, honesty and sincerity at all situations
Transparency:	To uphold transparency in service delivery
Accountability:	To be responsible and answerable to the public
Fairness:	To impartially investigate all allegations of corruption, and enforce law without any discrimination

## **First Strategy of the Commission (2009-2014)**

As a result of the ratification of the Act 13/2008 (Anti-Corruption Commission Act), an independent Anti-Corruption Commission came into existence whilst the first strategy (2009-2014) of the Commission was initiated during its transition period. This strategy was executed until the end of the Commission's first term. The main Strategy was built mainly based on three policy areas; i.e. Enforcement, Prevention and Public Awareness and comprised of 26 thrust areas as projects.

Although during the strategy period, a reasonable number of projects were accomplished, the commission faced a number of challenges in the execution of the projects and hence there was postponement of some projects. Key reasons for such delays were due to limitations in state budgetary support, challenges in the improvement of the administrative function of the Commission, shortage in efficient and skilled human resources, deferrals in bringing necessary amendments and revisions to the anti-corruption legal framework.

Soon after the members were appointed for a second term of office, the formulation of a new Strategy commenced after revision of the previous strategy with a view to bring about the modern changes that are required for the execution of the Commission's vision and objectives under the new leadership.

## Strategic Plan (2015-2019)

This strategic plan describes details of the main policies and informs on its objectives. Since the annual activities have been determined under various strategies adopted in accordance with the main policies and their objectives contained in this strategic plan, it will be referred to as the 'Anti-Corruption Commission's Strategic Action Plan (2015-2019).

To implement this plan an annual work plan will be devised which contains details of the activities required to carry out the Commissions' functions. This annual plan includes targets, timelines, key performance indicators and other relevant information that will be assessed to measure the achievements by the end of each quarter or annually. Furthermore, this plan was designed based on the following six research reports and groundworks of its application were used to construct a SWOT analysis.

1. Organizational assessment, Anti-Corruption Commission of the Maldives, IFES report, September 2014.
2. Assessment of the Anti-Corruption Commission of the Maldives, UNODC report, June 2014.
3. Corruption Perception of Civil Servants, Survey report, 2014.
4. National Integrity System Assessment of the Maldives, Transparency International report, 2014.
5. Situational Analysis, advisory note UNDP Asia Pacific Regional Center, intact project in Maldives, 20 April 2010.
6. Anti-Corruption Commission strategy (2009-2014).

Various recommendations highlighted in these reports, have been reviewed and incorporated into this plan. This includes strengthening and development of administrative and management policies, systems, procedures and processes of the Commission. Additionally, during the planning process, the following parental laws of

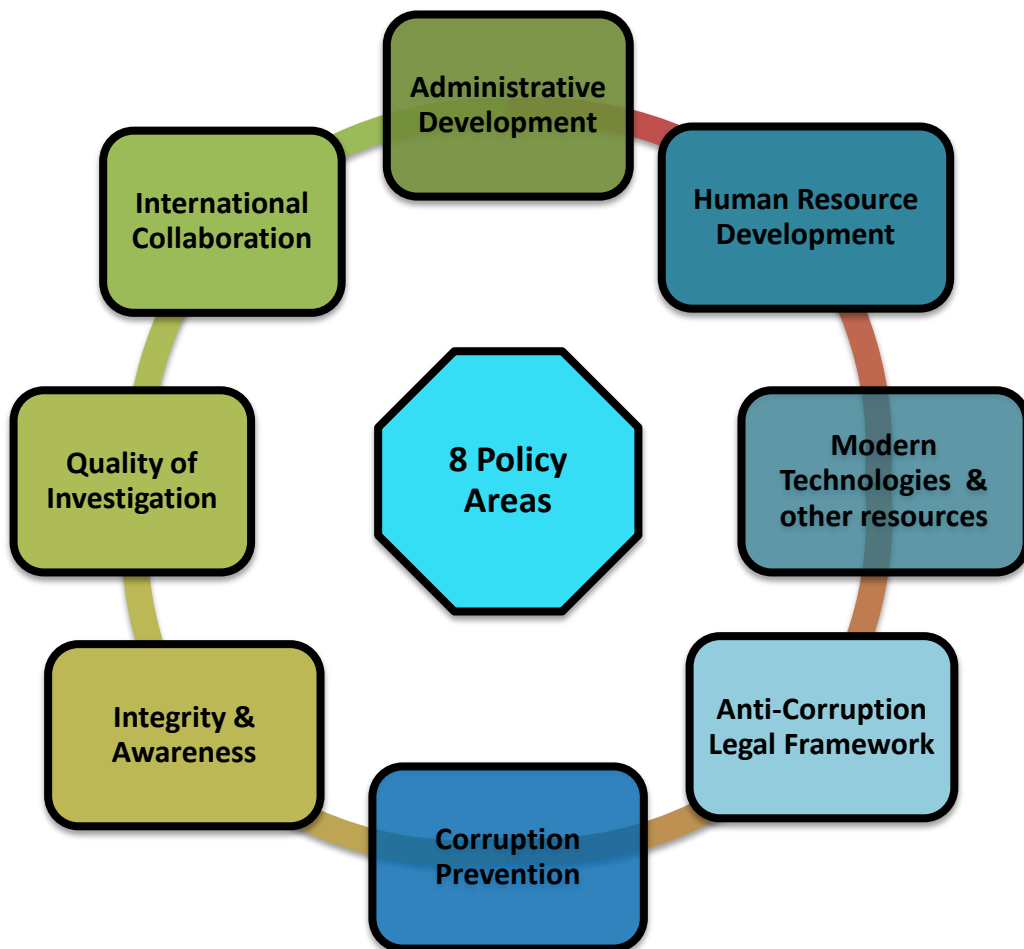
the Commission including the international convention to combat corruption have been considered.

