

## Liberia Anti-Corruption Commission

# **Strategic Plan (2019-2024)**



Sharpening Our Focus to Fulfill Our Mandate



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## **ACKNOWLEDGEMENT**

In order to establish and give us a sense of direction for the coming five years, we have formulated this 'Strategic Plan'. The plan is intended to sharpen our focus in helping us achieve our overall mandate.

The efforts and success of this initiative wouldn't have been possible had we not received the support of our partners who played tremendous role in this process. We remain forever grateful to the Government and people of the United States of America through USAID sponsored project – the Legal Professional Development and Anti-Corruption Programme in Liberia (LPAC) for the tremendous partnership and its support. LPAC has continued to provide technical and logistical support to the LACC in enhancing its work. The work of the 'Strategic Plan' team was made possible through the sponsorship of LPAC.

In addition, the United Nations Development Programme (UNDP) continues to significantly support and strengthen the programs of the Commission through its STAOP Project. The project's support is basically focused on the provision of logistics and boosting the work of the Enforcement, Legal, and Education and Prevention Divisions which is very critical to the sustenance of the Commission.

The support of the Open Society Initiative for West Africa (OSIWA) in our educational billboard and signpost project is remarkable. The unflinching contributions of other partners, including the Civil Society Organizations (CSOs), the Media and the National Integrity Forum (NIF) are fantastic. The contribution of staff of the LACC, including the Body of Commissioners (BoC) in the fruition of this project is marvellous. Their enduring commitment in the drafting, editing and finalization of this work culminated in the realization of this endeavour.

We finally remain grateful to LPAC's Strategic/Functional Consultant, Mr. Charles G. Tiah for his time and patience demonstrated for the success of this exercise. The input of everyone is appreciated.

Atty. Mohammed E. Fahnbulleh **EXECUTIVE DIRECTOR** 

# ABBREVIATION AND LIST OF ACRONYMS

No	Acronym/Abbreviation	Definition
I	AUCAC	African Union Convention on Anti-Corruption
2	AfDB	African Development Bank
3	ABC	Attitudinal and Behavioral Change
4	ВОС	Body of Commissioners
5	CSOs	Civil Society Organizations
6	DOP	Division Operation Plan
7	EU	European Union
8	ED	Executive Director
9	FIU	Financial Intelligence Unit
10	FBOs	Faith-Based Organizations
П	GoL	Government of Liberia
12	GC	Governance Commission
13	GAC	General Auditing Commission
14	GEMAP	Governance and Economic Management Assistance Programme
15	HR	Human Resource
16	HCA	Human Capital Advantage
17	HRA	Human Resource Advantage
18	HRM	Human Resource Management
19	IAD	International Anti-Corruption Day
20	IAA	Internal Auditing Commission
21	IEC/BCC	Information, Education, Communication and Behavior Change Campaign
22	KPI	Key Performance Indicators
23	LACC	Liberia Anti-Corruption Commission
24	LEITI	Liberia Extractive Industry Transparency Initiative
25	LPAC	Legal Professional Development and Anti-Corruption
26	LNP	Liberia National Police
27	LRA	Liberia Revenue Authority
28	LRC	Law Reform Commission
29	MACs	Ministries, Agencies, and Commissions

No	Acronym/Abbreviation	Definition
30	MoJ	Ministry of Justice
31	MOFDP	Ministry of Finance and Development Planning
32	MAP	Management Action Plan
33	MEAL	Monitoring, Evaluation, Accountability, and Learning
34	MSC	Most Significant Change
35	MCFs	Most Crucial Factors
36	NAS	National Anti-Corruption Strategy
37	NIF	National Integrity Forum
38	ODA	Oversea Development Assistance
39	OSIWA	Open Society of West Africa
40	PAPD	Pro-Poor Agenda for Prosperity and Development
41	PMs	Programme Managers
42	PPCC	Public Procurement Concession Commission
43	PME	Performance Management and Evaluation
44	PDIA	Problem-Driven Iterative Adaptation
45	QWP	Quarterly Work Plan
46	R&T	Research and Technical
47	SIDA	Swedish International Development Agency
48	SOPs	Standard Operating Procedures
49	SICs	Student Integrity Clubs
50	SWOT	Strengths, Weaknesses, Opportunities, and Threats
51	SP	Strategic Plan
52	SPIs	Standard Performance Indicators
53	SA	Strategic Analysis
54	TI	Transparency International
55	TA	Technical Assistance
56	Triple A	Acceptance, Ability, and Authority
57	ToRs	Terms of Reference
58	UNCAC	United Nation Convention on Anti-Corruption
59	USAID	United States Agency for International Development
60	UNDP	United Nations Development Programme

### **FOREWORD**

Globally, corruption is characterized as a complex social, political and economic phenomenon that affects all countries. Corruption undermines democratic institutions, slows economic development and contributes to governmental instability. Corruption attacks the foundation of democratic institutions by distorting electoral processes, perverting the rule of law and creating bureaucratic quagmires whose only reason for existing is the soliciting of bribes. Economic development is stunted because foreign direct investment is discouraged and small businesses within the country often find it impossible to overcome the "start-up costs" required because of corruption.

The Government of Liberia (GOL) has continued to formulate and adopt new regulations and measures aimed at strengthening laws and policies that adequately address the peculiar nature of corruption in society. These efforts have culminated in the Government declaring corruption as "public enemy number one". The setting up of the Liberia Anti-Corruption Commission (LACC) was a big and motivating step in battling this epidemic which has become a way of life. Truly and evidenced to its commitment, Government adopted a National Anti-Corruption Strategy (NAS) led by the Governance Commission (GC) in partnership with civil society. The Government also strengthened the General Auditing Commission (GAC), Public Procurement and Concessions Commission (PPCC), the Liberia Extractive Industry and Transparency Initiative (LEITI), the Internal Audit Agency (IAA), the Financial Intelligence Unit (FIU), the Liberia Revenue Authority (LRA), the Law Reform Commission (LRC) and the Independent Information Commission (IIC). These interventions in part fulfil Liberia's obligations under international treaties and conventions, including the United Nations Convention against Corruption (UNCAC), to which Liberia is a signatory and state-party.

Meanwhile, from the time the LACC was established some nine years ago, it has made significant progress in the fulfilment of its core mandates - education and prevention, and investigation and prosecution. The Commission has been able to adopt several measures and institutionalized policies intended to strengthen the fight against this menace. During the period, the LACC has hired and continues to hire relevant professional staff, drafted and ratified operational instruments; and investigated and prosecuted several cases of corruption. The progress made was achieved under difficult situation, including inadequate financial and material resources.

The area of prosecution seems to generate public interest as compared to education and prevention. This is largely due to the culture of impunity which long permeated our society. But today, serious efforts have been ignited in prosecuting persons accused of corruption despite the surmountable financial challenges in recruiting additional investigators, lawyers and acquisition of logistics to facilitate the work of the Commission.

LACC is so tedious and challenging. The LACC has a difficult mission. The Commission is engulfed with a daunting responsibility to restore integrity and accountability in the public sector. Hence, the formulation of this five-year "Strategic Plan" is the outcome of our farsightedness and honest desire to realistically pursue and implement the mandate of the LACC for the next five years that will

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make the Commission more responsive to the needs and aspirations of the Liberian people and partners. Transparency, accountability and integrity shall be the hallmark of this mission.

The implementation of this plan will require collaborative efforts and the involvement of all stakeholders, comprising relevant institutions, civil society and the citizenry. As we anticipate the implementation of this plan, it is our hope that we will receive the necessary support from the Government and people of Liberia, our international partners, civil society, the media and the private sector. This plan is a vision to move the LACC in a positive direction in stimulating the national fight against corruption. We are convinced that with the support of all, we will succeed.

Charles J. L. Gibson, III
OFFICER-IN-CHARGE

### **EXECUTIVE SUMMARY**

#### I. Overview

The Liberia Anti-Corruption Commission (LACC) is one of the major autonomous bodies/ agencies established to foster and promote a corruption-free society that advances transparency, integrity and accountability in Liberia. The mandate of LACC- to investigate, deter and prosecute acts of corruption, promote good governance and the rule of law, strategically positions the Commission to contribute towards promoting probity and accountability in both the public and private sectors. This new strategic plan sharpens LACC's focus and approach in pursuing its mandate. The Plan employed the value-based, issue-based, organic-based, and goal-based methods and utilized more than nine strategic tools to conduct external and internal environmental scans.

### 2. Major Achievements by LACC

During the performance period of LACC's previous Strategic Plan (2014 to 2017), twenty nine cases were concluded, representing 93.10 percent gallop in performance (from 2 concluded cases during the previous performance period (before 2014-to this one). It also represents 12.08 percent of a total of 240 cases reported. Similarly, a noticeable seven cases or 24.13 percent of the total 29 cases investigated, concluded, and forwarded were being prosecuted. Additionally, a whistle blower bill was drafted and presented to the Legislature for passage into law.

Of the cases prosecuted, two individuals pleaded guilty to corruption charges and restitution of funds is being enforced at the Circuit Court; but no conviction has yet been achieved at the Supreme Court in cases that were earlier convicted at Circuit Courts. These cases are still stalled at the high court awaiting final judgment. Meanwhile, restitutions were also made in other cases such as Aminata, a petroleum company, Mohammed Paasewe, former Superintendent of Grand Cape Mount County, Amos Tweah, former Assistant Minister, MICAT, Abu Kamara, former Assistant Minister for Administration, Ministry of Postal Affairs, and Hassen Kiadi, former Procurement Officer, Grand Cape Mount County. With respect to Education and Prevention, the Commission has conducted a number of public outreach campaigns and is facilitating the operation of Students Integrity Clubs in 19 public schools in Liberia with a focus of addressing systemic corruption in secondary schools.

### 3. Major Challenges

The Liberia Anti-Corruption Corruption Commission has made progress. However, the reality is, several unaddressed challenges continue to outweigh LACC's current capacity -legal, financial, logistical/material, and technical human resource- to mitigate these demands. Key among these challenges include:

a. Lack of adequate political will to fight corrupt practices manifests in many ways, including but not limited to: (i) concerted attacks on anti-graft institutions, including the LACC, by officials and their agents whenever they are accused of corruption; (ii) the lack of proper and adequate administrative actions against officials accused of or involved in corruption; (iii) unresolved corruption cases;(iv) unending corruption investigations;

- b. Failure to enact stronger laws that will strengthen current weak anti-corruption legislations, despite submissions and recommendations from the LACC. The current LACC legal framework limits the Commission from, directly and expeditiously prosecuting corruption cases. It also limits the Commission from effectively administering its Assets Declaration and Verification regime, as well as to protecting witnesses and whistles blowers.
- c. Failure on the part of MACs to adequately adhere to the Public Procurement laws and regulations; willingness to hold accountable those who are responsible for the loss of public funds and/or misuse of public resources; and corrupt practices that adjust to manipulate new accountability systems as they arise.
- d. While the general view is that the public detests corruption, ironically, directly and indirectly, the populace encourages it. Moreover, citizens seem to identify and speak of corruption only in terms of politics and acts of corruption associated with public officials and operatives.

In view of the above, inadequate financial and administrative support for the LACC has resulted to a number of demands faced by the Commission, which outweigh its current financial, human resources, material, and legal capacities to respond more effectively.

### e. Strategic Direction

Aligned to the Pro-poor Agenda for Development and Prosperity, this plan strategically positions LACC to lead the fight against corruption more effectively and to maximize its resources through the making of smart and potentially more rewarding choices in fighting corruption in Liberia.

#### LACC's Overall Goals are to:

- 1. Prevent, deter, and prosecute acts of corruption among 1.5 million citizens across Liberia through public education, institution of effective corruption prevention systems in 40% of public institutions, investigation and conclusion of at least 100 corruption cases and prosecution of 30% of concluded cases, and recover proceeds/assets from acts of corruption; and
- Elevate the fight against corruption to the fore front of Liberia's development agenda, driving
  it as a key vehicle in preventing development inequalities; mobilize support to strengthen
  existing anti-corruption policies, laws and instruments and to adequately resource LACC's
  operational functions.

Broadly, LACC will achieve the above goals through its four operational and administrative divisions, and in cooperation with strategic stakeholder groups. Through the divisions of Education and Prevention, Enforcement, Legal and Administration, the Commission and stakeholders will:

A. **PREVENT ACTS OF CORRUPTION:** Establish and work in collaboration with relevant stakeholders to promote adherence to systems for the prevention of systemic corruption in MACs; monitor and draw attention to violations of laws and regulations (mainly through annual performance report) and conduct public education targeting at least 1.5 million Liberians to promote economic prosperity, effective economic inclusion, and prevent social and civil tensions.

- B. **INVESTIGATE ACTS OF CORRUPTION:** Investigate and conclude at least 100 percent corruption cases in service-intensive, revenues/resource-based, and regulatory-driven ministries, agencies, and commissions (MACs) to promote financial governance and accountability for shared prosperity and sustainable development in Liberia.
- C. **PROSECUTE AND DETER ACTS OF CORRUPTION:** Modify the legal framework of LACC with attention to: enactment of laws for direct prosecutorial power and the establishment of specialised court; prosecute increased number of corruption cases, mainly systemic corruption in service-intensive, revenues/resource-based, and regulatory-driven ministries, agencies, and commissions (MACs) and recover assets/proceeds from acts of corruption to promote a accountable public sector and reduce development inequalities.
- D. **PROVIDE LEADERSHIP TO REDUCE CORRUPTION:** Increase the overall operational effectiveness of the LACC and diversify its resource base to expand its services to all regions of Liberia and to adequately support operational activities of front-service divisions through strengthening of the Commission's internal organizational processes, enhancing cost leadership, establishing a differentiated and sustained pool of resources (various streams of funding, competence and productivity-based HR and relevant non-human performance systems) to reduce acts of corruption.

