

Introduction

General framework of the National Anti-Corruption Strategy's Trends

Corruption, in its comprehensive concept, is considered to be the main cause behind the failure of development efforts and perpetuation of poverty in any community. In the presence of corruption the state's ability to achieve its development goals related to the welfare of citizens and provision of equality and justice is diminished, as it eats up the bulk of the resources allocated to finance development programs. In light of the major changes experienced by the communities, particularly in the presence of openness the world is witnessing today in term of open borders and the movement of people, ideas, data, information and capitals, opportunities for corruption are growing, and its approaches are strengthened to reach a level at which corruption becomes one of the attributes of communities living in the stage of political and economic transformation.

The Republic of Yemen has realized the organic link between anti-corruption efforts and the success of development plans, and had therefore placed anti-corruption efforts at the top of its priorities included in the national agenda for comprehensive reforms, recognizing that the major point to start is in the optimum use of available and limited resources in the overall development and the application of an effective poverty reduction strategy can only be achieved through containment of corruption as well as attempts to drain its origins. In this context, a strong and purposeful will to combat corruption was crystallized for the political leadership, hence a series of national reforms has began in this field, starting with the comprehensive national reform program on March, 1995 which was the cornerstone for launching a series of the national reform in the economic, political, administrative and financial aspects. The national strategy for poverty reduction for the years 2003 – 2005 was also prepared, which included a set of relevant indicators to assess the efforts of combating corruption. There is no doubt that the formation of the Supreme Board for the protection of public funds and combating corruption in 2003, has gained a special importance in the development of anti-corruption efforts in Yemen, since it, for the first time, drew attention to the importance of having a dedicated organization for combating corruption, and paved the way for Yemen participation in the UN rounds of negotiations that have been devoted to develop anti-corruption mechanisms, which were culminated with the United Nations Convention of Combating Corruption in

2005. These were normal run-ups for the national agenda of the comprehensive reforms to assume advanced position on the **priorities** ladder of the Republic of Yemen. Among the vocabularies of this agenda, the Law No. 30 of 2006 concerning the Financial Disclosure was issued, in which Article (2) points to the Supreme National Authority for Combating Corruption (SNACC), as a responsible agency for applying this law. It is crucial to emphasize that the reference to the Supreme National Authority for Combating in the context of Article (2) serves as the first legal text that mentions name of "the Supreme National Authority for Combating Corruption". In other words, Law No. 30 had given the task of implementing procedures for financial disclosure for a body that was not established yet. This was an introduction to complete the legislation governing anti-corruption efforts and seek enactment of Law No. 39 of 2006 concerning fight against corruption, as well as work on the formation of the Supreme National Authority for Combating Corruption in July 2007.

In implementation of this law, preparation of a national strategy to combat corruption comes as one of the main tasks which had been accorded by the law to the Supreme National Authority for Combating Corruption. The strategy consists of five sections as follows:

Section (I) would focus on defining corruption in Yemen, and diagnosing its causes, scope, implications and its international classification.

Section (II) chapter would tackle the main parties of the national integrity and anti-corruption system.

Section (III) analyzes the conceptual and methodological framework of the national anti-corruption strategy.

Section (IV) focuses on the main operational trends in line with the nature of the functions composing the efforts of anti-corruption being represented in three components which are:

- Component 1: Prevention and protection of corruption;
- Component 2: Law enforcement and prosecution.
- Component 3: Raising awareness, education and community participation.

A fourth component will be added which is capacity building. The importance of this component lies in supporting the three main functions composing the anti-corruption efforts referred to above in the first three components.

Then, in Section VII, comes the nature of the operational roles of different parties involved in the implementation of the national system in line with the three main functions. Then, the strategy will be ended with a set of final remarks relevant to the implementation of the strategy contents.

The Strategy ends with numerous of concluded recommendation to facilitate the implementation of the strategy.

The annex will contain the executive action plan being based on the strategic vision based operational work plan for the efforts to combat corruption in line with the priority that should receive attention, the timeframe for implementation, main action programs based on the nature of the different roles that should be performed by parties involved in the implementation of the national system of integrity and combating corruption, indicators measuring the implementation of programs for the plan and the level of performance.

SECTION I

Corruption in Yemen: Definition, causes, scope and implications

This section will contain a brief analytical frame for the definition, causes, nature, scope and the different forms of corruption in Yemen. The nature and negative implications of corruption on the different aspects of life in Yemen, particularly the overall development, shall be tackled.

I. Definition and conceptions of corruption:

It is difficult to provide a comprehensive and exclusive definition for corruption , as it is a compound concept and has different dimensions; "corruption", in the Islamic concept, is the antonym of "reform", Allah the Almighty says in the Holy Quran " And do not do mischief on the earth, after it has been set in order". And in the international context, United Nations Convention Against Corruption avoided providing an exclusive definition for corruption, despite the fact that article II provided brief definitions for some concepts for the public official, foreign public official, Official of a public international organization, Property, Proceeds of a crime, freezing or seizure, confiscation, Predicate offence and Controlled delivery.

It appears that the United Nations Convention Against Corruption has avoided providing such a definition, given the different nature of corruption from one country to another, which makes it difficult to reach a common definition unanimously accepted.

However, it is essential, for the preparation and implementation of the national strategy for combating corruption in Yemen, to reach a common understanding of what corruption is and its contents, as stated in the Yemeni legislation.

Article 2 of Law No. 39 of 2006 dealing with combating tackled this concept and defined it as "Misuse of the public office for private interests, whether through violating the law or the exploitation of the granted powers".

Corruption as defined under article II of law No. 39 of 2006 of anti-corruption:
"Corruption" is Misuse of the public power for private interests, whether through violating the law or the exploitation of the granted powers".

This definition draws the legal limits for the role to be played by the elements of the national integrity and anti-corruption system. Hence, the misuse of public office both to its spirit and ends, and exploitation of the powers granted to the public official are the core issue which the Supreme Authority for Combating Corruption and the other parties of the national system should focus on.

However, we should recognize the confusion caused by this definition when we discuss the provisions of article 30 of Law No. 39 of 2009, which enumerated and classified the crimes of corruption into 12 types as follows:

1. Offenses that affect the national economy provided for in the law of crimes and penalties.
2. Offenses against the public office provided for in the law of crimes and penalties.
3. Offences against the course of justice provided for in the law of crimes and penalties.
4. Embezzlement of property in the private sector, set forth in the Crime and Penal Code.
5. Bribery of foreign officials and officials of public international organizations to do or abstain from doing the work in a breach of the duties and functions in order to obtain undue commercial benefit or advantage, or, when it relates to carrying out international business, maintain such benefit or advantage, and for which the provision of the Penal Code are applicable.
6. Crimes of corruption-related fraud and crimes of forgery set forth under the Penal Code.
7. Crimes of customs smuggling and tax evasion.
8. Fraud and manipulation in the bids, tenders, specifications and other public procurement contracts.
9. Offences of the laundering proceeds of corruption crimes provided for in this article.
10. Use of the public office for private interests.
11. Crimes of illicit richness.
12. Any other offenses set forth under any other law as a crime of corruption.

As is obvious, a huge number of the above offenses are of a pure criminal nature and have no relation with the issues of corruption. They are also far from the definition provided in the above-

mentioned Article II, which causes some confusion, and, at the same time, adds heavy burden on the Supreme National Authority for Combating Corruption, as well as the remaining members of the National Integrity and Anti-corruption System, particularly the public funds prosecution and courts. The National Authority has recognized this imbalance earlier and sought to find alternative text for the definition of corruption in order to avoid the limitations of this definition.

II. Causes of corruption in Yemen:

1. The presence of corruption and reprobates tolerant concepts in the administrative system of the state, and failure to activate the principle of reward and punishment in the practices of the public office which encouraged corruption to persist and spread horizontally and vertically.
2. Lack of transparency and poor performance and effectiveness of the internal control units in the institutions of the administrative system of the State,
3. Lack of the codes of conduct, work rules and written procedures contributes to the spread of corruption.
4. Failure to comply with the reports and recommendations of the formal oversight institutions, like the Central Organization for Control and Accounting (COCA),
5. Low salaries of the public sector employees and the low standard of living push some public officials to search for additional sources of income and promote the spread of bribery and favoritism,
6. The presence of several shortcomings in the legislation that regulate the work of the parties involved in the National Integrity and Anti- corruption System, especially the Law No. 6 of 1995, which prohibits initiation of proceedings against senior officials ,
7. Lack of understanding of many procedures, rights, administrative and financial systems by a large segment of citizens, which led to expanding the area of the administrative corruption in particular, and the level at which utilization of the public office becomes the mate of the rights and privileges associated with such public office.
8. The weak role of the official media and its focus on the plans, strategies and the official discourse without discussing the issues of public concern, on top of which comes the

detection of corruption cases and tampering with the public money; and

9. Lack of strong civil society organizations and the absence of channels that could secure some forms of participation for Civil Society Organizations in the measures of monitoring the activities of the public sector.

III. Yemen's context in the international reports of corruption

The International corruption-concerned reports indicate that Yemen occupies a low position in this regard. It is enough to indicate herein to a few related reports:

1- Report of Transparency International

We can find that the corruption index, according to Transparency International, gives Yemen a relatively low scores, and these scores declined between 2004 - 2009 to a pointer consisting of 10 points

Year	Rank	Corruption Indicator
٢٠٠٤	١١٢	2.7
٢٠٠٥	١٠٣	2.7
٢٠٠٦	١١١	2.6
٢٠٠٧	١٣١	2.5
٢٠٠٨	١٥٤	2.1
٢٠٠٩	١٥٤	2.1

(10 points: corruption free community, whereas zero means corruption replete community). And whereas the index was 2.7 in 2004, it was declined in 2009 to record 2.1. It also indicates, at the same time, a decline in Yemen's ranking on the same indicator for the same period from 112 to 154.

2- Index Bertelsmann

The same situation applies to Bertelsmann index on the conversions during 2006 – 2009, which is an indicator consisting two sub-indices; the first is status indicator and the second is management performance indicator. For the status indicator, the rank of Yemen declined from 98 in 2006 to 103 in 2008. The same situation applies to the management performance indicator, for which the rank of Yemen declined from 86 to 94 for the same period.

3- Global Integrity Report:

The global integrity report of 2008 classified Yemen under "very weak" at 46 on a scale consisting of 1 - 100 degrees. There was variation in the components and categories included in the index, which ranged between "very weak" for each of the civil society, public information and Media organizations (36 points), election (46), government accountability (30), the administration and civil service (44), control and regulation (52) , and " weak" for the enforcement of law and combating corruption category (66). The interesting thing in this category is that, the report has given Yemen 100 points in the sub-category "Anti-Corruption Law" with "very strong" grade, with close points for the other sub-categories ("very weak" grade) such as the Anti-Corruption Agency (56), and the rule of law (54), and law enforcement (54).

4- Control of corruption in the Good Governance Indicators (World Bank):

Corruption control indicator contained in the good governance index published by the World Bank as one of the six criteria of good governance is consistent with the trends of the

Good Governance indicator	Year	Centennial Grade (0-100)
Control over corruption	2007	33.3
	2006	28.6
	2005	30.1
	2004	20.4
	2003	30.6
	2002	32.0
	2000	30.6

above-mentioned international reports, as Yemen ranges between 20 to 33 points within the period from 2000 to 2007 as shown in the attached table.

