



Institutional Integrity Framework Assessment Guide

Liberia

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Introduction

The Institutional Integrity Framework Assessment (IFA) Guide has been originally developed by Management Systems International (principal author is Dr. Svetlana Winbourne) and then adopted for Liberia under the USAID sponsored Legal Professional Development and Anti-Corruption Program in Liberia (LPAC). The Integrity Framework is defined as a set of policies and practices that establish safeguards to prevent corruption in public institutions. The objective of the IFA is through a rigorous assessment to enable public institutions to prioritize and enhance their corruption prevention policies and practices.

Methodology Description

Institutional Integrity Framework Assessment (IFA) provides a quick scan of the status of the integrity framework and corruption prevention measures of a public agency. IFA assesses ten dimensions of the integrity framework:

1. Leadership and Commitment
2. Decision Making and Discretionary Power
3. Conflicts of Interest
4. Code of Conduct
5. Gifts and Benefits
6. Whistleblowing and Internal Reporting
7. Complaint Management
8. Management and Internal Control
9. Internal Audit
10. Transparency and Access to Information

Each dimension is described by a set of indicators¹ grouped into three categories:

- 1) Institutional: established policies and procedures and their compliance with the applicable legislation or/and best practices and standards,
- 2) Operational: implementation of the established policies and procedures, and
- 3) Human/behavioral: personnel competencies, values and behavior.

Assessment Approach

The assessment can be conducted by an independent party, such as LACC or any other qualified organizations or individuals, knowledgeable in corruption prevention measures and public sector operations. It also can be used by a public agency as a self-assessment too providing that a designated

¹ In formulating the attributes, several sources were used as references, including the Public Sector Anti-Corruption Framework (PSACF) by the ICAC/Hong Kong, The Do-It-Yourself: Corruption Resistance Guide by the ICAC/New South Wales, and Philippines PRIDE Handbook. The attributes are also partially customized for Liberia.

team for conducting it has sufficient understanding of the corruption prevention measures and can maintain objectivity and independence in their conclusions.

Assessment templates (forms) for each dimension are provided in Annex I. Each template contains a brief discussion about a dimension and a list of suggested indicators grouped in three categories as described earlier. Each template also has suggested or illustrative sources of information that can be used for the assessment. These lists of sources should be expended and customized when necessary.

The assessment team should assess the level of the implementation of the integrity framework against each indicator, describe its conclusion, rate the level of the implementation, and provide recommendations.

The assessment team should use appropriate sources including document review, interviews, focus groups and other relevant information to formulate their conclusions about the level of the implementation of each indicator. Sources of information should be documented in the assessment forms.

The level of the implementation of each indicator should be described and then rated using the following scale:

- 0 – Not implemented
- 1 – Poorly implemented
- 2 – Partially implemented
- 3 – Largely implemented
- 4 – Implemented completely

It is advisable, that each member of an assessment team would rate the level of the implementation individually first. The team should discuss then the scores together and come to a consensus about the score and the description of the evidence for each indicator.

Upon reaching consensus the assessment team calculates the total score for each dimension and the % of the level of the implementation compared to the highest possible score for a dimension.

Finally, the assessment team should summarize the key recommendations for each dimension based on their assessment.

Assessment Report

The assessment should result in a report that summarizes key findings and points out at the most critical deficiencies. The summary can be supplemented with a

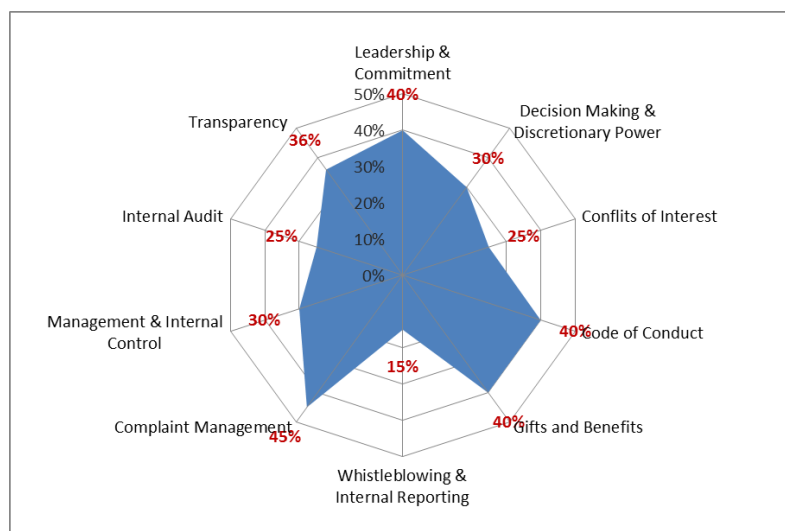


Figure 1. Graphical presentation of the Integrity Framework dimension scoring

graphical presentation of the dimensional scores for better visualization as it is provided in the Figure I.

The assessment report should also have the summary recommendations to address the key deficiencies. The recommendations should be prioritized.

Finally, the report should include an annex with the filled out assessment forms that detail findings against each indicator, provide scores, and recommendations for each dimension.

