INDEPENDENT JOINT ANTI-CORRUPTION
MONITORING AND EVALUATION COMMITTEE

Strategic Plan (short version)
July 2016 – November 2018

INDEPENDENT JOINT ANTI
CORRUPTION MONITORING AND
EVALUATION COMMITTEE (MEC)

PREFACE

The Independent Joint Anti-Corruption Monitoring and Evaluation Committee (MEC) was established in 2011 following the London and Kabul Conferences in 2010 to monitor and evaluate the progress made in fighting corruption by the Government of the Islamic Republic of Afghanistan and the International Assistance Community. Over the last five years, MEC has used its *Vulnerability to Corruption Assessment* (VCA) tool as the principal means of assessing corruption risks within the Afghan ministries, departments and agencies and in the international aid programs. MEC has issued over 400 recommendations with benchmarks, as well as produced special reports, focus papers and press releases on salient issues. It has also held numerous press conferences, and conducted outreach activities in Kabul and the provinces to disseminate its findings.

MEC has now established an enviable reputation not only within the Government of Afghanistan, but also among the international assistance community and the people of Afghanistan. It is now seen as a strong anti-corruption voice in the Afghan landscape. This, however, has also raised high expectations that MEC must now deepen and broaden its engagement.

MEC has responded to this challenge by launching a three-year strategic plan to set out the new pathways for future engagement. This process has involved doing an internal assessment of MEC's strengths and weaknesses, an extensive survey of stakeholder expectations, and consultations with all interested parties, including international donors and senior government officials. The present strategic plan for the next three years draws on all these inputs and lays out the direction and the priorities that MEC will embark on. It will be executed within the constraints of MEC's mandate.

Respectfully,

Dr Yama Torabi
Chair – MEC July 31st , 2016

1. Introduction

The purpose of this document is to present the new strategy of the Afghanistan Independent Joint Anti-Corruption Monitoring and Evaluation Committee (the MEC) for 2016-2019.

There is a harsh reality in Afghanistan. Corruption has increased during the last 15 years and the public has grown highly sceptical that it will ever be tackled. Deep corruption allegations have surfaced in education, health, defence, public services, election and other sectors in Afghanistan. Afghanistan has continued to be rated at the bottom of the corruption perception index (CPI) as well as in other global corruption indices and has not made any significant progress to bring reform to tackle corruption. Past shortcomings in political will and the existence of weak institutions to fight corruption have given rise to more corruption and have reduced people's confidence in the system to deliver with integrity.

The recent emphasis of the National Unity Government on the establishment of the High Council of Governance, Justice and Anti-Corruption directly under the President, the strong focus on ensuring compliance in central government contracting and the recent transfer or sacking of 630 judges, shows that the government at the highest level has now prioritized the fight against corruption. We welcome these positive signals.

The people of Afghanistan and the international community need to see the change in this fight, and that change will only come when our systemic efforts lead to effectiveness and impact in the lives of the Afghan people.

MEC governance, organisation and mandate

MEC consists of a directing Committee and a Secretariat. The Committee is constituted of six experts on anti-corruption (three Afghan members and Three international Members). The Secretariat comprises a staff of 44, of whom 25 are technical staff. MEC presently has an annual budget of $2.7 million and is supported by international donors, currently United Kingdom, United States, Denmark and Norway[1].

MEC's mandate is as follows:

The Committee is obligated a) to assist in defining effective developmental benchmarks for institutions; b) to monitor and evaluate activities to fight corruption at national level and in respect of foreign aid from governments and international organisations; c) to report to the President, the National Assembly, public and society, and the international community, every six months*. Presidential Decree 61, Article 8; 2010 – Translation by MEC April 2016*

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[1] In addition, Germany is presently funding two positions in the MEC Secretariat through the Centre for International Migration and Development (CIM)

MEC's mission, vision and core values

MEC's *mission* is that '***MEC is committed to independently and impartially help the people and the government of AFG in minimising corruption and embedding a culture of integrity'.***

MEC's vision is **'An Afghanistan that is united in saying no to corruption'.**

MEC has the following *core values*:

>**Independence:** taking decisions and actions without the influences of any person, group of persons or authority;

>**Impartiality:** non-partisan; neutrality and fairness;

>**Integrity:** working in an honest manner; cultivating the confidence and trust of stakeholders, particularly the Afghan people;

>**Commitment:** we are committed to our mission and to achieving results;

>**Public Trust:** we build the trust of our stakeholders, particularly the Afghan people by being transparent and publishing all we do.

