

CRIMINAL JUSTICE RESPONSE TO CORRUPTION IN MALDIVES

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I. INTRODUCTION

The Anti-Corruption Commission (ACC) of the Maldives was established on 16 October 2008. Prior to that, the function of corruption control was mandated to the Anti-Corruption Board (ACB), a governmental body established by Presidential decree on 21 April 1991.

ACC consists of five Members, appointed by the President of the Maldives with approval of the Peoples Majlis (Parliament). The Chairman of the Commission is the primary head of the institution responsible for oversight and delegation of tasks to Commission Members, Secretary General and Staff.

The first piece of legislation formulated to combat corruption in the Maldives is Act no 2/2000, Prevention and Prohibition of Corruption Act (PPCA) which was enacted on 31 August 2000.¹ The Act criminalizes various acts of corruption committed in public offices. Later, the democratic process led to the ratification of the 2008 Constitution, mandated the establishment of an independent statutory institution to combat corruption. Hence, Act no 13/2008, the Anti-Corruption Commission Act (ACCA) was enacted on 24 September 2008.²

Key functions of the Anti-Corruption Commission

The ACC Act 13/2008 mandates the following obligations of the Commission:³

- To inquire into and investigate all allegations of corruption; any complaints, information, or suspicion of corruption must be investigated;
- To recommend further inquiries and investigations by other investigatory bodies, and to recommend prosecution of alleged offences to the Prosecutor General, where warranted;
- To carry out research on the prevention of corruption and to submit recommendations for improvement to relevant authorities regarding actions to be taken;
- To promote the values of honesty and integrity in the operations of the State, and to promote public awareness of the dangers of corruption;
- Conduct seminars, workshops and other programmes to enhance public awareness on the prevention and prohibition of corruption; conduct surveys and research to further this end and the publication of such surveys and research;
- Disseminate information related to the prevention and prohibition of corruption that require public disclosure and publish statements where necessary;
- Implement and monitor the implementation of the Prevention and Prohibition of Corruption Act 2/2000 and formulate and implement all rules necessary for the enforcement of the Act.

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¹ Act no 2/2000, Prevention and Prohibition of Corruption Act.

² Act no 13/2008, the Anti-Corruption Commission Act.

³ Article 21 of the Anti-Corruption Commission Act.

A. UNCAC

Maldives acceded to the United Nations Convention against Corruption (UNCAC) on 22 March 2007. Since the Maldives accession to the United Nations Convention against Corruption, the legislative authorities have been trying to bring about legislative, institutional and policy measures or changes to implement UNCAC. Maldives has completed its first self-assessment on chapters 3 and 4 of the Convention and is in the process of finalizing its self-assessment report.

The provisions of the convention are incorporated into the domestic law through amendments or by passing new legislations or by adopting them into the administrative system. So far the main pieces of legislation in the anti-corruption framework are the Prevention and Prohibition of Corruption Act (the 'PPCA'),⁴ the Penal Code,⁵ the Prevention of Money Laundering and Financing of Terrorism Act⁶ (AML/CFT Act) and the Anti-Corruption Commission Act⁷ (the 'ACCA').

In 2015, two important international cooperation laws were enacted. They are the Law on Extradition,⁸ and the Act on Mutual Legal Assistance in Criminal Matters.⁹

1. Challenges or Problems Faced by Maldives in Implementing UNCAC

- Lack of an effectively coordinated means of communication among the stakeholders, resulting in a lack of coordinated effort on implementing UNCAC.
- Staff shortage and capacity faced by the ACC.
- Difficulties faced in getting necessary laws or amendments passed through the parliament due to challenges in the political environment.
- Technical assistance requirements.

II. MEASURES FOR DETECTION AND PUNISHMENT

A. Intelligence

1. Measures Used to Generate Leads

To generate the leads and clues of corruption, there is a hotline established at ACC where the public can report acts of corruption anonymously. Although no financial incentives are offered for reporting, in 2014, approximately 600 calls were received.

Apart from the hotline, cases are filed through written letter, by phone, by e-mail, fax or in person, and the informant has the choice of revealing their identity. The commission also has the power to initiate investigation on any suspicion of corruption. As such, some of the issues mentioned in the audit reports and newspapers were investigated. However, information obtained from social media and the Internet were not used as means of intelligence.