I. Leadership and Commitment



The role that leadership plays in promoting integrity in the organization cannot be over emphasized. In a society where institutions need to be strengthened, leadership in most cases determines the way an organization deals with the issue of integrity building. This dimension considers the equal importance of what a leader does and with what he or she professes. Senior leaders and officials are key in setting values

and directions, promoting, practicing, and rewarding good governance, using performance management in proactively addressing ethical and accountability requirements.

Many times resoluteness of the leadership determines the success of corruption prevention initiatives. Given the wide scope given to them, opportunities for abuse of authority should be carefully monitored. The agency should set clear organizational policies and structure in decision-making and accountability for senior leaders and officials.

(NOTE: if there is any legislation that requires public institutions to develop and implement a dedicated anticorruption or ethics strategies/programs/plan it will need to be reflected in the table below.)

#	Indicators	Score	Source	Evidence
A. Institutional				
1.	Senior leadership issued and renews regularly (at least annually) written and verbal statements of the organization's commitment to anticorruption principles and ensures that the message filters down to all employees			
2.	Senior leadership ensures that key integrity and anticorruption agency-wide policies are developed and implemented (e.g. code of conduct, conflict of interest, whistleblower reporting, complaint management, internal control, independence of the internal audit, and transparency and public accountability)			
3.	Senior leadership initiated the development, implementation, and monitoring of the achievements of an agency-wide integrity and anticorruption strategy and plan			
4.	Senior leadership allocates sufficient resources to ensure implementation or review of the anticorruption commitment			
5.	Senior leadership sets an example/right tone regarding integrity and ethical behavior (by making asset declaration known to staff, participating in ethics training, publicly recusing him/herself from decision making when in Col, etc.)			
B. Operational				
6.	Management demonstrates the importance of integrity and ethical values to all concerned by regular reminder to the staff and setting an example/right tone			
7.	Integrity and anticorruption measures within the agency are adopted through policies, guidance and training programs (e.g. code of conduct, conflict of interest, whistleblower reporting, complaint management, internal control, independence of the internal audit, and transparency and public accountability)			
8.	Integrity and anticorruption measures are operationalized throughout the agency in operational functions and key			

	departments (e.g. stipulation of Col in procurement, verification of asset declaration in recruitment and promotion, ethical behaviors as part of the personnel performance evaluation, etc.)			
9.	Punishment for violation of integrity and ethics standards is inevitable and made public while good ethical behavior is encouraged and rewarded			
C. Human/Behavioral				
10.	In recruitment of senior managers, their commitment to ethical leadership and high ethical standards is established			
11.	Employees are fully aware of the ethics and anticorruption policies and standards			
12.	Employees are regularly (at least once a year) trained in ethics and anticorruption			
13.	Employees strongly believes and value that the leadership is committed to integrity and anticorruption			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Agency mandate
- Organizational structure/functional chart
- Agency Manual of Operations and Staff Handbook



2. Decision Making and Discretionary Power

Decision-making forms an integral part of the administrative mechanism of any organization. The premise for decision-making is that all decisions should be based on the principles of fairness, transparency, and accountability. Decisions should be reached lawfully, based on relevant considerations, or based on the merits of the case.

Discretionary power is power conferred upon an individual/body by statute or authority, the exercise of which depends on judgement. Discretionary powers should be exercised by public officials promptly, in good faith and in accordance with the provisions of the law. Accountability in the form of appropriate checks and balances should be present within the system to avoid corrupt practices going unchecked. The higher the discretion, the higher should be the level of accountability.

(NOTE: if there is any legislation that stipulates decision making process or the exercise the discretionary powers it will need to be reflected in the table below.)

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	Policies and procedures for decision making process are established and in compliance with legal requirements [specify applicable legislation if in place]			
2.	Delegation of authority for decision making and division of tasks and responsibilities are clearly stipulated			
3.	Policy to guide decision-makers in exercising discretionary powers appropriately, consistently and fairly are established.			
B. Operational				
4.	Delegation of authority for decision making and division of tasks and responsibilities are documented, implemented and controlled			
5.	Discretionary powers in decision making process is exercised using sufficient criteria and procedures			
6.	Those exercising discretionary powers and making key decisions provide justifications in writing for all decisions that are based on acknowledged facts, without bias and observing the rules of procedural fairness			
7.	Proper records are kept on the decision making and the exercise of discretionary powers			
8.	The agency effectively uses an agency-wide comprehensive electronic document management system to log and track decisions			
9.	The decision making and the exercise of discretionary power is closely supervised			
10.	Reasons are provided to a party affected by a decision upon request			
11.	Parties affected by a decision is duly informed of their right of appeal and objections			
12.	A person affected by a decision is enabled to exercise any right of appeal and objections			
C. Human/behavioral				
13.	Managers and staff entrusted with the decision making and the discretionary powers have sufficient knowledge and experience in exercising discretionary powers			