2. MEC today

Since its establishment, MEC has been successful in becoming a recognised part of the national anti-corruption landscape. It has competent staff and a robust product in the form of its 'Vulnerability to Corruption Assessments' (VCA). The Afghan people, the media, the government and the international community all trust its voice and regard it as impartial.

MEC has had national impact: Through its work on the scandal of Kabul Bank, which continues today, through speaking out on scandals and issues of national concern, and through contributing to drafting relevant legislation. MEC has had impact in assisting governmental reform through its VCA analyses and its energetic follow up of the recommendations. There are many examples of improved government processes as a result of MEC's work.

However, despite these achievements, MEC's impact has not been nearly as great as it could be. Its output has been modest: 13 VCA reports, 25 Research reports, two special reports (on Land Usurpation and Kabul Bank), and three special enquiries on behalf of the President's office. Its voice is not regularly heard in public debate. Its coverage of topics has tended to be ad-hoc, rather than directed.

For the new strategy, MEC has consulted with stakeholders for their opinions on MEC and their ideas on how MEC can increase its impact. We asked questions of some 60 stakeholders, mostly national but also donors and international experts. Some of the questioning was through one-to-one interviews, where MEC staff asked 34 people a set of 12 open questions. In addition, MEC took advantage of other meetings to gather opinions from a further 30 people

The response was positive towards MEC – its role was seen as important and valuable. But at the same time there were some significant caveats. In particular:

- MEC is very good in specific areas such as conducting in-depth enquiries and issuing recommendations on the basis of its assessments of vulnerabilities to corruption.
- MEC needs to be regularly talking in public about the status of anti-corruption efforts in the country
- MEC has been too quiet and has not made its presence felt enough
- Concern about MEC's legal status.

The strongest response from stakeholders was in relation to speaking out publicly, with an almost unanimous view that MEC should make its voice and views much more widely known. On the other hand, there were no conclusive opinions on strategic options, with a 50:50 split on whether MEC should have a narrow focus or a broad focus.

MEC has also conducted its own analysis of strengths, weaknesses, opportunities and threats. The results show a common view of MEC's strengths: independence and credibility, quality work, ability to work across both national and international communities, good access to Ministries and Ministers, and the ability to engage with groups outside central government, such as in the provinces and with civil society. The weaknesses centred on limited resources, spreading itself too thinly, the unclear legal mandate, dependence on donors and the fragility of access to Ministries.

There are many in Afghanistan who see MEC as one of the few beacons of hope on the anti-corruption front; that MEC was 'the only game in town' when it came to independent oversight of, corruption. In the soliciting of stakeholder opinions, we heard this view from many people – from Ministers to civil society - who look to MEC for such support as it can provide.

3. The new strategy

There is no blueprint for eradicating corruption. Yet, despite the difficulties of tackling corruption, a surprising number of countries have had considerable success, often from a low base or in a fragile environment.

Drivers of change

Understanding why some countries have made progress in tackling corruption, whilst others have not, has been the subject of considerable research. Of interest is not least the EU funded ANTICORPP programme, which has over the past four years examined countries across the world for factors that explain their success. The findings[2] are relevant for anti-corruption policy and practice worldwide. The research suggests that there is one factor – political drive against corruption – that is relevant to all cases. In addition, there are six other main **drivers of change** against corruption, of which three or four are relevant in each country. The seven drivers of change are:

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[2] For an article presenting findings, see Alina Mungiu-Pippidi et al, *Journal of Democracy*, Vol 27(1), pp 95-109, January 2016.

1. *Informed citizen pressure and public anger.* Public pressure and protest has been a major feature in almost all the countries achieving success against corruption.

2. *Bottom-up citizen initiatives.* Grass roots citizen initiatives, including their requirements for social accountability, are the basis of some countries' successful anti-corruption reforms. Empowering citizens and fostering collective action among strategic groups within the society is another version of citizen initiative.