In addition, information regarding Suspicious Transaction Reports (STRs) are traced by the Financial Intelligence Unit (FIU), which is located within the Central Bank (Maldives Monetary Authority). It traces and forwards the respective intelligence information regarding STRs to the Maldives Police Service.¹⁰

2. Whistle-blower Protection in the Maldives

Although whistle-blowing is an effective way to generate leads on corruption, due to the lack of protection provided for the whistle-blowers, people are not willing to disclose information. According to the Global Corruption Barometer Survey 2013, 11 percent would not report an incidence of corruption, and of

⁴ Act no. 2/2000, Prevention and Prohibition of Corruption Act 2000.

⁵ Act no. 1/81, the Penal Code.

⁶ Act no. 10/2014, the Prevention of Money Laundering and Financing of Terrorism Act.

⁷ Act no. 13/2008, the Anti-Corruption Commission Act.

⁸ Act no. 1/2015, Extradition Act.

⁹ Act no. 2/2015, the Prevention of Money Laundering and Financing of Terrorism Act.

¹⁰ Article 38 of the Banking Act 2010.

this, 22 percent would not report for fear of the consequences.¹¹ In order to support maximum information disclosure, more needs to be done to ensure protection for whistle-blowers.

Concerning the protection of whistle-blowers, general whistle-blower protection is contained in Article 18 of the PPCA. It stipulates that where the informants wish to remain anonymous, such anonymity should be maintained, and whoever fails to afford such anonymity is punishable by imprisonment, banishment or house arrest for a period less than a year.¹²

Article 41 of the Banking Act and Article 44 of the the Prevention of Money Laundering and Financing of Terrorism Act further provide protection for the directors and staff of banks who report in good faith. Moreover, Article 35 of the Maldivian Civil Service Act provides protection for the employees who report a breach or an alleged breach of that Act, Regulation and Code of Conduct of the Maldivian Civil Service to the Responsible Officer of that institution or to the Civil Service Commission against victimization, or discrimination.¹³

B. Investigation

The complaints lodged at the Anti-Corruption Commission are checked by the members of the Commission to decide whether the complaint falls under the mandate of the Commission, whether it is frivolous, whether it requires corrective action, or whether it warrants investigation.

When the Commission decides that an allegation warrants investigation, a Case File is prepared and assigned to an investigation team which consists of three investigators with auditing or law backgrounds. The leader of the investigation team assigns the case to one of the investigators who will lead the case. The lead investigator has to produce a summary of the case proceedings within seven days. The summary proceedings are discussed within the team. Then, the investigation commences where documentary and verbal evidence are collected.

1. Evidence Collection.

Under the ACCA and PPCA, the Anti-Corruption Commission has the power to obtain admissible evidence by:

- Search and examination of premises of all such bodies that the Commission has the authority over in performing its duties.
- Checking and freezing suspicious bank accounts, confiscation of undue properties and monies through court order.
- Power to summon and obtain witness statements.
- Search and seizure of documentary evidence.
- Require any person or such body as the Commission believes to have information relating to an investigation to produce such information in writing.

As the Anti-Corruption Commission of the Maldives lacks the necessary technical capacity to carry out complex investigations, ACC seeks the assistance of experts where such assistance is needed in collecting evidence or in analysing the evidence. As such, ACC has a Memorandum of Understanding with Maldives Police Services to seek the assistance of police for forensic expertise.

The Banking Act obliges the banks to disclose confidential information upon a written request from a criminal investigative body.¹⁴ As such the investigating agency has the authority to obtain through the Maldives Monetary Authority bank account details and details of transactions carried out through banks

¹¹ Transparency Maldives, Global Corruption Barometer Survey 2013.

¹² Article 18 of the Prevention and Prohibition of Corruption Act.

¹³ Article 35 of the Maldivian Civil Service Act.

¹⁴ Article 42 of the Banking Act 2010.

and also to obtain copies of documents which are required for investigation.