14.	Managers and staff entrusted with the decision making and the discretionary powers are trained regularly			
15.	Improper use of discretionary powers is sanctioned (e.g. reprimand, withholding of performance incentive bonus)			
16.	Decision making and discretionary power policies are communicated to relevant staff			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Relevant legislation, executive orders or similar documents
- Agency policies, manuals, operating procedures
- Agency Manual of Operations and Staff Handbook
- Complaint records



3. Conflict of Interest

A conflict of interests is a situation where the private or personal interests of a public official compete or conflict with his official duties. Understanding and managing conflict of interests are the most important aspects of building

corruption resistance in an organization. Corruption in most of the cases arises because of conflicts between the public interest and private, professional or commercial interests. As such, management should have in place an appropriate mechanism where: conflicts of interests are addressed in relevant administrative and operational policies and procedures; staff understand, accept and comply with the policy; those who would do business with the organization understand, accept and comply with the policy.

Private interests that constitute potential conflicts of interest risks include: financial and economic interests; family or private businesses; secondary employment; affiliations with for-profit and non-profit organizations, sporting bodies, clubs and associations; affiliations with political, trade union or professional organizations and other personal-capacity interests; obligations to professional, community, ethnic, family or religious groups in a personal or professional capacity or relationships to people living in the same household; enmity or competition with another person or group; significant family or other relationships with clients, contractors or other staff working in the same (or a related) organization; highly specialist skills in an area where demand for the skills frequently exceeds supply; future employment prospects or plans (i.e. post-separation employment).

Conflict of Interest (Col) is stipulated by Part IX: Gifts, Bribes and Conflict of Interest in the Liberian Code of Conduct (CoC) in 2014², which is applicable to all public officials and employees of the three branches of the government. The Code requires public official and employees of the public institutions to inform the authorities if and when they have direct or indirect personal interests and excuse themselves from the decision making process on the matters they have Col.

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	The agency has written Col policy that is consistent with the current CoC national legislation			
2.	The agency's Col policies exceeds the current requirements of the Liberian legislation and meets international best practices (indicate which)			
3.	The agency developed clear guidelines/manual that clearly stipulates specific types of Col and established procedures for managing (disclosing, recording and dealing) Col			
4.	Procedures for managing Col are included in the organization's administrative and organizational activities			
5.	The agency assigned a responsible officer to maintain the policy and manage Col			
6.	The duties of the agency's Col officer are clearly determined			
7.	The agency allocated sufficient resources for implementing Col			
8.	Col policy includes sanctions for any breach of the policy and procedures			
9.	Col policy and guidelines are reviewed and updated annually			
10.	Information on processes for managing Col is included in documents aimed at external stakeholders (such as a statement			

² [http://www.emansion.gov.lr/doc/Act_Legislature_Prescribing_A_National_Code%20of_Conduct%20\(Final_Version%202014\).pdf](http://www.emansion.gov.lr/doc/Act_Legislature_Prescribing_A_National_Code%20of_Conduct%20(Final_Version%202014).pdf)

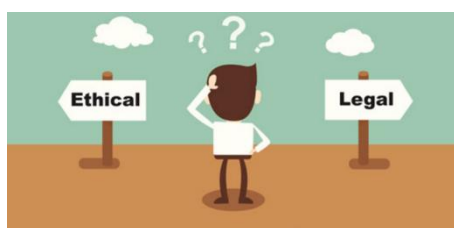
	of business ethics, client service charter)			
11.	Employees are required to complete a statement of private interests on commencement, annually or at another appropriate time			
B. Operational				
12.	The agency Col policy/guidance are regularly reviewed for effectiveness and updated			
13.	Col policy/guidance and procedures are made available and easily accessible (including in hard copies and on the intranet) to everyone within the agency			
14.	Col information and discussions on Col are included in induction process			
15.	The Col policy is actively promoted inside the agency and with external stakeholders			
16.	The Col officer provides advice and guidance to personnel on Col			
17.	The Col officer conducts annual training for all personnel on Col and how such conflicts should be managed in the context of their work			
18.	The Col is consistently enforced by a designated Col officer			
19.	Col is managed across and tailored to all organization's administrative and organizational activities			
20.	The consideration of Col issues are taken into consideration during the recruitment and promotion processes			
21.	Col disclosures are recorded properly and acted upon			
22.	The agency maintain proper channels for disclosing Col			
23.	Failure to disclose Col is sanctioned according to the established policies and procedures (e.g. reprimand, demotion, etc.)			
24.	Applicable provisions of the Col are included in contracts with external parties (e.g. suppliers)			
25.	Col policy is wide disseminated among relevant stakeholders			
26.	Procedures for disclosing and dealing with Col are included in the agency's procurement and disposal policy, recruitment and selection process, regulatory functions and secondary employment policy			
27.	Arrangements for addressing each Col are formally recorded so that the agency can demonstrate how each conflict of interest was managed			
C. Human/Behavioral				
28.	Personnel are aware and fully understand the Col provisions, as well as consequences for non-compliance.			
29.	All personnel attend annual training on Col and how such conflicts should be managed in the context of their work			
30.	Employees are confident they won't be vindicated for disclosing Col			
31.	Personnel disclose promptly any situation of Col			
32.	Personnel know where to seek advice about the Col policy and seek for such advice routinely			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Code of Conduct 2014 and internal policies and guidelines disseminated to employees
- Report on last orientation or training on the Col implemented and who attended
- Integration of the Col in specific functions of the agency, e.g. in bidding documents/contracts issued by the agency