3. *Modernisation of government processes,* gradually reducing the scope for discretionary choice and corruption. Examples include: Civil service employment; public sector procurement; public financial management and; the provision of services. This explains about half of the variation in control of corruption. Included in this are improvements in public reporting, and in internal and external control mechanisms. In some countries, a powerful focus on modernising just a single area of government – e.g. land reform – was the critical success factor.

4. *Investigations, prosecutions and sanctions.* Showing that the culture of impunity can be beaten, and thus building the confidence of potential reformers, has been a major part of progress against corruption. Examples of measures include replacing the majority of judges in situations of endemic corruption.

5. *Human agency.* Much change has come about because of groups of committed people who are working to change the system, or to have equal access. Such 'human agency' as it is termed, mattered a great deal in all succeeding countries, according to the research. As the research puts it: "Without educated and autonomous professional groups fighting for good governance because it is in their best interest, sustainable progress in fighting corruption will not occur".[3] However, there needs to be a critical mass of such people.

6. *External international support.* International support for anti-corruption efforts has been critical in many countries. The international support covers a broad range of interventions: From paying government employee salaries on an interim basis, to donors using their leverage to improve institutional endowment.

7. *Political determination.* Strong political drivers against corruption - limiting the scope for corruption and the building of supportive reform groups among government officials and political groups - are major enablers of successful reform. Usually, the heart of this is through creating incentives that make key groups want to support the reforms because they will benefit in some way – whether financially, through improved reputation or political recognition.

Besides identifying the principal drivers of change, the research also yielded another useful finding from the more successful countries. A governance order can be changed, but such change will occur gradually and 'punctuated equilibrium' will be the rule – unexpected events will upset the current equilibrium and these are an opportunity for a new and better balance to be achieved. For a body such as MEC, this means that it is extremely important to be alert to such dynamic situations and to adjust accordingly.

Four of the seven drivers of change - citizen initiatives, prosecutions, external assistance and political change - are not relevant to MEC's mandate. MEC's strategy is to apply its mandate of 'Monitoring and Evaluation' to the other three of these seven drivers:

1. Informed citizen pressure and public anger

MEC will speak more on corruption matters and will be instrumental in shaping the public debate on corruption. It will do this through the knowledge it gains from its inquiries, its analyses, its monitoring across a broad range of government activities, and its dissemination efforts.

2. Modernisation of government processes

MEC will empower government ministers and officials to make better progress against corruption by providing in-depth analyses, comparative analyses, and a perspective on the quality of the current monitoring of government institutions. In respect of its in-depth evaluations, MEC will prioritise those people and organisations that are committed to reform.

3. Human agency

MEC will devote significant resources to helping to build and empower all those engaged in the fight against corruption. MEC will also provide input to help reformers move forward on anti-corruption initiatives and strategies after MEC has completed the in-depth analyses. This includes top government officials, such as by prioritising their Ministries and following up with them on a regular basis. Building such capacity and competence - including for mainstream professionals such as auditors, technical officers, governance specialists and relevant NGO personnel - is a core part of reducing corruption over the course of the next decade. It may be that this effort will develop into a 'Centre of Anti-Corruption M&E Competence'.

Concept of the strategy

The strategy is based on MEC aligning its efforts to the other initiatives that are also supporting these three drivers of change. In addition, the strategy incorporates the following elements:

- **Broadening MEC's scope** by working at two technical levels – in-depth studies in a limited number of areas and smaller studies across a wider range of institutions. In the past MEC have worked only at the more detailed level, which limits its scope and impact.

- Paying close attention to which measures are having an impact and to changes in circumstances. This requires that MEC has a structured approach to **learning**. Equally, trying out new measures that could be meaningful in relation to the drivers of change.

- Implementing the strategy by steadily **building out** from MEC's current capability and capacity.

Prioritisation

MEC's resources will always require prioritisation. When it comes to in-depth technical studies, MEC will apply three criteria in selecting where to place its effort.

First, in relation to in-depth studies, MEC's primary criterion for prioritisation will be the commitment to reform of the sponsoring Minister, senior individual and organisation. MEC seeks to empower government officials to progress against corruption, and so prioritizing those who share this objective is the most natural first filter. It also means that MEC will be working to support such champions in any follow up work or advice after the analysis is done.