No covert investigation or special investigative techniques such as wiretapping, telephone bugging, geo-location, sting operation, controlled delivery or special computer software are used to investigate a corruption case in the Maldives. However, article 49 and 50 of the Prevention of Money Laundering and Financing of Terrorism Act regulates the use of special investigative techniques, upon court order, to obtain evidence of money laundering and for tracing proceeds of crime. Special techniques foreseen in the Act include electronic surveillance, wiretapping, controlled delivery and undercover operations.¹⁵

2. Challenges Faced at the Investigation Stage.

The Maldives still faces many problems and challenges in terms of investigation. As for the investigations carried out by the Anti-Corruption Commission, the following problems and challenges are faced:

- Maldives is an island nation consisting of many islands which are separate from each other; hence there is always difficulty in reaching the destination with ease.
- Due to geographical barriers, it is difficult to take prompt action when there is a need to investigate a case with urgency.
- Travelling is costly whether by sea or air. Sometimes it is not easy to find transport when required and delays also occur due to weather conditions.
- It is time consuming to obtain a Court order to freeze and seize suspicious bank accounts, confiscate undue properties and funds and to search and seize documentary evidence.

In order to overcome the challenges faced in terms of investigation, assessing the geographical situation of the country and the adoption of effective methodologies is needed, and relevant laws need to be introduced which would allow the Anti-Corruption Commission to issue court orders which are necessary when investigating corruption cases.

3. Investigation Reports.

Upon collection of all the necessary evidence, an investigation report is prepared. Then, the report is reviewed to check whether any legal or evidentiary issues need to be resolved with regard to the case and its facts, and if the report does not suffice, it is handed back to the lead investigator for further inquiry. The final report and the recommendations of the investigator are then submitted to the Commission members for further review, and the case is concluded when the members decide what action needs to be taken. There are three ways in which a case is concluded. If there is sufficient evidence, the case is forwarded to the Prosecutor General's Office; if there is not enough evidence, then the case is closed. Where the investigation has identified administrative or procedural issues that lead to corruption, then the relevant institution is notified and ordered to make amends in the administrative or procedural methods implemented. When the case is sent for prosecution, or notified to the relevant authorities about the changes in administrative or procedural issues, the Commission receives notification of the action taken.

There are no official statistics that state the duration taken on average to investigate a corruption case, as it depends on the cases on hand. The following table shows the number of cases reported and the actions taken during the years 2009 – 2014.¹⁶

¹⁵ Article 49 and 50 of the Prevention of Money Laundering and Financing of Terrorism Act.

¹⁶ Annual Reports of ACC in 2009, 2010, 2011, 2012, 2013 & 2014.

Particulars	2009	2010	2011	2012	2013	2014
No. of cases reported to ACC	254	917	260	1138	1085	597
No. cases initiated by ACC for investigation	-	63	19	156	231	125
No. of cases that ACC decided was beyond its mandate	76	257	41	197	225	243
No. of cases ACC decided to forward to other institutions	22	23	5	13	5	6
No. of cases ACC completed investigation	153	324	134	431	620	783
No. of cases forwarded for prosecution	7	17	6	49	57	35

C. Prosecution

The Prosecutor General's Office was established on 7 August 2008 under Article 220(a) of the Constitution.¹⁷ The Prosecutor General's Office is an independent legal entity with a separate seal, possessing power to sue and be sued, and to make undertakings in its own capacity.¹⁸ The Prosecutor General is to institute and conduct criminal proceedings in respect of any alleged offence, to take over, review and continue proceedings and, at his discretion, to discontinue any criminal proceedings at any stage prior to judgement.¹⁹

Article 25(b) of the Anti-Corruption Commissions Act states that upon completing the inquiry and investigation of a case, the Commission has to send the case to the Prosecutor General's Office for prosecution if the case is one which involves an offence of corruption, and the Commission believes that there is sufficient evidence to obtain a conviction at trial.²⁰

In the current system practiced in Maldives, upon submission of the case for prosecution, the prosecutor objectively assesses whether there is sufficient evidence for prosecution, and whether the case should be prosecuted in the interest of the public. Prosecution guidelines, formulated by the Attorney General, provide the basis to determine the type or gravity of cases that warrant prosecution.

1. Standard Used for Prosecution of Corruption Cases.

Currently, there are three pieces of anti-corruption legislation which are, the Prevention and Prohibition of Corruption Act (Act No.22/2000), the Anti-Corruption Commission Act (Act No: 13/2008) and the new Penal Code (Act no. 9/2014).

Section 1(a) of the Prevention and Prohibition of Corruption Act states that the purpose of the Act is to prevent the offer and acceptance of bribery in addition to the prevention and prohibition of attainment of undue advantage through the use of influence from his/her position, and also the prevention of any such act which can be considered as corruption.²¹ Although this Act does not give a definition of corruption, it gives the power to the Courts to decide whether or not an act not explicitly stated in the PPCA constitutes corruption.

