

DETECTING CORRUPTION: LEARNING FROM SUCCESSFUL METHODS, PRACTICES AND TECHNIQUES

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I. INTRODUCTION

The Anti-Corruption Commission of the Maldives (Anti-Corruption Commission) was established under the 2008 Constitution as an independent institution, with the mandate to investigate corruption crimes and prevent corruption in the country. The first ever corruption related legislation in the country was the Prevention and Prohibition of Corruption Act, which came into effect in 2000.¹ The Anti-Corruption Commissions' Act defines the main functions of the commission, which include investigation and prevention of corruption, as mentioned earlier. The Act specifically states that the Commission shall inquire into all allegations of corruption.² The Maldives ratified the United Nations Convention Against Corruption in March 2007.³

As emphasized by the Secretary General of the United Nations, Kofi A. Annan, in 2003, on the adoption by the General Assembly of the United Nations Convention against Corruption, the evil phenomenon, which is corruption, is found in all countries, and the effects of it are most destructive in the developing world.⁴ This demonstrates the high emphasis Maldives should place in detecting and successfully combating corruption, as a developing country.

The Anti-Corruption Commission has faced numerous challenges in detecting corruption over the years. The Anti-Corruption Commission receives complaints of corruption in different ways. This includes, phone calls, letters, emails, among other means. The Anti-Corruption Commission receives a large volume of alleged corruption complaints every year, and a significant amount of these complaints are not registered for various reasons which include, but are not limited to, the complaint not being related to a corruption crime and the complaint not containing enough information to carry out an investigation. The large volume of complaints that fall outside the scope of the Commissions' responsibilities pose a significant hindrance in detecting real instances of corruption, given the resource limitations faced by the Commission.

Corruption is widespread in the Maldives, which is evident in Maldives' gradual decline in points in the Corruption Perceptions Index (CPI) of Transparency International. The Maldives scored 43 points in 2020, and 40 points in both 2021 and 2022, 39 points in 2023 and 38 points in 2024.⁵ The steady decrease in the Country's CPI is alarming as it indicates that corruption is getting worse in the country. In this paper I will be highlighting the challenges and barriers faced by the Anti-Corruption Commission, in successfully detecting corruption, the best practices the commission adopts in detecting corruption and the ways in which the link between detection and investigation of corruption can be made stronger.

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¹ Prevention and Prohibition of Corruption Act (Act No. 2/2000), available at: <https://old.mvlaw.gov.mv/pdf/ganoon/chapterVIII/2-2000.pdf>

² The Anti-Corruption Commissions' Act (Act No. 13/2008), available at: <https://mvlaw.gov.mv/dv/legislations/184/consolidations/1262>

³ United Nations Treaty Collection, available at: https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=XVIII-14&chapter=18&clang=_en

⁴ Statement by the Secretary General, available at: <https://www.unodc.org/corruption/en/uncac/preparatory-and-negotiating-sessions/secretary-general-speech.html>

⁵ Corruption Perceptions Index, Transparency International, available at: <https://www.transparency.org/en/cpi/2024>

II. ISSUES AND CHALLENGES IN DETECTING CORRUPTION

There are various challenges and barriers faced by the Anti-Corruption Commission in detecting corruption. Some of these challenges stem from the anti-corruption framework and current anti-corruption regulations of the Maldives, while others stem from the public perception and societal attitudes towards corruption. In this paper, I intend to explore in detail, the main challenges faced by the Anti-Corruption Commission in efficiently and effectively detecting corruption.

A. Challenges in Protecting Whistle-Blowers

The effective implementation of whistle-blower protection measures in the Maldives is, thus far, highly questionable. One of the most significant corruption scandals in the history of the country is the Maldives Marketing and Public Relations Corporation (MMPRC) scandal. The MMPRC scandal alleged that senior officials including then President, Abdulla Yameen Abdul Gayyoom and then Vice President, Ahmed Adeen Abdul Gafoor, misappropriated a huge amount of public funds for private gain. When the scandal came to light in 2015, Niyaz Ibrahim, who served as the Auditor General of the Maldives from May 2011 to November 2014, revealed that he had flagged irregularities about MMPRC in a 2014 audit report. Niyaz Ibrahim also claimed that 14 members of his family received death threats.⁶ Instead of being protected for his efforts to expose the corruption of MMPRC, Niyaz Ibrahim was removed from the position of Auditor General. This indicates that there is limited institutional support and effective protection for whistle-blowers in the Maldives.