1. Anti-Corruption Commission Act 13/20008
2. Corruption Prevention and Prohibition Act (02/2000)
3. United Nations Convention Against Corruption

A Technical Committee that comprised of commission members and senior staff members were formed to advice on the formulation of the Strategic Action Plan. A total of twenty seven committee meetings were convened during this process. On collation of the Technical Committee recommendations, the first draft of the plan was presented and discussed at a full day staff workshop held on 27<sup>th</sup> January 2015. Extensive discussions resulted in further enhancement of the plan, which was subsequently reviewed and officially endorsed by the Commission members on 15<sup>th</sup> March 2015.

## Policies and Objectives

Set forth here are the policies and their objectives that form the basis for Strategic framework and formulation of the Commission's five year Strategic Action Plan (2015-2019).





### **Policy 1. Strengthen and Development of administrative function**

**Objective:**

To strengthen the administration of the Commission by providing speedy and high quality services, establishing safe working environment and to certify the Commission as an International Standard Organization (ISO) approved institute.

### **Policy 2. Sustainable Development of Human Resources**

**Objective:**

To induce staff motivation at the Commission by developing their technical capability, confidence, and directing towards result oriented service.

### **Policy 3. Establishment of modern technologies and other resources**

**Objective:**

To establish modern technology at the Commission, familiarize the staff to adopt and use the available technology effectively.

### **Policy 4. Strengthen the legal framework to prohibit and prevent corruption**

**Objective:**

To empower the Commission through a legal regime, and to ensure all perpetrators of corruption are impartially subject to legal action and protect the society from corruption.

### **Policy 5. Establish and strengthen corruption prevention system**

**Objective:**

To eliminate the corruption risks, promote accountability and transparency among public institutions.

### **Policy 6. Foster integrity and anti-corruption awareness in the society**

**Objective:**

To make the Maldivian society aware about corruption and foster a culture of integrity.

### **Policy 7. To improve the quality of investigation related areas and achieve results**

**Objective:**

To improve the quality of the investigations carried out by the Commission, enforce the law on corruption offenders, and recover the loss incurred from corruption, and to gain public confidence for the Commission.

### **Policy 8. International Collaboration to combat corruption**

**Objective:**

To build and maintain relations with international stakeholders' whereby transferring information and knowledge, obtaining financial assistance, and establishing a network to exchange technical assistance.