5- Report of the U.S. Agency for International Development (USAID)

Consistent with the international methodology of corruption classification into petty corruption, likely to be represented by the administrative corruption, and grand corruption that goes out to monopoly the resources and potentials of the state, the report

prepared by the USAID on the assessment of corruption in Yemen, indicates the existence of both types of corruption. The large-scale corruption in Yemen comes as a result of interaction between the weakness of state institutions and the multipartite elites. And the petty corruption penetrates as one of the key components of the common culture in which it became habitual that a public official usually makes corrupt practices as a means to improve his situation, and to have recourse to disrupting public regulation in order to obtain personal benefits.

Thus, we find that international reports on a gathering that Yemen is in the category of countries with higher corruption, and placed large-scale corruption (monopolize the resources of the State) in Yemen at the high category, and petty corruption (administrative corruption) at the higher category. Despite SNACC reserves many of the contents of those reports, but it, on the other hand, takes these contents seriously since it reflects the vision of the outside world on corruption in Yemen, and at the same time affects the status of Yemen with the donor countries and international organizations, and therefore affects the size of the commitments and support allocated to finance development programs in Yemen. This makes SNACC commence preparation of national anticorruption strategy in line with the classification of corruption in Yemen at both levels (High petty– High grant corruption).

IV. CORRUPTION AND ITS IMPACTS ON THE DEVELOPMENT IN YEMEN

1. Devouring the greater bulk of the development resources.
2. Establishing an environment repellent to investment.
3. Deteriorating poverty situation in Yemen.
4. Poor level of the services accessed by the citizens.
5. Low credibility of the reform efforts with development partners and the low volume of the commitments and foreign support for development programs.
6. Threatening the political stability.

SECTION II

NATIONAL INTEGRITY AND ANTI-CORRUPTION SYSTEM

This section includes a brief explanation of the institutional structure of the system, its elements of different bodies, organizations, committees and offices; and the nature of the functions and powers delegated to each, with an attempt to put them in a triplex classification consistent with the nature of functions, powers and roles delegated to each of them in fighting corruption.

I. Anti-Corruption Specialized Agencies

SUPREME NATIONAL AUTHORITY FOR COMBATING CORRUPTION (SNACC)

SNACC is the latest mechanism that has been established in Yemen, on July 3, 2007 under the anti-corruption efforts, by the law No. (39) of 2006 dealing with anti-corruption. The Authority is composed of 11 members, including three representatives of the civil society institutions, the private sector and women sector, elected by the Parliament from amongst a list of 30 candidates presented by the Shura Council (Consultative Council). SNACC are elected only once for five years period, starting from the day following the issuance of Presidential Decree for appointment. According to article (9) of the said law, the member of the Board is granted the rank of a Minister.

SNACC is financially and administratively autonomous, and submits periodic reports to the President and the Cabinet every three months on the performed activities and actions. In more than one place, the law confirms the autonomy of SNACC and criminalizes the intervention of any person or entity in its affairs, and subjects them to punishment. At the same time, SNACC is required by law to adopt absolute neutrality in performing its functions as prescribed by law, and prohibits its staff to disclose any secret or information or data that comes to their knowledge by reason of their work in SNACC during detection or investigation in corruption crimes, with obligation to publish all information and data on corruption crimes once evidenced by a virtual court sentence.

Under the article (8) of the anti-corruption law, the Authority has a number of broad powers and functions that adapt to all stages the anti-corruption

efforts gradated in, beginning the policy-making and strategy development, through different functional areas of anti-corruption measures that include awareness, prevention, receipt of communications, detections, investigation, prosecution, judicial follow-up and follow-up of the implementation of judicial rulings. These tasks can be understood more deeply through division of these functions and categorized into the following fields:

1. Policy-Making and Strategy Development

- § Preparation and implementation of the public policies aimed at combating corruption.
- § Development of a comprehensive national anti-corruption strategy and preparation and implementation of mechanisms, plans and programs for execution. The preparation of the national anti-corruption strategy by SNACC comes in line with this delegation conferred upon SNACC exclusively by the law without the other parties involved in the national integrity and anticorruption system.

2. Awareness and Education

The Authority shall exercise a significant role in promoting awareness on the risks of corruption. In line with this mission, SNACC has the following powers:

- § Adoption of measures to ensure the participation of the local community and civil society organizations in promoting awareness on the risks and consequences of corruption on the community, and maximize the role of the community in the anti-corruption activities.

§ Coordination with the media to educate and help the community understand the risks and impacts of corruption and how to prevent and control corruption.

3. Prohibition and Prevention of Corruption Practices:

§ Receive financial disclosure representations.

§ Coordination with all the state bodies in promoting and improving the necessary measures for prevention of corruption and updating anti-corruption mechanisms and means. However, such a coordination function should be considered in a more general and broader context that includes all forms and stages of anti-corruption efforts.

4. Law Enforcement and Prosecution

§ Review and evaluation of anti-corruption

Supreme National Anti-Corruption Authority Sectoral Objectives	
<p>- Asset Declaration Sector: Analysis of the declarations of financial disclosure to monitor and follow up cases of illicit enrichment of the public officials.</p> <p>- Media sector: Strengthening role of the media in exposing corruption cases and follow-up issues professionally supporting documents and evidences.</p> <p>- International Cooperation sector: Strengthening relationships with international and regional donors, and analyze their vision for the conditions of corruption in Yemen, and to take measures necessary to ensure the donors support for anti-corruption efforts.</p> <p>- Civil Society sector: Building the capacity of the civil society and establishing alliances to strengthen participation of the civil society in anti-corruption efforts, and promote awareness on its risks..</p> <p>- Detection, Investigation, Prosecution and Judiciary Pursuance sector: Detection, investigation and presentation of corruption cases to the jurisdiction.</p> <p>- Monitoring and Technical Inspection sector: Review and develop projects management systems to ensure safety of the technical designs of construction projects, follow-up implementation of the same in accordance with the approved specifications , prevent and reduce the damages of violations.</p> <p>- Financial and Economic Institutions sector: Follow up financial and economic indicators; reform the administrative system of the economic and financial units to ensure proper and transparent utilization of their financial resources and preparation of their closing financial statements.</p> <p>- Units of the State Administrative Organization sector: Reforming the governance structure of the administrative organization units to ensure proper and transparent utilization of their financial resources and preparation of their closing financial statements.</p> <p>- Development of Legislations and Financial systems sector: Reviewing imbalances in the legislative framework, financial and administrative systems and proposing the necessary amendments so as to contribute to strengthen corruption preventive measures and enhance the capacity to enforce the law and prosecution.</p>	

legislations to understand the scope of their effectiveness and propose amendments to keep pace with the international conventions and treaties ratified or acceded by the Republic of Yemen.

- § Receive the reports, communications and complaints relating to corruption crimes submitted to it, and review, verify and act in accordance with the applicable laws.
- § Investigate and refer the perpetrators of corruption crimes to justice.
- § Taking all legal actions necessary to terminate or rescind any contract in which the State is a party, or withdraw a concession or other contractual instruments if found to be concluded to the contrary to the provisions of the laws in force, or damage the public interest, in coordination with the competent authorities.
- § Taking the actions and measures necessary to recover funds and proceeds which have been generated as a result of corruption crimes, in coordination with the relevant authorities.

5. Analysis the actual situation of corruption and the preparation of studies and databases

- § Collecting information on all forms of corruption, develop databases and information systems, and exchanging information with the relevant agencies and organizations involved in corruption cases at home and abroad in accordance with the applicable regulations.
- § Studying and evaluating the reports issued by the local, regional and international anti-corruption organizations and considering the status of Yemen in such reports and taking the appropriate steps in that regard.

6. International cooperation

- § Represent the Republic of Yemen in anti-corruption-related international conferences and forums.
- § Coordination and cooperation with anti-corruption-related international, regional and Arabic countries and organizations and participation in the international programs aiming at preventing corruption.

Focusing on the above functions and powers of SNACC as mentioned earlier is extremely important, as it will later determine the conceptual

framework of the main trends and areas of work envisaged by the national anti-corruption strategy, and in line with these functions and powers.

SNACC, when developing its organizational structure, adopted classification for the operational sectors as follows:

- Asset Declaration sector;
- Financial and Economic Institutions sector;
- Media sector;
- International Cooperation sector;
- Civil Society sector;
- Detection, Investigation and Prosecution sector;
- Monitoring and Technical Inspection sector;
- State Administrative Organization Units sector; and
- Legislations and Financial Systems Development sector.

Each sector is headed by a member of SNACC, and together, in addition to the SNACC Chairman and Vice-Chairman, make up SNACC Board of Directors, which holds its regular meetings on weekly basis, as well as some complementary meetings. SNACC board reviews and takes decisions on all cases provided by the nine sectors. In addition to that, the board adopts the key trends and action plans of the nine sectors.

Moreover, SNACC has an executive organization that undertakes the technical, administrative and financial issues, headed by a Secretary-General appointed by a resolution from the chairman with the majority of the members; who is responsible before SNACC for managing and steering the daily activities of such executive organization.

II- SNACC Anti-Corruption Partners:

The national integrity and anti-corruption system in Yemen is composed of many institutions which are considered to be a natural partner of SNACC. These institutions exercise a number of powers in the three functional areas: Prevention of corruption, law enforcement and promotion of awareness. Some of these institutions carry out their activities in a mono- functional context such as law enforcement, while other institutions carry out their activities in the context of two functions such as prevention of corruption and its practices and law enforcement at the same time.

SNACC Anti-Corruption Partners – Members of the National Integrity and Anti-Corruption System

Agency	Regulation	Nature of responsibility	Position in Functions
Political Leadership	The Constitution	Issuance of Legislation, oversight, accountability and pleading	Prevention and protection, Law enforcement
House of Representatives (Parliament)	The Constitution	Enactment of Legislation, oversight, accountability and pleading	Prevention and protection, Law enforcement
The Government: Ministries of the following; Finance, Civil Service, Ministry , Information, Interior, Higher Education, Education, Justice, Legal Affairs	The Constitution, Cabinet Act, the Financial Act, the Civil Service Act, Press and publications Act and other Laws regulating the public institutions	Establishing financial and administrative regulations, proposing draft laws, detection, investigation, seizure and enforcement of the orders and judicial judgments.	Prevention and protection, Law enforcement
Central Organization for Control and Audit (COCA)	The Constitution & Low No. (39) For 1992 on COCA	Control & Audit	Prevention and law enforcement
High Authority for Tenders Control	Low No. (23) For 2007 on Public Tenders, bids and procurement.	Control & Audit	Prevention and law enforcement
Higher Tender Board	Low No. (23) For 2007 on Public Tenders, bids and procurement.	Control & Audit	Prevention and law enforcement
Central Bank of Yemen(Money Laundering Unit)	Low No. (35) For 2003 on combating Money Laundering	Control & Audit	Prevention and law enforcement
Local Councils	The Constitution & Low No. (4) of 2000 on Local Authority, and its amendments.	Control, Audit & Accountability	Prevention and law enforcement
The public Prosecution (Public Funds Prosecution)	The Constitution & Low No. (1) of 1991 on Judicial Authority, Resolution of Attorney General no. 158 of 1992 concerning the establishment of Public Funds Prosecution and the Resolution of the Attorney General No. 240 of 2001 amending resolution No. 158 of 1992.	Investigation, prosecution & enforcement of judgments.	Law enforcement
Public Funds Courts	Decree of the president of the Republic, president of the Supreme Judicial Council No. (3) For 1996 on	Making judicial judgments	Law enforcement

Agency	Regulation	Nature of responsibility	Position in Functions
	establishment of Public Funds Courts, and its amendments by decree No. (23) of 2001 and Decree of the president of the Supreme Judicial Council No. (137) of 2008.		
The Supreme Court (Constitutional Department)	The Constitution, Law No. (1) of 1991 on Judicial Authority & Law No. (6) of 1995 on prosecution of senior public officials.	Making judicial judgments	Law enforcement
Media	Law No. (25) For 1991 on press and publications, Law No. (39) of 2006 on combating corruption.	Awareness	Awareness
Civil Society	Low No. (39) For 2006 on combating corruption	Awareness	Awareness
Private sector	Low No. (39) of 2006 on combating corruption		Coordination
International & regional donor community	Low No. (39) of 2006 on combating corruption & UN Convention Against Corruption	Supporting, financing and capacity Building	Support & Funding

Through the previous review of the key components of the National Integrity and Anti-corruption System (NIACS), we can conclude this section with the following remarks:

1. There is an obvious limitation in the legislative framework of NIACS; the aspects of which can be demonstrated as follows:

- Contradiction among some provisions of the Law No. (39) of 2006, particularly among the units responsible for receiving complaints and communications related to corruption crimes and those responsible for investigation; which should be removed, not to mention the

Strengths of the national integrity and anti-corruption system

- Anti-corruption religious values, legislating punishment against corruption Perpetrators during both life and second life..
- The existence of an independent body authorized to establish a national anti-corruption strategy, develop measures and plans for its implementation, provide leadership of the system and take responsibility for coordination between the different roles.
- Willingness of different actors in the system to coordinate efforts and recognize the importance of roles integration.
- The presence of a strong political will to support anti-corruption efforts.
- The existence of a national agenda for financial, administrative and political reforms.
- The willingness of all development partners to support the Supreme National Authority to Combat Corruption and the rest of the actors in the system.

limitations on the definition of corruption, and expansion of the issues that fall within the scope of corruption under Article 30.

