



INDEPENDENT JOINT ANTI-CORRUPTION  
MONITORING AND EVALUATION COMMITTEE

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# Strategic Plan (July 2016 – November 2018)

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Part 1 of 2: Full strategy

***FINAL DRAFT***





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.

The strategy is presented in two parts. Part 1, this document, lays out MEC's full strategy, which requires additional financial resources beyond the current agreed donor funding levels. Part 2 shows the extent to which the strategy can be implemented within the existing funding from current donors.

Respectfully,

Dr Yama Torabi  
Chair – MEC July 23rd , 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<sup>1</sup>.

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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<sup>1</sup> 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.<sup>2</sup>

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.<sup>3</sup>

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<sup>4</sup>. 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.

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<sup>2</sup> A report detailing the effect of the VCAs and other MEC interventions is available from MEC

<sup>3</sup> The detailed stakeholder analysis is available as an annex to this document

<sup>4</sup> The SWOT analysis is available as an annex to this document

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<sup>5</sup> 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:

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".<sup>6</sup> 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

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<sup>5</sup> For an article presenting findings, see Alina Mungiu-Pippidi et al, *Journal of Democracy*, Vol 27(1), pp 95-109, January 2016.

<sup>6</sup> Ibid, p105

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<sup>7</sup> 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

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<sup>7</sup> Measures initiated by MEC or others



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')<sup>8</sup>

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<sup>8</sup> MEC will provide an independent perspective on the progress/success of some of those bodies who currently have an executive role to monitor anti-corruption progress; for example, Ministerial action plans (where they relate to anti-corruption), internal control units in Ministries, Inspectors General, internal and audit bodies. On a larger scale, these include High Office of Oversight, Supreme Audit Office, the Parliamentary oversight commissions including the Complaints' Commission, the Admin Office of the President's Monitoring Unit, the Access to Info Oversight Commission. MEC does not want in any way to supplant the proper monitoring functions of such existing organisations in GIRoA. However, it is within MEC's monitoring mandate to check that those with such roles are indeed carrying them out properly; and to take action when this is not the case. This will also include the new High Council.

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<sup>9</sup>.

#### 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.<sup>10</sup>
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.<sup>11</sup>
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:

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<sup>9</sup> For example, MEC may make a detailed trial of one such project, dependent on the availability of funding. This is to develop **a national anti-corruption benchmark** through which progress each year can be tracked. There is a new trend in anti-corruption work to develop technical indexes, to complement the well-known corruption perception indexes. This trend is driven by dissatisfaction with the perception indices, because they are of almost no use as a basis for tracking improvement against action plans. Some of these indexes that have been developed include those on education (Global Integrity), African Governance (Mo Ibrahim foundation) and Defence/Military (Transparency International). It means that governments and observers can see what progress is being made and can see which further actions to take in order to improve their results. The confidence to make such a benchmark has only emerged in the last 5 years or so, and the Committee has some expert competence in this specialized area and can advise on commissioning expertise to develop it.

<sup>10</sup> See separate discussion on prioritisation in Chapter 3

<sup>11</sup> There is much beneficial impact to be had from small, focused analyses of specific weaknesses. An example would be to monitor the proportion of financial information reaching the provinces from the centre. Another would be the comparative self-assessment of each Ministry on the extent to which each Ministry adheres to meritocratic recruitment and promotion. A current example is to follow which Ministries have set out proper anti-corruption plans within their '100 day plans'. The result itself is unlikely to be a surprise, but the usual experience is that the relative situation of each Ministry – some are happy to be 'best', whilst others are embarrassed to be poorly scored - provides an incentive for improvement by Ministers. MEC has not done such studies before, but it will be straightforward to build such capability as they do not require special competences.

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.