### I. Resources Requirement

The resources required, in dollars value, to implement the plan is US\$36,324,177, summarised below:

Tabular Summary of	of Resource I	Requirement (	(see chap	oter five)	
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No	Program/	%	Personnel	%	Total	%	Sources of Funding	
	Operations	/0					GoL	Partners
Enf.	7,267,000	30.73	3,265,064	25.76	10,532,064	28.99	7,590,064	2,942,000
Legal	3,347,000	14.15	2,032,317	16.03	5,379,317	14.81	2,163,317	3,216,000
E&P	5,853,500	24.76	1,872,914	14.77	7,726,414	21.27	2,102,914	5,623,500
Admin	7,178,794	30.36	5,507,588	43.44	12,686,382	34,93	6,850,588	5,835,794
G/Total	23,646,294	100	12,677,883	99.99	36,324,177	100	18,706,883	17,617,294
Percentag	ge Distribution	of Requir	ed Funds Bet	ween LA	ACC & Partne	rs	51.50	48.50

### 2. Implementation and Management Arrangements

The Strategic Plan will be implemented at two levels: policy and functional. At the policy level, the LACC's Body of Commissioners (BOC) will oversee the implementation of the Plan. To operationalize the plan, the BOC will facilitate the development of strategies and policies that are relevant to or aligned to all crucial aspects of LACC. These strategies/policies will include: a) resource mobilization strategy; b) competence and productivity-based HR strategy; c) partnership

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development and management strategy; d) Organization Culture and Development Policy; e) Operational Planning and Management SOPs; and f) Monitoring Evaluation Accountancy and Learning system. Relevant systems, processes, and procedures will be developed consistent with the nature of the policies, strategies or frameworks. These strategy documents, along with related systems will be implemented at the level of the Divisions.

At the functional level, the plan will be implemented through an annual Management Action Plan (MAP), broken down into quarterly operational plan (QOP), and monthly work plans. At the Divisional level, each Division will develop a Division Operation Plans (DOPs) which will feed into the MAP. In order to effectively and efficiently implement LACC's socio-technical system, the Commission will establish relevant cross-departmental work teams; promote cohesive work teams, healthy interpersonal relationships, and create the organizational climate needed.

The BOC will track performance targets monthly/quarterly and will review the SP annually. Each year, strategic plan-specific performance review and progress report will be prepared. Relevant to monitoring evaluation accountability and learning, performance indicators will be tracked at three levels; namely: Outcomes, Objectives, and Intervention Outputs in keeping with the standard performance indicators in the plan. At the Strategic Objectives and Outcomes level, monitoring will focus on gathering evidence of any early results that indicate change is taking place in the conditions against which interventions were developed. Performance tracked will be compared to baselines established in this Strategic Plan.

### **CHAPTER ONE: INTRODUCTION**

### I.I About the Strategic Plan

The endemic nature of corruption in Liberia threatens the economic and social development of the country and challenges all Liberians and integrity institutions, including the LACC, to do more to strengthen and expand the fight against this menace. This fact is the most important basis for engaging in the strategic thinking and planning exercises that has led to the development of this Five-Year Strategic Plan. The technical assistance from the Liberia Legal Professional Development and Anti-Corruption(LPAC), a United States Agency for International Development (USAID)-funded project implemented by Checchi and Company Consulting, Inc., was solicited to develop this Strategic Plan. Meanwhile, the entire process was driven by LACC administrative and technical staff, allowing for experience sharing, action and experiential learning, and ownership. The strategic plan will span from July 2019 to June 2024.

### 1.2 Process in Developing the Strategic Plan

The methods utilized to develop this plan encompass the value-based, issues-based, organic-based, and goal-based approaches to strategic planning (see chapter three). To this effect, more than nine strategic analysis tools were used, including value-chain, stakeholders, forced field, and SWOT (strengths, weaknesses, opportunities, and threats) analytical tools. Particularly, the processes of developing the plan comprise four phases; namely:

- Phase One: Organization of Strategic Planning Team and Development of Strategic Analysis Tools
- Phase Two: Strategic Analysis Sessions and In-depth Analysis of Strategic Issues
- Phase Three: Implementation Programming and Functionality Design
- Phase Four: Technical Review, Editing, and Validation of the Plan

### 1.3 Strategic Framework of LACC

The Government of Liberia declared corruption a "public enemy number one" in January 2006 in response to the endemic nature of corruption which continued to undermine the institutional framework of good governance and economic prosperity. Consequently, it adopted a National Anti-Corruption Strategy in 2006, followed by the establishment of an autonomous and independent Liberia Anti-Corruption Commission (LACC) on August 28, 2008. Particularly, the strategic framework of LACC consists of: a mandate, vision, mission, mission objectives, values, and core programs, as described below:

### A. Mandates of LACC

The "LACC Act of 2008" establishing the Commission gives it the broad mandate and functions to implement appropriate measures and undertake programs geared toward investigating, prosecuting and preventing acts of corruption in both the public and private sectors of the Liberian society, including educating the public about the ills of corruption and the benefits of its eradication.

#### B. I. Vision

The Liberia Anti- Corruption Commission (LACC) vision is a corruption free society that advances transparency, integrity and accountability in Liberia.

#### B. 2 Mission

The mission of the Liberia Anti-Corruption Commission (LACC) is to investigate, deter and prosecute acts of corruption, promote good governance and the rule of law.

### **B.** 3 Objectives

The objectives of LACC are as follows:

- a. Ensure a coordinated, consistent, effective, realistic, and sustained fight against corruption;
- b. Promote transparency, accountability, integrity and access to information at all levels of society in the fight against corruption;
- c. Promote the full and effective participation of all Liberians and other stakeholders in the fight against corruption;
- d. Engage and work with the citizens of Liberia and the government, business, education and national and international organizations in the fight against corruption;
- e. Provide a governmental and non-governmental framework for the effective participation, coordination, monitoring, evaluation and review of anti-corruption activities in the fight against corruption;
- f. Break the culture of impunity that has engulfed Liberia by punishing people fairly but effectively in keeping with rule of law in Liberia's fight against corruption;
- g. Ensure that corruption investigators and cases are handled fairly, effectively and efficiently, free of political influence in the fight against corruption;
- h. Promote public awareness related to the direct and indirect cost of corruption to the Liberian people and the role of each citizens in the fight against corruption; and
- Ensure effective monitoring of the fight against corruption through oversight bodies and mechanisms that involve the consistent participation of civil society.

### **B.** 4 Core Programmes:

- a. Prevention of Corruption
- b. Investigation of Corruption Cases
- c. Prosecution of Cases of Corruption
- d. Institutional Management and Capacity Building

### B. 5 Governance and Management Team

The Liberia Anti-Corruption Commission (LACC) comprises a governance and strategic leadership of five (5) Commissioners, one of whom serves as Executive Chairperson and another as Vice Chairperson. The commissioners are nominated and subsequently appointed by the President of Liberia after confirmation by the Liberian Senate. The Commissioners as designated by the Executive Chairperson, exercise oversight responsibilities over the four divisions of the Secretariat.

At the functional level, LACC consists of a Secretariat, headed by an Executive Director, who is hired by the Commission for the period of three years renewable. The Secretariat is composed of four (4) Divisions: Administration, Investigation & Enforcement, Legal & Prosecution, and Education & Prevention. These four divisions are headed by program managers and supported by technical and administrative personnel.

#### 1.4 Strategic Direction of the Five-Year Plan

This plan strategically positions LACC to lead the fight against corruption more effectively and to maximize its resources through the making of smart and potentially more rewarding choices in fighting corruption in Liberia. This strategic plan is aligned to all crucial aspects of the Pro-poor Agenda for Development and Prosperity (PAPD), including its overall goals, pillar goals summarized as follows:

#### PADP Goals:

- 1. To build a stable, resilient, and inclusive nation embracing our triple heritage and anchored on our identity as Africans.
- 2. To lift an additional one million Liberians out of absolute poverty over the next six years (and reduce absolute poverty by 23 percent across 5 of the 6 regions) through sustained and inclusive growth driven by scaled-up investments in agriculture, in infrastructure, and in human capital development.

#### **PAPD's Pillars Goals:**

- 1. Power to the People— To reduce developmental inequalities so the people can prosper
- **2.** The Economy and Jobs— Economic stability and job creation through effective resource mobilization and prudent management of economic inclusion.
- 3. Sustaining the Peace—Promoting a cohesive society for sustainable development
- **4. Governance and Transparency**—An inclusive and accountable public sector for shared prosperity and sustainable development.

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Elevate the fight against corruption to the fore front of Liberia's development agenda, driving
it as a key vehicle in preventing development inequalities; mobilize support to strengthen
existing anti-corruption policies, laws and instruments and to adequately resource LACC's
operational functions.

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- **B. INVESTIGATE ACTS OF CORRUPTION:** Investigate and conclude at least 100 percent corruption cases in service-intensive, revenues/resource-based, and regulatory-driven ministries, agencies, and commissions (MACs) to promote financial governance and accountability for shared prosperity and sustainable development in Liberia.
- C. PROSECUTE AND DETER ACTS OF CORRUPTION: Modify the legal framework of LACC with attention to: enactment of laws for direct prosecutorial power and the establishment of specialised court; investigation and prosecution of increased number of corruption cases, mainly systemic corruption in service-intensive, revenues/resource-based, and regulatory-driven ministries, agencies, and commissions (MACs) to promote a accountable public sector and reduce development inequalities.
- **D. PROSECUTE AND DETER ACTS OF CORRUPTION:** Modify the legal framework of LACC with attention to: enactment of laws for direct prosecutorial power and the establishment of specialised court; prosecute increased number of corruption cases, mainly systemic corruption in service-intensive, revenues/resource-based, and regulatory-driven ministries, agencies, and commissions (MACs) and recover assets/proceeds from acts of corruption to promote a accountable public sector and reduce development inequalities.

The specific objectives of each division are as follows:

**Table I: Strategic Objectives** 

Division	Specific Strategic Objectives			
Investigation	Increase the number of investigated and "high and low" profile concluded cases to 100 from July 2019 to June 2023.			
	Improve the human and operational capacities of the division to investigate by June 2021.			

Division	Specific Strategic Objectives
Legal	Increase the number of prosecuted cases to 30 by improving the internal communication systems of LACC, strengthening collaboration with MOJ, and recruiting additional five lawyers on "need basis" by October 2021.
	Increase to 40 percent the number of MACs benefiting from functional corruption prevention systems by June 2024.
Education & Prevention	Increase the number of public officials complying with the Asset Declaration regulations published by LACC to at least 70 percent by November 2021.
	Heighten public confidence in LACC and secure the cooperation of the public to prevent corruption through attitudinal change campaign targeting 1.5 million people by February 2024.
	Improve the organizational performance of the LACC by increasing HR outputs, management accountancy, improving operational and business processes, enhancing the communications and technological capacities of the Commission by June 2024.
Administration	Improve LACC's service coverage by decentralizing the Commission in four regions of Liberia and constructing Office Complex by October 2023.
	Establish the conditions for speedy trial of corruption cases by securing direct prosecutorial power and establishing a specialised anti-corruption court by June 2021.

The following strategic themes are identified as the most crucial functional elements underpinning the works of the Commission.

### Strategic themes:

- a. Evidence Security and Integrity;
- b. Investigation of Systemic Corruption
- c. Modification of existing anti-corruption laws, policies, and statue
- d. Assets Recovery and Forfeiture
- e. Asset Declaration and Illicit Wealth Monitoring
- f. Community-driven Awareness, Mobilization, and Actions
- g. Resource Mobilization, Organizational Development and Operational Productivity

Regarding professional behaviour and practices, LACC works will be guided by the core values of accountability, transparency, integrity, confidentiality and professionalism.

**Table 2: Core Values:** 

VALUES	OUR COMMITMENT
ACCOUNTABILITY	We are committed to ensuring accountability of resources and authority entrusted to us and to all public servants.
TRANSPARENCY	We are committed to ensuring that we and all public servants act in an honest, impartial, fair and transparent manner in the discharge of duties.
INTEGRITY	We are committed to fair play in public service.

VALUES	OUR COMMITMENT
CONFIDENTIALITY	We are committed to safeguarding official information by maintaining high level of confidentiality without compromising the legality of the facts.
PROFESSIONALISM	We are knowledgeable and skilled anti-corruption professionals who match our words with deeds.

## **CHAPTER TWO: THE ANTI-CORRUPTION CONTEXT**

### 2.1 The National Operating Context

The LACC Act defines corruption within a more public sector context as "any act or acts, decisions or decisions or use of public resources by a public or private official in the discharge of official duties and/or responsibilities which, in order to satisfy the selfish desire or interest of the said official or other person or persons, natural or legal, ignore the established laws, regulations, and thereby, denies, deprives, and prevents, the State or person or persons natural or legal from receiving entitlements, considerations, and/or treatment". Acts of corruption identified by the Act include; bribery, embezzlement, extortion, fraud, influence peddling, insider trading, misuse of entrusted public property and vested authority, and any economic and financial crimes, which are now provided for under the Penal Code of Liberia, or may later be defined and enacted.

"Corruption is also closely linked to, and often a driver of, major threats of our time, from organized crime, to human trafficking and illegal trade, to name but a few. Governance gaps, combined with the commitment of huge amounts of resources to corrupt deals, also make corruption a risk in several key social, economic and environmental policies and development areas, from climate change, to humanitarian assistance, to poverty reduction and the achievement of the Millennium Development Goals" (TI, 2011).

### 2.2 The Enablers (Stimuli)

There is the view that Liberia achieved remarkable progress in the fight against corruption since 2003<sup>1</sup>. A National Anti-Corruption Strategy (NAS) was developed in 2006 by the Government, in collaboration with Civil Society, the media, and other development partners. Since its adoption, several integrity institutions and instruments needed to collaborate and fight corruption were established. They include: the Liberia Anti-Corruption Commission (LACC), the Public Procurement and Concessions Commission (PPCC), the Liberia Extractive Industry and Transparency Initiative (LEITI), the Internal Audit Agency (IAA), the Law Reform Commission (LRC), and Freedom of Information Act. These reforms were generally pursuant to Liberia's obligations under international treaties and conventions, which included the United Nations Convention Against Corruption (UNCAC) and the African Union Convention on Preventing and Combating Corruption (AUCPCC), to which Liberia is a state-party.

The establishment of these integrity institutions was followed by the implementation of several programs including the Governance and Economic Management Assistance Program (GEMAP), which aimed to promote accountability, responsibility, and transparency in key areas of governance, particularly revenue collection, Liberia's global integrity ratings improved. For instance, in 2005, the country was ranked 137 out of the 158 surveyed, with a score of 2.2. In addition, the World Bank's Worldwide Governance Indicators scored Liberia 36.4 on a 0 to 100 scale in 2010 in terms of control of corruption; this compared to 14.1 in 2005. Transparency International's 2011 Corruption Perception Index ranked Liberia 91 out of the 183 countries and territories assessed, with a score

<sup>&</sup>lt;sup>1</sup>Anti-Corruption Resource Center (U4), Overview of Corruption in Liberia, Aug. 2013

of 3.2 on a 0 (highly corrupt) to 10 (very clean) scale. The country has also made reasonable progress in other areas of governance assessed, especially with regard to political stability (29.7 compared to 10.1 in 2005), regulatory quality (16.7 compared to 4.9 in 2005) and rule of law (17.1 compared to 8.1 in 2005). The 2011 Ibrahim Index of African Governance also indicates regular progress made over the past few years, with steady improvements in the country's scores since 2006.<sup>2</sup>

In spite of all of these developments (which were mainly as a result of the establishment of relevant structures), the reality is that corruption is endemic in Liberia. It permeates all of society and has a history that is as old as the founding of the nation, making it the major undercurrent to the fight against corruption. Meanwhile, the above-mentioned stimuli are crucial success factor to succeed in the fight against corruption.