The new Penal Code which came into effect on 16 July 2015 replaced the country's existing Penal Code which dates back to 1968.

The new Penal Code also uses 'Beyond a reasonable doubt' as the standard of proof. This standard of proof is used exclusively in criminal cases, where a person cannot be convicted of a crime unless the judge is convinced of the defendant's guilt beyond a reasonable doubt.

¹⁷ Article 220 (a) of the Constitution states that there shall be an impartial Prosecutor General of Maldives.

¹⁸ The Prosecutor General is independent and impartial, and he shall not be under the direction or control of any person or authority in carrying out his responsibilities and the exercise of his powers. He shall carry out his responsibilities and exercise his powers without fear, favour or prejudice, subject only to the general policy directives of the Attorney General, and on the basis of fairness, transparency, and accountability.

¹⁹ Article 223(c) and (g) of the Constitution.

²⁰ Article 25(b) of the Anti-Corruption Commission Act.

²¹ Section 1(a) of the Prevention and Prohibition of Corruption Act (Act No.22/2000).

2. Prosecution Rate of Corruption Cases.

Although ACC has sent over 160 cases for prosecution since 2011, the number of cases sent for trial by the Prosecutor General's office and successful convictions are very low on corruption cases. In fact, according to the records²² from the Prosecutor General's Office, only three cases of bribery have been prosecuted between 2010 and 2014, and only a single case of undue advantage has resulted in a definitive conviction with all the stages of appeal exhausted. In *Abdul Hameed v PG* (2011), the Supreme Court upheld the conviction by the Criminal and the High Court and the accused was found guilty under section 12 of the PPCA, and was sentenced to one year and six months of banishment for unduly conferring an advantage to another party. He was a serving member of the parliament when the case was heard in the courts, and as result of the conviction he lost his seat in the parliament.

3. Immunity

In Maldives, there is no immunity for public officials from being investigated or prosecuted. However, immunity is provided for diplomatic officials²³ and the president during his term. In the case of the latter, he is accountable by law for any offence committed before or during his tenure, but the People's Majlis (Parliament) may decide to defer criminal proceedings until after the expiration of the term of office.²⁴

4. Plea Bargaining

Plea bargaining is not provided for in the Maldivian legislation, and is not practiced. However, under Section 30 of the new Penal Code, an accomplice is given mitigated punishment or immunity if it is proven that he is made accountable for the conduct of another.²⁵ Under section 1107 of the new Penal Code, cooperation with law enforcement authorities is encouraged to the extent that an offender's sentence can be mitigated if he provides substantial cooperation to law enforcement authorities.²⁶ The mitigation and aggravation of the sentence is based on the sentencing guidelines, depending upon the crime and the offender, to maintain consistency.

In cases of money laundering, penalties may be reduced if the perpetrator provides the competent authorities with information they would not have otherwise obtained.²⁷

D. Trial Procedure and Adjudication

1. Judicial System

Maldives has an adversarial judicial system where the court plays a role primarily that of an impartial referee between the prosecution and the defence. The court does not actively take part in any process of an investigation.

In 2008 a new Constitution was ratified in the Maldives, and it brought a huge change to the judicial system of the country. The Supreme Court established under this constitution is the highest institution of the judiciary. The duration taken for a case to finish the process of adjudication is not uniform and not definitive. So far only one case of corruption has gone through all the stages of adjudication, and it took about three years for the case to finish the whole process. Some cases take the same time to finish through the lower court.

Advancing trials of corruption cases depends on socio-political factors of the case. The political ideology of the person who is tied to corruption plays a huge role in how fast the trial is expedited. Although article 17(a) of the Constitution states that everyone is entitled to the rights and freedoms included in this Chapter without discrimination of any kind, including race, national origin, colour, sex, age, mental or physical disability, political or other opinion, property, birth or other status, or native island,²⁸ it is arguable whether

²² Records were obtained under the Right to Information (RTI) Act via an RTI application submitted to the Prosecutor General's Office.

²³ Section 63 of the Penal Code.

²⁴ Article 127 of the Constitution.

²⁵ Section 30 of the Penal Code.

²⁶ Section 1107 of the Penal Code.

²⁷ Section 61 (b) of the Prevention of Money Laundering and Financing of Terrorism Act.

²⁸ Article 17(a) of the Constitution.

the right of non-discrimination is exercised properly.