## Specific additional staff roles

The MEC secretariat needs strengthening with the following positions:

- **Operational excellence:** MEC needs a senior person who can take overall charge of MEC's work. MEC is producing many reports at the same time, and the system is not strong enough to simultaneously maintain consistently high technical standards, meet the agreed delivery timetables, and develop advocacy plans for each work product. Until now this has been the role of the Executive Director, in addition to his roles of external representation and strategic direction. We propose that a position be created that covers all responsibility for production of technical work. It may or may not oversee the supporting functions as well. In commercial organisations, this role is termed 'Chief Operating Officer' or Technical Director. It is a serious, essential role, NOT a 'deputy' position.
- **Senior finance support:** MEC has strengthened its finance function compared with 12 months ago. However, it is still not strong enough, as evidenced by the recent audit report. Having multiple donors also imposes additional budget and reporting obligations, which need full time support in order to fulfil well. MEC will thus bring in a second finance person.
- **Senior Human Resource Development support:** The donors have done several reviews of MEC's support functions, and have requested that MEC strengthen not only its finance capability but also its Human Resource function's ability to support the development of MEC staff's capabilities.
- **M&E:** MEC currently does very little M&E of its own activities. (MEC does have an M&E group, but this group has a quite different function – to follow up the recommendations of the VCA reports). MEC will recruit an M&E consultant, or request donor support to bring one in as a long-term consultant. This person will also prepare the ground for a structured learning programme to examine progress on anti-corruption measures, which will be implemented in the second year.
- **Communication and advocacy:** MEC has very limited communications capability. For example, it is not doing any strategic communications. Nor is it doing any proactive advocacy of its work, which will have a great impact on take-up of its recommendations and proposals. MEC is in serious need of a senior communications and advocacy person.
- **Senior legal adviser:** MEC is operating in a very sensitive area and needs routine legal advice. This will be a part-time position – it would be too expensive and MEC would also be unlikely to secure such a senior person on a full-time basis.

- **Pashto and Dari translators:** The quality and timeliness of MEC's products are seriously undermined by inadequate translation facilities. External translation is often not possible because of the sensitive nature of some documents.

Regarding the budget for these positions, MEC will enter into discussion with donors for these essential positions to be funded.

## 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.<sup>12</sup> 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

Subject to detailed consideration, and any necessary additional funding, the workplan for the rest of Year 1 will comprise the following elements:

- Increase the enquiry work: Build the enquiry team capacity and competence from current research team set out its guidelines and technical standards, develop its priorities. Build the capability slowly. Start with some smaller situations.
- Hold back some of the currently completed reports so as to issue them over the coming months in line with a more thought-through communications and advocacy strategy
- Follow up the MOPH Special Report (to be published shortly) through the year with regular, detailed monitoring of their action plan, both in Kabul and in the provinces.
- Do two further major in-depth reports. Choose them on the basis of the new criteria.
- Document the methodology used in MEC's in-depth reports and train MEC Secretariat staff more intensively in its use.
- Engage with the new High Council to agree on cooperation and how MEC can best contribute.
- Build closer links with the Parliamentary Anti-Corruption Caucus, civil society anti-corruption groups and others to create a more useful basis for selecting which will provide the most benefit from MEC's efforts.
- Try out the 'specific indicator' approach in one or two projects.
- Develop the methodology for 'Monitoring the Monitors' and start one or two pilots.

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<sup>12</sup> 1) MEC can ask the President to take forward a new Presidential Decree. 2) Introducing a bill (not a decree) to the National Assembly. Based on Article 97 of the Constitution: If a draft law is proposed by 10 members of either of two Houses of the Parliament, it shall be after the approval of one fifth of the House where it was initiated, then included in the work agenda of that House. 3) MEC can channel the legislative decree as a draft bill through Anti-Corruption Caucus of the National Assembly, with whom MEC has good relations. Plus two further options.

## 6. 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:

- Some teams, e.g. enquiries, can start to be built up in Year 1, based on the existing organisation.
- Other teams can be built early in Year 2 and start to have immediate impact.
- Some will take time after recruitment or commissioning to build up their competence and authority, so are unlikely to be functioning at full strength before the end of Year 2.

Subject to funding being available, we envisage that MEC will double the number of technical staff by the end of the third year of the strategy. Approximately speaking, there would be an equivalent doubling of the budget (see below).

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.

### Budget implications of the strategy

There are two different areas where the budget is increased.