- Failure to issue bylaw of the Law No. (39) of 2006 on anti-corruption.
- The anti-corruption efforts are hampered by some constitutional and legal procedures relating to indictment and proceedings of the officials of the supreme executive authority, in a way that makes anti-corruption efforts unable to touch the group covered by articles number (128 and 139 of the Constitution, and Articles 3 and 4 of the Act No. 6 of 1995 on the procedures of indicting and prosecuting high officials of the supreme executive authorities in the State. Perhaps the substantive conditions in which this Act was developed, as well as the constitutional grounds were associated with an era of time with different characters than of today, which requires re-consideration of the whole procedures.
- The obvious legislative limitation in the mechanism of access to information.

2. Equated pillars of the national integrity and anti-corruption system in the absence of codes of conduct that frame their work and give it the moral dimensions, adorned with the values of integrity and anti-corruption.

3. Dominance of competitive values among some parties of the NIACS about the distribution of roles. This is caused by the lack of legislative framework and the cumulative experience of some NIACS parties, on one hand, and the juvenility of some others, on the other hand.
4. Slow procedures for litigation, and daliance with penalties and enforcement of the judgements, stimulate corruption to spread horizontally and vertically, and call into questioning on the anti-corruption efforts,
5. The government owns the bulk of the visual, audio and press media, and the poor efficiency and means of informal media including the partisan and independent newspapers, as well as lack of objectivity and impartiality in dealing with corruption cases.
6. The weak performance, capacity and financial resources of the Yemeni civil society, and the considerable dependence on foreign support.
7. The poor relationship between SNACC and the private sector, in view of the young experience and clear legal limitation in the definition of corruption and the lack of reference to the private sector within the Law.
8. The obvious confusion in the authorities of the local councils and exercising roles of monitoring, supervisory and guiding nature and others of executive nature (Tenders committees).
9. Poor coordination level among the pillars of the NIACS (lack of regular consultative meetings under the pretext of fighting corruption - a limited exchange of information and reports on anti- corruption - mutual

Weaknesses in the national integrity and anti-corruption system

- Legislative limitations in the laws of some NIACS parties.
- The existence of constitutional provisions and legislations that prevent effective control of corruption at higher levels public posts. (Articles 128 &139 of the Constitution - Law No. (6) For 1995).
- Ambiguity in the roles of some of the pillars of the system and overlapping roles of others.
- The slow procedures of the House of Representatives to consider the draft amendments to laws regulating the work of some of the pillars of the system.
- The young experience of Supreme National Authority to Combat Corruption with larger power generated fears of loss of some of the powers to some of the other pillars.
- Doubts about the integrity of some NIAC pillars, particularly the judiciary.
- Government interference in the activities of the system through the budget and resource allocation.
- Government wide powers preventing the independence of the judiciary.
- Overlapping roles within some of the pillars of the system, such as local councils, which combine supervision and oversight, accountability and vote for non-confidence, and at the same time exercising executive and financial powers (tender committees)
- The absence of effective mechanisms for coordination among NIACS parties on the anti-corruption efforts.

concerns on conflict of roles - a gap between the media and Supreme National Authority for Combating Corruption (SNACC) and the remaining parties of NIACS).

10. Young experience of the SNACC, which gives rise to many issues including:
 - a. SNACC needs to make a lot of efforts to be able to strengthen the confidence of citizens on seriousness of the anti-corruption efforts, and the ability to convince them of the importance of the role it plays,
 - b. Focus on the capacity building, and the use of expertise, capabilities and possibilities for the remaining parties of the NIACS in this regard,
 - c. Bridging the relationship with the rest of the actors in the system to facilitate the flow of information to and from SNACC,
 - d. The need to benefit from the experiences of other countries in anti-corruption efforts, designing anti-corruption measures and assessing the adequacy of SNACC organizational structure to fulfill its obligations.

SECTION III
The Conceptual and Methodological Framework of
NACS

The national anti-corruption strategy adopts a set of concepts and methodological frameworks that later will determine the contents of the different sections constituting the strategy. This section will focus on reviewing the trends of the message values, which the strategy seeks to disseminate, and the objective vision to translate the content of its message, with the analysis of concepts, frameworks and methodology in its international context and linked to the Yemeni context. This section will also discuss the intellectual and legal foundations from which the strategy emerges, taking into account of international cooperation interests, with the review of the central objectives of the strategy envisaged to achieve.

I- KEY BASIS OF THE STRATEGY

1 - Values of the true Islamic religion

The values of the true Islamic religion form a solid foundation for this strategy, Islam is the official religion of the State under the Constitution. The only source of all legislation, and all strategies, including anti-corruption strategy, which is in line with Islamic teachings and noble values. The fight against corruption has a religious dimension based on a constant principle in Islamic laws. The Holy Quranic verses include many evidences that make the fight against corruption a religious duty, in addition to Hadith (Prophet Muhammad Sayings) that are supporting such tendencies.

Therefore, promoting the values of integrity and fighting corruption from a religious point of view is an integral element in this strategy, particularly since the exploitation of the public job for personal benefit is a crime punishable in this world and the afterlife.

**In the name of God the
Compassionate the Merciful**

"And do not do mischief on the earth, after it has been set in order" (Al-Araf, 56)

"When he turns his back his aim everywhere is to spread mischief through the earth and destroy crops and cattle. But Allah loveth not mischief." (Al-Baqara, 205)

"And they (ever) strive to make mischief on earth. And Allah loveth not the Mufsideen (mischief makers)." (Al-Ma'idah, 64)

"So see what the end of those who acted corruptly was!" (Al-Naml, 14)

"(All) these transgressed beyond bounds in the lands.

And made therein much mischief. So your Lord poured on them different kinds of severe torment. Verily, your Lord is Ever Watchful (over them)." (Al-Fajr, 11)

2 - National Legislations

The Constitution of the Republic of Yemen and national legislations governing the work of various agencies all together form the legislative framework that lays the foundation for building anti-corruption efforts. Article 19 of the Constitution of the Republic of Yemen has made the protection and maintaining the public funds and property the duty of the State and all members of society.

The national legislations came to crystalize this constitutional vision in the form of a set of punitive legal provisions applicable to any person who may tamper or attack the public funds and property. The contents of such legislations will be refered to later when we

Among the Tasks of SNACC

“Drafting a national comprehensive strategy to combat corruption, and developing and implementing measures, plans and programs to carry out this strategy.” Article (8), Paragraph (2) of the Anti-Corruption Law

discuss the pillars of the national system of integrity and combating corruption in Yemen. Here, we do list them only with a focus on direct legal texts that deal with the issuance of the national strategy to combat corruption and the responsible agency for that, as stipulated in Law No. 39 of 2006 on combating corruption, where the second paragraph of Article (8) of the Supreme National Authority to Combat Corruption’s responsibility "Drafting a national comprehensive strategy to combat corruption, and developing and implementing machinsms, plans and programs to carry out this strategy." Therefore, the text above is a legal starting point for Supreme National Authority to Combat Corruption to start the preparation of this strategy and make its plans and desiged programs for its implementation in order to achieve the goals laid out in Article (3), and the exercise of functions and powers contained in Article (8) of the Law.

In addition to Law No. (39) of the year 2006 on the fight against corruption, as noted above, this strategy starts from the legislative system governing the work of the rest of the pillars in the national system of integrity and combating corruption, on top of this legislation are:

- Law No. (30) of 2006 on the financial disclosure, which the legislature entrusted the task of implementation of this Law to the Supreme National Authority for Combating Corruption (SNAC) prior to the establishment of such Authority and, therefore, this Law integrates with Law No. (39) of the year 2006 on the fight against corruption from the perspective of the unity of the party responsible for its implementation.
- Law No. (23) for the year 2007 on Public Tenders and Auctions,
- Law Number (47) of 2005 concerning ratification of the United Nations Convention against Corruption (UNCAC).

The Electoral Program of the President of the Republic of September, 2006

Point V - Combating Corruption is a lasting option and a path that shall not stop

Continue efforts to combat financial and administrative corruption through the development of policies and mechanisms to Combat Corruption as follows:

1. The application of The Financial Disclosure Law .
2. Issuance of the Anti-Corruption Law and the establishment of an independent body to combat financial and administrative corruption .
3. Activating bodies related to oversight, accountability and protection of Public Funds and the application of the principle of reward and punishment .
4. Activating the role of the Central Organization for Control and Audit and the issuance of the necessary legislation to ensure that the affiliation is to the presidency and the legislature body so that to conduct all reporting on control and on the progress of financial and administrative performance in all government agencies and institutions and to ensure the preservation of Public Funds .
5. Amendment of Tender and bids Law and strengthening independency of the Supreme Committee for Tenders through the establishment of an independent body with membership of persons known for their integrity and efficiency for managing and adopting policies and bidding systems to ensure transparency in the bidding process .
6. Activating the role of prosecutors and the courts of Public Funds and the completion of infrastructure and institutions in the rest of the governorates in order to give them full authorization to manage all issues related to financial and administrative corruption .
7. Accountability measures against corrupt officials and bringing them to justice .
8. Promoting principles of transparency and accountability in all areas of government action and legislation that govern public institutions .
9. Activation of the use of operational manuals in government services provisions and related fees, and dissemination of such tools through available channels.

- Law No. (35) for the year 2003 on Combating Money Laundering

- Law No. (4) for the year 2000 on the Local Authority and its amendments
- Law No. (6) For the year 1995 on the Impeachment Proceedings and Trial of the Occupants of the Senior Executive Authority (senior officials) in the government.
- Law No. (12) for the year 1994 on Crimes and Penalties
- Law No. (13) for the year 1994 on Criminal Procedure
- Law No. (39) for the year 1992 on the Central Organization for Control and Audit (COCA)
- Law No. (1) for the year 1991 on the Judiciary System
- Law No. (19) for the year 1991 on the Civil Service
- Law No. (8) For the year 1990 on the Financial Law, as amended by Law No. (50) for the year 1999
- Law No. (25) for the year 1990 on the Press and Publications
- Presidential Decree, the President of the Supreme Judicial Council (No. 3) for the year 1996 on the Establishment of Courts of Public Funds and determination of their tasks.