MEC's *second criterion* will be to prioritise government work in:

      a. Public Service Delivery organisations and Ministries
      b. Revenue Generating organisations and Ministries
      c. Security Sector
      d. Areas of top priority to the Government's fight against corruption (e.g. AGO)
      e. Systemic cross-government processes.

MEC's *third criterion* will be related to maximizing the chance of having a sizeable impact in that Ministry or organisation. The two key elements of this are:

- Whether MEC's findings and recommendations are likely to leverage *substantial donor funding to the relevant Ministry* to help with the implementation of the recommendations. The more likely this is, the more positive chance for MEC to work with this particular Ministry.

- Whether the Ministry is likely to have sufficient own resources to devote to implementing the recommendations.

In relation to enquiries and to the smaller focused studies (the second technical level, as mentioned above), MEC's priority will be to choose topics that are of most public interest*. These could cover any topic and are not limited by functional areas.

Notwithstanding the above, the Committee will exercise its own judgement in respect of which studies to do.

MEC very occasionally also receives requests for priority work from the President's office. There have been four such requests: One to MEC directly and the other three to Committee members in their personal capacity. MEC is currently seeking to agree a formal protocol for such requests with the President's office. In cases where the request is to a Committee member in their personal capacity, the Committee will also be informed in advance and able to discuss the request. Where such assignments are indeed personal to the Committee member rather than in their MEC capacity, MEC resources will not be provided to assist such studies.

Prioritisation and the International Community

It is an integral part of MEC's mandate to monitor corruption issues arising in aid provided by the international community, or as a result of international community activity. To date, MEC has done one in-depth analysis of aid effectiveness, and has 13 recommendations in its M&E tool relating to the international community.

MEC will fulfil its mandate in the new strategy as follows:

- In MEC's six-month reports to the Public, the President and Parliament, MEC's commentary will include reference to corruption issues related to aid from the international community.

- MEC will include an examination of relevant international aid issues in its in-depth analyses. For example, if the report is on Ministry of Education, MEC will include an examination of corruption vulnerabilities related to international aid for education.

- MEC's workplan will include work on international community aid corruption issues according to the judgement of the Committee.

MEC and working in the Provinces

All MEC's strategic objectives have a provincial component. The Committee has reviewed the extent to which Provincial work forms a part of the overall strategy, and our conclusions are the following:

- MEC will discuss the key corruption issues with stakeholders in the provinces on a regular basis; and will follow these up in line with its regular work. Such matters might include, for example, analysis of the proportion of budgeted funds reaching the provinces, or corruption in fuel duties at customs posts.

- MEC will establish its priorities in the provinces on an annual basis, subject to the security and budget constraints at the time.

- The purpose of MEC 's objective of 'Helping to build an enabling environment' (Objective 6) includes supporting anti-corruption work in the provinces – such as the 'Provincial Working Groups'. MEC will explore how best in can do this in the course of the coming year.

- MEC's in-depth reports will include evaluation of corruption vulnerabilities and issues in the provinces as well as in the central government; to the extent possible within security and budget constraints.

4. Strategic objectives

MEC has organised its objectives for 2016-2019 under the umbrella headings of the three drivers of change. Within those, MEC has identified two 'Strategic objectives' for each driver - six objectives in total - each outlining what we wish to achieve as our contribution to reinforcing these drivers. Finally, we have listed a number of 'pathways' underneath each strategic objective. These are the ways in which we will try to achieve the given objective.

First driver of change: Informed public pressure and anger about corruption

Strategic objective 1: Generate data and knowledge to inform the public
Pathways:
1. Establish appropriate policy and methodology in respect of data collection, evidence gathering, analysis, communications and advocacy.
2. Monitor specific situations that are of public interest and where there is no current or prospective government action.
3. Monitor specific misuses in the government system.
4. Monitor information from government entities that may be withheld or suppressed, and triggering pro-active disclosure. (e.g. HOO and asset declarations; publishing the statistics of 119 calls regarding corruption that are being addressed).

Strategic objective 2: Build public pressure for anti-corruption reform
Pathways:
1. Communicating MEC overview on a regular basis, and MEC's results.

2. Strengthen the public's voice on corruption issues on the basis of MEC's information and evidence gathering.
3. Monitor areas of resistance to corruption reform and consider ways that such resistance can be addressed.