- First, in respect of Year 1, there are the costs of strengthening the foundations, plus the costs of additional experts as we move to the more in-depth form of analysis. Some of these costs are one off (like the organisation capability assessment), but most are ongoing (new staff, hiring in of experts). The new staff costs are approximately \$750,000 per annum, as from mid 2016; the one off costs are about \$150,000; and the costs of the extra experts will be about \$550,000 as from mid 2016.
- Second, the strategy calls for the Secretariat's core staff to double over the strategy period, from 25 to 50 technical staff, excluding the additional six staff that are part of the strengthening of the foundations. We assume that there will be a 50% percentage increase in support costs, and no increase in Mission costs. We estimate that the budget change will be as follows:

\$'000	2016	2017	2018	2019
Current budget	2551	2735	2855	2975
New strategy (full version)	3364	5012	5790	5790

In a separate document, Part 2 of this strategy, we show the way in which MEC will achieve as much from this new strategy as possible within current funding levels.

## 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.<sup>13</sup>
- 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.

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<sup>13</sup> The M&E plan is attached to this document.





INDEPENDENT JOINT ANTI-CORRUPTION  
MONITORING AND EVALUATION COMMITTEE

## Strategic Plan

————— (July 2016 – November 2018) —————

Part 2 of 2: MEC Strategy based on currently agreed funding levels

*July 23rd 2016*





INDEPENDENT JOINT ANTI  
CORRUPTION MONITORING AND  
EVALUATION COMMITTEE (MEC)

## PREFACE – PART 2

MEC's new strategy 2016-2019 was presented in Part 1.

This strategy is founded on MEC's enviable reputation with the Government of Afghanistan, among the international assistance community and the people of Afghanistan, built over the five years since its inception. MEC has responded to these high expectations with a fundamental reappraisal of how it can use the credibility achieved so far to have an order-of-magnitude increase in impact over the coming three years.

The new strategy is based on extensive stakeholder discussion and is deeply rooted in the findings from recent research about success in reducing corruption. The MEC Committee members passionately believe that this strategy will have a significant impact on the harsh problems of corruption in Afghanistan, that it is robust for operating in the very difficult Afghan environment, and that the planned outcomes are both significant and achievable.

Full implementation of MEC's new strategy requires additional resources above those that are currently agreed with donors. MEC will be working in the coming months to identify additional funding resources for the full strategy, both bilateral funding and new core donors. In the meantime, MEC's current donors have requested that MEC shows the extent to which the full strategy can be implemented within the agreed financial resources from donors, and what will be the difference in outcomes. MEC is deeply grateful to its current donors for their support, and will do its utmost to achieve as much of the strategy's outcomes as possible within the agreed current financing resources.

This document, Part 2 of the strategy, provides the requested information.

Respectfully,

Dr Yama Torabi  
Chair – MEC July 23rd , 2016



# 1. Introduction

MEC's new strategy 2016-2019 expresses how MEC can have a significantly greater impact in reducing corruption in Afghanistan. MEC's current donors agree that this is a good strategy.

Because full implementation of MEC's new strategy requires additional resources above those that are currently agreed with donors. MEC will be working in the coming months to identify additional funding resources for the full strategy, both new core donors and bilateral funding.

MEC's current donors have requested that MEC shows the extent to which the full strategy can be implemented within the agreed financial resources from donors, and what will be the difference in outcomes. Accordingly, this document shows the key assumptions inside the strategy as regards which objectives will be pursued with the current funding levels and what will be the difference in outputs and expected outcomes.

## 2. Strategic objectives

MEC 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. These six objectives are:

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

Strategic objective 1: Generate data and knowledge to inform the public

Strategic objective 2: Build public pressure for anti-corruption reform

Second driver of change: Modernising government processes

Strategic objective 3: Empowering government officials and other stakeholders in anti-corruption activities

Strategic objective 4: Support and contribute to national policy on anti-corruption

Third driver of change: Human agency

Strategic objective 5: Empower reform minded individuals and groups

Strategic objective 6: Improve the enabling environment for addressing corruption

Within current funding, MEC will continue to pursue all the above objectives, because we believe that they form a coherent whole. Within this high level picture, some of the specific activities will be at a lower activity level, and some of the new specific activities will not be started. The main ones to be left for new funding include 'monitor the monitors', building networks of committee individuals, and conducting highly focused studies on specific systemic weaknesses using single indicators. The difference between the two scenarios and the impact on each pathway is shown in Annexe 1.