#### 2.3 Functional Challenges

### 2.3.1 Accountability System

Bad practices such as cronyism, misuse of public offices and properties, improper award of public contracts/concessions, and corrupt business practices, among others, have continuously stood in the way of development. Meanwhile, as mentioned above, a number of accountability mechanisms have been set up, which can support anti-corruption efforts. However, there are a number of weaknesses, which undermine accountability and make the system largely ineffective. These include weak adherence to established regulations and legal requirements such as the public procurement laws and regulations; inadequate political and administrative oversight of public institutions; political decisions that do not consider resource situation; unwillingness to hold accountable those who are responsible for the loss of public funds and/or misuse of public resources; and corrupt practices that adjust to manipulate new accountability systems as they arise.

### 2.3.2 Citizens' Perception, Understanding and Commitment

A major challenge in fighting corruption in Liberia is to change citizens' understanding and attitude toward corruption and corrupt individuals. While the general view is that the public detests corruption, ironically, directly and indirectly, the populace encourages it. Moreover, citizens seem to identify and speak of corruption only in terms of politics and acts of corruption associated with public officials and operatives. However, they ignore similar acts performed by private individuals in their daily lives. Some of these citizens are beneficiaries of officials they criticize and decry. According to Glencorse (2013)<sup>3</sup>, "politicians, civil servants and businessmen may abuse their positions, mistaking their wealth for legitimacy, yet, at the same time, citizens who often complain about officials "eating money" are also willing to accept patronage from these power-holders when it suits their own interests. A syndrome has developed where those with access to resources through any kind of position of power are seen as "stupid" if they do not use this access to maximize their own wealth".

<sup>&</sup>lt;sup>2</sup>Ibid (paragraph)

<sup>&</sup>lt;sup>3</sup>Glencrose, B. 2013, Corruption and accountability are still Liberia's biggest challenges<a href="http://www.trust.org/item/20130816151037-js4r5/">http://www.trust.org/item/20130816151037-js4r5/<a href="https://www.trust.org/item/20130816151037-js4r5/">https://www.trust.org/item/20130816151037-js4r5/<a href="https://www.trust.org/item/20130816151037-js4r5/">https://www.trust.org/item/201308161037-js4r5/<a href="https://www.trust.org/item/20130816151037-js4r5/">https://www.trust.org/item/201308161037-js4r5/<a href="https://www.trust.org/item/20130816151037-js4r5/">https://www.trust.org/item/201308161037-js4r5/<a href="https://www.trust.org/item/20130816151037-js4r5/">https://www.trust.org/item/201308161037-js4r5/<a href="https://www.trust.org/item/20130816151037-js4r5/">https://www.trust.org/item/201308161037-js4r5/<a href="https://www.trust.org/item/20130816151037-js4r5/">https://www.trust.org/item/201308161037-js4r5/<a href="https://www.trust.org/item/201308161037-js4r5/">https://www.trust.org/item/2013081037-js4r5/<a href="https://www.trust.org/item/201308161037-

### 2.4 Strategic/Policy Risk Factors

The lack of adequate political will to fight corrupt practices manifests in many ways, including but not limited to: (i) concerted attack on anti-graft institutions, including the LACC, by officials and their agents whenever they are accused of corruption; (ii) the lack of proper and adequate administrative actions against officials accused of or involved in corruption; (iii) unresolved corruption cases; (iv) unending corruption investigations; (v) failure to enact stronger laws that will strengthen current weak anti-corruption legislations, despite submissions and recommendations from the LACC; and (vi) inadequate financial and administrative support for anti-corruption institutions.

### 2.5 Institutional Capacity of LACC

The institutional capacity of the LACC to fulfil its mandate is inadequate. First, LACC's legal framework is limited and second, financial requirements for its operations far exceed the financial commitments made by the Government of Liberia to the Commission. For instance, the Commission's first year of operation, LACC received only 21 percent of its funding request. While the gap between what is requested and what is actually received has narrowed over the years, what has been requested has normally been limited or restricted, due to the restrictive nature of the budget process, which implements "cuts and caps" before the final budget is produced for legislative debate and approval, where, again, additional adjustments are possible. This results into weak resource base for the Commission, making LACC to lack adequate quantities of other basic resources, including personnel office facilities and logistics.

Moreover, the human resource capacity is critically inadequate to support LACC's presence in all regions of Liberia.

Table 6:	LACC Budg	et Requests an	1 Approvals	from GOL	(2014– 2018)
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Description	Fiscal Year					
Description	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	
Amount Requested*	2,2,829,691	2,784,911.50	2,567,498.00	2,532,173		
Amount Provided	2,681,384.10	2,783,327.11	2,455,446.31	2,382,775.00		
Shortfall	5.241%	0.05%	4.3%	5.9%		

<sup>\*</sup> Amounts generally based on predetermined budget ceilings for the LACC set by the Government.

### 2.5.1 Performance Review of LACC past Strategic Plan (2014-2018)

The Liberia Anti-Corruption Commission developed and implemented a strategic plan from 2014 to 2017. The plan had three strategic priorities, 14 major sub-priorities and 78 activities. Summary of achievements of that strategic plan is below. Meanwhile, during the period 2017 to 2018, LACC implemented a number of pre-planning interventions, carried out before the validation of this SP.

### A. ENFORCEMENT DIVISION

### A.I Outputs

Of the five activities planned, a total of 40 percent were fully implemented; the execution of another 40 percent was ongoing, while 20 percent was not started.

### A.2 Most Significant Results

- Seven investigators were recruited and trained in police science;
- Standard Operating Procedures (SOP) on internal workflow was established; and a case management system developed but not fully in use;
- Twenty Nine cases were concluded, representing 93.10 percent gallop in performance (from 2 concluded cases in the previous performance period –before 2014-to this one); and
- The LACC collaborated throughout with the Ministry of Justice, particularly the Liberia National Police (MoJ-LNP) before and during the prosecution of corruption cases and formed partnerships with anti-graft institutions including General Auditing Commission (GAC) and the Liberia Revenue Authority (LRA). The works of these institutions aided the LACC to achieve the mentioned achievements.

Table 2: Challenges Encountered by Enforcement Division

No	Nature	Description	
I	Materials/Assets	Limited logistical capacity.	
2	operational effectiveness	Internal organization, mainly with respect to task/work load distribution and strategic HR reengineering not very effective.	

### A.4: Measures to Mitigate Challenges and Scale-Up Achievements

LACC will restructure the Enforcement Division to include sections such as cybercrime investigation and furnish the department with logistical resources.

## **B.** LEGAL DIVISION

### **BI: Key Outputs**

None of the planned activities of the Legal Division was fully implemented; 62.5 percent was ongoing, while 37.5 percent was not started.

#### **B2: Most Significant Results**

- A total of seven cases were being prosecuted and a whistle blower bill was drafted;
- A one-month capacity building training on investigating forensic cases and prosecuting; and corruption crimes was carried out abroad (New Mexico, USA), supported by US Embassy.

### **B3: Challenges**

### A. Table 3: Challenges Encountered by Legal Division

No	Nature	Description	
I	Political (external)	Lack of direct prosecutorial power, specialised corruption court, and very limited commitment of MOJ to fast-track the process of assigning cases.	
2	Planning and Operational effectiveness	Tactical planning, focusing on strategically aiming to prosecute more "low profile" cases, and then scaling up to high profile ones was lacking.	

### **B4 Measures to Mitigate Challenges and Scale-Up Achievements**

LACC will seek to secure direct prosecutorial power, establish a specialised court and the Commission will employ systematic and incremental approach beginning with prosecuting low profile cases then high profile ones.

### C. EDUCATION AND PREVENTION DIVISION

### CI: Key Outputs

A total of 26 activities were developed; of this, 15.84 percent was fully implemented, 53.84 percent was on-going, while 30.76 percent did not start.

#### **C2: Most Significant Results**

- Five corruption risk assessments were carried out, at least 20 Behavioural Change Campaign (BCC) bill boards were installed at strategic locations in in six counties, including Montserrado; Information, Education, and Communication/ Behavioural Change Campaign (IEC/BCC) materials were produced and distributed. Also, a prevention officer was hired;
- BCC public education outreach activities were carried out in 50 schools in Montserrado County;
- Nineteen Student Integrity Clubs (SICs) were established in 19 public schools;
- One Hundred public outreach sessions were conducted in market settings, and International Anti-Corruption Day (IACD) was celebrated on an annual basis; and
- A call centre was established but that communication infrastructure was not fully organized and utilized.

### C3: Most Crucial Challenges

**Table 4: Challenges Encountered** 

No	Nature	Description
I	Outreach	The coverage of E&P had been concentrated in urban communities and messaging had seemingly been directed at affecting peripheral attitudinal change instead of at the entire core personality construct (attitude, belief, values).
2	Programming	Demand-creation and ABC Campaign activities were not guided by guidelines.
3	Human Resources	Staff members need advanced skills in civic education, attitudinal/behavioural change programming, personality psychology, social accountability and advocacy.

### C4: Measures to Mitigate Challenges and Scale-Up Achievements

The Education and Prevention Division will focus more on establishing corruption prevention systems in MACs and on mobilizing the public in the fight against corruption. To this effect, LACC will integrate in IACD celebrations community-led activisms and will develop public outreach guidelines for the implementation of ABC activities.

### D. ADMINISTRATION

### **DI: Key Outputs**

LACC's Administration Division planned 21 activities; of which a total of 53.84 percent were fully implemented, the execution of 23.07 percent were on-going, while 23.07 percent were not started.

### **D2: Most Significant Results**

- Basic reporting templates and coordination space such as meeting were established and operationalized;
- LACC's organizational organogram, ToRs for departments and staff were redesigned and communicated; and a basic performance management and evaluation system was developed and being iterated;
- Business processes regarding procurement, communication, record management were partially streamlined and a few work tools developed and assimilated. Additionally, procurement documents and basic system was developed and being implemented;
- Public relations and communication policy had been completed at 50 percent and training of media practitioners was initiated;
- LACC technological needs were assessed, its website was redesigned, some equipment were donated, and a case management software was developed but not in use;

- Donor conference was held to mobilize support from donor community; during that occasion the past plan was launched but the process did not seem to yield any direct result; and
- The Commission relocated to a more ideal and accessible building.

### **D3: Most Crucial Challenges**

Table 5: Challenges Encountered by Administration Division

No	Nature	Narrative
I	Asset	Limited vehicles to support operational functions and administrative activities; and Outdated/ damaged computers, laptops and damaged ICT equipment
2	Human Resources	Implementation of LACC's Performance Management Evaluation system is slow; the PME focuses more on process than productivity outputs LACC' staff handbook does not address all aspect of HRM, for example health and safety, quality of work life, etc.

### D4: Measures to Mitigate Challenges and Scale-Up Achievements

The Administration Division will design a more competence and productivity-based systems whereby operational interventions will focus on higher level outcome instead of input-based activities. The Commission will focus on establish a viable pool of resources.

## **CHAPTER THREE: STRATEGIC ANALYSES**

### 3.1 Analytical Tools

More than nine strategic analytical tools were utilized to gauge issues (in both the internal and external environment) observed to be driving, stagnating, and threatening to retrogress achievements made by LACC. These tools include: Achievement analysis, Strengths Weaknesses, Opportunities, and Threats (SWOT), Power, Stakeholders, Value Chain, Strategic and Operational Risks analyses. Other tools include: Forced Field and Political, Economic, Social, and Technological (PEST) analyses. To study the root causes of the strategic issues, some of the tools utilized were: the 5Whys approach utilizing the fishbone diagram, the PDIA approach of problems construction, deconstruction, and sequencing, and issues diagramming.

### 3.2. Analysis of Strategic Issues and Implementation Programming

As a result of employing the above-mentioned tools, a total of 48 strategic issues were identified. These issues were further studied with a view of identifying the nature of them (financial, human resources, front service operations, etc.) and their root causes. The work sheets of the strategic analysis tools employed are not inserted in the plan. However, the processing of narrowing down the strategic issues (products of the tools) gauged are populated in this section.

### A. ENFORCEMENT

Based on results from the strategic analysis process carried out, a total of 12 major issues (the first column) were gauged. Following an in-depth analyses, these issues were grouped into six (the second column) as follow: a) internal organization and work processes issues; b) public relation policy issues; c) human resources management; d) financial planning and resources mobilization; e) external organization and networking; and f) investigation and reporting of completed cases. The potential root causes of those issues are listed in the last column titled abstraction/core or root of issues. Below are the details of the process of narrowing down of the strategic issues.

**Table 8: Narrowing Down of Enforcement Division Strategic Issues** 

No	Issues	Grouping/Categorization of Issues	Abstraction/Core or Root of Issues
1.1	Internal SOPs not finalized		
1.2	Reporting channels and internal communications broad		
1.3	No Operational guide for cooperation with partners/donors	Internal organization and work processes issues	limited operational management systems
1.4	Planning system is rated average or below average		
1.5	Lack of SOP for chain of custody		
2.1	Premature exposure of report to	Internal control and public relation	Quality control

No	Issues	Grouping/Categorization of Issues	Abstraction/Core or Root of Issues	
	public	policy issues (administration)	system limitation	
3.1	Understaffed (intelligence officers)	Human resources management issues	Inflexibility of strategic HR planning	
4.1	Insufficient funding and logistical support	Financial planning and resources mobilization challenge/issues	financial planning inflexible and fund-	
4.2	limited national budgetary allocation		raising not diversified	
5.1	Utilization of partnership building opportunities limited	External organization and networking issues	Policy-level leadership or governance issue	
6.1	Functional evidence room but no electronic storage	Investigation and reporting of	Inflexibility or limited initiative to organize work processes;	
6.2	Exposure of evidence before trial procedures begin	completed cases	internal security protocol issues	

### **B.** LEGAL DIVISION

Ten major strategic issues were mapped-out following the strategic analysis exercise (see first column for issues). These issues were analysed and categorized into five core issues: legal framework and authority, human resources, financial, external organization and cooperation, and internal organization and business processes (see column two). Results from the analysis of the root causes of those core issues are mentioned in the last column. Below are the details of the process of narrowing down of the strategic issues.