3 - The Political Will

The availability of the political will is considered to be a key pillar on which the national anti-corruption strategy depends. The political discourse at the highest level, the presidency, through the electoral program, as well as the general program of the government had given explicit support efforts to fight corruption.

3-1 - The electoral program of the President of the Republic:

The President of the Republic, Ali Abdullah Saleh's has presented his electoral platform in the midst of the presidential elections in Yemen in September 2006. This program consisted of sixteen points where the fifth one focused on efforts to combat corruption, title of this point was: "Combating Corruption is a lasting option and a path that shall not stop." This included nine sub-points came in the forefront of the application of financial disclosure law and the issuance of anti-corruption law and the establishment of an independent body to combat financial and administrative corruption.

The promulgation of Law No. 39 of 2006 on the fight against corruption, and the composition of the Supreme National Authority for Combating Corruption (SNACC) in July 2007 as an immediate translation of the electoral program of the President of the Republic, and a practical guide on the availability of a strong political will at the highest level of the presidency in support of efforts to combat corruption.

3 - 2 - The General Governmental Program

The Government has submitted its General Program to the House of Representatives (Parliament) in April 2007, almost three months earlier than the composition of the Supreme National Authority for Combating Corruption. This program has included fourteen points, where point eight focuses on the institutional building of the Government and promotion of good governance and fighting corruption. And this axis, as elaborated later, closely related to the substance of the functions exercised by the Supreme National Authority for Combating Corruption (SNACC). Here, one may only refer to the government's commitment to support SNACC, and securing the necessary financial resources to it prior to the official declaration of its establishment, reflecting the availability of government will to support efforts to fight corruption, as well to support SNACC in building its capacity and securing its needed financial resources.

**The Government's General Program
April 2007**

Point 8: the institutional structure of the Government and the promotion of good governance and combating corruption:
"Working to help the anti-corruption body to build the institutional and regulatory framework in order to accelerate exercising its functions Stated by the Law and the provision of operational budgets and infrastructure for it."

4 - The Overall National Reforms Agenda

Within the Yemeni government's commitment to implement fundamental reforms in all political, economic, social and administrative areas, transparency and the fight against corruption component occupied a privileged priority within the matrix of the Executive National Reform Agenda. The fight against corruption includes around thirteen issues out of total twenty-seven issues included in the matrix. In keeping up with that trend many of the Anti-corruption related components were completed, such as the enactment of Law No. 30 of 2006 on the Financial Disclosure, which was issued on August 19, 2006. The Financial Disclosure Law stated the jurisdiction of the Supreme National Authority for Combating Corruption (SNACC) to receive officials' assets statements, even before SNACC was established or issuance of its Law. In implementation of the component (10) of the matrix of National Reform Agenda, Law No. 39 of 2006 on Combating Corruption was issued in December 2006, forming the major beginning point for the establishment of SNACC in July 2007 to exercise the functions stipulated in the Law. Therefore, the preparation of the

national strategy comes in the context of Yemen's obligations to conduct comprehensive reforms in all economic, political and administrative areas as part of the National Reforms Agenda.

5 - Yemen's International Commitments with Development Partners

In efforts of the Yemeni government to fill the financing gap and mobilize the necessary resources to finance the development programs and plans (five-year plan 2006 - 2010, and the ten-year plan 2006 - 2015), a technical Yemeni - GCC committee was formed for managing preparations for the donors' conference (Donors Consultation Meeting). The Yemeni government's efforts to mobilize international support were culminated in the successful organizing the Donors Consultation Meeting in the British capital, London during November 15-16, 2006, in which Twenty-five countries and 15 organization were represented and pledged to provide about 4.7 billion dollars to finance the investment program for the period 2007 2010 in Yemen. This was followed by additional commitments provided, bringing total financial commitments for aforementioned period to more than five billion dollars. In return for these financial commitments made by donors, Yemen has become more demanding than ever before to find the real mechanism to combat corruption, which flourishes in all public agencies, as is threatening Yemen access to foreign support in case there are no concrete efforts in this regard, particularly because of the adoption of the Country Policy and Institutional Assessment (CPIA) ratings the World Bank provided, which became the key standards and preconditions for developing countries to obtain grants and development loans provided by many donor countries and international institutions as aid or loans.

Thus, now anti-corruption efforts and progress in this regard has become a main part of Yemen's international obligations before development partners. The ant-corruption component and strengthening of the Supreme National Authority to combat corruption also topped on high priority support programs by development partners. In this sense, collaboration between Yemen and development partners of countries and international or regional organizations also represent a key pillar for launching a National Strategy to Combat Corruption in the Republic of Yemen.

6 - International Legislation Represented in the United Nations Convention against Corruption (UNCAC)

The international community recognized the seriousness of corruption and its adverse impact on various aspects of development, which was reflected in launching many regional initiatives that have put up the building blocks for anti-corruption efforts. Most important initiatives and mechanisms were the American Convention against Corruption (1996), the Convention on Combating Bribery of Foreign Public Officials in International Business Dealings (1997), the European Convention Against Corruption Involving Staff and Member States of the European Union (1997), and the Council of the European Criminal Law Convention against Corruption (1999).

Consistent with this understanding, the United Nations launched its commitment to fight corruption in 1997 with a view to the issue of combating corruption in the

Objectives of the United Nations Convention against Corruption (UCAD)

I: To promote and strengthen measures to prevent and combat corruption in efficient manner,

II: To promote, facilitate and support international cooperation and technical assistance in preventing and combating corruption, including in the area of asset recovery,

III: To promote integrity, accountability and proper management of public affairs and public property.

global context, and to create some kind of international consensus on a range of mechanisms to combat corruption. These efforts met with issuing the United Nations Convention against Corruption in October 2003, and its entry into force on December 14, 2005. The agreement is by all standards the only document that reflects the unprecedented international consensus on the seriousness of corruption as a phenomenon threatening the development and reform in its broadest sense. This convention also moved the issue of corruption from national to international concern, and opened broad prospects for a stronger role for the international community in the fight against corruption at the national levels. The Convention envisaged to achieve three main objectives devoted to support measures aimed at preventing and combating corruption, and to facilitate and support international cooperation, and promote integrity and accountability.

UNCAC includes seventy-one articles addressing many of the basic issues and themes in eight main chapters: Chapter I: General provisions, Chapter II: Preventive measures, Chapter III: Criminalization and law enforcement, Chapter IV: International Cooperation, Chapter V: Asset recovery chapter

VI: Technical assistance and exchange of information, Chapter VII: Mechanisms for implementation, Chapter VIII: Final provisions.

In general, the convention includes various provisions in its entirety represent a remarkable development in terms of control methods and tools, and the mechanisms that go beyond traditional control mechanisms, particularly in the part relating to the transfer and smuggling of money collected for the crimes of corruption.

In the context of Yemen's keenness to interact with the international cooperation efforts in this area, and its International commitment to the fight against corruption, the Yemeni parliament ratified UNCAC in June 2005, and its final ratification was culminated by enactment of Law No. (47) For the year 2005, issued in August of the same year.

There is no doubt that this Convention and all its articles constitute a general framework that Yemen agreed to comply with, including all its content and items. Therefore, the national strategy to combat corruption is based on a system of national legislation and in conformity with the provisions of the United Nations Convention against Corruption, so that Supreme National Authority for Combating Corruption (SNACC) works in one of the main paths of its functions, particularly in the field of law enforcement. The preparation of this strategy is in keeping with the general trend of the United Nations, which states in Article (5), paragraph (1) "Each State Party shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability."

II - THE CONCEPTUAL FRAMEWORK

The strategy will adopt the concept of the "National Integrity and Anti-Corruption System", and in the same way as developed in the context of the efforts of Transparency International in 2000. This concept provides us with an analytical framework focusing on the causes of corruption and the adequacy and effectiveness of reform and efforts to combating corruption in the national context. This includes the concept of government institutions and non-government organizations that have the ability to work together to meet the high standards and lasting transparency and accountability, and low levels of corruption and mismanagement. This concept can be reflected

in the form of a building where government institutions and non-governmental organizations represent its pillars that are founded on bases of values and social awareness. This concept refers to the interdependence between the different pillars in the midst of the fight against corruption. When a pillar becomes weak and frail, the construction keeps standing due to the presence of this interdependence, as the rest of the pillars contribute to carry that part of the ceiling, which is located above this weak pillar. But when many of the pillars are weak and vulnerable, the rest of the pillars cannot afford carrying the ceiling, and here lies the disaster. Therefore, the real reform aimed at promoting and strengthening the entire building becomes an essential requirement for the success of efforts to combat corruption.

In line with this concept, the national integrity and anti-corruption system include a group of main pillars of which takes upon their selves the different tasks of fighting corruption in Yemen, and comes in the forefront the Supreme National Authority to Combat Corruption, the Central Organization for Control and Audit, the High Authority for Tenders and Auctions Control, the Higher Tenders Board, the Ministry of Finance, the Ministry of Civil Service, the Ministry of Legal Affairs, the Ministry of Interior, the Ministry of Justice, the Ministry of Information, the Public prosecution, the Public Funds Courts, the Supreme Court (the Constitutional Chamber), the House of Representatives, the Shura (Consultative) Council, as well as other pillars of non-governmental organizations represented in civil society and the private sector and the media. The promotion of the capacity of these pillars and coordination between their different roles become part of this concept and the main goal of the strategy.

III - METHODOLOGY OF THE DEVELOPMENT OF THE NATIONAL ANTI-CORRUPTION STRATEGY (NACS)

The National Anti-Corruption Strategy (NACS) eventually seeks preparation of a comprehensive, integrated strategic framework to combat corruption, with the design of viable action plan for the implementation of the different sets of roles to be performed by the active parties composing the national integrity and anti-corruption system. In other words, as a general trend to be adopted by the Supreme National Authority for Combating Corruption (SNACC), these parties were key and active partners in the preparation of the national strategy and its operational plan as long as

they necessarily would bear the burden of implementing the contents of this strategy in cooperation with SNACC. Based on the conviction that full integration of roles between different components of the national integrity and anti-corruption system, SNACC has adopted a methodology based on the active participation of all parties concerned and taking action to put an initial nucleus for the formation of a national team representing these parties, building the main trend in the fight against Corruption that starts from the premise that the fight against corruption is everyone's responsibility, while SNACC remains responsible for policy designing and coordination of roles.

IV- VISION AND MISSION

1. **Mission**: strengthen the values of integrity and develop systems of transparency and accountability.
2. **Vision**: build institutions capable of law enforcement, activating accountability, preventing corruption and to track and prosecute the perpetrators.

This vision and this letter constitutes key framework out of which the remaining items of the conceptual and systematic framework of the national anti-corruption strategy emerge.

V. – MAIN OBJECTIVES OF THE STRATEGY

SNACC envisages strengthening the national reforms system related to good governance principles. In this context, the strategy objectives emerge from the pivotal objectives set forth in article (3) that Anti-Corruption Law No. (39) of 2006 seeks to achieve; and which can be summarized as follows:

1. To prevent and combat corruption, ward off its risks, pursue its committers, seize and retrieve proceeds yielded from corruption.
2. To stabilize the principles of honesty and transparency in the economic, financial and administrative transactions so as to ensure good governance and best use of public property and resources.
3. To enforce accountability principle, enhance the controlling role of the concerned organizations, and to facilitate the access by community members to information and to the concerned authorities.

4. To encourage and activate the role of civil society organizations to effectively participate in preventing and combating corruption, promotion of awareness on its causes and risks, and the ways of preventing it.
5. To promote the concept of cooperation and partnership with other countries and international organizations in international anti-corruption programs and projects.