## 3. Impact on budget elements

Implementing the strategy within our current funding has two impacts from a budget perspective.

- i. The 'Year 1 strengthening' is much less possible
- ii. Keeping to the same number of technical staff means that the higher level of output of analyses, as sought in the full strategy, will not be possible unless bilateral funding can be found.

### 3.1 Year 1 strengthening

This was a core part of the strategy, and highly desired by both MEC and our donors. However, it can only be done partially in this current funding scenario. What we will do instead is to reorganise ourselves within the current 2016 budget, delay some of the strengthening recruitments, and request donors to commit seconded staff to us; until such time as we can raise additional funds to put permanent people in place.

There were four additional budget elements in the 'Year 1 strengthening' part of the full strategy, and the impact on each is shown in blue, compared with the full strategy:

- 1) Making MEC technically and administratively more robust through adding 6 more positions as from mid 2016, so that it has strong foundations for having a significantly greater impact across the country and on government performance and integrity. Costs start in mid 2016 and continue as core budget.

Strengthening position	'Current funding' scenario
Chief operating officer	will not recruit
Second finance person	will stay at just one person, but more senior
Full time HR person	will not recruit
Head of comms and advocacy	will rearrange within current budget, if possible
M&E expert	will not recruit unless vacancy appears
Senior legal adviser	recruit part time within current budget
Extra translator (for simultaneous Pashtu).	will rearrange current budget

- 2) A review of the organisation and of the staff's capabilities studies, plus some capacity training in the second half of 2016 to prepare staff for a more robust technical standard of operation. Costs are in second half 2016 only.

RESPONSE: Organisation review is continuing (already commissioned, will fit within current 2016 budget). Planned capacity training will not take place unless bilateral funding can be found.

- 3) An addition of a rented armoured vehicle to up the safety level for MEC staff and Commissioners. An alternative would be to purchase the vehicle.

RESPONSE: Not possible, unless bilateral funding can be found.

- 4) Immediately adding budget for employing expert consultants in a proportion of the detailed analyses. Costs start from mid 2016 and we expect them to continue, but they do not need to be 'core' costs.

RESPONSE: This will require extra bilateral funding (for the expert consultants), but we are hopeful of achieving enough such funding to do 2 more Ministry-wide VCAs (like MOPH).

### 3.2 Impact with constant number of technical staff

The same objectives will be pursued, but the outputs and outcomes will be reduced in comparison with the full strategy. The team sizes will remain broadly the same as today, and a comparison with the full strategy scenario is shown in Annex 2.

## 4. Current funding scenario – work focus

In the new strategy – both scenarios – MEC will be doing four main sets of activities, compared with doing mostly VCAs under the old strategy. The sections below show how MEC will organise its work in the current funding scenario, comparing the current funding scenario with the full strategy.

### 1. VCAs and MVCAs (Team 1)

In the 'current funding' scenario, MEC will change to doing 'Ministry wide' analyses. The recent MOPH report is the first, trial case of this. We would expect to do 2-3 Ministry-wide analyses each year, subject to funding bilateral funding for the experts. The number of noral VCA's will drop proportionately.

### 2. Specific situations (Team 2)

These are analyses across a broad area that cover specific abuses, areas of major concern to the public, or areas where tracking of a key indicator could leverage significant reform action. (Team 2). In the 'current funding' scenario, MEC will do this with current staff, and will increase it as much of this as it can by seeking bilateral funding. Speaking out, base don factual research is a core part of the new strategy, so we will be pushing to do more.