A few years down the line, the Maldives began enforcing the Whistleblower Protection Act, on 17 October 2019. The objectives of the said Act include the following. First, to instate clear and accessible procedures for whistle-blowing. Second, to ensure that all disclosures made under the Whistleblower Protection Act are adequately investigated and that appropriate action is taken in a timely and effective manner. Third, to provide comprehensive protection and ensure the safety of whistle-blowers. Fourth, to promote and strengthen a culture of accountability, transparency and integrity. Fifth, to encourage responsible use of the rights and protections afforded by the Act, while taking necessary measures to prevent their misuse or abuse.⁷

Article 3 of the Whistleblower Protection Act outlines the circumstances that constitute whistle-blowing. These include the disclosure of information related to corruption and abuse of public office. Article 6 of the said Act specifies the categories of individuals eligible for whistle-blower protection, which include employees of public entities, employees of private entities and separate legal entities. However, the Act excludes members of the public from its scope. This means individuals who are not employed by either public or private entities are not entitled to the protection provided by the Whistleblower Protection Act. This undermines the public's interest in reporting corruption thereby hindering the Commission's efforts to detect corruption promptly.⁸

The Whistleblower Protection Act provides protection to whistle-blowers. Article 9 of the Whistleblower Protection Act states that no person or entity shall retaliate or take any form of reprisal against an individual who has made a whistle-blowing disclosure, or is about to do so, or is believed to be intending to do so. Article 10 of the said Act defines retaliation to include any act or omission in the workplace that discriminates against whistle-blowers. This includes dismissal, demotion, transfer, changes to duties or working hours, unjustified probation, denial or delay of allowances, restrictions on promotion or training, issuance of threats or warnings, or any other action intended to punish or deter whistle-blowing.⁹

It is also important to acknowledge the positive developments resulting from the implementation of the Whistleblower Protection Act. One of the most positive developments which resulted from the implementation of the said Act, is the establishment of the Whistleblower Protection Unit. The Whistleblower Protection

⁶ Ex Auditor General weighs in on Maldives' biggest corruption scandal, Maldives Independent, available at: <https://maldivesindependent.com/feature-comment/ex-auditor-general-weighs-in-on-maldives-biggest-corruption-scandal-122385>

⁷ Whistleblower Protection Act (Act No. 16/2019), available at: <https://mvlaw.gov.mv/dv/legislations/139/consolidations/167>

⁸ Ibid.

⁹ Ibid.

Unit is established within the Human Rights Commission of the Maldives.¹⁰ The Whistleblower Protection Unit, in February 2025, imposed the first-ever fine of MVR 900,000.00 on Maldives Post Limited for dismissal of an employee who had exposed alleged corruption involving the senior management of the Company.¹¹

In 2021, the Anti-Corruption Commission established procedures to be followed in protecting the rights of whistle-blowers who disclose information related to corruption to the Commission.¹² However, the effectiveness of the measures the Anti-Corruption Commission is taking in protecting whistle-blowers remains highly questionable. The National Corruption Perception Survey 2023 highlighted this concern, revealing that a staggering 81 per cent of respondents believe that strengthening whistle-blower protection is essential and must be treated as a priority in the fight against systemic corruption in the country.¹³

This highlights the need to implement measures aimed at improving public trust in the whistle-blower protection mechanisms provided by the Anti-Corruption Commission and the Whistleblower Protection Unit. However, the limited budget available to the Whistleblower Protection Unit hinders its ability to carry out essential operations. The 2023 and 2024 annual reports of the Whistleblower Protection Unit noted that they were forced to cancel events intended to mark the World Whistleblower Protection Day in both years, due to budgetary constraints. Additionally, the reports also noted that a dedicated portal for the Whistleblower Protection Unit could not be developed, due to limited funding.¹⁴