In the same context, the United Nations Convention against Corruption bears in mind three main objectives devoted to:

- 1- promote and strengthen anti-corruption preventive measures more efficiently and effectively;
- 2- Promote, facilitate and support international cooperation and technical assistance in the field of preventing and combating corruption, including recovery of assets; and
- 3- Promote integrity, accountability and proper management of public affairs and property.
- 4- Building capacities of the National Integrity and Anti-corruption System

Therefore, these goals constitute a general framework from which the main objectives of the national strategy to combat corruption emerge, and which are embodied in the following:

1. Developing clear administrative and institutional mechanisms to enhance accountability, protection against corruption and prevention of its practices.
2. Drafting an effective legislations and accurate and clear regulations to detect and investigate corruption cases and punish their perpetrators.
3. Creation of a community-based environment supporting the values of integrity and transparency, urge toward accountability and questioning and oppose any corruption-tolerant culture.
4. Building the capacity of the National Integrity and Anti-Corruption System (NIACS).
5. Harmonizing the performance of NIACS parties and coordinating their anti-corruption roles.

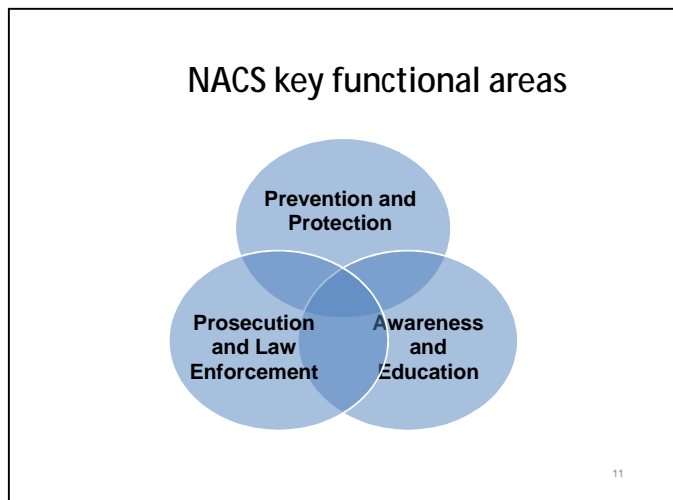
1. Section IV

National Anti-Corruption Strategy (NACS) Components and the Main Areas of Operation

Consistent with the contemporary concepts and methodologies of anti-corruption, and to meet the requirements of the aforementioned strategic objectives, this section will include the key components of the strategy that goes toward the three main operational areas being prevention and protection of corruption, law enforcement, and promotion of awareness and education, as well as a fourth component supporting the aforementioned three key functional components, which is "capacity building".

On this basis, the components of this section include the following:

- Component (1) :Prevention and Hindering Corruption Practices;
- Component (2) : Law Enforcement;
- Component (3) : Promoting Awareness, Education and Community Participation; and
- Component (4) : Capacity Building.



Component (1)

PREVENTION AND HINDERING PRACTICES OF CORRUPTION

The Component of corruption prevention of and hindering its practices is considered a major point of starting the establishment of a clear strategy for combating corruption in Yemen. It therefore turns to resolve a part of administrative and institutional deficiencies that create, in all standards, an environment in which corruption find many opportunities of proliferation and expansion at both vertical and horizontal levels. This section will focus on major trends, necessary reforms and key action areas for anti-corruption efforts in the field of

Component: Prevention of Corruption

Strategic objective:
Development of clear administrative and institutional mechanisms to strengthen accountability and the prevention of corruption

Short-term objectives:

- Clear the existing overlapping and interference in performing the tasks of the national integrity and anti-corruption system and to coordinate their roles.
- Limit the legislations that hinder anti-corruption efforts.
- Finalize the legislative framework in support of transparency and anti-corruption.
- Achieve compliance between the international laws and domestic laws.
- Develop the procedures structure and simplify administrative and financial procedures.
- Stabilize ethics and values of public service
- Enhance transparency in recruiting based on merits.
- Develop monitoring measures on political, administrative, and financial practice
- Improve the national wages in accordance with the available resource.
- Enhance the transparency in financial public procedures.
- Enhance the measures which prevent corruption and hinder its practice

prevention and hendering corrupt practices so as to score a clear strategic and defined aim. **It goes out to develop a legislative framework and administrative and institutional mechanisms by which accountability and prevention of corruption practice can be strengthened.**

Policies and Tools:

SNACC would focus on achieving the strategic objective of this component through a set of policies and tools that will eventually construct the environment where corruption can not take place. These policies multiplies to include close dimensions of strong relevance to the legislative framework

of NIACS and exercising the administrative process, of which comes in the forefront: regulatory, monitoring, and employment policies, as well as fiscal, auditing and assessment policies.

I. THE LEGISLATIVE POLICIES

Legislative policies aim to achieve the followings:

1. A diagnostic review the legal and regulatory framework for anti-corruption in Yemen was carried out by SNACC with technical assistance from the World Bank in 2008. This study was conducted to identify the shortcomings that could result in inconsistencies in the roles of some of NIACS pillars. In this context, the elements of internal regulation governing the activities of the National Integrity and Anti-Corruption System (NIACS), and other laws relevant to the investigative procedures, and litigation were the focus of attention in this review. The laws examined were: Anti-corruption law, the Judicial Authority Law, the Civil Service Law, Financial Disclosure Law, the Fiscal Law, prosecution of senior officials Law, the Penal Code, the Criminal Procedures Law, the Central Organization for Control and Audit Law and anti-money laundering Act.

Laws that hamper anti-corruption efforts in Yemen

 - Law No. (6) of 1995 on prosecuting senior officials of the supreme executive authority .
2. Amendments were proposed to these legislations for development, improvement, effectiveness enhancement purposes, as well as creation of better coordination in roles.
3. Amendments were proposed to repair the deficiencies in the anti-corruption law, and in particular the articles related to the definition of corruption, and its scope and elimination of the aspects of contradiction with the other laws.
4. Amendments were proposed to reform the Judicial Authority Law to ensure better autonomy of the judiciary system from the executive system.
5. Amendments were proposed to amend the Law No. (6) of 1995 on

Laws that the National Integrity & Anti-Corruption System lack

 - Law of the right to Access to Information
 - Law of whistleblowers protection
 - Law of defining the preventing of conflict of interest
 - Law of basic standards for decision makers in public sectors (objectivity ,impartiality , equity commitment to justify actions ,...etc)

the procedures of prosecution of high officials in order to eliminate the immunities granted to these officials in regard to corrupt acts.

6. Legislations were proposed in regard to the free access to information, protection of whistleblowers, witnesses and experts.
7. Recommendations were made to achieve harmonization between the Yemeni anti-corruption legislations and international legislations, particularly the UN Convention against Corruption.

The Government had formed an inter-ministerial committee to review these recommendations and suggest measures to improve the legal framework to combat corruption. The committee has reviewed the recommendations of that study in part and given its own recommendations. SNACC has proposed a few legislative changes to the Shura Council based on those recommendations and the work to review the remaining set of recommendations is ongoing. Under the NACS, SNACC will give this work a top priority and complete the review of recommendations and suggest a comprehensive set of legislative changes to the Shura Council within one year.

II. REGULATORY AND ADMINSTRATIVE POLICIES

- Conducting a diagnostic review of forms and manifestation of corruption in four pilot ministries-Education, Health, Water and Social Protection. This study will analyze the manner in which, corruption takes place in this ministry, and will recommend changes in business procedures of these ministries to minimize the scope of corruption by enhancing transparency; giving a level-playing field; minimizing discretion; and, replacing subjectivity in decision-making with objectivity.
- Simplifying and promoting awareness on the administrative procedures and posting the same in the announcement designated corner at all the institutions of the administrative system and the private sector,
- Ensure the clarity of the instructions for fees, fines, financial obligations and Payment procedures.
- Preparation of functional code of conduct which identify the behavioral patterns and values to be observed by the public and private officials during the performance of

**Elements of the integrity system in the work
(Code of Conduct)**

Code of ethics is Honor Charter that includes the ethics of work in the framework of public or private office, set for the workers group of behaviors and values that should be observed during the performance of their duties in their relationship with the public, and linking this code to a clear system and for the application of the principle of reward and punishment.

their job duties, whether they are related directly or indirectly to public and beneficiaries, linking the codes of conduct with a clear procedural system, and also, providing incentives for the staff so as to promote anti-corruption culture and adopting the values of integrity and honor through honoring the honest and fair-minded employees in public occasions to be defined for this purpose,

- Obligating various authorities in the administrative system of the state and private sector institutions to prepare and submit to SNACC their internal regulation to promote integrity, combat corruption, and undermine mediation and favoritism.

III. POLICIES OF RECRUITING AND APPOINTMENT IN THE PUBLIC SECTOR

1. Selection of staff in Government ministries, departments and agencies in accordance with the criterion of qualification, merit and capability to deal with the beneficiaries.
2. Adoption of public announcements and open competition as the main bases for appointment in all staff positions in all public institutions.

Inherent principle in prevention – Integrity Component

Integrity: is the system of values of truthfulness, honesty and loyalty in the work. It requires disclosure of public employee property before assuming his/her functions, and declare any conflict of interest that may arise between its own interests and the public interest. These values include the desire to reject any employee for money (bribes) from an external source to do any act affecting the public interest or lead to wasting the public money.

Supporting tools:

- Continuous publicity for vacancies on the web sites and Media,
- Allow applying for vacant posts electronically (online application).

IV. MONITORING POLICIES

1. Public Tenders and Bids constitute a key source of promoting corruption. Therefore, efforts will focus on the following:
 - 1.1. Implementation of the Procurement Management Information System (PMIS) of the High Authority on Tender Control (HATC) to monitor and track all public procurements to ensure that they conform with National Procurement Law and its Bylaws.
 - 1.2. Strengthening the control on public tenders and bids procedures, starting with the preparation of specifications brochure, estimated cost, through announcement, submission of bids, and technical analysis up to contract award.

- 1.3. Obliging various authorities to abide by transparency in concluding contracts of sale and purchase,
2. Giving the public, civil society organizations and the media the right of access to government contracts, tender and bids documents.
3. Publishing bids and tenders on the websites and arrange for the possibility to apply electronically.
4. Strengthening the role of control, and inspection units of the state institutions and protection of their staff.
5. Supporting the role of Money Laundering Unit in monitoring banking transfers.
6. Examining whether the declared assets of public officials under the Financial Disclosure System are proportionate to their incomes. Scrutinizing and preparing a list of public officials with assets disproportionate to their incomes for further investigation by SNACC.
7. Strengthening citizens and civil society organizations role in monitoring activities of the public institutions.

Elements of the integrity system in the work, transparency

Refers to all tools that facilitate access by citizens to information on the performance of public system, and enhances their understanding of the mechanisms of decision-making. Transparency in the public sector starts by the application of clear criteria for access to information, and clarity of regulations and procedures within institutions, as well as the relationship of public institutions with clients, and public actions and goals and objectives in their works.

Support tools:

- Creation of complaints reporting system on the operations of the administrative system institutions, public economic units and private sectors institutions.
- Create websites that constantly publish data and information on the activities of the institutions and update such data on regular basis.
- Publish bids and tenders on the websites and arrange for the possibility to apply electronically.

V. FISCAL POLICY

As for the fiscal policies, NACS looks for:

- Promotion of transparency on the preparation of the budgets of the administrative and economic units, conduct logical dialogues in this regard and cancellation of personal budgets.
- Examining the possibility of improving the living standards of public officials, by review of present wage structure and increasing salaries if possible within national financial resources, particularly for those working at low levels, as per the National Wage Policy.
- Improving transparency in tracking the flow of extractive industry proceeds.
- Disbursement of the incentives and financial bonuses based on transparent and clear criteria and the rates of performance and achievement.