Table 9: Narrowing Down of Legal Division Strategic Issues

No	Issues	Grouping/Categorization of Issues	Abstraction/Core or Root of Issues
1.1	Competing priorities seemingly faced by MOJ in assigning cases		
1.2	No direct prosecutorial power	Legal framework and	Second tier legal power (LACC)
1.3	Partnership and cooperation between LACC and MOJ is less productive	authority issues	
2.1	Planning is rated average (projection of cases)		HR Model not competence and
2.2	Limited implementation (mainly enforcement of indictment)	HR issues	productivity-based and performance management and
2.3	Inadequate planning of human resources		accountancy systems limited
3.1	Funding of enforcement of prosecution is limited	Limited budgetary	Financial planning inflexible
3.2	Logistical and financial resources	allocation	

No	Issues	Grouping/Categorization of Issues	Abstraction/Core or Root of Issues
4.1	Limited partnership opportunities	External organization and cooperation issues	strategic/policy level inflexibility challenge
5.1	Weak internal communications system	internal organization or business process	non-standardized internal communication or organization culture
6.1	Legal framework weak, not clear, not enabling to prosecute corruption cases.		
6.2	Limited influence to effect political will in favour of LACC.	Legal framework and external organizational	Limited political will
6.3	Cooperative and collaborative efforts with executive branch of government not achieving Goal of increased convictions.	issues	

### C. EDUCATION AND PREVENTION

A total of 14 major issues were identified as a result of applying various tools of strategic analysis. A process of in-depth analyses applied revealed these issues can be categorized into five major strategic issues as follow: a) business process and organization culture; b) legal and brokering abilities; c) operational effectiveness and image building; d) financial and operational management; and e) human resources development. The root causes of those five issues are mentioned in the last column (abstraction/core). Below are the details of the process of narrowing down of the strategic issues.

Table 10: Narrowing Down of Education and Prevention Division Strategic Issues

No	Issues	Grouping/Categorization of Issues	Abstraction/Core Issues
1.1	Bureaucratic culture of work delays efforts to meet targets		Inflexibility in governance-
1.2	Inadequate internal communication system	Business process and organization culture.	level leadership practice and limited initiative to establish and implement
1.4	Lack of formal SOPs to collaborate with external partners		internal processes.
3.1	Diminishing public trust, low public morale, and unmet pubic expectations	operational and image building issues	Inflexibility in programme planning and implementation culture.
4.1	Lack of adequate budgetary support	Financial and operational	Financial planning
4.2	Inadequate logistics and budget	Management issues	inflexible and limited

No	Issues	Grouping/Categorization of Issues	Abstraction/Core Issues
4.3	Donor fatigue, funding challenge		Initiative to raise funds.
5.1	Limited technical training, required skills set	HR planning, development,	HR module tend to not be best fitted; inadequate
5.2	Inadequate staff planning	and performance management issues	HR planning, development and performance
5.3	Limited technical training and required advanced skills set.		management

### D. ADMINISTRATION

Twelve (12) issues were identified (see column one) as a result of employing various strategic analytical tools. These issues were analysed and grouped into four core issues: policy and governance, business process and organization culture, HRM, financial, operational issues and lobbying challenge (as indicated in column two). Further analysis was carried out and the root causes were identified (see the last column). The table below depict the process of narrowing down the strategic issues.

Table II: Narrowing Down of Administration Division Strategic Issues

No	Issues	Grouping/Categorizati	Root Cause/Core or
140	issues	on of Issues	Root of Issues
1.1	Effectiveness of policy decision is at medium level	Policy-level and /or	Inadequate regulations
1.2	Delay in Responding to operational issues	governance issues	madequate regulations
1.3	Double reporting channels delay efficient implementation of tasks and prolong performance	Organizational chart; Business process and organizational cultural challenge	Role conflict in policy- level leadership practice.
2.1	Inadequate Continuing Professional Development program		
2.2	Lack of HR policy or system to coordinate training activities	Human resources	Limited commitment or one-dimensional human
2.3	Limited advanced procurement skills training for procurement support staff	development issues	resource development system
2.4	Minimum skills in operational planning		
2.5	Little training in advanced HRM		
3.1	Effectiveness in allocating resources is at a medium	Financial and operational	Financial planning not

No	Issues	Grouping/Categorizati on of Issues	Root Cause/Core or Root of Issues
	Inadequate budgetary allotment	issues and lobbying challenge	participatory and planning of material
3.2	madequate budgetary anotheric	Chanenge	resources not
3.3	Limited logistics		harmonized.
3.4	Lack of joint financial-programme planning		
4.1	Inadequate budgetary support		Financial planning
4.1	Inadequate logistics and budget planning	Financial and operational Management issues	inflexible and initiative to diversify fund-raising
4.2	Donor fatigue, funding challenges		not accelerated.
4.3	Limited technical training, required skills set		
4.4	Inadequate staff for LACC's presence in all regions	Human resources development issues	Inflexibility in strategic HR planning and development culture.
4.5	Limited technical training and required advanced skills set.		

Following the process of narrowing down the strategic issues, implementation programming exercises were carried out to determine concrete actions, socio-technical and non-human systems requirements, and practical approaches, including strategies and processes required to implement defined solutions. Results from these processes are in the succeeding chapters. Thus, this section is the product of implementation programming processes carried out.

### A. ENFORCEMENT DIVISION

### Al Strategic Alignment

At the national level, the interventions of Enforcement Division are aligned to pillars one and four of the Pro-Poor Agenda for Prosperity and Development (PAPD) and the strategic framework of LACC as follows:

- Power to the People— To reduce developmental inequalities so the people can prosper;
   and
- **2. Governance and Transparency**—an inclusive and accountable public sector for shared prosperity and sustainable development.

At the organizational level, the strategic plan is aligned to the following mission objectives of LACC:

- a. Efficiently and independently, free of political influence in the fight against corruption;
- b. Ensure a coordinated, consistent, effective, realistic, and sustained fight against corruption; and
- c. Engage and work with the citizens of Liberia and the government, (including other law enforcement institutions), business, education and national and international organizations in the fight against corruption.

### A2 Performance Baseline (Based on Past Plan-2014 to 2017)

Out of the 240 cases received, a total of 29 cases (12.08 percent) were investigated, concluded, and forwarded to MOJ for prosecution.

### A3 Situation Overview, Outcome, Strategic Plan Objectives

At the strategic/policy level, bad practices such as cronyism, misuse of public offices and properties, improper award of public contracts/concessions, and corrupt business practices, among others, have continuously stood in the way of development. Meanwhile, a number of accountability mechanisms have been set up, which can support anti-corruption efforts. However, there are a number of weaknesses, which undermine accountability and make the system largely ineffective. These include weak adherence to established regulations and legal requirements such as the public procurement laws and regulations; inadequate political and administrative oversight of public institutions. Appallingly, in spite of established accountability mechanisms, corrupt practices tend to continue to adjust to manipulate new accountability systems as they arise. Amidst these numerous challenges, LACC's Enforcement Division had investigated and concluded a total of 29 cases out of

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240 cases received (12.08 percent). This statistics is telling. It mirrors the challenges LACC faces in investigating corruption cases.

At the functional level, the major strategic issues identified to have been affecting the operations of LACC's Enforcement Division were: a) limited coverage of investigation of cases; b) leakage or premature exposure of cases (being investigated or concluded) as a result of weak adherence of staff to confidentiality terms and internal security protocol; c) weak internal organization and work process with respect to communication of concluded cases; and d) limited logistics and related support to resource field operations, compared to the demands the Division faces. Additionally, the Division did not have a defined strategy or operational plan to accelerate the investigation of systemic corruption in Liberia because of: limited managerial and supervisory initiatives and weak planning culture. Other issues that exist at the Division include: limited initiative institute management action planning system and to organize work processes, adequately plan human resources.

To address the above situations, the Commission, mainly through its Enforcement Division will:

**INCREASINGLY INVESTIGATE ACTS OF CORRUPTION:** Investigate and conclude at least 100 percent corruption cases in service-intensive, revenues/resource-based, and regulatory-driven ministries, agencies, and commissions (MACs) to promote financial governance and accountability for shared prosperity and sustainable development in Liberia.

#### A4 Outcome

The number of cases (mainly systemic corruption in MACs) investigated and concluded are at least 100 (including small wins or low profile cases or high profile cases).

#### A5 Objectives

A5.1 Increase the number of investigated and "high and low" profile concluded cases to 100 from July 2019 to June 2024; and

A5.2 Improve the human and operational capacities of the Division to investigate the targeted cases by June 2021.

### **A6 Key Performance Indicators:**

LACC will track the number of cases successfully prosecuted as a result of adequate evidence. The Commission will also measure the proportion of cases investigated and concluded against the total number of cases reported and or identified. Another measure of performance will be the quality of the evidence security system of LACC-how many cases being investigated were leaked and the extent to which the cybercrime lab is being utilized to optimize evidence gathering and prosecution. To actualize the above outcome and objectives the following interventions will be carried out:

### **A7** Intervention Matrix

**Table 12: Enforcement Division Intervention Matrix** 

NO	INTERVENTIONS	TIMELINE	
		Begins	Ends
Front-Office Functions			
Evidence Security and Integrity			
A7.1	Maintain the established cybercrime and data storage compartment, establish the function into a unit, and expand its responsibilities to data mining.	August 2019	Dec 2024
Investigation of Systemic Corruption			
A7.2	Establish offices/focal points in four regions of Liberia and scale-up the number of cases investigated and concluded, incrementally, beginning with "low profile" cases and then "high profile" cases.	August 2019	September 2024
A7.3	Support E&P's map-out exercise and Support E&P's and use product from same for covert investigation planning.	November 2019	November 2022
Back Office Functions			
Internal Organizational Strengthening and Operational Productivity			
A7.4	Develop/finalize and implement SOPs on: investigating cases, planning and reporting procedures; cooperation with partners; and chain of custody.	August 2019	September 2020
A7.5	Provide refresher and advanced training in intelligence-based approaches to investigation each year.	August 2019	November 2024
A7.6	Conduct 10 performance review and working sessions at the divisional level and carry out two study visits targeting two highly performing anti-corruption institutions with a view of assimilating existing and best practices applicable to Liberia's context.	Nov 2019	March 2024

### **A7 Key Success Factors**

The successful accomplishment of the planned activities is contingent on the following conditions; that:

### **A7.1 Front Service Functions**

- 7.1.1. Systems for the prevention and investigation of systemic corruption in MACs and enterprises linked to the public sector are in place and functioning; and
- 7.1.2. tactical plan on covert investigation, including data mining of corruption cases leads are functional, evidence gathered are drawn from impeccable sources, and adequate proof/evidence exist for each investigated and concluded cases of corruption.

### A7.2. Back Service Functions

- 2.1. The established cybercrime lab is effectively functioning and it is being utilized; a quality control system is in place to ensure evidence security and integrity; and
- 2.2. The Enforcement Division is adequate supported and LACC organization's culture and systems further allow for semi-autonomy in the execution of the Division's programs, while ensuring a "tight-tight" evidence security control system.

### A8 Strategies and Processes of Change

#### A8 Front Service Functions

The Division will carry out its activities in keeping with the following processes, systems, and culture for change.

# Adopt an Evolutional Approach, Incrementally Scaling Up Investigation From "Small Wins to Big Wins" Cases

Existing approaches carried out by the Enforcement Division in investigating cases will be diversified to an evolutional approach and to address corruption at the more subtle level- systemic corruption in MACs. Regarding the evolutional approach, LACC' Enforcement will focus on more winnable, low profile cases and then scale up to high profile ones ("big wins"<sup>4</sup>). This means that, unlike before, initially the end-value of this model is not the magnitude of the cases being prosecuted; instead, its goal is to earn small scale results, and then generate momentum leading to the successful prosecution of bigger/high profile cases.

### A8.2 Back Service Functions

At the back service functional level, Enforcement Division will:

# 8.2.1. Limit Risk of Leakage and Premature Disclosure of Cases

The report writing and documentation system of LACC will be restructured. Only one senior staff will have access to the final report, all investigation and other staff's access to the cybercrime lab will be restricted and control by one staff, and all

### Summary Strategies and Processes

- Adopt Evolutional Approach
- Limit Risks to Leakage of Cases
- Increase Operational Productivity
- Reflect, Study, Learn, Adjust, and Reiterate

documents will be protected in restricted electronic and non-electronic system by the staff who has access to the final report. Additionally, conveyance of documents between Enforcement and the BOC will be carried out by a single staff, all documents will be sealed, and a registry of documents movement will be prepared and utilized.

### 8.2.2. Increase Operational Productivity to Achieve Planned Outputs And Outcomes.

<sup>&</sup>lt;sup>4</sup> A "small win or Big Win" comprises "low and high profile" cases, usually determined by the venue (Circuit or Magisterial Court), person involved (major political figure or someone with a lower status), and the amount of money associated with the case. LACC will focus more on Small Win cases to achieve quick success and then scale-up to big wins, gradually but steadily.

The Enforcement Division will increase its staffing level if its workload increases beyond the capacity of the existing staff and persist for sometimes. If procurement of additional staff is not possible due to funding limitation, the Division, with the technical support of the Human Resource Unit, will alternatively broaden the job responsibilities of staff, improve working conditions, and promote cross-departmental teamwork. Meanwhile, as part of the Division's Continuing Professional Development Program, refresher and advanced training will be conducted covering topics such as: facts-finding, support of the discovery, preparation, and management of evidence. Other topics could include: data mining, fraud detection, discovering and recovering hidden assets. However, specific training needs will be established through a capacity needs assessment exercise.

### 8.2.3. Reflect, Study, Learn, Adjust and Reiterate

Finally, problem-solving sessions will be carried out regularly, utilizing approaches such as the Problem-Driven Iterative Adaptation (PDIA) <sup>5</sup> and action-learning to review progress, share experience, define emerging issues, and implement identified solutions. The proposed Research and Technical Section will support this effort.

### A9 Actors and Agents of Change

The major stakeholders groups of the Enforcement Division will work with include:

### 9.1. Enhance cooperation and collaboration to prevent fraud.

Enhance cooperation and collaboration with General Audit Commission (GAC), Internal Audit Agency (IAA), and Liberia Revenue Authority (LRA) in conducting investigations and sharing information to jointly prevent fraud, waste and abuse of government \_\_\_\_\_ resources.

### 9.2. Information sharing to aid investigation

LACC will collaborate with the Financial Intelligence Unit (FIU), Liberia Business Registry (LBR), Public Procurement Concession Commission (PPCC), Ministry Of Finance Development Planning (MFDP) to share information in order to prevent or aid in the investigation of corruption cases.