4. Code of Conduct

A code of conduct sets out the standards of behavior expected of staff. It defines desirable behavior for all types of work in the agency. The existence of a code of conduct should not be seen as an end in itself. For the code of conduct to become an effective integrity enhancement measure, its form and content must be appropriate and relevant for

the agency. The end goal of a code of conduct is to define the behavior of officers and employees and should therefore be communicated, promoted and taught to all personnel of the agency and integrated in the various aspects of its operation.

Liberian government enacted the Code of Conduct (CoC) in 2014³ which is applicable to all Public Officials and Employees of the three branches of Government of Liberia, its parastatal bodies and any other agency/organization it deals with. Conflict of Interests and Gifts & Benefits are part of the CoC among other matters stipulated by the Code. While the overall oversight, enforcement, and monitoring the compliance with the CoC is assigned to the Ombudsman office (article 12.1) some provisions of the CoC require public institutions to set procedures for implementing the Code. This include, for example, article 2.2 that requires that the CoC be “reinforced by professional codes of conduct” which means that public institution are required to adapt the CoC to their institutions. As of March 19, the Ombudsman office has not been established that left the implementation of the CoC in limbo. While the Ombudsman is responsible for enforcement, oversight, monitoring and evaluation adherence to the Code of Conduct the LACC Act stipulates that LACC leads the implementation of the Anti-corruption Strategy of Liberia, including the Code of Conduct for Liberian Public Servants.

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	The agency has a written CoC policy consistent with the CoC law of 2014. (CoC, article 2.2)			
2.	The agency's CoC policies exceeds the current requirements of the Liberian legislation and meets international best practices (indicate which)			
3.	The agency developed clear guidelines/manual that includes concrete examples of ethically acceptable practices relevant to the different types of work carried out by the agency, particularly for high risk functions			
4.	A person(s) or a division is assigned to operationalize, oversee and enforce the implementation of CoC.			
5.	The duties of the agency's CoC officer(s) or a division are clearly determined			
6.	The agency allocated sufficient resources for implementing CoC			
7.	CoC policy includes sanctions for any breach of the policy and procedures			
8.	CoC policy and guidelines are reviewed and updated annually			
9.	Information on processes for managing CoC is included in documents aimed at external stakeholders (such as a statement of business ethics, client service charter)			
B. Operational				
10.	The agency CoC is regularly reviewed for effectiveness in			

³ The complete title is An Act Of Legislature Prescribing a National Code of Conduct for All Public Officials and Employees of the Government of the Republic of Liberia:

[http://www.emansion.gov.lr/doc/Act_Legislature_Prescribing_A_National_Code%20of_Conduct%20\(Final_Version%202014\).pdf](http://www.emansion.gov.lr/doc/Act_Legislature_Prescribing_A_National_Code%20of_Conduct%20(Final_Version%202014).pdf)

	specifying and promoting the desired behavior of employees			
11.	The policy is available to everyone within the organization			
12.	All employees sign the CoC 2014 at their induction into the public service or at the commencement of their orientation program. (CoC, part 20)			
13.	Personnel are trained annually on CoC			
14.	Each employee is provided with a copy of the code for which s/he should acknowledge receipt			
15.	The CoC included in an employee handbook or policy manual or some other formal document so that it can be referred to when needed			
16.	The CoC is actively promoted inside the agency and featured in agency publications			
17.	The CoC is consistently enforced, with managers having clear tasks of promoting and monitoring compliance			
18.	The agency CoC is integrated in all the operating systems of the agency (e.g. human resource management, performance management, procurement, internal reporting and investigation, and line operations)			
19.	Disclosures of employees from Asset Declarations are taken into consideration in decision-making (e.g. staff movement).			
20.	Compliance with the prohibition of political participation is sufficiently monitored according to the established procedures (CoC, part V)			
21.	Sensitive information is safeguarded and official information is managed properly according to the established policies and procedures (CoC, part VI)			
22.	Use of public funds, properties and facilities effectively monitored and managed according to the established procedures (CoC, part VIII)			
23.	Filing complaints related to sexual harassments enabled sufficiently by established policies and procedures (CoC, articles 11.6-11.8)			
24.	Ethical misconduct is sanctioned according to the established policies and procedures (e.g. reprimand, demotion, etc.) (CoC, article 15.1)			
25.	Employees' record of adherence to or violation of the agency CoC is taken into consideration during promotion			
26.	Good ethical behavior performance is rewarded (e.g. commendation, cash bonus, promotion, etc.)(CoC, article 18.1)			
27.	Applicable provisions of the CoC are included in contracts with external parties (e.g. suppliers)			
28.	Suppliers who have violated applicable provisions of the CoC are blacklisted and disqualified from participating in all procurement related activities of the agency			
C. Human/Behavioral				
29.	Personnel are aware and fully understand provisions of the CoC, as well as consequences for non-compliance.			
30.	All personnel attend annual training on CoC			
31.	Employees are confident they won't be vindicated for reporting violations of CoC			
32.	Personnel routinely submit their annual Asset Declarations			