3. Team 3 **developing work in common with others** - civil society groups, media, religious bodies and business. Using such a coordinated approach to strengthen our combined voice on anti-corruption and to develop a stronger and less fragmented public platform. Facilitating networks of committed individuals across government in mid-level and junior positions of monitoring, control, audit and anti-corruption. MEC will do as much of this as it can using the current outreach team
4. MEC will not start providing independent monitoring of those bodies responsible for monitoring or controlling Ministries and other government agencies ('**monitoring the monitors**'), unless additional bilateral funding can be found
5. Team 4 - MEC will be taking a higher public profile of commentary on current anti-corruption progress and activities to inform public pressure about corruption. MEC will do as much of this as it can using the current Comms team, plus enlarging temporarily the comms capability according to each bilaterally funded project.



# Annex 1. Comparison of “Pathways’ between ‘current funding’ scenario and full strategy

## Strategic objective 1: Generate data and knowledge to inform the public

### Pathways:

5. Establish appropriate policy and methodology in respect of data collection, evidence gathering, analysis, communications and advocacy. UNCHANGED
6. Monitor specific situations that are of public interest and where there is no current or prospective government action. CONTINUED +BILATERAL FUNDING
7. Monitor specific misuses in the government system. CONTINUED, lower level of output
8. 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). NOT DONE

## Strategic objective 2: Build public pressure for anti-corruption reform

### Pathways:

4. Communicating MEC overview on a regular basis, and MEC’s results. UNCHANGED
5. Strengthen the public’s voice on corruption issues on the basis of MEC’s information and evidence gathering. CONTINUED, lower level of output
6. Monitor areas of resistance to corruption reform and consider ways that such resistance can be addressed. WILL NOT INITIATE

## Strategic objective 3: Empowering government officials and other stakeholders in anti-corruption activities

### Pathways:

8. Providing in-depth analysis of corruption issues. CONTINUED+BILATERAL FUNDING
9. Ensuring follow up of MEC’s recommendations; similar to how we do this today. UNCHANGED
10. Plan for repeated follow-up reviews of the progress of the Ministerial anti-corruption action plan with committed Ministers. CONTINUED+BILATERAL FUNDING
11. Providing independent perspectives on those bodies responsible for monitoring or controlling corruption (‘monitor the monitors’) BILATERAL FUNDING
12. Using leverage, partnerships and collaboration to increase MEC’s impact with government. CONTINUED+BILATERAL FUNDING
13. Monitoring progress on government reforms where there is an anti-corruption angle. CONTINUED, lower level of output
14. In year 2, develop a national anti-corruption benchmark to track progress. BILATERAL FINDING

## Strategic objective 4: Support and contribute to national policy on anti-corruption

### Pathways:

4. A. Review existing legislation pertaining to corruption and identify risks;  
UNCHANGED
- B. Support efforts by parliamentarians to advance legislation and oversight.  
CONTINUED
5. Review existing anti-corruption policies and identify gaps based on established priorities; support efforts of policy makers to make progress. CONTINUED
6. Monitor progress on the implementation of new anti-corruption policies and reforms.  
UNCHANGED

### Strategic objective 5: Empower reform minded individuals and groups

#### Pathways:

8. Prioritise reform minded Ministries when planning in-depth studies.  
UNCHANGED
9. Monitor and highlight successful anti-corruption strategies, successful initiatives and individuals of integrity.  
WILL NOT INITIATE
10. Support leadership officials with advice on anti-corruption strategies, action and action plans.  
CONTINUED, lower level of output
11. Develop and publish scorecard evaluations of government performance on specific corruption aspects of public services to incentivize and reward improvement.  
CONTINUED+ BILATERAL FUNDING
12. Conduct focused small comparative studies across Ministries on specific issues/weaknesses.  
BILATERAL FUNDING
13. 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).  
BILATERAL FUNDING
14. 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.  
WILL NOT INITIATE

### Strategic objective 6: Improve the enabling environment for addressing corruption

#### Pathways:

4. 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.  
CONTINUED, lower level of output
5. Use MEC's mandate and capabilities to work with business groups and the donors to improve the enabling environment.  
AWAIT BILATERAL FUNDING for working with business groups
6. 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.  
BILATERAL FUNDING