# **9.3.** Further cooperation to prosecute corruption cases

LACC will continue to foster cooperation with the Liberia
National Police (LNP) of the Ministry of Justice (MOJ) to enforce and prevent
crime. Additionally, the Commission will also enhance collaboration with the courts to issue
writ of arrest, search and seizure and subpoena mandates.

### **B.** LEGAL DIVISION

<sup>&</sup>lt;sup>5</sup> PDIA or Problem-Driven Iterative Adaption is an approach based on the principle of solving problems by construction, deconstruction, sequencing, and iterating solutions.

# **BI Strategic Alignment**

At the national level, the interventions of Legal Division are aligned to pillars one, two and four of the Pro-Poor Agenda for Prosperity and Development (PAPD) and the strategic framework of LACC as follows:

- 1. Power to the People— To reduce developmental inequalities so the people can prosper
- **2.** The Economy and Jobs— Economic stability and job creation through effective resource mobilization and prudent management of economic inclusion.
- **3. Governance and Transparency**—An inclusive and accountable public sector for shared prosperity and sustainable development.

At the organizational level, the interventions to be carried out by the Legal & Prosecution Division are aligned to the following mission objectives of LACC:

- 1.1. Provide a governmental and non-governmental framework for the effective participation, coordination, monitoring, evaluation and review of anti-corruption laws and activities in the fight against corruption; and
- 1.2. Break the culture of impunity that has engulfed Liberia by ensuring that persons convicted of corruption be punished fairly in keeping with the rule of law in Liberia's fight against corruption.

# B2 Performance Baseline (based on past strategic plan-2014 to 2017)

- 2.1. A total of seven cases or 24.13 percent of the total 29 cases investigated, concluded, and forwarded were being prosecuted and a whistle blower and Witness Protection bill was drafted and submitted to the former President (Madam Ellen Johnson Sirleaf) for onward submission to the national Legislature.
- 2.2. Five individuals pleaded guilty to corruption charges and made restitution of funds but no conviction had been made at the Supreme Court of cases that were earlier convicted at Circuit Courts.

# **B3 Situation Overview, Outcome, and Strategic Objectives**

Financial Accountability is of utmost importance for any national reform and development process. Africa Union/United Nations report estimates that upwards of USD50 billion are misappropriated annually in every region of the African continent due in large part to misuse of public funds and resources. In Liberia, the lack of adequate political will to fight corrupt practices manifests in many ways, including but not limited to: (i) concerted attack on anti-graft institutions, including the LACC, by officials and their agents whenever they are accused of corruption; (ii) the lack of proper and adequate administrative actions against officials accused of or involved in corruption; (iii) unresolved corruption cases; (iv) unending corruption investigations; (v) failure to enact stronger laws that will strengthen current weak anti-corruption legislations, despite submissions and recommendations from the LACC; and (vi) inadequate financial and administrative support for anti-corruption institutions.

Since the LACC was established, the Commission had endeavoured to prosecute investigated and concluded cases to deter and prosecute corruption, promote accountability, assist in reducing

development inequalities and promote economic development. Meanwhile, the Commission's efforts had been challenged by a number of operational challenges. One of the major issues seemingly stalling the effective prosecution of corruption cases by LACC's Legal Division is the limited legal framework of LACC. The legal framework and independence of LACC is limited because the Commission does not have direct prosecutorial power. Meanwhile, to mitigate this situation in the interim while the Commission endeavours to secure adequate legal framework, LACC had been fostering partnership with the Ministry of Justice but such an effort is yet striving. Complicating the limited legal framework situation of the Commission is insufficiency of resources to prosecute existing cases. While there is much demand for the prosecution of corruption cases in Liberia, there tends to exist limited external funding opportunities because existing funding seem to not prioritize the prosecution of corruption cases and budget allocated to the Legal Division is inadequate to finance operational costs. The fact that LACC had received a total of 240 cases, investigated and concluded a noticeable 29 cases or 12.08 percent and had prosecuted seven or 24.13 percent of the concluded cases emphatically mirrors this situation.

In addition to policy/strategic challenges, the Division is also faced with functional constraints. At the internal operating environment of LACC, the Legal Division's communication system is not guided by formal procedures. Additionally, staff and operational planning of the Division is inadequate. This situation tends to exist because Legal Division appears to not have a mix of skills that include HR and planning.

To address these challenges and scale-up existing gains, the LACC through its Legal Division will:

**PROSECUTE AND DETER ACTS OF CORRUPTION:** Modify the legal framework of LACC with attention to: enactment of laws for direct prosecutorial power and the establishment of specialised court; prosecute increased number of corruption cases, mainly systemic corruption in service-intensive, revenues/resource-based, and regulatory-driven ministries, agencies, and commissions (MACs) and recover assets/proceeds from acts of corruption to promote an accountable public sector and reduce development inequalities.

#### **B4 Outcome**

At least 30 percent of all investigated and concluded cases prosecuted and judgement rendered by judges/the Supreme Court of Liberia by November 2024.

#### **B5 Strategic Objectives**

5.1. Increase the number of prosecuted cases to 30 or 30 percent of all concluded cases by improving the internal communication systems of LACC, strengthening collaboration with MOJ, and recruiting additional five lawyers on "need basis" by October 2021.

# **B6 Key Performance Indicators:**

The performance of the Legal Division will be measured by the number of cases the Division had successfully prosecuted (i.e. the number of judgment rendered by the Court (Magisterial, Circuit, and Supreme) in favour of LACC against the total number of cases concluded. The proportion of cases won and cases loss will be tracked as well. Another measure standard for Legal Division will be the Division's performance by the total value of asset recovered as a result of cases prosecuted. To actualize the above outcome and objectives the following interventions will be carried out:

#### **B7** Intervention Matrix

**Table 13: Legal Division Intervention Matrix** 

NO	INTERVENTIONS	TIM	ELINE
	INTERVENTIONS	Begins	Ends
Front-	Office Functions		
Extern	al Organizational Strengthening (cooperation, collaboration, et	c.)	
<b>B</b> B7.1	Develop and implement a partnership and lobbying strategy to guide the Division's engagement with MOJ and other relevant partners.	Oct 2019	April 2022
Modifie	cation of Legal Framework and Prosecution of Cases		
B7.2	Implement in-depth analysis of the court management system and review existing anti-corruption laws and policies to identify bottlenecks and advance recommendations for speedy trial of corruption cases, asset tracing, seizure and recovery.	October 2019	March 2020
B7.3	Enhance the statutory mandate of LACC by working to	Nov.	March
	modify the legal framework of the Commission to include direct prosecutorial power and establishment of a specialised corruption court.	2019	2024
B7.4	Strengthen anti-corruption existing policies, framework and	Feb 2020	Oct. Oct.
	instruments such as the Code of Conduct, statute of limitation, and establish laws on illicit enrichment.		2024
Back (	Office Functions	<u>'</u>	
Interna	al Organizational Strengthening and Operational Productivity		
B7.5	Develop a system to track movement of investigation	Oct	December
	reports between LACC and the MOJ and enhance other internal operational processes.	2019	2019
B7.6	Integrate the expansion of the operations of the Legal Division in all regions of Liberia as part of LACC's decentralization plan.	Jan 2019	August 2023
B7.7	Adequately plan the Division's existing human resources and increase its staff level proportional to its workload, utilizing on-call or need-basis recruitment approach to achieve the prosecution at least 30% of all investigated and concluded cases.	Sept 2019	July 2020
B7.8	Enhance the logistical capacity of the Division to facilitate its operational needs.	October 2019	March 2020
B7.9	Conduct 10 performance review and working sessions at	Oct.	December
	the divisional level and carry out two study visits targeting two highly performing anti-corruption institutions with a view of assimilating existing and best practices applicable to Liberia's context.	2019	2024

# **B8 Key Success Factors**

The achievement of the above interventions is based on the following conditions; that:

#### **B8.1 Front Service Functions**

- 8.1.1. there exists the necessary legal environment for speedy trial of corruption cases and the political will to fight corruption; and
- 8.1.2. the external organizational processes between the Commission and the Ministry of Justice (MoJ) as well other relevant partners are improved.

#### **B8.2 Back Service Functions**

LACC will seek to ensure the following:

- 8.2.1. the internal processes within LACC (communication and movement of for prosecution or being prosecuted, particularly between the Legal Division and the BoC are enhanced; and
- 8.2.2. The conditions for increased operational performance of the Legal Division are strengthened.

# **B9 Strategies and Processes of Change**

#### **B9.1 Front Services Functions**

LACC will achieve the desired goal by:

 Furthering Cooperation, Building Additional Partnerships and Securing Adequate Political Will.

The LACC will continue to further cooperation with MACs such as MOJ, and overall the judiciary, the Executive, and Legislative branches of the Government aimed at establishing the legal conditions for speedy trial of corruption cases in keeping with a developed partnership strategy. The partnership strategy will mapped-out all relevant actors, determine requirement to advance cooperation and concerted actions by employing techniques such Stakeholder Analysis and "Triple A" (Acceptance, Authorization and Ability) analysis.

#### **B9.2 Back Service Functions**

## At the back service functional level, LACC will:

# 9.2.1. Improve Operational Productivity to Achieve Planned Outputs and Outcomes.

LACC's Legal Division will procure the services of additional lawyers on need-basis, proportional to an increase in the work load of the Division.

# Summary Strategies and Processes

- •Further Cooperation, Build Additional Partnerships, and Secure Adequate Political Will
- •Improve Operational Productivity
- •Strengthen Cooperation
- •Limit Risk of Leakage and Premature Disclosure of Cases
- •Reflect, Study, Learn, Adjust, and Reiterate

Meanwhile, the HR Unit of LACC will support the Legal Division to adequately plan its existing staffing system, implement established staff performance management and continuing professional development (CPD) models to prosecute at least 30 percent of all investigated and concluded cases. On the other hand, the Commission will provide logistical resources and other operational needs of the Legal Division to enhance it productivity.

# 9.2.2. Further Strengthen Cooperation Among the Legal, Investigation, And E&P Divisions

The BOC will facilitate cross-divisional team work among the Legal, Enforcement, and E&P divisions to collaborate on common efforts, share resources, enhance and sustain the internal core competence profile of the Commission to deliver on its mandate. Cohesion among Legal and other divisions, among staff in legal and work teams will be promoted.

# 9.2.3. Limit Risk of Leakage and Premature Disclosure of Cases

All files and reports regarding cases being prosecuted will be managed by one person, preferably the head of the Division. Access to confidential documents in the division will be restricted and conveyance of documents between the Legal Division, Investigation and the BOC will be carried out by a single staff. All confidential documents to be conveyed to a division will be sealed and a registry of documents movement will be prepared and utilized.

# 9.2.4. Reflect, Study, Learn, Adjust and Reiterate.

Problem-solving work sessions will be carried out regularly, utilizing approaches such as the Problem-Driven Iterative Adaptation (PDIA) <sup>6</sup> and action-learning. This activity may comprise: progress review, experience sharing, defining of emerging issues, and developing solutions for iteration. The Research and Technical section will support this effort.

# **B9** Actors and Agents of Change

The Legal Division will foster partnership and collaboration with major stakeholders as follows:

 LNP will assist LACC in the prosecution of corruption cases by providing evidence/ witnesses; enforcement/execution of lawful orders;

 LACC will work with the National Legislature to enact appropriate legislations to enhance prosecutions of corruption cases and the commission will as well provide expert opinions during legislative enactment of Anti-corruption laws;

 The FIU will share information with LACC and will assist with appropriate evidence for prosecution;

 GAC will continue to assist in the prosecution of corruption cases by providing appropriate evidence for prosecution; and

■ The Judiciary will provide conducive environment for prosecution of corruption cases to speedily adjudicate corruption cases.

sident

<sup>&</sup>lt;sup>6</sup> PDIA or Problem-Driven Iterative Adaption is an approach based on the principle of solving problems by construction, deconstruction, sequencing, and iterating solutions.

# C. EDUCATION AND PREVENTION DIVISION

# CI Strategic Alignment

At the national level, the interventions of Education and Prevention Division are aligned to pillars three and four of the Pro-Poor Agenda for Prosperity and Development (PAPD) and the strategic framework of LACC as follows:

- 1. Sustaining the Peace—Promoting a cohesive society for sustainable development
- **2.** Governance and Transparency—an inclusive and accountable public sector for shared prosperity and sustainable development.

At the organizational level, the Education and Prevention division's interventions are aligned to LACC's strategic direction as follows:

- I.I.Promote the full and effective participation of all Liberians and other stakeholders in the fight against corruption;
- 1.2. Engage and work with the citizens of Liberia, the government, business and national and international organizations in the fight against corruption; and
- 1.3. Promote public awareness related to the direct and indirect cost of corruption to the Liberian people and the role of each citizen in the fight against corruption.

# C2 Performance Baseline (based on past plan-2014 to 2017)

- 2.1. Five corruption risk assessments were carried out in five public institutions; and
- 2.2.BCC public education activities were implemented in 50 schools in Montserrado County; 100 public outreach sessions conducted in market settings; and 20 BCC bill boards were installed.
- 2.3. Nineteen Student Integrity Clubs (SICs) were established in 19 of the 50 public schools covered in Montserrado County.

## C3 Situation Overview, Outcome, and Strategic Objectives

At the macro level, the general view is that the public detests corruption but, at the micro level, they ignore acts of corruption performed by private individuals in their daily lives. More appallingly, citizens often launch concerted attacks on anti-graft institutions, including the LACC when public officials are accused of corruption. In respond to this, LACC's E&P had implemented a number of corruption prevention activities in public institutions and communities, including the establishment of corruption prevention systems, implementation of public awareness and education, among others. While these interventions yield fruition, only lower level outcome had been achieved and progress made cannot be linked to higher level outcomes such as reduction in systemic corruption, an appreciable participation of the public, including CSOs in the fight against corruption, and increased positive perception of the public regarding LACC's ability to lead the fight against corruption.

Liberia Anti-Corruption Commission Strategic Plan (2019-2024)

At the micro level, the E&P Division had been largely resource-constrained. Human and non-human resources are limited compared to the demands E&P faces. Particularly, the Division is challenged with limited or no internal organizational processes, guidelines for the implementation of ABC campaigns. Other challenges include work overload of a few staff as a result of inadequate HR planning and or limited skills set of staff that are seemingly under loaded, and budgetary limitation.