33.	Personnel promptly report on violation of CoC when observe it			
34.	Personnel know where to seek advice about the Col policy			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Code of Conduct 2014 disseminated to employees
- Report on last orientation or training on the code of conduct implemented and who attended
- Agency Manual of Operations and Staff Handbook
- Integration of the Code in specific functions of the agency, e.g. in bidding documents/contracts issued by the agency



5. Gifts and Benefits

Gifts and benefits are offered innocently or as bribes. Similarly, the public officials' work may place them in a situation where they could give or receive personal benefits, which might include preferential treatment, promotion or access to information. The acceptance of a gift or benefit can in some circumstances create a sense of obligation that may compromise the employee's honesty and impartiality. Agencies need to have policies and procedures in place to deal with gifts and benefits and also need to promote their policies and procedures to their

staff/officials and clients. A step in ensuring that agencies deal effectively with offers of gifts and benefits is to establish a gift register and ensure that all staff (and where necessary the community and clients as well) is fully aware of it. The register should document information such as: name of the person and/or organization offering the gift, the type of gift, value of the gift, decision taken regarding what should happen to the gift.

The Liberian Code of Conduct 2014 has a section - Part IX: Gifts, Bribes and Conflict of Interest – that discusses gifts and benefits and set policies for managing receiving and reporting them (articles 9.1-9.5).

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	The agency has a written policy on receiving and reporting gifts and benefits with relevant examples that is consistent with the law (<i>Code of Conduct 2014</i> , articles 9.1-9.5)			
2.	A person(s) or a division is assigned to operationalize, oversee and enforce the implementation of the gifts and benefits policies.			
3.	Gifts and benefits register is established			
4.	The agency allocated sufficient resources for implementing gifts and benefit management system			
B. Operational				
5.	The gifts and benefits policy is made known to all officials and staff of the agency periodically			
6.	The policies on acceptance of gifts and benefits and offers of bribe are consistently enforced			
7.	Responsible persons for monitoring compliance with the policies implement their responsibilities properly in accordance with the CoC and the agency's policies.			
8.	The gifts and benefits policy is made known to clients and suppliers and other stakeholders of the agency			
9.	Bidding documents issued by the agency inform potential suppliers/contractors that gifts and benefits should not be offered to employees			
10.	The gifts and benefits received by the agency or through any of its officials and staff are routinely documented in an official register			
11.	The gifts and benefits received and documented are disposed of according to procedures defined in the policy			
12.	The register and manner of disposal of gifts and benefits are available for examination by internal and external stakeholders			
13.	Rewards are given to officials and staff who report offers of bribes			
14.	Sanctions are applied to officials and staff who fail to comply			

	with the policy on gifts and benefits			
15.	The gifts and benefits in register and reported bribes are regularly reviewed and examined vis-à-vis treatment of agency's stakeholders			
16.	Results of the review are considered in strengthening the gifts and benefits policy of the agency			
C. Human/Behavioral				
17.	Personnel are aware and fully understand the bribery, gifts and benefits policies and procedures, as well as consequences for non-compliance			
18.	Personnel are trained on annual basis on the bribery, gifts and benefits policies and procedures.			
19.	Each employee is provided with a copy of the CoC that has provision regarding bribery, gifts and benefits			
20.	Personnel report gifts and offered benefits according to the established policies and procedures(<i>Code of Conduct 2014</i> , article 9.4 and 9.5)			
21.	Employees are confident they won't be vindicated for reporting offered bribes, gifts and benefits			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Code of Conduct 2014
- Agency Manual of Operations
- Agency policies (memo, orders on gifts, benefits, and bribery)



6. Whistleblowing and Internal Reporting

Whistleblowing should be encouraged in every agency, as it is one of the fastest ways of detecting corruption though admittedly it is one of the most difficult things officials and staff can do. Many times reporting has led to harassment of the whistleblower, or worse, complete reversal of the case where the whistleblower becomes the offender. Incentives and protection are therefore necessary to encourage employees to report corrupt behavior or practices. Protected disclosures and easy procedures for internal reporting

and a good witness protection scheme should be established within the agencies.

In Liberia, the Executive Order #62 of 2014 – Protection of Whistleblower – currently sets policies for whistleblower disclosure of information, investigation of the disclosed information, and the protection of whistleblowers from retaliation.