2. Standard of Proof for Conviction

Under the constitution for a person to be convicted for a criminal offence it has to be proven beyond a reasonable doubt. Article 51(h) of the constitution states that a person should be presumed innocent until proven guilty beyond a reasonable doubt.²⁹ This is the standard of proof in corruption cases, too, as it is a criminal offence.

3. Conviction Rate of Corruption Cases

Although several cases are submitted to the PG each year, very few of these result in successful convictions. As of 2012, there has been only one major corruption case that resulted in a successful conviction — a case involving a sitting MP, which resulted in the removal from his post as a Member of Parliament.³⁰ Contrastingly, 26 cases involving 52 prosecutions were sent to the PG by the end of 2011.³¹ A parliamentary oversight committee reported in 2012 that the majority of corruption cases forwarded by the ACC to the PG are pending a decision at the PGO,³² and that those forwarded to courts by the PG often face another waiting period while the courts make a decision.³³

4. Pre-trial Procedure

There are no pre-trial procedures for identifying issues, facts or to scrutinize the evidence. However, with the new Penal Code, which came to effect on 16 July 2015, the trial procedures might change so that there will be two separate hearings, one to prove the offence is committed and the other to decide on the sentencing.

5. Witness Protection in the Maldives

To date there are no witness protection laws in the country. However, an amendment to the National Police Act provides for some witness protection measures. In some cases judges have allowed witness statements to be given under special procedures where the identity of the witness is hidden.

III. GOOD PRACTICES AND PROBLEMS IN THE SYSTEM

A. **Good Practices**

1. Public-Private Cooperation

To promote public-private cooperation in the fight against corruption, the Anti-Corruption Commission has established a confidential reporting channel, a hotline, where anyone can report wrong doing without their identity being disclosed. It also entails prompt disclosure and cooperation with enforcement authorities when violations occur.

Various types of public awareness campaigns, such as media advertisements, seminars and workshops are carried out in all parts of the country every year to promote public awareness on the dangers of corruption. The main aim of these awareness campaigns is to prevent and prohibit corruption in the country.

Much needs to be done to strengthen the public-private cooperation in combating corruption. Based on the statistics of the corruption cases filed, the following are some areas that need improvement in the current system.

- Public sector ethics and procedures: require recruitment and promotions to be based on efficiency, transparency and objective criteria such as merit, equity and aptitude.
- Public procurement: require procurement systems to be based on transparency, competition and

²⁹ Article 51(h) of the Constitution.

³⁰ National integrity system, Maldives 2014.

³¹ ACC Annual Report 2011.

³² "Seventy-two percent of corruption cases pending on PG's table: Nazim" *Haveeru News (web) 15 August 2015* at <<http://www.haveeru.com.mv/news/46420>>http://www.haveeru.com.mv/dhivehi/abdulla_hameed/110061>.

³³ See for example, corruption case of former Minister Abdulla Hameed: "Court orders to arrest and summons Abdulla Hameed" *Haveeru News (web) 15 August 2015* at <www.haveeru.com.mv/dhivehi/abdulla_hameed/110061>.

objective criteria.

- Public sector finance: require appropriate measures to be taken to promote transparency and accountability with respect to, procedures for the adoption of the national budget, timely reporting on revenue and expenditures, accounting and auditing standards, effective and efficient systems of risk management and internal control.

Although the above three measures are already implemented in the Anti-Corruption Commission, there are many government offices that do not follow such a system, leading to corrupt practices in the three areas mentioned.

2. International Cooperation

(i) *Extradition*

Before the enactment of the Extradition Act (Act No. 1/2015),³⁴ which came into force on 5 April 2015, Maldives had very limited experience with extradition. Prior to this act Maldives signed three extradition agreements. They are with Sri Lanka on the 2 of September 1981, with Germany on the 14 of September 1982 and with Pakistan on the 12 of July 1984. The new act ensures smooth cooperation with other nations.

(ii) *Mutual Legal Assistance*

The Mutual Legal Assistance Act (Act No. 2/2015),³⁵ which came into force on 5 June 2015, provides for mutual legal assistance (MLA) on a treaty basis, including for cases involving non-coercive measures. It sets out a general framework to regulate procedures for providing or requesting MLA.