In view of the above, the Education and Prevention Division will:

**PREVENT ACTS OF CORRUPTION:** Establish and work in collaboration with relevant stakeholders to promote adherence to systems for the prevention of systemic corruption in MACs; monitor and draw attention to violations of laws and regulations (mainly through annual performance report) and conduct public education targeting at least 1.5 million Liberians to promote economic prosperity, effective economic inclusion, and prevent social and civil tensions.

#### C4 Outcomes

- 4.1. At least 40 percent of MACs, particularly service-intensive, revenue-based, and regulatory-driven institutions have effective corruption prevention systems and 30 percent MACs decentralised their prevention systems; and
- 4.2. at least 1.5 million of the Liberian population are informed about corruption prevention, 250 CSOs, including community, school, and faith-based groups are engaged in the fight against corruption.

## **C5 Strategic Objectives**

- 5.1. Increase to 40 percent the number of MACs benefiting from functional corruption prevention systems by June 2024;
- 5.2. Increase the number of public officials complying with the Asset Declaration regulations published by LACC to at least 70 percent by November 2021; and
- 5.3. Heighten public confidence in LACC and secure the cooperation of the public to prevent corruption through attitudinal change campaign targeting 1.5 million people by February 2024.

#### **C6 Performance Indicators:**

The performance of the Education and Prevention Division will be measured by the number of functional corruption prevention systems in MACs and the number of CSOs, FBOs, and other groups integrating anti-corruption in their core functions and participating in joint anti-corruption initiatives. Additionally, the participation of citizens in the fight against corruption will be tracked by measuring the number of citizens participating in public educational activities such as ABC campaign to reduce acts of corruption.

To realize the above outcomes and objectives the following interventions will be carried out: **C7.** Implementation Matrix

## Table 14: Education and Prevention Division Intervention Matrix

NO	INTERVENTIONS	TIME	LINE
		Begins	Ends
Front-	Office Functions		
Corru	ption Prevention in MACs		
C7.1	In collaboration with LACC's Enforcement Division and the GAC, conduct corruption risk assessment and establish corruption prevention systems in 40% of MACs.	Oct.11 2019	Nov. 2023
Comr	munity-driven Awareness, Mobilization, and Actions		
C7.2	Work with anti-graft institutions and CSOs to jointly plan and implement advocacy measures for the enactment of laws to give LACC direct prosecutorial power and for the establishment of specialised court to prosecute corruption cases.	Feb 2020	Nov. 2021
C7.3	Support 250 CSOs, FBOs, CBOs, School-based organizations to implement at least 8 large-scale and 20 small-scale community-driven ABC campaigns focusing on systemic corruption at the family and community-levels in keeping with the developed guidelines.	June 2020	Nov. 2023
C7.4	Review and improve the performance of the current SICs, establish additional 20 SICs in secondary and tertiary schools, and replicate the model in 10 CBOs, Workers' Unions as well as FBOs.	Oct. 2019	June 2022
Asset	Declaration and Wealth Creation Monitoring		
C7.5	Monitor compliance of public officials (at least 70%) to LACC's Asset, Declaration, and Verification regime.	Dec 2019	Nov. 2022
C7.6	Monitor the asset acquisition activities of public officials and furnish the Enforcement Division upon detection of illicit enrichment.	April 2020	Nov. 2024
Back (	Office Functions		
Interr	nal Organizational Strengthening and Operational Product	ivity	
C7.7	Conduct a baseline and end-line studies on public perception of corruption targeting the general public and MACs.	March 2020	Sept. 2020
C7.8	Develop and implement simplified business processes/SOP on: planning, execution, reporting, internal communication, as well guidelines on conducting ABC.	Oct. 2019	Mar 2020
C7.9	Conduct 10 performance review and working sessions at the divisional level and carry out two study visits targeting two highly performing anti-corruption institutions with a view of assimilating existing and best practices applicable to Liberia's context.	Dec 2019	Dec 2024

# **C7 Key Success Factors**

At least the following conditions should be established to enable the Commission achieve the above outcomes; that LACC:

#### **C7.1 Front Service Functions**

- 7.1.1. Secures good will of MACs to effectively establish, implement, monitor prevention systems, as well as implement administrative sanctions/measures;
- 7.1.2. Anti-corruption awareness activities are driven by communities and CSOs, guided by guidelines designed and targeted at the core personality construct (attitudes, beliefs, and values- and behaviour/actions) of the public; and
- 7.1.3. Demonstrates success of its work and communicates high-impact results to the public to increase public confidence and secure public cooperation.

## **C7.2 Back Service Functions**

- 7.2.1. Develops ABC guidelines targeting the core personality construct of the public and aimed at securing public cooperation in the fight against corruption; and
- 7.2.2. Assesses, defines, and implements staff performance solution needs to close gap between existing skills set and desired competency to implement planned interventions.

# **C8 Strategies and Processes of Change**

#### **C8.1 Front Service Functions**

At the macro level, E&P will commit a lion share of its efforts in reversing the trend of systemic corruption in service-intensive, revenue-rich, and regulatory-based MACs.

# 8.1. Establish and Facilitate the Effective Functioning of Prevention Systems

Corruption prevention systems will be established with a focus on broader issues of "...weak adherence to established regulations and legal requirements such as the public procurement laws and regulations, inadequate political and administrative oversight of public institutions, political decisions that do not consider available resources, unwillingness to hold accountable those who are responsible for the loss of public funds and/or misuse of public resources". Meanwhile, in collaboration with PPCC, E&P will also seek to be involved (as observers) in the bidding processes of major government contracts to deter and prevent possible acts of corruption.

# 8.2. Remove Barriers to Cooperation and Encourage Good Will Of MACs.

LACC's BOC will seek to secure the cooperation of MACs as preintervention conditions for the conduct of corruption risk assessments and the implementation of established corruption prevention systems.

## Summary Strategies and Processes

- Effective Establishment and Functioning of Prevention Systems
- •Remove Barriers to Cooperation and Encourage Good Will
- Develop ABC Guidelines
- •Reflect, Study, Learn, Adjust, and Reiterate

## 8.3. Develop ABC Guidelines

At the micro level (community and family), LACC's E&P Division, with the support of the Commission's Research and Technical section, will develop guidelines for the implementation of

ABC campaigns. The ABC campaign guidelines will incorporate the five elements model of governance civic empowerment (awareness, mobilization, participation, organization, and action) and utilize social accountability approaches. Additionally, ABC messaging will be designed to affect the core personality construct (attitude, belief, values, and faith) of citizens.

#### **C8.2 Back Service Functions**

LACC will implement the following processes in order to achieve its outcomes.

# 8.2.1. Conduct Custom-Continuing Professional Development Program to Close Performance Gaps

LACC's E&P will be supported by the HR Unit to assess, define, and implement staff performance solution needs to close performance gap between existing skills set of staff and the desired competency of the Division. To this effect, the training needs assessment exercise will be competence-based and the internal training program will seek to establish a viable technical system and a profile of core, complementary, and supplementary human resource competencies for the Division.

# 8.2.2. Reflect, Study, Learn, Adjust and Reiterate.

Problem-solving work sessions will be carried out regularly, utilizing approaches such as the Problem-Driven Iterative Adaptation (PDIA) <sup>7</sup> and action-learning. This activity may comprise: progress review, experience sharing, defining of emerging issues, and developing solutions for iteration. The Research and Technical section will support this effort.

## **C9** Actors and Agents of Change

LACC's Education and Prevention Division's major stakeholders and partners are: Liberia Extractive Industry Transparency Industry (LEITI), United Nations Development Programme (UNDP), African Development Bank (ADB), Student Bodies, Civil Society Organizations (CSOs), including Faith-Based Organizations (FBOs).

# 9.1. Secure the Cooperation of Pressure Groups

The cooperation of FBOs, CSOs, and communities will be secured to undertake corruption prevention campaigns.

# 9.2. Establish/Promote Strategic Partnerships for Technical Support and Funding

LACC will increase collaboration and enhance partnership with the World Bank, SIDI, EU, AfDB, UNDP, among others for technical support and funding.

# D. ADMINISTRATION

ADB

E & P
Stakeholders

GoL

Other
Partners

<sup>&</sup>lt;sup>7</sup> PDIA or Problem-Driven Iterative Adaption is an approach based on the principle of solving problems by construction, deconstruction, sequencing, and iterating solutions.

# **DIVISION**

# **DI Strategic Alignment**

At the national level, the interventions of Education and Prevention Division are aligned to all the four pillars of the Pro-Poor Agenda for Prosperity and Development (PAPD) and the strategic framework of LACC as follows:

- 1. Power to the People— To reduce developmental inequalities so the people can prosper
- **2.** The Economy and Jobs— Economic stability and job creation through effective resource mobilization and prudent management of economic inclusion.
- 3. Sustaining the Peace—Promoting a cohesive society for sustainable development
- **4. Governance and Transparency**—An inclusive and accountable public sector for shared prosperity and sustainable development.

At the organizational level, the interventions of Administration are aligned to LACC's strategic direction as follow:

- Ensure a coordinated, consistent, effective, realistic, and sustained fight against corruption;
- Promote transparency, accountability, integrity and access to information at all levels of society in the fight against corruption; and
- Ensure effective monitoring of the fight against corruption through oversight bodies and mechanisms that involve the consistent participation of civil society.

# D2 Performance Baseline (baseline on strategic plan-2014 to 2017)

- 2.1.LACC's Administration Division secured resources and supported the Commission's front service divisions, including Enforcement, Legal, and E&P to investigate and conclude 29 cases, prosecute six corruption cases, and conduct various BCC activities; and
- 2.2. Previously, the Administration Division supported front service divisions to increase the number of cases prosecuted from zero (2009- to 2013) to six (2014 and 2017).

# D3 Situational Overview, Outcome, and Strategic Objectives

At the macro level, LACC had initiated partnership with OSIWA, UNDP, the World Bank, SIDA, EU, AfDB, among other international organizations. LACC's partnership formed with these organizations resulted into the funding of a few programs/projects, including UNDP-Supported Strengthening Accountancy Oversight and Participation project (STAOP); OSIWA-funded Anti-Corruption Day celebration, BCC Bill boards, and communication strategy development; World Bank-supported Transparency and Accountability project, among others. Nationally, the Commission is a part of the National Integrity Forum (NIF), had formed functional partnership with key institutions such as Liberia Revenue Authority (LRA), Internal Audit Agency (IAA), Financial Intelligence Unit (FIU) and continues to foster cooperation with the Ministry of Justice. While partnerships with some of these institutions are effectively working, negotiation and discussion on more effective working relationships with others are ongoing. For example, the Commission is currently engaged in discussions with the Ministry of Justice on ways to strengthen collaboration for

more effective concerted actions that would result in the prosecution of an increased number of cases.

At the internal operational environment of LACC, the Commission's Administration Division is challenged by: insufficient funding and logistics to resource operational activities of front service divisions. Regarding policies, strategies, processes, plans, systems as well as other internal organizational performance factors, the Commission does not have a human resource strategy and policy. Additionally, LACC's asset management policy and system is inadequate and its operational planning systems need to be enhanced, and the Commission's management information systems needs further strengthening. While LACC is observed to have a unique human capital advantage (HCA) or individual staff, it tends to lack the desired human resource advantage (HRA) or collective organizational competence because the Commission's existing socio-technical systems (i.e. motivational systems, cross-division team work, etc.) are limited. On the other hand, though the organizational structure of LACC tends to be "divisionized" and modelled as a specialised structure, LACC lacks a research and technical section.

To address the above situation, overall, LACC Administration (and BOC) will:

**PROVIDE LEADERSHIP TO REDUCE CORRUPTION:** Increase the overall operational effectiveness of the LACC and diversify its resource base to construct an office complex and expand its services to all regions of Liberia and to adequately support operational activities of front-service divisions through strengthening of the Commission's internal organizational processes, enhancing cost leadership, establishing a differentiated and sustained pool of resources (various streams of funding, competence and productivity-based HR and relevant non-human performance systems) to reduce acts of corruption.

#### **D4 Outcome**

 The frontline service divisions and all functions of LACC received full support to operationalize their plans and service interventions, assist those divisions to be mutual enforce another and focus their activities on higher level goals (i.e. number of cases concluded, cases prosecuted, and prevention systems established and functioning).

# **D5 Strategic Objectives**

- **5.1.** Improve the organizational performance of LACC by increasing HR productivity, management accountancy, improving operational and business processes, enhancing the communications and technological capacities of the Commission by June 2024;
- **5.2.** Improve LACC's service coverage by decentralizing the Commission in four regions of Liberia and constructing Office Complex by October 2023; and
- **5.3.** Establish the conditions for speedy trial of corruption cases by securing direct prosecutorial power and establishing a specialised anti-corruption court by June 2021.

#### **D6.** Performance Indicators:

The extent to which the Administration Division had established the relevant resource pool for the Commission, compared to the projected resources (human/technical, financial, material, etc.)

required to achieve the Strategic Plan goals will be measured. Higher level outcome and results achieved by each Division and staff will be tracked. LACC will utilize an input-output ratio of measure to compare the total remuneration package (salary and benefits) to the actual productivity of staff. The effectiveness of use of non-human resources will be measured by quantity or monetary value of resources expended against actual results achieved.

To actualize the above outcomes and objectives the following interventions will be carried out:

#### **D7** Intervention Matrix

**Table 15: Administration Division Intervention Matrix** 

NO	INTERVENTIONS	TIME	LINE		
.,,	INTERVENTIONS	Begins	Ends		
	nal Organizational Strengthening (cooperation, collaborate alition)	tion, coor	dination,		
D7.I	Establish and staff a Research and Technical function/section to support operation and programme research, monitoring and evaluation and all technical activities of the commission.	Nov I, 2019	Aug 30, 2020		
D7.2	Develop and implement a partnership development strategy to guide all partnership building and engagement efforts with stakeholders.  Foster cooperation among divisions of LACC, promote cross-				
D7.3	Foster cooperation among divisions of LACC, promote cross-divisional team work utilizing effective organizational culture building and joint task teams.	Nov 2019	Dec. 2020		
D7.4	Conduct prospect research, identify funding options, and develop and sell winning grant proposals to resource the activities of the Division and support frontline divisions implement planned programs.	Oct 2019	Nov. 2023		
D7.5	Expand the offices/services of LACC in all regions of Liberia.	Aug 2020	Dec. 2021		
D7.6	Construction of an Office Complex for LACC to completion level.	April 2020	April 2024		
ADMII	NISTRATION, REASEARCH/MEAL & TECHNICAL FUNCTION	IS			
	onal Specialism (HR, Operational Systems, Research, Program L, etc.)	mme Deve	lopment,		
D7.7	Implement two work and motion study, job satisfaction, and training needs assessments.	Sept. 2019	Dec. 2019		
D7.8	Based on the above assessments carried out, determine and implement the socio-technical systems and logistical requirements for improved performance of all Divisions, teams, and key positions of LACC.				