**Table of Activities**  
**Strategic Action Plan (2015-2019)**

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
<b>Policy 1: Strengthen and Development of administrative function</b>							
<b>Strategy 1:</b> Establish, implement and strengthen regulations and procedures of administrative management	1. Establish and strengthen the following staff development procedures;						
	1.1 Staff Performance Management Procedures		x				
	1.2 Recruitment, suspension, termination and retirement strategies and procedures		x				
	1.3 Staff training and development strategies and procedures		x				
	1.4 Code of conduct		x				
	1.5 Structural Procedures to overcome staff grievances		x				
	2. Establish, implement and rectify regulation procedures regarding organizational management;						
	2.1 Review Commission's General Rules and Regulations and make the necessary changes		x	x			
	2.2 Strengthen Commission regulation for Commissioners and Staffs		x	x			
	2.3 Strengthen Anti-Corruption Commission's rules and regulations (currently in use)		x	x			
	3. Establish additional procedures for organizational administrative management						
	3.1 Responsibilities of Commissioners and Secretary General in organizational		x	x			

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
	administrative management						
	3.2 Responsibilities of investigation team leaders and section heads		x				
	3.3 Procurement regulations and procedures		x				
	3.4 Work place discrimination, bullying and sexual harassment ombudsmen Committee procedures		x				
	3.5 Regulations and procedures for issuing criminal records		x				
	3.6 Procedures to maintain the commission's archive ( documents, photos, audios and videos)		x				
	3.7 Regulation and procedures for dissemination of information to the public		x				
<b>Strategy 2:</b>  Strengthen administrative regulations	1. Develop detail structures and functioning of organizational sections		x				
	2. Develop and implement standard operating procedures of sections and unit		x				
	3. Establish and execute section's yearly plans to achieve the objectives of the Commission's Strategic Action Plan		x	x	x	x	x
	4. Establish a system to accommodate opinions of staff and public to strengthen administrative functioning		x				
<b>Strategy 3:</b>  Ensure staff well-being and security for those summoned to the Commission	1. Establish a mechanism to counsel the staff		x				
	2. Establish guidelines and procedures to address workplace emergencies for staff and those summoned;						
	2.1 Establish Policies/ Procedures/Guidelines		x				
	2.2 Physical structural changes and resources necessary to address the issue.			x	x		

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
	2.3 Provide safety and emergency training (safety during handling summoners)			x			
	3. Establish procedures to arrange for police protection during investigation, awareness and official trips		x				
	4. Execute programs for physical well-being of staff		x	x	x	x	x
	5. Arrange and execute staff recreational programs		x	x	x	x	x
<b>Strategy 4:</b>  Review the administrative structures and functions.	1. Review administrative structure of the Commission;			x		x	
	2. Establish Legal Support Unit or a Legal Counselor		x				
	3. Establish an independent Internal Audit Unit with functional procedures		x	x	x	x	x
	4. Establish a Corruption Prevention Section		x				
	5. Establish a Training Development Unit		x				
	6. Establish a separate Section to support Commission's information, communication and technology		x				
	7. Review staff job descriptions		x				
	8. Establish regional offices to support and accelerate Commission's mandate		x	x		x	x
<b>Policy 2: Sustainable Development of Human Resources</b>							
<b>Strategy 1:</b>  Human Resource Development of the Commission	1. Developing and implementing of a Human Resource Development (H.R.D) plan						
	1.1 Conducting staff need analysis		x	x	x	x	x
	2. Seeking special training opportunities for the staff from abroad and home country		x	x	x	x	x
	3. Establishing a mechanism to transfer institutional knowledge and experience		x	x	x	x	x
	4. Building the Commission to become an				x		

Policy / Strategy	Activities	Section/Unit/Staff	2015	2016	2017	2018	2019
	(Association of Chartered Certified Accountants) ACCA approved employer						
	5. Establishing a mechanism to share knowledge (experience), abroad and home country		x	x	x	x	x
<b>Strategy 2:</b>  Familiarize the staff to job functions and enhance technical capacity	1. Conducting awareness programs on the following areas						
	1.1 Developing and conducting 'induction programs' for new recruits		x	x	x	x	x
	1.2 Conducting 'on the job training' programs for staffs		x	x	x	x	x
	1.3 Conducting basic training programs inclusive of physical and psychological well-being		x	x	x	x	x
	1.4 Conducting training programs on communication skills		x	x	x	x	x
	1.5 Familiarize with the changes on corruption related laws, rules and regulations		x	x	x	x	x
	2. Training the investigators on the following areas and other identified areas;						
	2.1 Investigation techniques		x	x	x	x	x
	2.2 Money laundering		x	x	x	x	x
	2.3 Computer forensic investigation		x	x	x	x	x
	2.4 Asset tracing and asset recovery		x	x	x	x	x
	2.5 Investigation skills on organized crimes		x	x	x	x	x
	2.6 Laws, rules and regulations related to investigation		x	x	x	x	x
	3. Provide study tour opportunities to visit anti-corruption authorities abroad		x	x	x	x	x
	4. Provide short term internship/ attachment opportunities at anti-corruption authorities abroad		x	x	x	x	x
<b>Policy 3: Establishment of modern technologies and other resources</b>							
<b>Strategy 1.</b>  Develop and implement Information	1. Formulating and implementing (Information and Communications Technology) ICT policies and procedures		x	x			
	1.1 Password protection policy		x	x			
	1.2 Data storage and backup policy		x	x			