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	The agency has a written policy/guideline that is in compliance with the current legislation on whistleblowing and internal reporting (Executive Order #62)			
2.	The policy/guideline provides clear procedures for reporting corruption and malpractices			
3.	The agency assigned a designated personnel to manage and implement internal reporting system			
4.	The policy/guideline provides sufficient level of independence and authority for the personnel managing internal reporting system			
5.	The policy/guideline sets a standard processing time and specifies roles and responsibilities for accepting reports, conducting investigations, and giving advice to employees who want to report corruption			
6.	Confidentiality clauses are provided to ensure the protection of employees who report on corruption and malpractices			
7.	Provisions are in place for disciplinary actions against staff who unnecessarily breach the confidentiality of a disclosure			
8.	The agency allocated sufficient resources for implementing internal complaint management systems			
9.	The agency set requirements for regularly assessment whether the internal reporting and investigation system is being used or perceived as an effective mechanism to prevent corrupt practices			
B. Operational				
10.	The agency regularly (at least annually) disseminates information among personnel on how to report corruption and how reports are handled including the disposition of complaints or cases			
11.	The agency provides convenient and confidential channels and means for lodging reports (such as dedicated consultation rooms, telephone line/s, e-mail)			
12.	Personnel managing internal reporting system follow policy/guideline for accepting, processing, investigating and following up on the complaint reports			
13.	Personnel managing internal reporting system exercise sufficient level of independence and authority and do not			

	experience inappropriate interference			
14.	Confidentiality is strictly observed by the personnel managing internal reporting system			
15.	Proper record are kept of disclosures and actions taken			
16.	The agency conducts investigations of reported corruption and tracks complaints/cases until final action is taken			
17.	The agency protects employees who report corrupt behavior			
18.	The agency rewards employees who report corrupt behavior			
19.	The agency inform all personnel about sanctions taken against officials committed corruption offences and abuse of power			
20.	The agency imposes appropriate sanctions to reported erring employees and officials			
21.	Results of the review are used to strengthen corruption risk management and enhance the internal reporting and investigation process			
C. Human/Behavioral				
22.	Personnel managing internal reporting system receive appropriate training and annual re-training			
23.	Personnel managing internal reporting system demonstrate knowledge of policies and procedures and the capability for processing complaints			
24.	All personnel receive sufficient instructions/information about policies and procedures of the internal reporting system annually			
25.	All personnel are fully aware about policies and procedures of the internal reporting system including lodging complaints, confidentiality, responsibility, etc.			
26.	All personnel are confident that their complaints will be reviewed fairly and they won't be victimized for filing complaints.			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Liberia Executive Order #62 of 2014 – Protection of Whistleblower
- Agency policies and or guidelines on internal reporting
- Number of reports vs. investigations made by the agency
- Number of cases sanctioned and nature of sanctions given
- Agency guidelines for monitoring/follow-up or follow through mechanisms particularly if actions are delegated to field units
- Liberia Code of Conduct 2014

- Agency Manual of Operations
- Agency Administrative Reports
- Policy on Protected Disclosure



7. Complaint Management

A complaint handling system is an appropriate mechanism for recording and responding to complaints. It is an effective way to aim at customer satisfaction and at the same time to provide instances where unethical behaviors on the part of employees can be disclosed. An effective complaints handling system is an essential part of providing quality service. It provides positive feedback about aspects of the service that work well, and is a useful source of information for improvement.

The Liberian Code of Conduct 2014 requires the Office of the Ombudsman to take responsibility and collaborate with the three Branches of Government and Civil Society Organizations in order to develop complaint management regulations for the Code of Conduct. (Liberia CoC, article 12.2)

(NOTE: if there is any legislation regarding complaint management it will need to be reflected in the table below.)

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	The agency has a complaints handling policy and procedures in place, which is consistent with relevant guidelines and addresses how complaints may be lodged (provide reference if such legislation exists)			
2.	The handling procedures assigns roles and responsibilities for taking, recording and analyzing complaints, publicizing the system and providing feedback to complainers			
3.	The agency allocated sufficient resources for implementing complaint management systems			
B. Operational				
4.	The agency keeps centralized records of complaints, even though complaints might be handled in the local workplace (which may be geographically separate from the central office)			
5.	The complaints handling system has been reviewed regularly (in the last 12 months) and necessary changes introduced			
6.	The use of complaint forms is made it easy for customers to lodge complaints and receive feedback			
7.	Stakeholders/customers fully utilize the complaints process			
8.	The complaints handling procedure is promoted to customers, contractors and others the agency deals with			
9.	Information provided by complaints is fully utilized to inform and enhance agency policies and operations and anticorruption measures			
10.	Information from complaints is collected and recorded in a way that allows for comprehensive analysis of the level of effectiveness of the system and the identification of emerging complaint patterns.			
11.	The organization established performance standards to measure the efficiency and effectiveness of the complaint handling system, one measurement being <i>-Time taken to resolve problems</i>			
12.	Substantiated complains against agency's personnel results in sanctions and measures for improve personnel performance.			