NO	INTERVENTIONS	TIME	LINE
D7.9	Plan and implement an effective Continuing Professional Development programme based on the established sociotechnical and logistical requirements and other growth needs.	Oct. 2019	Dec. 2024
D7.10	Support the HR function to modify/scale-up the existing PME module, employing motivational packages and high competence model.	June 2020	Sept 2020
Financ	e, Logistics, ICT, procurement, internal coornentation, etc.) Functions	dination,	policy
implen	mentation, etc.) Functions		
D7.11	Establish a special account to deposit proceeds from assets investigation/recovery, and forfeiture processes.	Oct 2019	Sept 2020
D7.12	Develop/modify and satisfactorily implement assets mgt. policy & systems.	May 2020	AugDec. 2020
D7.13	Develop & implement communication strategy to manage and dissimilate information regarding the works of LACC to internal and external stakeholders, mainly the press and to the general public.	Nov 2019	Nov. 2024
D7.14	Review and align internal coordination mechanism such as performance update/general staff meeting, reporting system, among others to the strategic plan's key performance areas.	Dec. 2019	Feb 2020
D7.15	Coordinate with the proposed Research & Technical section to review and track the performance of MAPs quarterly and the strategic plan annually.	Dec 2019	Dec. 2022
D7.16	Conduct 10 performance reviews and working sessions at the divisional level and carry out two study visits targeting two highly performing anti-corruption institutions with a view of assimilating existing and best practices applicable to Liberia's context.	Dec 2019	Dec 2024

# **D8 Key Success Factors**

The successful accomplishment of the planned activities is contingent on the following conditions; that LACC:

#### **D8.1 Front Service Functions**

8.1.1. Cultivates partnership with and secure grants, technical resources, and political will to resource planned activities of the Commission.

# **D8.2 Back Service Functions**

8.2.1. Adequately creates the internal work atmosphere and climate and secure staff commitment for the implementation of increased performance improvement programs; and interventions.

# **D9 Strategies and Processes of Change**

#### **Back Office Functions**

LACC will further or more effectively:

# 9.1. Increase Outputs/Performance, and Reduce Spending.

LACC's Body of Commission will support the Administration Division to implement reengineering processes with a focus on

Summary Strategies and Processes

- •Adopt Appropiate Work Culture, Implement BPR, and Increase Productivity
- Establish Research and Technical Function
- Enhance Leadership Style, Performance Mgt., & Staff Productivity
- Streamline and Maximize Use of Material/Logistical Resources
- Conduct Prospect Research, Plan, Develop, and Deliver Grant Proposals
- •Reflect, Study, Learn, Adjust, and Reiterate

strengthening the human and non-human performance management systems of LACC. To this effect, HR programming practices will be scaled-up with a focus on transforming the unique human capital advantage (HCA) of LACC into a viable Human Resource Advantage (HRA) to enable the Commission develops and sustains a differentiated core, supplementary, and complementary competence/human resource base. Additionally, the existing performance management system of LACC will be migrated to an input-based system, ensuring that staff incentives and labour hours are matched with efforts expended and results achieved. Such a modified system will be directly linked to higher level outcomes such as cases investigated and concluded, cases prosecuted, and number of corruption prevention systems established and functioning. Regarding non-human systems, LACC's assets management system will be strengthened with a focus on tracking/monitoring of vehicle mileage, fuel consumption, and maintenance costs, among others.

The Commission will elevate the position of the HR Officer to Manager and support the HR function to modify/scale-up the existing PME module, employing motivational packages and high competence model. This elevation is due to the fact that LACC is a knowledge-intensive organization and creating a viable strategic human resource advantage will require scaling up the HR section from functional HR works to more strategic efforts. In this case, the new HR Manager will serve as advisor and specialist staff to the managers of all Divisions and to the BOC while at the same time manning functional HR activities.

# 9.2. Establish a Special Account to Deposit Proceeds from Assets Recovery and Forfeiture Process

LACC will establish a special account to deposit proceeds from assets recovery and forfeitures execution. Amounts raised over a period of time will be communicated to the public and LACC will encourage the Liberian Government to spend collected funds on tangible projects. This will serve as motivational incentive to the public to fight corruption.

#### 9.3. LACC Will Establish a Research and Technical Function (R&T)

LACC will establish an R&T function to implement operational and programme research, monitoring and evaluation, planning, programme development, proposals writing functions. LACC will, when and where necessary, hire a consultant on a part-time and or purchase-of-service contractual basis to support the proposed R&T section.

# 9.4. Continuously Enhance Managers Competence to Scale-Up Operational Effectiveness

LACC HR function will develop and implement a management development module as a part of the Commission's Continuing Professional Development programme. The module will focus on alignment of management and supervisor styles in keeping with staff individuality, conditions, and circumstances surrounding performance and the employ of higher performance management techniques. It will also focus on developing customized performance management systems in keeping with staff needs.

# 9.5. Reflect, Study, Learn, Adjust and Optimize the Efficiency, Effectiveness, and Performance of LACC Subsystems

At the end of every quarter, the Division will assess the practicality of LACC structure, systems, tools, culture, among others, ensuring that systems and structures are adequately aligned to the nature of activities of the Commission (form=functions)<sup>8</sup>. Similarly, the Administration Division will review its performance, share experience, identify and define emerging issues, and develop and implement solutions. The Research and Technical section will support this effort.

# **D9.2 Front Service Functions**

# 9.2.1. Conduct Prospect Research, Plan Projects/Programmes, and Develop and Deliver Proposals.

Fundraising activities will be conducted through a joint team effort. Meanwhile, the Body of Commissioners will endeavour to secure funds from potential donors, and will lobby for additional budgetary support to resource the plans of the Commission.

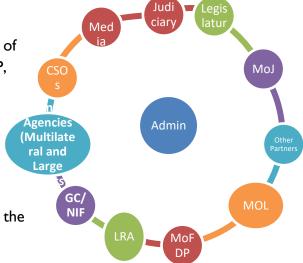
## 9.2.2. Improve the Public Image of LACC

Restoring the public image of LACC will be carried out by demonstrating and communicating successes/achievements resulting from the Commission's works. Particularly, gains made regarding investigated and concluded cases, implementing administrative sanctions and prosecuting corruption cases, including assets recovery and forfeiture will be communicated to the public regular.

# D10. Actors and Agents of Change

LACC's major strategic level partners are: Ministry of Justice, (MOJ), the Judiciary, the Legislature, MoFDP, Ministry of Labor, LRA, and Governance Commission (GC)/NIF all of which require higher level collaboration in strengthening transparency, integrity and accountability in service provision.

LACC will heighten its donor engagement approaches to ensure the 5-year strategic plan is adequately funded and successfully implemented in keeping with the resource mobilization strategy described in chapter six.



<sup>&</sup>lt;sup>8</sup> The "form=function" concept implies that policies, SOPs, etc. should be develop and implemented as tools to further the objectives or functions of the Commission, and not for administrative convenience or familiarity.

# CHAPTER FIVE: IMPLEMENTATION AND MANAGEMENT ARRANGEMENT

# 5.1. Operational Strategies, Plans, and Work Systems

The Strategic Plan will be implemented at two levels: the policy and functional. At the policy level, the BOC will oversee the implementation. The Body of Commissioners will facilitate the development of strategies and policies that are relevant to or aligned to all crucial aspects of LACC. These strategies/policies will include: a) resource mobilization strategy; b) competence and productivity-based HR strategy; c) partnership development and management strategy; d) Organization Culture and Development Policy; e) Operational Planning and Management SOPs; and f) Monitoring Evaluation Accountancy and Learning framework. Relevant systems, processes, and procedures will be developed consistent with the nature of the policies, strategies or frameworks. These strategy documents, along with relevant systems will be implemented at the level of the Divisions.

At functional level, the leadership of each division headed by the Division Manager will supervise the implementation. The plan will be implemented through a Management Action Plan (MAP) annually, broken down into quarterly operational plan (QOP), and monthly work plans. At the Divisional level, each Division will develop a Division Operation Plans (DOPs) which will feed into the MAP. The Division will develop their DOP as follows: I) lift up interventions from the Strategic Plan. For each intervention, determine the conditions surrounding that activity, what the activity seeks to change and how that change could be implemented (who should be the actors, what resources are needed, what technical tools, processes, and HR capacity are required) as described in the Strategic Analysis, Technical/Functional, and Implementation and Management aspects of the SP; 2) discern emerging issues, trends, opportunities, risks, among others to determine what to add, modify, or disregard; and 3) consider issues or renewed perspectives on situations that emerged during meetings, feedback from actions carried out, policy resolutions of the BOC, among others.

The preparation of Section Operation Plans (SeOPs) which will be informed by the DOP or feed into same will follow similar pattern. Based on the DOPs or SeOP, each staff, in keeping with their modified job description, will determine (with the guidance of the division manager) how he/she will contribute to the achievement of the DOP, the MAP and by extension to the achievement of the Strategic Plan. This process may not necessary be linear as issues that may feed into each plan may arise from various operational sources, including policy decisions and feedback from the BOC, emerging issues from the field, regularly meetings, among others. Meanwhile, in order to efficiently and effectively implement LACC's socio-technical system, the Commission will establish relevant cross-departmental work teams; promote cohesive work teams and healthy interpersonal relationships. LACC will also utilize cost-effective means to improve the quality of staff work life and adapt an organizational culture and arouse the relevant work climate that complements the Commission's productivity-based work systems. The Commission will employ a more flat matrixed organizational structure that minimizes hierarchical processes without reducing quality control and work conversion processes will be implemented. The below restructured work patterns may be employed.

# 5.2. Performance Management and Appraisal Systems

# 5.2.1. Coordination System

An output/performance-based reporting system focusing on the achievement of performance targets will be established and a monthly meeting will be convened to provide update on the level of achievements made compared to what was planned. Challenges encountered during the implementation period, lessons learned, way forward, emerging issues, among others will be considered during the regular coordination meeting. This coordination space will be moved from input and process-based reporting to an output, results, and outcome-based system. Following each meeting or after a quarter, an achievement analysis based on reports provided by each division will be carried out by the proposed Research and Technical Section under the guidance of the ED and Administration Division Manager. Performance data from this process will feed into a performance report and LACC's established management information system (MIS).

LACC's current PME system will be elevated from an input and process-based systems to results and outcome-based model, focusing on the bottom-line of the Commission's mandate and the key performance areas of the SP. On the other hand, under LACC's modified control system, the budget planning and control processes will not be carried out independent of Division heads and or of staff manning very important performance variables such as programme, human resources, asset, management, etc. of the Commission.

# 5.2.2. Performance Appraisal

Based on the DOP, each staff, in keeping with their modified job description, will determine (with the guidance of the division manager) how he/she will contribute to the achievement of the DOP, the MAP and by extension to the achievement of the Strategic Plan. The performance of staff will be followed-through by the HR and Administration heads through the Division managers. Meanwhile, every Division will implement the HRM strategy and systems at the level of their division with the advisory support of the HR Section. Staff performance evaluation will be carried out on the basis of staff performance plan. LACC's staff performance appraisal system will be revised by the HR section in keeping with the performance needs of LACC and the revised Performance Management and Evaluation system. The appraisal system may comprise components such as self-evaluation, measuring staff productivity, identifying training needs and conditions inhabiting performance.

# 5.3. Monitoring, Evaluation, Accountability, and Learning

Performance indicators will be tracked at three levels; namely: Outcomes, Objectives, and Intervention Outputs. Output indicators will be tracked weekly/monthly/quarterly, and will measure progress against Key Performance Indicators (kpi). At the Objectives and Outcomes level, monitoring will focus on gathering evidence of any early results, noting the immediate change in the condition being addressed in comparison with baselines established in the plan.

# CHAPTER SIX: RESOURCES REQUIREMENT AND MOBILIZATION

# **6.1 Resource Requirement**

The total amount required to implement this five year strategic plan, is US\$36,324,177. A summary itemization of this amount is below (Table 17), while the detailed version is appendixed to this plan.

**Table 17: Summary Resource Requirement Matrix** 

No	Program/	% of	Personnel	% of	Total	% of	Sources of F	unding
	Operations	Total Progs		Total Personnel		Total SP	LACC	Partners
Enf.	7,267,000	30.73	3,265,064	25.76	10,532,064	28.99	7,590,064	2,942,000
Legal	3,347,000	14.15	2,032,317	16.03	5,379,317	14.81	2,163,317	3,216,000
E&P	5,853,500	24.76	1,872,914	14.77	7,726,414	21.27	2,102,914	5,623,500
Admin	7,178,794	30.36	5,507,588	43.44	12,686,382	34,93	6,850,588	5,835,794
G/Total	23,646,294	100	12,677,883	99.99	36,324,177	100	18,706,883	17,617,294
Percenta	ge Distribution	51.50	48.50					

# 6.2 Resource Mobilization Strategy

# 6.2.1 Business Case for Increased Support from GoL

The Commission will an overall resource mobilization strategy. Based on the strategy, LACC will develop and present at various engagements a strong business case describing the situation of corruption in Liberia, achievements LACC had made, various challenges in implementing the mandate of LACC, the need for increased budgetary allocation from the Government, and benefits to be gained by the Government and people of Liberia should the requested support be acquired.

# **6.2.2 Development Partners' Support**

LACC will continue to engage development partners as source of funding some of its programmes and activities.

## 6.2.3 Partnering with Stakeholders

The Liberia Anti-Corruption Commission will map-out potential donors, following which the Commission will cultivate partnership with those organizations to gain funding and collaboration opportunities.

# **APPENDIX I**

#### A. IMPLEMENTATION PLAN

Code	Interventions including Expected Results		Indicators	Lead	Timeframe					
Couc	targets	Expected results		Lead	19/20	20/21	21/22	22/23	23/24	

#### **PROGRAM DIVISION: ENFORCEMENT**

**OUTCOME:** The number of cases (mainly systemic corruption in MACs) investigated and concluded are at least 100 (including small wins or low profile cases or high profile cases).

**OBJECTIVES:** Increase the number of investigated and "high and low" profile concluded cases to 100 from July 2019 to June 2024; and Improve the human and operational capacities of the Division to investigate the targeted cases by June 2021. STANDARD

**PERFORMANCE INDICATORS (SPIs):** number of cases successfully prosecuted; proportion of cases investigated and concluded; number of cases leaked and use of the cybercrime lab.