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
Communication and Technology (ICT) policies and procedures	1.3 ICT hardware equipment standard policy		x	x			
	1.4 ICT Usage policy (Internet and IT equipment)		x	x			
	1.5 Information security policy		x	x			
	1.6 Software development and maintenance policy		x	x			
<b>Strategy 2.</b> Develop and establish of Information Communication and Technology systems	1. Developing and enhancing of the information management systems;		x	x	x	x	x
	1.1 Researching and developing applications required or needed by the commission		x	x	x	x	x
	1.2 Developing and maintaining a web based intra-net		x	x			
	1.3 Developing an application to maintain and track recommendations issued by the Commission to other organizations		x	x			
	1.4 Developing an online library			x	x		
	1.5 Development of a system to track the items (photo/video/documents) brought in to the Commission		x				
	1.6 Developing a case management system		x	x	x	x	x
	1.7 Developing a case archiving system		x	x			
	1.8 Developing a mail management system		x				
	1.9 Developing a dispatch system		x				
	1.10 Developing a budget management system (accounting software)			x			
	1.11 Developing an inventory system		x	x			
	1.12 Developing a stock module/system		x	x			
	1.13 Enhancing the human resource management system		x	x	x		
	1.14 Developing a Library management system			x			
2. Improving the IT infrastructure and enhancing security			x				

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
	3. Obtaining licensing for software's that are currently used by the Commission		x	x	x		
	4. Obtaining equipment to enhance the IT Infrastructure		x	x	x		
	5. Developing a system to exchange in the communication and data between the organizations in the criminal justice system		x	x	x		
	6. Implementing an automated audio/video recording system in the investigation rooms		x	x			
	7. Updating the Commission's website		x	x	x	x	x
<b>Policy 4: Strengthen the legal framework to prohibit and prevent corruption</b>							
<b>Strategy 1:</b> To attain and enhance legal power of the Commission as stipulated in the Constitution	1. Revising the Anti-Corruption bill and forwarding the amendments to Attorney General's office to submit to Peoples Majlis, with regard to the following points;						
	1.1. Attain full financial independency to the Commission		x	x			
	1.2. Attain legal power to trace and recover proceeds of crime		x	x			
	1.3. Attain the power to take legal actions against responsible persons who do not implement the recommendations of ACC (given after an investigation or a preliminary report) within the specified time frame		x	x			
	1.4. Attain the legal power to halt State projects(temporarily) if alleged corrupt practices are suspected		x	x	x		
	1.5. Set experience and educational criteria as pre-conditions to qualify for commission members		x	x	x		
	1.6. Attain similar investigative powers as of Maldives Police Service		x				
	1.7. Amend law to adhere to guidelines stated in United Nations Convention Against Corruption (UNCAC)		x				
<b>Strategy 2:</b>	1. To identify and bring required changes to the		x	x	x		



Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
Amend the existing Anti-Corruption legal frame work and to formulate relevant new laws	existing anti-corruption legal frame work						
	1.1 Research on the Corruption offences, complications and contradictions the Commission would face when the new Penal Code is implemented and forward it to Attorney General's Office		x				
	1.2 Research on the court rulings on corruption, other Criminal Investigations and apply appropriate changes		x	x	x	x	x
	1.3 Bring necessary changes to the laws and regulations related to commission's mandate		x	x	x	x	x
	2. Include the following areas in to a legal framework						
	2.1 Whistleblower protection			x			
	2.2 Witness Protection			x			
	2.3 Criminal Procedure Code			x			
	2.4 Illicit Enrichment			x			
	2.5 Governing Public Companies			x			
	2.6 Public Procurement			x			
	2.7 Asset and Wealth Declaration			x			
<b>Strategy 3:</b>	1. Encourage to revise and amend public financial regulation		x				
To formulate and revise rules and regulations required under Prevention and Prohibition of Corruption Act	2. Introducing the following rules and regulations;						
	2.1 Regulations on complaint lodgment, acceptance and assessment		x				
	2.2 Regulation and guideline on implementing National Integrity Plan		x	x	x	x	x
	2.3 Regulation on gift and gratitude for public officials		x				
<b>Strategy 4:</b>	1. Implementing the obligations under UNCAC and other Conventions in cooperation with Public Institutions		x	x			
Collaborate with Public Institutions to eliminate corruption	2. Establish a system to exchange information on corruption related money laundering offences to the Financial Intelligence Unit of Maldives Monetary Authority (MMA)			x			
	3. Conduct Joint Investigations with the relevant		x	x	x	x	x

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
	public institutions						
	4. Establish and implement a system to recover proceeds of crime derived from corruption offences			x	x		
<b>Policy 5: Establish and strengthen corruption prevention system</b>							
<b>Strategy 1:</b> Establish a corruption prevention mechanism in the Commission	1. Research on establishing a corruption prevention system		x				
	2. Follow ups of post-investigation recommendations given to public institutions		x	x	x	x	
<b>Strategy 2:</b> Minimize corruption risk factors in public institutions	1. Conducting corruption risk assessments in public institutions and preventive measures		x	x	x	x	x
	2. Encouraging public institutions to establish compliance mechanisms		x	x	x	x	x
	3. Encouraging institutions to strengthen regulations on public official's wealth declaration			x			
	4. Encouraging public companies to develop and establish procedures for procurement, staff recruitment/retirement, promotions, sponsorships etc.			x	x	x	x
	5. Developing a surveillance mechanism for electoral corruption						
	5.1 Encouraging to lobby amendments to election laws on controlling electoral corruption				x	x	x
	5.2 Prohibit the use of public assets and resources for election campaigns.		x	x	x	x	x
	6. Developing a mechanism to verify and approve institutional policies against corruption risks		x	x	x	x	x
	7. Issuing an 'ACC approved Certificate' for the systems established in accordance with ACC approved standards/guidelines		x	x	x	x	x
	8. Encouraging and enabling the public institutions, non-government organizations to develop 'whistle blowing' mechanisms			x	x	x	x

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
<b>Policy 6: Foster integrity and anti-corruption awareness in the society</b>							
<b>Strategy 1:</b> Encourage, promote and foster a culture of integrity in the society	1. Formulating and implementing a National Integrity Plan		x	x	x	x	x
	2. Implementing National Integrity Award		x	x	x	x	x
	3. Developing a mechanism to recognize those who share adequate information to convict a corruption case		x	x	x	x	x
	4. Delivery of information to the society on integrity using different resources		x	x	x	x	x
	5. Extensive delivery of information about integrity personalities to the society and students		x	x	x	x	x
	6. Researching on awareness and eliminating corruption risk areas in the society		x	x	x	x	x
	7. Identifying the good practices in the administrative mechanism of the institutions and sharing it with the public		x	x	x	x	x
<b>Strategy 2:</b> Plan and conduct Anti-Corruption awareness programs	1. Assessing the effectiveness of the current awareness programs		x				
	2. Extensively carrying out awareness activities using TV/ radio/ news/ website		x	x	x	x	x
	3. Conducting various competitions (debate, story writing, quiz, drawing etc.) against corruption.			x	x	x	x
	4. Publishing a magazine to promote integrity			x	x	x	x
	5. Dedicating a special day on the occasion of anti-corruption, at a national level.		x	x	x	x	x
	6. Disseminating information about the Commission using social media (Twitter, YouTube, Facebook, Instagram)		x	x	x	x	x
	7. Conducting awareness sessions and discussion forums for State Institutions and NGOs.		x	x	x	x	x
	8. Developing a system to conduct special Anti-Corruption program for new recruits at public sector		x	x	x	x	x
	9. Participating in Career fairs and Anti-Corruption campaigns		x	x	x	x	x
	10. Organizing a 'Quarterly News Brief' to give		x	x	x	x	x