13.	Complaints pertaining corruption and abuse of power are forwarded to the authorized agencies in accordance to the established procedures for formal investigation			
C. Human/Behavior				
14.	All complaints handling officers demonstrate knowledge of policies and procedures and the capability for processing complaints			
15.	All complaints handling officers receive appropriate training and have regular annual re-training			
16.	All personnel have received information on the complaints handling policy and procedure in the past 12 months			
TOTAL SCORE				
Total possible highest score (multiply number of indicators by 4 – to highest possible score)				
% of the achievement				

Summary of findings:

Recommendations:

Possible sources for validation:

- Agency policies and or guidelines on complain reporting
- Number of reports vs. investigations made by the agency
- Number of cases sanctioned and nature of sanctions given
- Agency guidelines for monitoring/follow-up or follow through mechanisms particularly if actions are delegated to field units
- Liberia Code of Conduct 2014
- Agency Manual of Operations
- Agency Administrative Reports
- Policy on Protected Disclosure



8. Management and Internal Control

A well-structured management and internal control system in a public sector organization help to detect and prevent public sector corruption and unethical behavior. This includes establishing standardized procedures for the essential operations for staff compliance, segregation of duties and functions to allow for proper checks and balances particularly for positions which are susceptible to abuse

or corruption, effective supervisory control, and information security among other measures. Management and internal control should also have effective enforcement policies and procedures to make punishment for corruption and wrongdoings predictable and unavoidable.

There are some international standards and best practices in the internal control area. This includes the Integrated Framework for internal control by the COSO (Committee of Sponsoring Organizations of the Treadway Commission)⁴ or International Organization of Supreme Audit Institutions (INTOSAI)

(NOTE: if there is any legislation or standards for the internal control system in Liberia it needs to be described and the statements in the table below reviewed accordingly)

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	Responsibilities of staff at all levels, including their role, duty, authority and chain of command are clearly defined			
2.	Responsibilities for authorizations and approvals are clearly stated			
3.	Duties and functions are segregated to allow for proper checks and balances (particularly for positions which are susceptible to abuse or corruption)			
4.	The procedures for the essential operations (e.g. procurement, recruiting, financial management, etc.) for staff compliance are laid down			
5.	Internal control policy is clearly laid down in the agency policy			
6.	Internal control policy is regularly reviewed in the light of changes and new trends			
7.	Channels for complaints by staff, customers and service providers are established and publicized			
B. Operational				
8.	Personnel tasks are carried out in accordance with rules and procedure			
9.	Internal control policy is regularly communicated to all employees through briefing and training (annually)			
10.	The agency uses an agency-wide comprehensive electronic document management system allowing to effective and timely internal control			
11.	Supervisory control is exercised at different levels of operations to deter and detect any undue irregularities			
12.	Supervisors conduct routine control that includes authorizations and approvals, verifications, physical controls, controls over standing data ⁵ , reconciliations.			

⁴ <https://www.coso.org/Pages/default.aspx>

13.	Supervisors conduct surprise checks to ensure compliance with all laid down rules and procedures			
14.	Sensitive and confidential information is properly classified; and measures to prevent access to sensitive and confidential information are adopted and observed			
15.	Staff is rotated on a defined time period			
16.	Early warning systems are established that allow management to identify and correct violations of policies and procedures			
17.	Accountability is established so that personnel can be held accountable for their actions or when they violate policies and procedures			
18.	IT policy is established stipulating all policies governing IT security norms, the use of information, IT equipment, exchange of information and connectivity issues			
19.	Management information reports is produced on a regular basis to report on any irregularities and disciplinary action taken			
20.	Disciplinary actions taken against personnel that violated rule are make public within the agency			
C. Human/Behavioral				
21.	All personnel receive sufficient instructions/information about internal control system annually			
22.	All personnel is fully aware of policies and procedures of internal controls			
23.	All personnel fully observe norms and standards required from them by the agency			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Agency policies, manuals, and operating procedures
- Internal audit reports

⁵ Standing data, such as the price master file, is often used to support the processing of transactions within a business process. Control activities over the processes to populate, update, and maintain the accuracy, completeness, and validity of this data are put in place by the organization.



9. Internal Audit

Internal audit provides for systematic scrutiny of an organization's operations, systems and performance. As such, the internal audit function is an essential corruption prevention strategy. Many public bodies have internal audit units as a way of monitoring compliance with internal control procedures. Such units evaluate the organization, its procedures and general discipline with the aim of finding weak points and making recommendations on how to eliminate them.

Internal auditing needs to be independent, and internal auditors should be able to conduct their work objectively. Internal auditors should be operationally independent, independent from management, independent in reporting and independent as individuals. Management should follow up on the audit recommendations.

There are international standards that an agency may require or select to meet, such as guidelines by the International Organization of Supreme Audit Institutions (INTOSAI)⁶ or the International Professional Practices Framework (IPPF) by the Global Institute of Internal Auditors.⁷

(NOTE: if there is any legislation or standards for the internal audit in Liberia it needs to be described and the indicators in the table below reviewed accordingly)