B. Lack of Political Will to Detect and Fight Corruption

The lack of political will to combat corruption in the Maldives has long been a matter of public concern. It is widely argued that elected officials and politicians often lack genuine commitment to detecting and preventing corruption. The National Corruption Perception Survey 2023 reinstated this view as it revealed that the public believes politicians and elected officials are more likely to commit corruption crimes. According to the survey, 92 per cent of the respondents believed that elected representatives and politicians influence the career advancement of public servants based on patronage rather than merit. Additionally, 86 per cent of respondents believed that politicians influence the awarding of government contracts to companies or individuals close to them. Notably, 76 per cent believed that elected representatives accept bribes or gifts in exchange for influencing public decisions and contracts. Furthermore, 73 per cent of respondents believed that politicians misuse public funds or property for personal or family gain.¹⁵ These findings show that elected officials and politicians, who are the main policymakers, have a limited, if any, will in detecting and fighting corruption.

Another indicator of poor political will in detection and prevention of corruption is that of the frequent changes in public finance regulations. The rules, methods and thresholds for public procurement in the Maldives, are set out in the Public Finance Regulation, brought into effect by the Ministry of Finance of the Maldives. The Maldives public procurement system study 2020 revealed that the public procurement rules are subject to change quickly and easily.¹⁶ One of the most significant instances of this was the 11th amendment to Public Finance Regulation, made effective on 28 May 2015. The amendment permitted special projects of the state to be authorized by the Economic Council of the Cabinet, to State Owned Enterprises or listed companies without carrying out an open tender process. The said amendment increased the risk of corruption in public procurement. It also had major implications for transparency. The Anti-Corruption Commission of the Maldives expressed serious concerns over the said amendment.¹⁷ It is worth noting that following this

¹⁰ Information about Whistleblower Protection Unit, available at: <https://hrcm.org.mv/en/departments/wbpu>

¹¹ Whistleblower Unit slaps Maldives Post with landmark first fine, Maldives Independent, available at: <https://maldivesindependent.com/politics/whistleblower-unit-slaps-maldives-post-with-landmark-first-fine-e3ae>

¹² Procedures to be followed by the Anti-Corruption Commission in protecting whistleblowers, available at: <https://acc.gov.mv/dv/media/downloads/26>

¹³ National Corruption Perception Survey 2023, Anti-Corruption Commission of the Maldives, available at: <https://acc.gov.mv/en/publications/228>

¹⁴ Annual Reports of the Whistleblower Protection Unit, available at: <https://hrcm.org.mv/en/departments/wbpu>

¹⁵ National Corruption Perception Survey 2023, Anti-Corruption Commission of the Maldives, available at: <https://acc.gov.mv/en/publications/228>

¹⁶ Maldives Public Procurement System Study 2020, Transparency Maldives, available at: <https://transparency.mv/downloads/maldives-public-procurement-system-study-2020/>

¹⁷ Press Release by the Anti-Corruption Commission of the Maldives, available at: <https://archive.acc.gov.mv/en/2016/07/anti-corruption-commission-has-expressed-its-concerns-over-the-11th-amendment-to-the-public-financial-regulation/>

major amendment, the public finance regulation was revoked, and a new public finance regulation was brought into effect. Such frequent and unjustified changes to the Public Finance Regulation increases corruption risks and complicates efforts to detect corruption.

C. Limited Cooperation from State Officials and the Public in Detecting and Fighting Corruption

The mandate of the Anti-Corruption Commission is to prevent and combat corruption in all arms of the State and to promote integrity. The Anti-Corruption Commission is responsible for inquiring into and investigating all allegations of corruption, including any information, complaints received by the commission. Additionally, the Commission is tasked with carrying out all actions necessary to fulfil its responsibilities and mandate.¹⁸ The Anti-Corruption Commission has the authority to exercise its power on all branches the government, including executive legislative and judiciary, as well as government funded companies, political parties and other organizations receiving public funds. The Commission has the authority to enter, search and seize evidence, summon witnesses and suspects, conduct interrogations, obtain written statements, check and freeze bank accounts, restrain persons being interrogated from departing from the Maldives.¹⁹ However, it is important to note that, as set out in the Criminal Procedure Act, the Commission can only search a public place without a court order. A private place can only be searched, and property can only be seized, with a court order. A court order is also required to freeze bank accounts or restrain suspects leaving the country.²⁰

It is worth emphasizing that there is limited cooperation from State officials and the public, in detecting and fighting corruption. The public's limited willingness in helping detect corruption could be attributed to losing trust in state institutions and law enforcement authorities among various contributing factors. The National Corruption Perception Survey 2023 revealed that the majority of the respondents believe that over the past three years, corruption had worsened in the Maldives. It is important to note that, in relation to the Parliament, government ministries and departments, state owned enterprises, courts/tribunals and local councils, this opinion is stronger.