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
	information about Commission's work						
	11. Introducing a mobile application that contains awareness materials and whistleblowing features		x	x	x	x	x
	12. Providing religious information regarding corruption to employees and public		x	x	x	x	x
<b>Strategy 3:</b>	1. Introducing an 'Anti-Corruption Certificate Level' course specialized for State Institutions		x	x	x	x	x
Introducing Integrity into the Maldivian education system and collaborate with education sector to eliminate corruption	2. Introducing a 'Postgraduate Diploma' course for Commissions' investigation staffs			x	x	x	x
	3. Introducing an Anti-Corruption module and incorporate it into Higher Education Curriculum		x	x	x	x	x
	4. Introducing a specialized Integrity module for students and integrate it into the national curriculum		x	x			
	5. Introducing Integrity Clubs in schools		x	x	x	x	x
	6. Introducing Integrity Ambassadors in schools		x	x	x	x	x
	7. Introducing 'Anti-Corruption Research Award' to higher education institutions			x	x	x	x
<b>Strategy 4:</b>	1. Working on the following areas in collaboration with NGOs						
Collaboration with NGOs to eliminate corruption and sharing support and assistance	1.1 Researching on the areas to work with NGOs in eliminating corruption			x	x	x	x
	1.2 Conducting awareness programs for NGOs			x	x	x	x
	1.3 Organizing and conducting productive activities with NGOs to prohibit and prevent corruption			x	x	x	x
	1.4 Developing an online platform/ network to share information with NGOs			x	x	x	x
	1.5 Providing technical and financial assistance for the activities conducted by NGOs			x	x	x	x
<b>Policy 7: To improve the quality of investigation related areas and achieve results</b>							
<b>Strategy 1:</b>	1. Categorizing corruption cases and to Specialize Investigation teams to the categories		x	x			
Introduce and revise	2. Developing an investigation manual with the following areas;		x	x			

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
regulations, guidelines and procedures related to investigation	2.1 Obtaining the documents required for the investigation		x	x			
	2.2 Summoning people for investigation		x	x			
	2.3 Handling case files		x	x			
	2.4 Transferring case files		x	x			
	2.5 Writing and Formatting Investigation reports		x	x			
	2.6 Handling the documents and books brought from other institutions for investigation purpose		x	x			
	2.7 Seizing of assets		x	x			
	3. Introducing a guideline to use forensics and other modern resources in investigation and familiarize employees		x	x	x	x	x
	4. Sharing information on asset recovery and asset tracing between international and domestic authorities			x	x	x	x
<b>Strategy 2.</b>  Collaborate with State authorities in resolving corruption, exchange information and assistance	1. Obtaining assistance from Prosecutor General's Office (PGO) in the following areas;						
	1.1 Obtaining technical assistance from PGO for ongoing investigations		x	x			
	1.2 Establishing a system to submit investigated case reports to PGO electronically.		x	x			
	1.3 Establishing a system to observe the actions taken by PG office on the cases forwarded by the commission		x	x			
	1.4 Establishing a system to identify the status of the cases related to commission through PG office case management system		x	x			
	1.5 Arranging a mechanism to include a lawyer from the Commission with PGO lawyer's team at court presence		x	x			
	2. Working with the Judiciary to resolve challenges in corruption investigations and law enforcement		x	x	x	x	x
	3. Obtaining assistance from the Maldives Police Services from the following areas;		x	x	x	x	x
	3.1 Establishing a mechanism to obtain and use police surveillance on high risk corrupt practices		x	x	x	x	x
	3.2 Arrange a mechanism for security and protection of Commission members and employees on official		x	x	x	x	x