Second driver of change: Modernising government processes

Strategic objective 3: Empowering government officials and other stakeholders in anti-corruption activities
Pathways:
1. Providing in-depth analysis of corruption issues.
2. Ensuring follow up of MEC's recommendations; similar to how we do this today.
3. Plan for repeated follow-up reviews of the progress of the Ministerial anti-corruption action plan with committed Ministers.
4. Providing independent perspectives on those bodies responsible for monitoring or controlling corruption ('monitor the monitors')
5. Using leverage, partnerships and collaboration to increase MEC's impact with government.
6. Monitoring progress on government reforms where there is an anti-corruption angle.
7. In year 2, develop a national anti-corruption benchmark to track progress

Strategic objective 4: Support and contribute to national policy on anti-corruption
Pathways:
1. Review existing legislation pertaining to corruption and identify risks; support efforts by parliamentarians to advance legislation and oversight.
2. Review existing anti-corruption policies and identify gaps based on established priorities; support efforts of policy makers to make progress.
3. Monitor progress on the implementation of new anti-corruption policies and reforms.

Third driver of change: Human agency

Strategic objective 5: Empower reform minded individuals and groups
Pathways:
1. Prioritise reform minded Ministries when planning in-depth studies.
2. Monitor and highlight successful anti-corruption strategies, successful initiatives and individuals of integrity.
3. Support leadership officials with advice on anti-corruption strategies, action and action plans.
4. Develop and publish scorecard evaluations of government performance on specific corruption aspects of public services to incentivize and reward improvement.
5. Conduct focused small comparative studies across Ministries on specific issues/weaknesses.
6. Build networks of committed individuals across government in mid-level and junior positions of monitoring, control, audit and anti-corruption. Explore how such individuals and initiatives of integrity can be supported through budget/off-budget support and other rewards (like training).

7. Over time, extend this work to building national competence on M&E and anti-corruption; with the view that this may develop into a Centre of Competence over the long term.

Strategic objective 6: Improve the enabling environment for addressing corruption
Pathways:
1. Develop priority work areas in common with media, religious bodies and civil society. Use such a coordinated approach to select common topics of interest so as to strengthen their voice on anti-corruption and to develop a stronger and less fragmented public platform.
2. Use MEC's mandate and capabilities to work with business groups and the donors to improve the enabling environment.
3. Set up and operate a structured learning process and forum, for discussing with other stakeholders in Afghanistan what anti-corruption measures are working and not working.

This work within this sixth objective is within our current mandate, in the context of determining effective developmental benchmarks. However, it is the case that this is a broad interpretation of the mandate, and so we will seek clarification of this from the President and in the updating of the legal foundation of MEC.

5. Implementation

The first year of the strategy will be spent on two sets of activities:
  i. Strengthening the organisational and technical competence of MEC; and
  ii. Completing the current workplan in good order, whilst preparing for the implementation of the strategy in the second and subsequent years.

Strengthening the organisation

MEC needs to be a stronger organisation if it is to support the significant extra scope that is explicit in the new strategy. The necessary strengthening is in the following areas:
  – Specific additional staff roles required.
  – Organisational capacity assessment and staff capability assessments: the foundation for new teams.
  – Technical standards, methodological rigour and training.
  – Legal foundations and clearer perspective on sustainable form of MEC.
  – Review and improve the funding practicalities with donors.

Gender
MEC is well aware that the bulk of their staff are male. MEC is committed to moving towards a better male/ female balance in the Secretariat, and will use the opportunity of increased staffing to improve this.

It is also probably not a coincidence that many committed anti-corruption citizens are women. For example, the Parliamentary Anti-Corruption Caucus (PACC) has 26 MPs as members, all of whom are women.

Organisational and staff assessments

The new strategy will require transitioning to a revised arrangement of teams and a different mix of skill sets. Upon approval of the strategy, MEC will immediately conduct both an Organisational Capacity Assessment (OCA) and Staff Capability Assessments (SCA). MEC will request donor assistance for resourcing any temporary consultancy support needed to do these assessments.

Technical standards, methodological rigour and training

MEC has worked on a fairly ad-hoc basis to date as regards technical standards. This will gradually be remedied through year 1, with articulated standards for key procedures, such as minimum standards of evidence required for particular types of statements, or operating guidelines for detailed interviewing. MEC will also review needs for other skills such as research techniques and advocacy skills.