The 2023 Annual Report of the Anti-Corruption Commission highlighted that the primary challenge in the complex investigation process is the acquiring of evidence. The Commission further stated in the said Annual Report that certain institutions do not fully cooperate in providing necessary documents to the Commission. It was further noted that some individuals summoned to the commission failed to attend, which hindered the investigations of the Commission.²¹ This shows that there is a lack of cooperation from the public as well as state institutions which in turn affects the Anti-Corruption Commission's effort to detect and investigate corruption efficiently.

D. Lack of Public Recognition of the Duty to Report Corruption and Limited Awareness of Corruption Crimes

Transparency Maldives observed that even though it is difficult to determine the crime economy of the Maldives, it is evident from national and international corruption assessments, media reports and grand corruption cases such as the MMPRC case, that the effort to counter and prevent corruption needs to be undertaken using a whole-of-society approach.²² However, there is a general lack of willingness by the public in reporting corruption crimes to relevant authorities. Research conducted by Transparency Maldives revealed that most young people interviewed did not report the incidences of corruption for reasons such as limited awareness of the procedures and not wanting to report against the people in powerful positions.²³ Another reason for lack of coordination from the public could be the lack of confidence in the State to solve problems, as revealed by the National Corruption Perception Survey 2023, which found that 67 per cent of

¹⁸ Organizational information about Anti-Corruption Commission of the Maldives, available at: <https://acc.gov.mv/en/about/organization>

¹⁹ An Assessment of the Anti-Corruption Commission Maldives – June 2014, UNODC, available at: https://acc.gov.mv/files/f4b8db6a-bd79-42e0-b91d-7ff7804e1f40/UNODC-Assessment-of-ACC-Maldives_2014.pdf

²⁰ Criminal Procedure Act (Act No. 12/2016) Available at: <https://mylaw.gov.mv/dv/legislations/128/consolidations/1272>

²¹ Anti-Corruption Commission Annual Report 2023, available at: <https://acc.gov.mv/en/publications/287>

²² An Assessment of Business Integrity Practices in the Maldives, Transparency Maldives, available at: <https://transparency.mv/wp-content/uploads/2023/02/Assessment-report-print.pdf>

²³ Youth, Opportunities and Corruption in Maldives 2015, Transparency Maldives, available at: <https://saruna.mnu.edu.mv/server/api/core/bitstreams/eb2ced3c-1bb1-43f4-b253-164327ca851d/content>

the respondents do not confide in the State to solve problems of the State.²⁴ This poses a great challenge to the Commission's efforts to detect Corruption.

Furthermore, the Corruption Perception of Civil Servants Survey Report 2014 revealed that the majority of the civil servants in Maldives are less likely to report occurrences of corruption. The survey further revealed that the reasons for this include, lack of confidence in law enforcement, delay or lack of justice, lack of action taken by relevant authorities, no witness protection for the person reporting, fear of work environment threats and fear of losing job.²⁵ This shows that there is a general hesitation among civil servants, who make up the largest segment of workforce in the Maldives, to report corruption instances to the Anti-Corruption Commission. This significantly undermines the Commission's ability to effectively detect corruption. It is important to note that no survey has been conducted since 2014, specifically addressing the perception of corruption among civil servants in the Maldives, highlighting the limited availability of up-to-date resources on this subject.