Policy / Strategy	Activities	Section/Unit/ Staff	2015	2016	2017	2018	2019
	trips						
	3.3 Obtaining assistance from police forensic department in investigating the cases		x	x	x	x	x
	3.4 Establishing a mechanism to use police resources during investigations		x	x	x	x	x
	4. Providing database access of State institutions to investigators (i.e. Department of National Registration, Ministry of Economic Development, Maldives Customs Service, Ministry of Finance and Treasury & Department of Immigration and Emigration)		x	x	x	x	x
<b>Policy 8: International Collaboration to combat corruption</b>							
<b>Strategy 1:</b>  Collaborate with International and Regional Anti-Corruption Authorities and exchange assistance	1. Providing assistance under United Nations Convention against Corruption (UNCAC)		x	x	x		
	2. Exchanging cooperation and assistance with international organizations		x	x	x	x	x
	3. Exchanging information and technical assistance		x	x	x	x	x
	4. Building international relations with overseas anti-corruption authorities		x	x	x	x	x
	5. Participating in international/regional forums for combating corruption.		x	x	x	x	x
	6. Participating in international programs, campaigns and special occasions organized by international authorities		x	x	x	x	x
	7. Establishing a mechanism to obtain assistance from other countries and International Criminal Police Organization (Interpol) to get hold of suspects (not residing in Maldives) for investigation.		x	x	x	x	x

## Implementation

To evaluate the outcomes of this strategy, periodic assessments will be done at the end of each quarter. Consequently, the SAP will be revised annually and appropriate changes will be incorporated to the strategy. During the implementation of this strategy, the implementing sections/ units/staff should work to undertake assigned activities and take responsibility to obtain results. This exercise should be performed by executing annual work plans. Annual work plan should include the following information.

1. Main Policy / Strategy
2. Priority of activity
3. Implementing section/unit/staff
4. Code#
5. Activities (including the sub-activities that will be carried out under the main activity)
6. Commencing date of the activity
7. Due date of the activity
8. Estimated budget for the activities
9. Information related to status of the activities including Output targets and Outcome of the activities

At the end of each quarter, all the sections/ units or implementing staff should share the above information with Prevention and Research Section. The following section provides a sample template of an annual work plan.

## Sample Template: Annual Work Plan Table

<b>Policy1: Strengthen and Development of administrative function</b>									
#Priority of activity	Implementing Section/Unit/ Staff	Code #	Work Plan / Activities	Commencing Date	Due Date	Budget			Status / output & or outcome
						2015	2016	2017	
		1.2.3	Establish and execute sections yearly plans to achieve the objectives of the Commissions Strategic Action Plan.						
1		1	To coordinate with all the sections to implement SAP						
		2	To attend to secretariat role of implementing SAP and prepare quarterly/annual report						
		3	To collect/ disseminate information						



## **Conclusion**

This plan is formulated with dedicated assistance from the Commission staff. It is assured that this plan will facilitate the Commission to perform its legal duties to its best ability by enabling delivery of services to the expectations of the public

Despite how well a plan is designed and formulated, it cannot be executed without the participation of the staff and without necessary resources required for its implementation.

The Commission expects to receive the highest consideration and support from the relevant government entities and stakeholders, in executing all the activities scheduled in the plan.

Sincere gratitude is expressed to the staff of Anti-Corruption Commission, for their support and cooperation and contribution in undertaking this important work.

**Technical Committee Members:**

Yazmeed Mohamed, Commission Member  
Abdulla Rasheed, Secretary General  
Fathimath Anoola, Investigation Officer  
Majid Hassan, Investigation Officer  
Ikleela Ismail, Research Officer  
Ali Tholib, Investigation Officer  
Shabnoon Khalid, System Administrator  
Mohamed Saleem, Education Officer  
Ahmed Yameen, Deputy Director, Finance  
Fathimath Nazima, Deputy Director, Administration  
Hassan Manik, Senior Case Officer  
Adam Shamil, Assistant Research Officer

**Translation Contributors:**

Ikleela Ismail, Research Officer  
Fathimath Nazima, Deputy Director, Administration  
Fathimath Ibna, Research Officer  
Nasira Iqbal, Education Officer  
Hamza Afeef, Senior Computer Programmer  
Ibrahim Ihusan, Assistant Investigation Officer  
Mariyam Asira, Assistant Investigation Officer  
Mariyam Nasha Mohamed, Case Officer  
Hussain Zameel, Assistant Education Officer  
Fathimath Shifa, Case Assistant  
Aiminath Hasma Habeeb, Case Assistant

**Editing:**

Fathimath Anoola, Investigation Officer  
Ikleela Ismail, Research Officer



## Anti-Corruption Commission

Huravee Building 2nd Floor | Ameer Ahmed Magu 20114

Mal'e, Maldives

+960 301 5200 | +960 301 5257 | 📠: +960 331712 | 📞: 1418

✉ info@acc.gov.mv | 🌐 www.acc.gov.mv