MEC will also be increasing its use of the latest development of its in-depth methodology. This type of work demands higher technical standards and this needs to be methodologically documented and training developed for staff who will use the approach. MEC will request donor support for an expert consultant for the necessary time to write the standards and deliver the necessary training. Similar standards and training guidance will be needed for the work on enquiries.

Communications and advocacy strategy

MEC will be much more strategic in how it engages with the public and with the government. MEC will develop a communications and advocacy strategy on how it will help to build pressure for national change, and how it will maximize the impact of its own work. MEC will request donor support for a communications/ advocacy expert to assist with this task.

Sustainability of MEC

MEC will also give detailed thought through Year 1 as to what might be the sustainable future for MEC – i.e. what its medium and long term 'shape' might be. There is a wide range of possible options. MEC will draft a paper on this topic for discussion and conclusion with key stakeholders including donors during the first year.

In the meantime, this new strategy has been developed on the core premise that MEC will become an essential, semi-permanent feature of the Afghan anti-corruption landscape, and thus that donor funding will be required on an ongoing basis.

Legal Foundation

MEC's legal status has not been clear since its inception. At the time of its establishment, MEC was intended to be an independent body established by decree, but when the Presidential Decree 61 was finalised, it placed MEC under the High Office for Oversight and Anti-Corruption (HOO). This status is incorrect and hampers the daily work of MEC.

There are several ways that this could be updated. MEC is in discussion with the President's office on this matter, and one outcome may be that a new decree needs to be put forward without delay. MEC is working on this basis. If that is not the case, then, MEC will wait for the shape and intention of the new High Council to become clearer, after which a decision will be made about putting forward a new Presidential decree. This updating will also include clarification on the terms of Commissioners, the possibility of extension, and the alternating nature of the Chairmanship.

Review and improve the funding practicalities with donors

MEC has no financial resources of its own. MEC's current funding agreement with the donors means that new tranches of funding only come once the accounting for the previous quarter's spending is complete. This is a major weakness for MEC, as it means that any delay in producing the quarter's figures immediately results in MEC running out of cash, with the consequence that its staff are not paid. MEC requests agreement from the donors, as part of this strategy, to change this to a better basis. MEC will discuss this and the related MEC-donor practical relationship during the first year. MEC understands the normal processes of donor annual reviews and logframes.

Year 1 workplan

Based on the above, the workplan for the first year of the strategy comprises the following three broad sets of activities:

A. Undertake all the 'Strengthen Foundations' actions – as already discussed
B. Complete the current workplan
C. Implement a workplan for the rest of the year that starts to build the strategy

Resources and M&E

MEC will reshape its teams and organisation to match the new strategic objectives. Assuming that the donors support expansion of activities, then there will be a transition period during the second year of the strategy, when capability is being built. We envisage this as follows:

MEC is confident that this new strategy will provide an attractive platform to a wider range of funders. Some will be attracted to support an expansion of our work in particular sectors, by increasing the size and scope of the in-depth teams working on Strategic Objective 3. Others may be attracted by the larger role of MEC in giving an independent perspective on the performance of the existing monitoring bodies, also in Objective 3. Others may be keen to support our proposed work in competence development and national capacity building on anti-corruption, as in Objective 5. Diversity of funding sources supports the more general objective of reinforcing MEC's independence, as well as minimizing the financial burden on a small pool of donors.

Measuring MEC's own progress

Whilst the only real measure of success is progress at the national level, MEC will put the following in place to track MEC's own progress:

- Tracking against the strategic objectives and related action plans. An M&E plan has been developed to assist this
- An independent evaluation of MEC at end 2017 and every 2 years thereafter.
- Electronic survey of stakeholders and members of the public every year. Questions would include their view of MEC's direct and indirect impact. We can consider the opinion of people about our major releases, e.g. media, policy makers and donors through our consultative meetings and document these.
- MEC's self-evaluation each year.

MEC will also develop the learning structure referred to in Objective 6. If there is one lesson from anti-corruption work around the world, it is that the need to pay attention to what is and is not working, and to how those opposed to reform are reacting and adapting. MEC will therefore set up a regular, structured learning and review capability, so as to watch very closely what seems to be working in Afghanistan against corruption, and to a lesser extent in governance reform.