<p style="text-align: center;">Prevention Component</p> <p>Key Actors</p> <ul style="list-style-type: none">• The Supreme National Authority for Combating Corruption (SNACC)• Central Organization for Control and Audit (COCA)• Ministry of Finance• Ministry of Civil Service• Higher Committee of Tenders and Auctions• The Supreme body for the control of Tenders• Local Councils• Development Partners <p>Targeted groups</p> <ul style="list-style-type: none">• All persons covered by the financial disclosure Law• All of the Tender Committees• Staff of Supervision and Inspection departments• Staff of the Financial Management• Staff of Personnel• Staff of Local Councils• The Private Sector

Supporting tools:

- Coordinating with the Ministry of Finance in designing an electronic window to access the draft budget at the time of submission to the parliament.
- Coordination with EITI in preparation of annual financial statement declaring oil revenues and channels of disbursement

VI. AUDIT AND EVALUATION POLICIES

- COCA conducts the review of practices and procedures adopted by the administrative institutions of the government and submit its report to the Parliament and the President. SNACC will garner support for Parliament Committees to ensure effective and proper

implementation of the recommendations of COCA, especially those on prevention of corruption.

- Advising the public and private institutions of corruption preventive measures.

Supporting tools:

- Preparation of periodic studies on the practices and procedures of a sample institutions,
- Holding seminars and workshops that promote the values of integrity,
- Select staff of integrity on a monthly and annual basis to be honored for best conduct,
- Honor three public and three private institutions on an annual basis,
- Reveal the three top institutions having witnessed the greatest corruption practices on an annual basis.

COMPONENT (2)

LAW ENFORCEMENT AND PROSECUTION

Law Enforcement , Prosecution and Pursuance Component

Strategic objective: to formulate an effective legal system and clear and precise procedures to determine and investigate in corruption cases and track down the perpetrators

Short-term objectives:

- Establishing effective measures on reporting of corruption cases and exchange verification and auditing-related information.
- Developing mechanisms for detection, collection of evidences and information on corruption cases.
- Improving investigation mechanisms and techniques.
- Improving the efficiency of the jurisdiction in dealing with corruption cases.
- Promoting coordination among the agencies involved in law enforcement.
- Improving the capacity of SNACC and the other NIACS related parties concerned with prosecution and law enforcement.

Long-term objectives 2009 - 2013:

- Provide a constitutional basis for the SNACC's activities in the first constitution amendment coming
- Complete the reform of the legislative framework governing anti-corruption efforts
- Complete the harmonization of legislative framework between the Yemeni and international legislation
- Abolition of the law No. (6) For the year 1995 and its constitutional context.

This section deals with the second functional dimension of anti-corruption drive, and is going to discuss the vocabulary of law enforcement and prosecution component. In other words, this section is concerned with anti-corruption efforts from a procedural point of view with regard to corruption practices actually take place, or those suspected of potential possibility. SNACC, through this component, seeks to achieve a strategic goal, namely formulation of an effective legal framework, clear and precise procedures to identify and investigate in corruption cases and track down the perpetrators. The same mechanism that has been addressed in the precedent component, achievement of this strategic objective can be accomplished through adoption of a set of law enforcement-related policies, and coordination of prosecution policies at its different stages.

<p>Component of law enforcement and prosecution</p> <p>Key Actors</p> <ul style="list-style-type: none"> • Presidency of the Republic • The House of Representatives (Parliament) • Shura Council • The Supreme National Authority for Combating Corruption (SNACC) • The Central Organization for Control and Audit • The Central Bank (Money Laundering Unit) • Media and Press • High Authority for Tender Control (HATC) • Police departments and investigation agencies. • The public funds Prosecutor • The public funds court • The Supreme Court (Constitutional Chamber) • Development partners <p>Targeted groups</p> <ul style="list-style-type: none"> • Public officials been reported to have committed corruption crime, or illicit enrichment. • NIACS parties concerned with capacity
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LAW ENFORCEMENT POLICIES

Prosecution and law enforcement coordination policies aim at the following:

1. With regard to complaints and reporting, it requires the following:
 - § Develop clear mechanisms to receive complaints from employees and citizens and reporting of various corruption cases;
 - § Develop programs for protection of whistleblowers, witnesses and experts in corruption cases,

2. Establish clear criteria and procedures for management of cases falling within the scope of the terms of reference, and should be investigated immediately.
3. Development of mechanisms for scrutiny and to enhance coordination between SNACC and COCA with aim to recruit potentials and COCA experiences and outputs in this regard.

**Elements of the Integrity System in the Work,
Accountability**

The staff member to submit periodic reports on how to use his powers and the extent of success in implementing its tasks, and acceptance of responsibility on the results of hi/her work implications.

4. With regard to detection and collection of evidences, focus shall be given to:
 - § Develop investigation capacity of the agencies concerned with detection, whether in the SNACC or in the remaining NIACS parties.
 - § Recruitment of effective investigation techniques, and use of various processes that rely on information technology and applications of information systems, and that enables detection bodies to diagnose and track corruption, whether being reported or not, and collect as many of the relevant reliable information and evidences.
 - § Achieve the greatest possible coordination among the agencies involved in investigation and collection of data and various evidences (Criminal Investigation Department, COCA and SNACC).
5. In the investigation and prosecution, it requires: Improving investigation techniques, and keep pace with technological developments in the area of criminal and financial investigations techniques.
6. In the area of litigation, it is necessary to reform the judicial system through:
 - § Reconsider the staff of the judiciary system, in a way that fits with the current economic conditions;
 - § Establishing courts and branches of appellate dedicated for review of corruption cases reported by SNACC.
7. With regard to cases persuance and enforcement of judicial judgments, it requires:

- § Defining clear procedures to follow up cases, starting with reporting and registration stage, through detection, investigation and seizure, prosecution and pleading, litigation stage, follow-up proceedings with the competent courts, and finally follow-up enforcement of the judicial sentences.
- § Identification of specific mechanisms, channels and agencies to be responsible for following up the enforcement of judicial judgments.

8. In the area of seizure, confiscation and recovery, it requires:

- § Development of clear procedures to facilitate seizure and confiscation of funds and the proceeds generated as a result of corruption crimes.
- § Define clear procedures to deal with the illegal conversion of assets and subsequent recovery as a result of corruption cases outside the borders of Yemen.

II. REVIEW AND ASSESSMENT POLICY

To carry out the functions and duties associated with the prosecution and law enforcement component requires ongoing review and evaluation by the concerned agencies. Hence, SNACC and the remaining parties of NIACS are in a desperate need to:

1. Form coordination committees and units led by SNACC to undertake coordinate among the parties of NIACS on:
 - Reporting on corruption cases.
 - The flow of information and reports.
 - Procedures and the inspection and the Audit teams
 - Investigation and evidences collection teams and procedures.
 - Investigation and seizure.
 - Litigation and prosecution
 - Enforcement level of the judicial judgments.
2. A diagnostic study by the World Bank in regard to the profile of civil servants convicted of corruption crimes revealed that none of the civil servants convicted of

corruption crimes in the past 3 years were given any administrative punishment by their respective ministries or removed from their service by the Ministry of Civil Service as per the Civil Service Law. The study thus called for greater coordination between the Judiciary, Line Ministries, and the Ministry of Civil Service. SNACC will establish an adequate coordination mechanism in this regard.

3. Hold regular consultative meetings at the level of NIACS leadership to discuss major corruption cases pending before the competent authorities,
4. Hold regular consultative meetings at the level of the coordination committees and units every three months,
5. Hold regular consultative meetings on the files and cases of corruption whenever needed,

COMPONENT (3)

RAISING THE LEVEL OF AWARENESS, EDUCATION, CULTURE AND COMMUNITY PARTICIPATION

RAISING AWARENESS, EDUCATION, CULTURE AND COMMUNITY PARTICIPATION COMPONENT

Strategic goals: creation of community-based environment supports values of integrity and transparency, and urges the accountability and resists against any culture tolerant with corruption.

Sub- objectives

- Building bridges of partnership between the National Integrity and Anti-Corruption System (NIACS) and community frameworks.
- Promoting Media contribution in anti-corruption efforts and a professional and impartial manner.
- Raising the new generation on the concepts of values, integrity, honorability and fighting corruption.

This component takes an interest in the moral and cultural dimensions and community participation through achievement of a strategic objective that is creation of a participating community environment that advocates values of integrity and transparency, encourages the accountability and resists any culture tolerant with corruption.

This strategic goal can be achieved through a correlative series of community, cultural, educational, and scholarly and research policies and instruments; which features can be touched in this component.

I. Community Participation Policies

1. Strengthening community participation in anti-corruption efforts

The strategy is to emphasize that the contents and components are property of the system parties including the community based on the idea that the strategy is the property of the citizen and society, and is not just a strategy for the Authority. In this context, the attention of the Authority is on achieving a real partnership with the community in the ownership of this strategy and implementing the contents. A Civil Society Coalition against Corruption, comprising of 16 civil society organizations (CSOs), has been established in Yemen with the help of the World Bank. The Memorandum of Association and the Executive and Financial By-laws of this coalition have also been ratified by member CSOs. This coalition will target 4 pilot ministries of Education, Health, Water, and Social Protection, to identify the victims of corruption in these sectors, document their case studies, and provide them a public platform to disseminate the form and manifestation of corruption in these sectors. This partnership can be further manifested through supporting tools, in the forefront, building a national coalition in which is the recruitment of the vast majority of community activists, civil society institutions, parliamentarians, academics, teachers, businessmen, social figures, political and party leaders to support anti-corruption efforts, so that it works as a

RAISING AWARENESS, EDUCATION, CULTURE AND COMMUNITY PARTICIPATION COMPONENT

Key actors:

- SANCC
- Civil Society Organizations
- Media and Press
- Educational Institutions
- Research Centers
- Development Partners

Targeted Group:

- Religious Clergy
- Teachers and Headmasters
- School & University Students
- Media Staff
- Staff of Civil Society Organizations

substitute to the formal NIACS.

2. Strengthening the role of civil society organization in anti-corruption efforts through effective involvement in awareness and capacity building programs.
3. Continual consultation with the civil society organizations.
4. Promoting awareness and educating the citizens on the risks and destructive implications of corruption on the present of the nation and future of the generations to come, explaining anti-corruption mechanisms and reporting channels.
5. Promoting the roles of local councils in anti-corruption efforts.
6. Continuous promotion of awareness among the beneficiaries and citizens on the various aspects of the performance of State public order.

Supporting tools:

- Holding periodic consultation meetings with the civil society organizations and the local councils.
- Sponsoring the activities of the civil society institutions in anti-corruption efforts, materially and morally,
- Allocating annual awards for the most three active civil society organizations worked in anti-corruption activities.
- Pocket manuals and pamphlets, leaflets and posters that introduce the corruption manifestations, devastating effects, control mechanisms and reporting channels on incidence and distribution at large-scale.
- Regular issuance of the integrity magazine and transparency Bulletin of SNACC, to assume the publication of studies, scientific and intellectual effects related to combating corruption; continuing work to develop and expanding in the preparation of the relevant brochures, pamphlets and posters.

II. Policies: Activating the Role of Media

It is necessary to revitalize the role of mass media (TV, radio, press and theater) to participate actively in anti-corruption efforts including its three

topics; prevention, prosecution and education; raising awareness among citizens on the issues of corruption; the continual disclosure of corruption cases involved; the nature of corruption practices that they made; judgments rendered; highlighting the rules, financial and administrative regulations related to financial procedures, in line with the requirements of the media.