The Anti-Corruption Commission receives a huge volume of corruption complaints each year and a significant amount of these complaints are not registered by the Commission. In 2022, a total of 758 corruption complaints were submitted to the Commission, out of which 272 complaints were not registered.²⁶ The year 2023 saw a surge in complaints submitted to the Commission as the Presidential Election was held during that year. In 2023, a total of 1151 complaints were submitted to the Commission out which 501 complaints went unregistered.²⁷ Given the limited number of resources at the Commission's disposal, such a huge volume of unnecessary and unrelated complaints deters the efforts of the Anti-Corruption Commission to successfully detect corruption.

It is also important to note that, since the establishment of the Anti-Corruption Commission, there is a common belief that battling corruption is the sole responsibility of the Commission.²⁸ This means much less, if any, work is done by the government in raising awareness among the public about corruption. Thus, the public has limited knowledge of corruption, the ill effects of corruption on society and mostly fail to recognize their duty to report corruption cases timely. This makes effective and efficient detection of corruption, a hard task for the Anti-Corruption Commission.

III. BEST APPROACHES OF DETECTING CORRUPTION IN MALDIVES

There are effective and efficient approaches followed by the Anti-Corruption Commission in detecting corruption. One of such approaches is the proactive investigation of corruption. The Anti-Corruption Commissions' Act entrusts the Commission with the power to initiate investigations independently, without requiring a formal complaint. The Anti-Corruption Commission proactively registered 23 corruption cases in 2024.²⁹ This represents an increase from 16 cases registered proactively in 2023.³⁰ This proactive approach suggests that the Commission is actively monitoring sources such as social media and other public channels to identify possible instances of corruption. This initiative driven approach represents a significant advancement in the proactive detection and effective addressing of corruption. Notably, several cases investigated on the Anti-Corruption Commission's own initiative, have been successfully concluded. In one such case, the Anti-Corruption Commission found that the Ministry of Health had procured four ambulances that did not meet the pre-established requirements and that the bid committee members had misused their official authority and granted an undue advantage to the bidder. As a result, the Anti-Corruption Commission

²⁴ National Corruption Perception Survey 2023, Anti-Corruption Commission of the Maldives, available at: <https://acc.gov.mv/en/publications/228>

²⁵ Corruption Perception of Civil Servants Survey Report 2014, Anti-Corruption Commission of The Maldives, available at: <https://archive.acc.gov.mv/wp-content/uploads/2014/12/CS-CorruptionPerceptionReport.pdf>

²⁶ Statistics Book 2022, Anti-Corruption Commission of the Maldives, available at: <https://acc.gov.mv/dv/publications/184>

²⁷ Statistics Book 2023, Anti-Corruption Commission of the Maldives, available at: <https://acc.gov.mv/dv/publications/249>

²⁸ National Integrity System Assessment Maldives 2014, Transparency Maldives, available at: <https://acc.gov.mv/dv/publications/203>

²⁹ Anti-Corruption Commission Annual Report 2024, available at: <https://acc.gov.mv/dv/publications/306>

³⁰ Anti-Corruption Commission Annual Report 2023, available at: <https://acc.gov.mv/dv/publications/247>

referred the case to the Prosecutor General's Office to press charges against the bid committee members.

One of the most successful means of detecting corruption is through the audits of State bodies. In 2024, a total of 732 cases were registered by the Anti-Corruption Commission, of which 97 cases were submitted to the Commission by State authorities.³¹ This shows that State authorities are proactive in alerting the Commission when potential cases of corruption are identified. One of the most notable corruption scandals in Maldives, in recent years was the Dhuvaafaru Council case. This case was referred to the Commission by the Local Government Authority (LGA), which oversees local councils, after carrying out an audit of the Dhuvaafaru Council. In the audit carried out by the LGA, they observed that council members and some of the administrative staff at the Council were misusing public funds in violation of the Public Finance Regulation. Following the referral of the case to the Commission by LGA, a team of investigators of the Commission travelled to R.Dhuvaafaru, to collect information, evidence and interview witnesses and suspects. The Anti-Corruption Commission carried out a swift investigation and concluded that six of the seven council members of Dhuvaafaru Council, along with two senior administrative staff had misused public funds, some of which were used for personal gain. The case was forwarded to the Prosecutor General's Office for prosecution in court.³²