In October 2009, Maldives ratified the Convention on Mutual Assistance in Criminal Matters of the South Asian Association for Regional Cooperation (SAARC Convention). Article 1 of the Convention States that the State Parties to the convention shall, subject to their national laws, and in accordance with the provisions of the convention, provide to each other the widest possible measures of mutual legal assistance in criminal matters, namely investigations, prosecution and resulting proceedings.

Under the Prevention of Money Laundering and Financing of Terrorism Act, it is mandatory for the domestic authorities to provide the widest possible range of cooperation to competent authorities of requesting States. Section 49 and 50 of the Prevention of Money Laundering and Financing of Terrorism Act regulates the use of special investigative techniques, upon court order, to obtain evidence of money laundering and for tracing proceeds of crime. Special techniques foreseen in the Act include electronic surveillance, wiretapping, controlled delivery and undercover operations.³⁶ However, there is no record of identifying, tracing, freezing and confiscation of any proceeds, property or assets.

Maldives has signed the Transfer of Prisoners Agreements with India, Sri Lanka and Russia and proposed Transfer of Prisoners Agreements to Syria, Indonesia, Philippines, Thailand, Bangladesh and Pakistan. However, the latter are yet to be agreed upon.

(iii) *Law enforcement cooperation*

As Maldives is a member of Interpol, Maldives seeks and provides assistance to/from other nations who are a party to Interpol.

In addition, Maldives has provided cooperation with other law enforcement agencies in the region in a limited number of cases. It includes exchange of information, identification of persons and cases of joint investigations. The Maldivian Police have cooperated at the international level, utilizing techniques of controlled delivery in drug-related offences.

B. OTHER PROBLEMS OR CHALLENGES

1. Due to the shortfall in the financial capacity, it affects the performance of ACC in carrying out its

³⁴ Extradition Act (Act No. 1/2015).

³⁵ Mutual Legal Assistance Act (Act No. 2/2015).

³⁶ Act no. 10/2014 - the Prevention of Money Laundering and Financing of Terrorism Act.

functions especially in relation to the challenges incurred due to the geography of the country. The lack of financial resources limits the ACC's capacity to establish an adequate number of regional offices throughout the country. Likewise, financial limitation also results in lack of capacity for adequate public awareness programmes to be carried out throughout the country at times.

2. With the growing number of complaints lodged, and for the effective functioning of the mandate of the ACC there is an imperative need to build the human resource capacity of the ACC by recruiting professional, skilled staff and to provide the necessary training to enhance their skills.
3. Due to the weaknesses in the current Anti-Corruption Commission Act and the Prevention and Prohibition of Corruption Act, a revised bill has been drafted and proposed to the parliament in late 2012. However, due to challenges in the political environment, the bill has not yet been passed.
4. Lack of effective coordination and communication among stakeholders, resulting in a lack of coordinated effort on implementing UNCAC.
5. One of the ACC's mandates is educating and raising awareness among the general public against corruption, but it falls short of achieving this goal due to budget constraints.
6. Lack of a compliance mechanism to evaluate whether the recommendations given by the ACC are adhered to by the institutions.
7. Due to the weaknesses in the legal framework, it is difficult to take prompt action when there is a need to investigate a case with urgency.
8. ACC does not have prosecutorial powers, which lay with the Prosecutor General (PG), who is responsible for instituting and conducting all criminal prosecutions and proceedings on the cases forwarded by ACC. Although a number of cases are being forwarded every year, actions are taken on a very few cases. So it is very important to improve the coordination between ACC and the Prosecutor General's Office, as the effectiveness of the ACC is significantly dependent upon the performance of PG and the courts for successful prosecution.

IV. RECOMMENDATION

1. It is vital to assess the geographical situation of the country and to adopt an effective methodology to combat & prevent corruption.
2. Measures need to be taken to ensure financial stability and predictability for the ACC, to enable it to plan its investigations and awareness activities.
3. Human resources and training opportunities for ACC staff need to be increased, especially in terms of investigative capacity.
4. Establish a review and follow-up mechanism to ensure the recommendations provided are enforced by the institutions.
5. Need to strengthen the coordination between the work of the ACC and other law enforcement agencies, such as the PGO and the judiciary, to increase collaborative efforts. Also, efforts need to be made to build public confidence in institutional cooperation.
6. Preventive efforts need to be planned and implemented with other stakeholders such as local NGOs and businesses in order to use the limited resources most efficiently.
7. Build and maintain international cooperation to transfer information and knowledge, and obtain financial and technical assistance.