Supporting tools:

- Conducting talk shows with associates of the organizations, authorities and institutions created the national integrity system and giving them the opportunity to explain their attitudes, policies and procedures.
- Conducting survey programs to measure corruption cases through a sample of the institutions of the State administrative organization and some institutions of the private sector.
- Designing continuous media campaigns through publication of scientific articles on causes, dimensions, contents, indicators and results of corruption and prevention mechanisms.
- Conducting intensive media campaigns against corruption practices, symbols and related adjudications.
- Honoring the distinguished media in following up corruption cases.

III. Education and Scientific Research Policies

1. Upbringing the new generations on the concepts of values, integrity, honor and fighting corruption through integrating the concepts of anti-corruption in the curriculum of the primary, secondary and university education.
2. Guiding the scientific research and supporting research and scientific in strengthening NIACS, and encouraging the academics to prepare studies and researches in this field.

Supporting tools:

- Allocating certain days of the annual school calendar to provide additional awareness lectures on anti-corruption.
- Preparation of anti-corruption brochures for three different levels; the first brochure for 1 to 6 classes, the second for 7 to 9, and the third for the secondary school, to be distributed to students in coordination with the Ministry of Education.

- Holding public and targeted lectures addressed to young people in the campus in cooperation with the public and private universities.
- Organizing scientific conferences dealing with anti-corruption and strengthening the national integrity system in coordination with universities.
- Seeking the assistance of the universities and research centers to conduct studies required for SNACC and remaining NIACS parties whether on legislations, rules or regulations.
- Allocating an annual prize for the best three studies or researches prepared in anti-corruption.

COMPONENT 4 CAPACITY BUILDING

This component has been developed to support the aforementioned three functional components. Thus, this component shall be tackled in line with the three functions components of anti-corruption strategy, as capacity building policies in the field of prevention and protection of corruption, law enforcement, and awareness, education and community participation will be addressed, taking into account the key areas related to these four components.

1- Building Capacities in the Field of Infrastructure and General Skills:

- a. Finalizing the establishment procedures of the training center in SNACC, strengthening its capacity with specialized staff and provision of the financial resources and allocations required for the implementation of training plan and capacity building programs.
- b. Designing programs to build the capacity of SNACC staff, which shall consider computer skills, languages and secretary skills.
- c. Qualifying the technical staff of SNACC and enrolling them in the postgraduate programs, inside and outside Yemen, in the fields relevant to SNACC activities and areas of competence.

2- Capacity Building Policies in Prevention and Protection Field:

- a. Strengthening SNACC capacities for prevention and protection against corruption and providing it with the technical staff and equipment to enable SNACC analyze public officials assets, conduct regular comparison based on the timeframe set forth in the financial disclosure Act, follow up implementation of budgets and construction projects and development of legislations and administrative regulations.

CAPACITY BUILDING

Strategic Goal:

Building the skills of the National Integrity and Anti-Corruption System.

Sub Objectives:

- In infrastructure and general skills is to continue establishing the infrastructure and capacity required in preventing corruption.
- In prevention: enhancing the skills of personnel and empower the civil servants.
- Law enforcement: SNACC capacity enhancement as well as for the related law enforcement agencies.
- Rising awareness, education and community participation: Enhancing the skills of manpower works in this field.

- b. Adoption of continuous awareness and training policy for public officials that should consider the administrative and financial regulations and vocational code of conduct.
- c. Continuous training for controlling, monitoring and inspections agencies to ensure following the procedures and preventing corruption before it occurs.
- d. Continuous training for media and public relationship departments' staff.
- e. Continuous training for the staff of the financial affairs, personnel and tender committees units on the values of integrity and anti-corruption.
- f. Workshops, seminars and lectures for public officials on the values of integrity, combating corruption, reporting mechanisms and codes of conduct

Supporting tools:

Development of training programs package to prevent corruption in:

- § Analysis of asset declaration applications;
- § Control and technical inspection programs;
- § Budgets analysis (preparation and level of implementation);
- § Procurement and warehouses,
- § Personnel department; and
- § Conclusion of financial and administrative contracts.

3- Building Capacity Policy in the Field of Law Enforcement

Law enforcement and prosecution component represents the most important component for the efforts of combating corruption cases which files have opened, and is the component that measures, to a large extent, the credibility of anti-corruption efforts, and therefore, the capacity-building policies of this component are on the top of priorities agenda of the remaining NIACS pillars concerned with the prosecution and law enforcement. This requires focusing on the following dimensions and aspects:

1. Providing Complaints and communications Receipt agencies, verification, detection, investigation, prosecution and proceedings with the technical staff and equipment required to meet the needs of these agencies, including the concerned sectors of SNACC.
2. A computerized Management Information System (MIS) will be established in SNACC to monitor and track public complaints related with corruption.

3. Upgrading the skills of various NIACS pillars' staff working and SNACC sectors through designing separate training programs in each of:
 - § Receiving and analyzing complaints and reports;
 - § Data and documents verification and scrutiny;
 - § Detection and evidence collection;
 - § Investigation, seizure, pleading and prosecution; and
 - § Follow-up judicial proceedings and enforcement of verdicts.
4. Continuous training of judges in the procedural and technical areas.

4- Capacity Building Policy in the field of awareness, education and community participation:

- 1) Training the staff of civil society organizations on specific programs such as instruments of the effective control, reporting in anti-corruption, reporting corruption practices, skills of promoting awareness on the importance of anti-corruption.
- 2) Training of the Central Training Team in the Ministry of Education, and a team from centers' trainers, a team from guides, a team from school principals and a team from teachers on anti-corruption training manuals.
- 3) Building special training team for community awareness and participation including promotion of women participation in anti-corruption.
- 4) Training journalists to follow up corruption cases, revealing corruption perpetrators, and contributing actively in anti-corruption efforts by dimensions and different levels.
- 5) Building capacities of SNACC I the field of promoting awareness, education and community participation, and focusing on providing the media center with the latest methods and modern equipment,

SECTION V
COMPONENT OF ROLES COORDINATION

Implementation of the aforementioned policies requires synergism among the elements of the National Integrity and Anti-Corruption System (NIACS).

And If the Authority is legally empowered to prepare a national anti-corruption strategy, implementation of its components shall be a joint responsibility between SNACC and remaining parties of NIACS. And this requires a high degree of coordination of tasks and roles of each party of NIACS, and therefore, the strategic objective of this component seeks to achieve the harmony between pillars of the national integrity system in the anti-corruption efforts and demarcates borders in which shall take the role of each party and those shall expire then. An Attention also goes in this section to highlight nature of the roles played by each party to the system, taking into account the roles played by other parties in order to create a kind of harmony between all parties in the implementation of the strategy components.

COORDINATION OF ROLES
Strategic Goals: to achieve harmony in the performance of the system pillars and coordinate their roles in the anti-corruption efforts.
Sub Objectives:
- Clarifying the nature of the role of each party of NIACS in implementing the components of the strategy.
- Improving the level of coordination among NIACS parties in order to achieve optimal implementation of the key functions , namely prevention, education and law enforcement
Key Actors
- All NIACS parties.

I. Political Leadership

We already indicated the availability of the political aspiration in Yemen at the highest levels as a basis from which the main strategy started, continuation of this aspiration of the political leadership which is the main factor for success of anti-corruption efforts, and translation of the contents of this strategy in practice. Not to mention that the aspiration expressed by the political leadership in the fight against corruption are contributing to create a political culture resisting corruption and committed to the integrity and transparency standards. The role played by the political will in this regard includes provision of absolute support for the strategy and securing the necessary resources.

- Forcing political leaders to abide by indicators of integrity and anti-corruption within the scope of their powers.

- Forcing the political leaders to sign the code of conduct in which they are obliged to distinguish between the public interests and self-interests.
- Instructing the senior leadership in the State to complete delivery of the asset deceleration form.
- Supporting non-renewal of monopolistic contracts of and decline issuing resolution to implement projects through commissioning.
- Supporting SNACC resolution with regard to termination of monopolistic contracts causing damages to the national economy.
- Emphasis on the efficiency and ability as the key criteria of candidacy for managerial and senior executive posts.

II. Parliament

Following are the most important roles required:

- Amending the laws regulating the performance of the parties involved in NIACS in a way as to promote establishment of a moral system able to contribute to creation of a community-based anti-corruption culture, notably:
 - § Law No. 39 of 2006 on anti-corruption, (the definition of corruption, the classification set out in article 30, making an end for duplication of roles between the SNACC and public prosecution)
 - § Review the Law No. 6 of 1995 in regard to the possibility of relaxing immunities to high officials from investigations into the crimes of corruption.
 - § Review the Judicial Authority Law No. (١) of 1991, and that promotes independence of the judiciary from the executive authority
 - § Review local authority law, particularly the mechanisms of electing the governor, appointment of districts General Manager and authorities of the local councils that combines the monitoring and supervisory roles and the executive role.
 - § Working to pass the law of the right of access to information which is an important corner of anti-corruption in Yemen.
 - § Reviewing the law on public elections and referendum so as ensuring greater autonomy of the Higher Elections Authority to be away from political parties.
- Preparation of codes of conduct for members of the Parliament that could address many of issues, in particularly the powers of Attorney not employed to achieve personal benefits, and the frequent absence of the members to attend meetings of Parliament or committees.
- Developing an internal audit unit on disbursement of the budget of the Parliament. Presentation of an annual report in this subject would make the Parliament a model to be followed in applying integrity and transparency measures in the aspects related to implementation of budget.

III. SHURA COUNCIL

Shura Council exercises a supportive role for SNACC anti-corruption-related activities through the consultative tasks on the performance of the public executive units which the council reports directly to the President of the Republic.

Within the context of this support, Shura council may consider the importance of including corruption component and anti-corruption mechanisms within the valuable reports and studies prepared by the committees of Shura Council on the performance of the executive units together with proposals to address the deficiencies and imbalances in the financial and administrative performance of these units.

IV. JUDICIARY SYSTEM

There is a key goal in this strategy which deals with a clean and corruption practices-free judiciary, and to make the courts a main tool of anti-corruption. This objective is of paramount importance; given the judiciary is the receptacle into which all anti-corruption efforts flow, not to mention the fair and honest judiciary that ensures legal protection to contracts and property rights, as well as providing legal protection to human rights violated by corruption practices. There is no doubt that this target would be achieved in the context of the overall reform of the judiciary system that go beyond the general framework of the national anti-corruption, but there are some key elements that should be focused on in line with the objectives of the strategy, notably:

- Promoting the independence of the judiciary and its impartiality to confront the executive authority.
- Reforming the recruitment system in the judiciary system based on merit and integrity as the main criteria. This matter includes lawyers in the PFPs, judges of the courts of public funds. It also includes promotions, transfers, delegation, so as to make such procedures transparent and subject to competition among the applicants for judiciary offices.
- Developing the structure of the courts of public funds supported with qualified cadre of judges, developing a division for the public funds prosecution which deals with corruption cases, to ensure rapid processing of corruption cases referred by SNACC.

- Training a team of judges of the courts of public funds through a specific training linked to issues of corruption in general, and cases referred by the SNACC to take into account the dimensions and complications of corruption cases.
- Prosecution of public funds is the main link between the national integrity and anti-corruption system and the courts of public funds specialized in issues of corruption; as it receive corruption cases referred to it by SNACC, COCA, the Parliament, the Higher Authority for Tender Control, police stations, and institutions of the State administrative system, not to mention the complaints and allegations of corruption issues resulting from lack of transparency, mismanagement and practice of various forms of corruption. Although the public prosecution does not have the power to make verdicts, but has a moral force influencing the progress of various issues prior to submission to the courts; the matter which require special attention to be given to the prosecution of public funds and providing it with adequate staff to meet the requirements of work in corruption cases, and improving its capacity in investigation and pleading in corruption cases.