Another important area worth highlighting is the role of the Auditor General in referring suspicious cases to the Anti-Corruption Commission, following audits. The Auditor General is appointed by the President of the Maldives, in accordance with the 2008 Constitution of the Maldives.³³ The Auditor General's Office operates as an independent institution and reports directly to the Parliament. The Auditor General audits and reports on the finances of government ministries, agencies and departments under the executive, legislative and judicial branches, as well as independent commissions and independent offices established in accordance with the Constitution and laws. According to the Auditor General's Office, there are five main types of audits carried out: financial audits, compliance audits, special audits, performance audits and information systems audits.³⁴

The Auditor General's Office collects necessary information and documents from relevant authorities to conduct audits and if corruption is suspected, the case is forwarded to the Anti-Corruption Commission. This is a crucial practice in detecting and addressing potential corruption. A recent example is the alleged corruption scandal involving the Police Corporative Society (POLCO) which was brought to the attention of the Commission through an audit report, which revealed that the Police Housing Project (Blues Housing Project) had resulted in a huge financial loss for the government.³⁵ The Commission is currently investigating the matter.

One of the most significant steps the Commission has taken in effectively detecting corruption is allowing individuals to submit complaints anonymously. In 2024, the Commission received a total of 1171 corruption complaints, of which 689 were submitted anonymously.³⁶ In comparison, in 2023, the Commission received 1151 corruption complaints, with 516 submitted anonymously.³⁷ The high number of anonymous submissions shows that the public is eager to combat corruption, even if they prefer to do so anonymously. Through this system, the Anti-Corruption Commission can effectively detect credible corruption threats and respond with appropriate measures.

³¹ Anti-Corruption Commission Annual Report 2024, available at: <https://acc.gov.mv/en/publications/306>

³² ACC Sends Dhuvaafaru Corruption Case to PGO for Prosecution, Press Release, available at: <https://acc.gov.mv/dv/media/news/280>

³³ Constitution of the Republic of Maldives 2008, available at: <https://www.agoffice.gov.mv/files/English-constitution.pdf>

³⁴ Types of Audits, Auditor General's Office, available at: <https://audit.gov.mv/webpage.aspx?pageID=37>

³⁵ Special Audit Report of Police Housing Project (Blues Housing Project), Auditor General's Office, available at: [https://audit.gov.mv/Uploads/AuditReports/2025/01January/5._Special_Audit_Report_of_Police_Housing_Project_\(Blues_Housing_Project\).pdf](https://audit.gov.mv/Uploads/AuditReports/2025/01January/5._Special_Audit_Report_of_Police_Housing_Project_(Blues_Housing_Project).pdf)

³⁶ Anti-Corruption Commission Annual Report 2024, available at: <https://acc.gov.mv/en/publications/306>

³⁷ Anti-Corruption Commission Annual Report 2023, available at: <https://acc.gov.mv/dv/publications/247>

IV. ENHANCING DETECTION OF CORRUPTION AND COORDINATION BETWEEN DETECTION AND INVESTIGATION

There are several measures the Anti-Corruption Commission of the Maldives can adopt to enhance detection of corruption and the link between the detection and investigation of corruption cases. One of the most significant measures the Commission can take is to conduct comprehensive risk assessment research across various areas of state institutions and state-owned enterprises. Such assessments would help identify systematic vulnerabilities and loopholes that create opportunities for corrupt practices and abuse of power. This would help the Commission to understand the areas where corruption risks are most prevalent. Thus, the Anti-Corruption Commission can implement targeted strategies and approaches which can help in effectively detecting and preventing such activities. It should also be noted that comprehensive risk assessment research can play an important role in strengthening the link between detection and investigation of corruption cases by systematically identifying where corruption is likely to occur and guiding the allocation of investigative resources more efficiently and effectively.

Another important measure the Anti-Corruption Commission can take to strengthen the link between the detection and investigation of corruption is to increase the human capital, particularly by expending the number of trained investigators. The Anti-Corruption Commission receives a huge number of corruption complaints each year but operates with a limited number of investigators. In the year 2024 alone, the Commission received 1171 corruption complaints, and the Commission has less than 60 investigators to investigate the cases.³⁸ Such imbalances create a significant backlog, leading to delays between the registration of a case and the actual investigation. Such delays hinder the timely collection of information and evidence and make it more difficult to obtain accurate witness and suspect statements, as significant time may have elapsed since the alleged incident took place. All these factors affect the Anti-Corruption Commission's efforts to effectively detect corruption and timely investigate corruption cases.