ΑI	Cybercrime maintenance,	Lab maintained and effectively	Evidence gauged using the lab	Enf. staff & TA		
	data storage, and data	functioning; Investigation intelligence	and Frequency of cases			
	mining.	gathering is optimised and evidence	leakage.			
		gathered are secured and protected				
		from premature exposure				
A2	Establish offices/focal	At least 30% increase in number of	Number of cases concluded.	Enf. & Admin		
	points in all regions and	cases investigated and concluded.		Staff		
	scale-up performance.					
<b>A</b> 3	Support E&P's mapping-	Covert plan collects intelligence on	# of intelligence gathered	Lead: BOC		
	out exercise and use	key corruption control points on a		Support: Enf.		
	product from same for	roll-basis.		Staff, E&P, &		
	covert investigation					
	planning.					
<b>A</b> 4	Develop/finalize and	Operational performance optimized.	Number of SOP developed	TA, Enf. Staff,		
	implement SOPs.		and in use; and level of	BOC.		

Code	Interventions including	Expected Results		Indicators	Lead	Timeframe					
Code	targets	Expected Results			Leau	19/20	20/21	21/22	22/23	23/24	
			oper	rational proficiency.							
A5	Provide refresher and or advanced training	Staffs are committed to continuous learning and their performance continuously improved.		of increase in cases stigated and concluded terly.	Enf. Staff. TA, HR Staff,						
A6	I - I	Performance targets tracked; lessons learned and challenges implemented; emerging issues and best-fitted practices identified and implemented.	track ident	of targets and lessons ked; challenges resolved, tified best-fitted practices emented.	TA, Enf. & HR Staff						

#### **PROGRAM DIVISION: LEGAL**

**OUTCOME:** At least 30 percent of all investigated and concluded cases prosecuted and judgement rendered by judges/the Supreme Court of Liberia by November 2024.

**OBJECTIVES:** Increase the number of prosecuted cases to 30 or 30% of all concluded cases by improving the internal communication systems of LACC, strengthening collaboration with MOJ, and recruiting additional five lawyers on "need basis" by October 2021.

**SPIs:** Number of MOUs signed and functioning; number of cases successfully prosecuted; number of judgment rendered by the Court (Magisterial, Circuit, and Supreme); and total value of asset recovered as a result of cases prosecuted.

ВІ	Develop and implement a	Partnerships with MOJ and other	Number of MOUs	BOC & Legal		
	partnership and lobbying	partners established/improved and	signed; and # of joint			
	strategy	functioning result in increased	prosecutorial actions			
		number of cases prosecuted.	taken.			
B2	Implement in-depth analysis of	Bottlenecks to speedy trial of cases	Number of	Ex. LTA, R&T		
	the court management system	removed.	courts/counties	& Legal staff		
	and review existing anti-		participating; and			
	corruption laws		number of			
			recommendations made			

Code	Interventions including	Expected Results	Indicators	Lead		Т	imefran	ne	
Code	targets	•		Leau	19/20	20/21	21/22	22/23	23/24
В3	Modify LACC's legal framework, prepare and submit additional bills for the empowerment of LACC for direct prosecutorial power, establishment of specialised court, among others.	and corruption/economic crime cases are expeditiously prosecute corruption cases.	Number of acts passed; and number of cases prosecuted under the new instrument.	BOC and Legal					
B4	Strengthen anti-corruption existing policies, framework and instruments such as the Code of Conduct	framework, statue, frameworks	% of increase in cases prosecuted.	BOC and Legal					
B5	Develop a document movement system	Internal and external communication systems optimized; pre-prosecutorial processes effective and efficient; timely retrieval of cases.	Reduction in pre- prosecutorial preparatory processes.	BOC and Legal					
В6	Integrate the expansion of the operations of the Legal Division	Prosecution of corruption cases geographical increased.	Proportion of cases prosecuted geographical and or across public sector.	BOC, Admin, & Legal					
В7	Adequately plan HR, 2 recruit lawyers on needs-basis to prosecute at least 30% of all investigated and concluded cases.	and concluded cases are prosecuted.	% of increase in cases prosecuted annually.	BOC, Legal, & HR					
В8	Enhance the logistical capacity of the Division to facilitate its operational needs.		Number of logistical resources provided	BOC, Admin; Legal					

Code	Interventions including	Expected Results	Indicators	Lead	Timeframe				
	targets	Expected Results		Leau	19/20	20/2 I	21/22	22/23	23/24
В9	Conduct 10 performance review	Performance targets tracked; lessons	# of targets and lessons	Legal; TA &					
	and carry out two study visits	learned and challenges implemented;	tracked; challenges	Admin/HR					
		emerging issues and best-fitted	resolved, identified	Staff					
		practices identified and implemented.	best-fitted practices						
			implemented.						

#### PROGRAM DIVISION: EDUCATION & PREVENTION

**OUTCOMES:** I) At least 40 percent of MACs, particularly service-intensive, revenue-based, and regulatory-driven institutions have effective corruption prevention systems and 30 percent MACs decentralised their prevention systems; and 2) at least 1.5 million of the Liberian population are informed about corruption prevention, 250 CSOs, including community, school, and faith-based groups are engaged in the fight against corruption.

**OBJECTIVES:** Increase to 40 percent the number of MACs benefiting from functional corruption prevention systems by June 2024; Increase the number of public officials complying with the Asset Declaration regulations published by LACC to at least 70 percent by November 2021; and Heighten public confidence in LACC and secure the cooperation of the public to prevent corruption through attitudinal change campaign targeting 1.5 million people by February 2024. **STANDARD PERFORMANCE INDICATORS:** # of functional corruption prevention systems in MACs; number of CSOs, FBOs, etc. integrating anti-corruption and participating in joint anti-corruption initiatives; and number of citizens participating in public educational activities.

CI	Conduct risk assessment and	, , ,	•	E&P Staff & TA			
	establish prevention systems	established and functional in 40% MACs	participating; # of				
	in 17 MACs		systems implemented				
C2	Work with anti-corruption	Massive peaceful public demonstrations	Number of	E&P Staff &			
	institutions to jointly plan and	targeting the Legislature and Executive	CSOs/persons	BOC-OC			
	implement advocacy	braches.	participating in joint				
	measures.		engagements				
C3	Support 250 to implement at	Collective participation and will to fight	Number of groups	E&P Staff & TA			
	1	corruption demonstrated by various	_ ·	Zoti otali ot i i			
	_	•					
	small-scale community-driven	groups.	campaigns conducted.				
	ABC campaigns.						

Code	Interventions including targets	Expected Results	Indicators	Lead	Timeframe					
Code					19/20	20/21	21/22	22/23	23/24	
C4	Review SICs, establish additional 20 SICs and replicate the modules in Churches, FBOs, etc.	School-level anti-corruption activities effective.	# of activities carried out by SICs and Number of additional clubs established	E&P Staff						
C5	Monitor compliance of public officials (at least 70%) to LACC's Asset, Declaration, and Verification regime.	At least 70% of public officials declared their assets.	% of public officials complying	E&P ADV Staff						
C6	Monitor the asset acquisition activities of public officials.	A minimum of 60% of those that declared their assets acquisition activities monitored.	# of public officials assets acquisition activities monitored.							
<b>C</b> 7	Implement 2 Corruption perception surveys.	Public perception of corruption quantified.	Number of sectors, counties, participating.	BOC, E&P, &						
C8	Develop and implement simplified SOPs on internal process and awareness.	E&P operational productivity improved and higher level results achieved.	# of SOPs developed; and number of SOPs implemented.	E&P, Admin, Staff, & TA						
	Conduct 10 performance	Performance targets tracked; lessons	# of targets and lessons	Legal; TA &						
	review and carry out two	learned and challenges implemented;	tracked; challenges	Admin/HR Staff						
	study visits	emerging issues and best-fitted	resolved, identified							
		practices identified and implemented.	best-fitted practices implemented.							

## **PROGRAM DIVISION: ADMINISTRATION**

**OUTCOME:** The frontline service divisions and all functions of LACC received full support to operationalize their plans and service interventions, assist those divisions to mutually enforce one another and focus their activities on higher level goals (i.e. number of cases concluded, cases prosecuted, and prevention systems established and functioning).

**OBJECTIVES:** Improve the organizational performance of LACC by increasing HR productivity, management accountancy, improving operational and business processes, enhancing the communications and technological capacities of the Commission by June 2024; Improve LACC's service coverage by decentralizing the Commission in four regions of Liberia and constructing Office Complex by October 2024; and Establish the conditions for speedy trial of corruption cases by securing

Code	Interventions including targets	Expected Results	Indicators	Load	Lead Timefran				ne		
Code		Expected Results		Lead	19/20	20/21	21/22	22/23	23/24		
-	irect prosecutorial power and establishing a specialised anti-corruption court by June 2021.										
	STANDARD PERFORMANCE INDICATORS: Relevant resource pool established; Higher level outcome and results (cases concluded and prosecuted; prevention										
	systems established and functioning, etc.) achieved by each Division and staff will be tracked; input-output ratio of staff productivity; quantity or monetary value of non-										
	numan resources expended lower than or equal to actual results.										
DI		Shared-vision of the SP communicated		BOC & Admin							
	the plan and a pictorial										
	version on flex banner and	document learned by all staff.	SP communication								
	communicate same internally		session; and # of								
	and externally.		partners receiving SP								
			package.								
D2	Establish a Research and	' '	Skills set of staff	BOC, Admin							
	Technical function/section and	increased	manning the technical								
	Task/Project Team;		functions; and								
			productivity outputs of								
			R&T (# of TA								
D2	<b>6</b> 1 1 1 1 1	C	provided).	A 1 ·							
D3	Develop and implement a	0 1	· •	Admin							
	partnership development	cooperating with LACC to implement its mandate.	participating in LACC's activities.								
	strategy	its mandate.	activities.								
D4	Foster cooperation among	A viable HRA established and the	Number of								
	divisions of LACC and	Commission's overall productivity	staff/divisions								
	promote cross-divisional	maximized.	participating in common								
	teams.		efforts; and concerted								
			achievements made.								
D5	Conduct prospect research,	A donor prospect database of at least	# of proposals	BOC, TA,							
	identify funding options, and	15 potential funders established, selling	developed; and % of	PR&MEAL							
	develop proposals.	proposals developed; and at least 60%	potential funders								
		of all proposals result into grant	donating grants.								

Code	Interventions including targets	Expected Results	Indicators	Lead	Timeframe						
Code					19/20	20/21	21/22	22/23	23/24		
		donation.									
D6	Expand the offices/services of LACC in all regions of Liberia.	The operational coverage of LACC is effective in all regions and at least 80% or 12 of Liberia's 15 counties covered.	Number of regions LACC offices are established.	BOC & Admin							
D7	Construction of an Office Complex for LACC	Land Purchased & Surveyed, Architecture design completed, & LACC Office Complex completed.	Number lots/acres of land procured; and capacity of the new complex.	BOC & Admin							
D8	Implement three (baseline, mid-line, and end-line) work and motion study, job satisfaction, and training needs assessments.	Performance gaps identified and jobs redesigned	Number of staff participating; number of performance gaps identified.	HR staff and R&T							
D9	Based on the study, determine and implement the socio- technical and logistical requirements of LACC	based HR system is functioning and the	% of performance targets achieved.	Admin Staff & TA							
DIO	Plan and implement a Continuing Professional Development (CPD) programme	, ,	% staff completing CPD training; and relevance of courses to the practical performance needs of staff.	HR/Admin & TA							

Code	Interventions including	Expected Results	Indicators Lead		Т	imefran	ame			
Code	targets	Expected Results		Leau	19/20	20/21	21/22	22/23	23/24	
DII	Elevate the position of the HR Officer to Manager and support the HR function to modify/scale-up the existing PME module, employing motivational packages and high competence model.		Number of staff awarded; and % of staff achieving performance targets.	Admin/HR & R&T						
D12	Establish a special account to deposit proceeds from assets investigation, and forfeiture processes.		Amount of funds recovered	BOC/Admin						
DI3	Develop/modify an assets management policy & systems.	Cost for maintenance and fuel reduced; and underused asset redeployed or scope of usage enlarged.	% of reduction on maintenance and fuel consumption costs;	Admin.						
DI4	Develop & implement communication strategy	The public is regularly informed about and motivated by the progress of LACC activities.	Perception of the public regarding corruption.	PRO & Admin.						
DI5	Review and align internal coordination mechanisms to the SP's key performance areas.	More efficient and effective work organizational processes in place and functioning.	# of internal mechanism modified; and number of modified systems implemented.	Admin & R&T						

# Liberia Anti-Corruption Commission Strategic Plan (2019-2024)

Code	Interventions including	uding Expected Results	Indicators	Lead	Timeframe					
Couc	targets	Expected Results		Lead	19/20	20/21	21/22	22/23	23/24	
DI6	Coordinate with the Research	The implementation of the strategic								
	& Technical section to review	plan is either on target or ahead of	sessions held; and							
	the performance of MAP	target; and LACC performance	number of							
	quarterly and the strategic	tracked against the targets of the	divisions/section							
	plan every year.	strategic plan; and the Commission	reaching or exceeding							
		continuously strategize to meet and	targets.							
		exceed performance targets								
DI7	Conduct 10 performance	Performance targets tracked; lessons	# of targets and lessons	Admin & R&T						
	review and carry out two	learned and challenges implemented;	tracked; challenges							
	study visits	emerging issues and best-fitted	resolved, identified							
		practices identified and implemented.	best-fitted practices							
			implemented.							

Liberia Anti-Corruption Commission Strategic Plan (2019-2024)

This Strategic Plan Was Prepared With the Technical Assistance of:

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2. Jeanet Sonpon-Sarsih Program Manager/Administration Division

3. Cllr. Othello S. Payman Program Manager/Legal Division

4. James K. Kingsley Program Manager/Education & Prevention Division

5. Baba M. Borkai Program Manager/Enforcement

6. Tupee Freeman-Semper Executive Assistant/Program Manager

7. Cllr. Tarweh S. Johnson Legal In-House Legal Consultant

8. Isaac C. Davies Internal Auditor

9. Atty. Marc N. Kollie Chief of Investigators

10. Wade Matilda Neufville Human Resource Officer

II. J. Bernard Nagbe Comptroller

12. Rebecca Kiawon Procurement Officer

13. Andrew S. Hoff ICT Administrator

14. Edwin Clarke Public Relations Officer

15. Moses V. Kowo Community Relations Officer

16. Robert W. Jarwleh Research Officer

# **END OF STRATEGIC PLAN**