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	The agency has internal audit policies that are aligned with the [specify Liberian legislation regarding internal audit or applicable international standard]			
2.	The agency has an internal audit plan that identifies key risks relevant to the work of the agency including corruption			
3.	The agency has a strategy for regularly reviewing the internal audit plan and implementing the outcomes of the reviews			
4.	Internal auditors are provided sufficient level of independence to carry out audit and report on finding			
B. Operational				
5.	Internal audits are conducted regularly according to the plan and established policies			
6.	Internal auditing is independent, and internal auditors conduct audit objectively			
7.	The internal audit function is directly responsible to senior management			
8.	Responsibility for directing the implementation of internal audit findings and recommendations has been allocated to a senior manager			
9.	The internal audit process includes random sample auditing of the agency's key corruption risk areas as a regular function of the auditing process			
10.	Internal audit has full access to information for conducting audit			
11.	Remedial outcomes of the internal audit have been implemented			
12.	An audit committee oversees the internal audit function			
13.	An audit committee pre-approves all auditing services			

⁶ <http://www.intosai.org/issai-executive-summaries/4-auditing-guidelines/general-auditing-guidelines.html>

⁷ <https://global.theiia.org/standards-guidance/Pages/Standards-and-Guidance-IPPF.aspx>

14.	An audit committee resolves any disagreement between management and the auditor regarding audits			
C. Human/Behavioral				
15.	Internal auditors' skills are maintained and enhanced effectively through regular training			
16.	Internal auditors are qualified according to industry standards			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Agency policies, manuals, and operating procedures
- Internal audit reports



10. Transparency and Access to Information

Operating transparently and disclosing key information to public governmental institution enhances public scrutiny of an agency and disincentivizes officials to get engaged in corruption. Liberia passed the Freedom of Information Act in 2010. The FOIA grants citizens right to receive public information from any public agency regarding its core functions, nature of its activities and operations, and the information it possesses. FOIA prescribes public agencies to provide citizens with

information in user-friendly format on timely basis using variety of channels. FOIA also specifies type of information that is not subject to public disclosure. Each agency is required to have an authorized person/s to implement FOIA. The independent Information Commissioner appointed by the President with the advice and consent of the Liberian Senate oversees the implementation of the FOIA. The statements below are largely aligned with the FOIA requirements.

#	Indicators	Score	Sources	Evidence
A. Institutional				
1.	The agency has a policy for making public information regarding core functions, nature of its activities and operations, and the information it possesses (sections 2.1 & 2.2).			
2.	The agency established procedures for making and responding to request for information that are in compliance with the FOIA (chapter 3)			
3.	The agency reviews FOIA policy and procedures regularly for further improvement.			
4.	The agency has clear and user-friendly forms for requesting public information (section 2.1, 2.3 & 3.4)			
5.	The agency has a designated person/s responsible for implementing FOIA (section 3.8)			
6.	The agency has clear policy about costs associated with providing with information (photocopying, transcribing, scanning or other forms of reproduction) (section 3.11)			
7.	The agency allocated sufficient resources for implementing FOIA			
B. Operational				
8.	The agency publishes automatically on timely basis and maintains published information defined by the section 2.6 of the FOIA (legislation; policies, procedures and rules; budgets; financial accounts; contracts; org. chart including lines of reporting; complaint procedures; other information that enables the public to deal with the authority and/or monitor its performance) (section 2.6)			
9.	The information required for automatic publication is easily available on and downloadable from the agency's website			
10.	The agency has information billboards, desks and public computers with information that is required to be automatically available for public			
11.	Access to the agency public information is widely accessible and user-friendly format including hard and soft copies (section 2.1 & 2.3)			
12.	The agency enables citizens to request information in writing, by electronic mail, or orally in person, or by any			

	alternative means (please describe) and use the same channels for responding to requests (section 3.4)			
13.	The agency does not require citizens to provide reason for for requesting any public information (section 3.5)			
14.	The agency responds to every request for information within thirty (30) calendar days; provided that this period shall be extended once upon showing of a reasonable cause (section 3.9)			
15.	The agency makes public information about costs associated with providing with information (photocopying, transcribing, scanning or other forms of reproduction) (section 3.11)			
16.	The agency automatically transfer the request to the public authority or private entity known or believed to hold the requested information 15 days after receipt of the request and with prompt notice served the requester (if the first transfer was done to a wrong entity, the agency transfer the request to another entity within 10 working days). (section 3.13)			
17.	The agency has a list of the data and information exempted from disclosure to public under FOIA. The list in full compliance with the Chapter 4 of the FOIA.			
18.	The agency sanctions those who violated FOIA according to the Chapter 7 of the FOIA and established internal policies (chapter 7)			
19.	The agency does not have complaints from the public regarding the implementation of the FOIA			
C. Human/Behavioral				
20.	Information officer/s have sufficient knowledge and competency to effectively implement FOIA requirements			
21.	Information officer/s are trained once a year to refresh their knowledge and competency			
22.	Information officer/s instruct agency personnel on annual basis about the FOIA requirements and the agency policies and procedures			
23.	Personnel exhibits understanding of the value and the requirements of the FOIA and full compliance with the Act.			
	TOTAL SCORE			
	Total possible highest score (multiply number of indicators by 4 – to highest possible score)			
	% of the achievement			

Summary of findings:

Recommendations:

Possible sources for validation:

- Agency policies, manuals, and operating procedures
- Agency's website
- Record of the requests for information and responses

- Record of filed complaints against the agency