It is important to recognize the increasingly complex nature of corruption in recent years. Individuals, institutions and corporations involved in corruption have been employing complex financial instruments and channels that leave minimal trace. This makes detection and investigation of corruption more challenging for the Anti-Corruption Commission. To successfully detect and strengthen the link between the detection and investigation of such cases, the Anti-Corruption Commission must train its investigators particularly in areas such as complex financial auditing, forensic accounting, and advanced evidence collection techniques. Building expertise in these areas is important to keep pace with evolving corruption tactics. It would also ensure that detection and investigation processes remain efficient and responsive.

Another important step in enhancing detection of corruption and strengthening the link between detection and investigation of corruption is enhancing cooperation between the Anti-Corruption Commission and other state and independent institutions. Currently, the Anti-Corruption Commission receives Suspicious Transaction Reports from the Financial Intelligence Unit, which is the central national agency for receiving, analysing and disseminating information concerning activities related to money laundering, terrorism financing and proceeds of crime, in the Maldives.³⁹ Similarly, the Auditor General refers suspected corruption cases to the Anti-Corruption Commission, following audits of state institutions and state owned enterprises. The LGA, a state institution established under the Decentralisation Act, to regulate and oversee the functioning of local councils, also alerts the Anti-Corruption Commission of alleged corruption instances, after carrying out audits of the local councils.⁴⁰ It is important to establish mechanisms for sharing such information with the Anti-Corruption Commission in a faster and more efficient manner, allowing investigations to begin promptly without undue delay. Such measures would enhance the effectiveness of detecting corruption and strengthen the link between detection and investigation of corruption.

One of the most important measures the Anti-Corruption Commission can take in effectively detecting corruption and strengthening the link between detection and investigation of corruption is to establish and

³⁸ Anti-Corruption Commission Annual Report 2024, available at: <https://acc.gov.mv/en/publications/306>

³⁹ The Prevention of Money laundering and Financing of Terrorism Act (Act No 10/2014), available at: <https://mvlaw.gov.mv/dv/legislations/77/consolidations/85>

⁴⁰ The Decentralization Act (Act No. 07/2010), available at: <https://mvlaw.gov.mv/dv/legislations/193/consolidations/1281>

implement mechanisms to protect whistle-blowers. The Anti-Corruption Commission shall carryout research to identify the gaps in legislation that undermine whistle-blower protection and deficiencies in enforcement that render whistle-blower protections ineffective. Such research would help the Anti-Corruption Commission in successfully combating the factors that undermine whistle-blower protection in the Maldives and thus help in timely detection of corruption. It would also enhance the link between detection and investigation of corruption.

It is worth noting that the Anti-Corruption Commission has undertaken efforts to educate the public and raise awareness regarding corruption. As part of these efforts, the Anti-Corruption Commission recently established the Maldives National Anti-Corruption Academy with the objective to educate and create awareness on corruption, among the public. This initiative will help in addressing the prevailing lack of public recognition and awareness of corruption. Furthermore, it will enhance the link between the detection and subsequent investigation of corruption.

V. CONCLUSION

Corruption is usually hidden in plain sight. Due to the hidden nature of corruption, detection of corruption is not an easy task. The Anti-Corruption Commission faces numerous challenges in efficiently detecting corruption. The Commission, mandated with fighting and preventing corruption in Maldives, shall first identify the main challenges the Commission faces in detecting corruption. These challenges include the limited and ineffective protection provided to whistle-blowers, lack of political will to fight corruption and limited cooperation from state institutions and state employees. To increase the effectiveness of the Anti-Corruption Commission in detecting corruption and to strengthen the link between effective detection and investigation of corruption crimes, the Commission shall formulate strategies, both short term and long term, to address the challenges faced by the Commission in detecting and effectively investigating corruption. These strategies should focus on increasing cooperation between the Commission and other state institutions, enhancing whistle-blower protection mechanisms and increasing the capacity and productivity of investigators of the Anti-Corruption Commission, among other factors.