V. THE GOVERNMENT

The Government owns considerable cards to achieve the goals of the national anti-corruption strategy, as major part of the strategy fields of operation deals in the first place with government's activities as being the key source of procedures and various administrative decisions, or key receptacle for the main public revenues and disbursement of the state resources and capabilities, as set forth in the public budget, and it is responsible for preparation of final accounts on disbursement and expenditure. In this context, the government is required to take the following:

- Undertake appointment of senior administrative officials in the public system in accordance with transparent, clear criteria and based on the principle of competition and equality of opportunity,
- Improve the general level of wages for public officials in a manner that ensures the minimum level associated with the necessary livelihood,

- Refer the management of governors' election from the Ministry of Local Administration to the Supreme Committee for Elections and Referendum, with the necessary legal amendments in the law of election in a way as to ensure direct election of governors and general managers of districts,
- Provide bigger playing field for Media and civil society in anti-corruption efforts, with access for information and data related to the performance of public institutions, and
- Issue rules and regulations to simplify processes, enhance transparency and reduce opportunities of corruption practices.

At the level of government agencies, the roles of the following institutions could be considered:

1- Ministry of Education

Ministry of Education is considered to be the first responsible agency for preparation and upbringing of a new generation on the values of integrity and combating corruption. In line with this proposal, Ministry of Education is required to undertake the followings:

- Establish a moral and cultural system that stimulates the new generation to engage in the issues of public affairs, and develop their skills to participate constructively in the anti-corruption efforts in the future,
- Integrate the concepts of good governance and anti-corruption in the education curricula of both basic and secondary education, and
- Integrate anti-corruption concepts and values in the training programs designed for teachers, guides and school principals in both basic and secondary education, so that this activity extends to include private schools.

2- Ministry of Technical Education and Vocational Training(MOTAVT):

Within the same context, MOTAVT is required to undertake the following:

- Integration of anti-corruption concepts in the training programs designed for guides, teachers and managers of Technical Institutes, and
- Integration of good governance and anti-corruption concepts in the curricula of technical education and vocational training.

3- Ministry of Finance:

Significant part of corruption practices goes mainly toward financial transactions sector. Hence, MOF is required to undertake the following:

- Preparation of various agencies budget in line with the principle of transparency throughout all budgeting stages,
- Preparation of budgets in manner that reflects the actual needs of the development process,
- Streamlining the disbursement procedures in accordance with the approved budgets and plans of the concerned agencies,
- Provision of accurate and transparent accounts statements on public revenues and expenditures, and
- Review the legislations governing financial transactions in a manner that promotes transparency and reduces the potentialities and opportunities for corruption,

4- Ministry of Civil Service

- Commitment to transparency and open competition in the allocation of public vacancies),
- Make an end for manipulating the public vacancies and activate the legal penalties and procedures,
- Prepare codes of conduct for public officials in coordination with the concerned agencies,

- Finalize restructuring public administrative agencies in coordination with the concerned ministries, agencies and institutions, and
- Review the general level of wages and salaries in general, and provide recommendation for improvement.

5- Ministry of Information:

- Supporting the mission and vision adopted by SNACC and remaining parties of NIACS, and deliver the same to all targeted segments through all official media.

6- Central Bank of Yemen (Money Laundering Unit)

The goal in this section is to reveal transactions involving money laundering events, a matter which requires MLU of the Central Bank to communicate to SNACC any doubts about any operation that involves money laundering attempt in order to enable SNACC to take initial action in coordination with other agencies.

7- Central Organization for Control and Accounting

The strategy emphasizes the integration of roles between SNACC and COCA, being the central tool of verification and auditing the organizations falling under its control within the context of the authorities envisaged to it. Successful implementation of a large part of the strategic objectives is contingent upon successful integration thereon. This requires COCA to perform the following:

- 1) Provide SNACC with copies of COCA reports on any organization falling under its control on regular bases, at the same time COCA send such regular report to the concerned agency,
- 2) Cooperate with SNACC to utilize COCA's abilities, potentials and cumulative experience in building SNACC capacity and training its staff in the areas required by SNACC and in line with COCA capabilities and experiences,
- 3) Cooperate with SNACC to form joint teams to work on corruption issues, if needed.

- 4) Cooperate with SNACC to form joint sectoral work teams to review and develop the financial and administrative laws and regulations,
- 5) Continuous coordination with SNACC on corruption files through coordination committees to be formed at all levels and when needed, and
- 6) Finalize the arrangements required to ensure establishment of a Higher Council for accounting and auditing in a manner as to contribute to organizing the profession of accounting and auditing, and develop accounting and auditing standards, as well as vocational code of conduct.

VIII - Supreme National Authority for Combating Corruption (SNACC)

SNACC assumes the responsibility of preparing and implementing public policies to combat corruption. It also undertakes development of the anticorruption strategy and the implementing mechanisms, plans and programs. This means that SNACC role is pivotal in the context of NIACS roles. In this respect, SNACC will undertake the following:

1. Corruption preventive measures:

- 1.1.** General review of the financial and administrative laws and regulations of the public administration in coordination with COCA, High Authority of Tender Control, Ministries of Finance and Civil Service, the Central Bank and the other concerned organizations,
- 1.2.** Develop mechanisms for reporting on corruption cases in the administrative organizations of the State and the economic and fiscal units, and
- 1.3.** Initiate review and analysis of financial disclosure declarations to determine any change in the financial situation of the senior officials of the State.

2. Law enforcement and Prosecution

- 2.1. Review of legislations governing the roles of the national integrity and anti-corruption system in coordination with Central Organization for Control and Audit, Public Prosecution, Ministry of Legal Affairs, Ministry of Justice, Ministry of Finance and the rest of the concerned parties,
- 2.2. Review the implementing regulations of Law No. (39) of 2006 in line with the statutory powers envisaged to SNACC,
- 2.3. Propel the draft law on right of access to information, and develop the draft law on protection of whistle-blowers, informers, witnesses and experts on corruption cases,
- 2.4. Propel the draft amendment of COCA law in a manner as to promote its autonomy and in line with the conventions signed by Yemen at both regional and International levels, and
- 2.5. Eliminate the aspects of contradiction related to investigation in corruption cases.

3. Awareness and community participation

- 3.1. Launching the concept of National Coalition against Corruption, and initiating the executive procedures necessary for its establishment,
- 3.2. Coordination with the Ministry of Local Administration and local councils to spread the concepts of anti-corruption at the community level,
- 3.3. Coordination with the Ministry of Education to form a joint committee to develop guidelines for incorporating the concepts of anti-corruption in the curricula of basic and secondary education,
- 3.4. Bridging the relationship with different media, and enhance the media confidence in SNACC and its credibility and seriousness in the efforts against corruption, and ensuring a regular press conference, in which SNACC provides a summary on its activities, explains its efforts, how far, and the cases referred to

the prosecutors and already adjudicated, the encountered obstacles and challenges,

- 3.5. Supporting civil society organizations working in the field of combating corruption, building their capacities to become an effective anti-corruption tool, particularly in promoting awareness on the risks of corruption,
- 3.6. Bridging the gap with the private sector, and initiate action to coordinate between SNACC and the private sector on the axis of cooperation between both parties; and
- 3.7. Consolidate efforts with the universities and research centers to integrate concepts of anti-corruption in higher education curricula, with the use of university specialized staff in combating corruption, promoting scientific research in this area, organizing lectures, seminars, workshops, scientific conferences dedicated to contribute in building the capacity of the national integrity and anti-corruption system.

4. Capacity Building

- 4.1. Develop a plan to build the capacity of SNACC which should consider the nature of SNACC tasks, main objectives, sectoral needs and the staff required to achieve the objectives,
- 4.2. Develop a plan to build the capacity of the National Integrity and Anti-Corruption System in coordination with all concerned executive parties, legislative and judicial authorities, as well as with the local authority, anti-corruption institutions, civil society organizations and the private sector, and
- 4.3. Establishment of a training center to provide training on integrity and anti-corruption programs, and to undertake the responsibility for preparation of national cadre in this area.

5. Audit and evaluation

- 5.1. Development of an annual action plan based on the components of the national strategy the action plan, defining the roles of SNACC sectors and progress indicators for each sector,

- 5.2. Evaluating SNACC activities on annual basis, and providing progress indicators in the areas where SNACC operated actively based on its legal functions and annual plans,
- 5.3. Development of a code of conduct for SNACC members and staff,
- 5.4. Evaluation of SNACC organizational structure and efficiency to meet SNACC tasks in the areas of education, prevention of corruption and law enforcement, and achieving the objectives for which SNACC was established, and
- 5.5. Design a plan to establish branch offices for SNACC.

6. International Cooperation

- 6.1. Enhance cooperation with the relevant international organizations having interest in anticorruption efforts and creating partnership with development partners.
- 6.2. Engage in the regional and international efforts to combat corruption and make use of the international experience in this field.

7. Preparation of Assessment Documentation and Indicators:

- 7.1. Producing a national report to assess the situation of corruption in Yemen on annual basis;
- 7.2. Translate the international reports relevant to assessment of the corruption level in Yemen, to be reviewed, making them available to researchers, the public and the media, and preparing comments and evaluations of such reports.
- 7.3. Develop quantitative indicators for measurement on an annual basis taking into account the three main functions included in anti-corruption efforts.

8. Local Councils

The strategy envisages strengthening the capacity of local councils in the area of supervision and oversight and accountability. To achieve this goal, it requires the following :

- 8.1.** Careful identification of the functions of local councils in coordination with the Ministry of Local Administration and SNACC, and separation between the function of supervision and accountability on the one hand, and the exercise of operational activities on the other hand, particularly in the area of tenders and contract.
- 8.2.** Immediate enforcement of accountability and deposition measures against everyone proved to be involved in corruption cases, and communicating the same to SNACC.
- 8.3.** Periodic assessment of the performance of the executive units, particularly in the field of financial and administrative transactions, as well as service delivery to citizens.
- 8.4.** Coordination with the Ministry of Local Administration to design programs to raise awareness on the risks of corruption, and the importance of delivering financial disclosure declarations by the groups, at governorate level, covered under the Financial Disclosure Act.
- 8.5.** Coordination with Ministry of Local Administration to design programs to build the capacity of local councils with regard to oversight, supervision and financial audits.

9- The Media

The strategic objective of this component is to enable the media express the demands of the local people in creating corruption-free government, and, at the same time, monitoring government activities, spotlight corrupt practices in a professional and subjective manner supported with reliable evidences.

There is no doubt that the media's role in combating corruption is, to some extent, influenced by the margin of freedom permitted by the government, and the development of mechanisms to access information through the

adoption of a new law on the right of access to information. In this regard, media is required to undertake the following:

1. Subjective display of corruption cases once adjudicated,
2. Continuous promotion of awareness on the anti-corruption Act and other NIACS related laws,
3. Continuous introduction of SNACC objectives and role in combating corruption ,
4. Continuous promotion of awareness on the national integrity system, particularly the Central Organization for Control and Audit, the Public Prosecution, the Higher Tenders Committee, the Supreme Authority for tender control, the judiciary and the House of Representatives(Parliament),
5. Conducting public polls on the various issues of corruption, and based on the opened cases and files,
6. Contribute to the creation of a strict culture against perpetrators of corruption,
7. Continuous promotion of awareness on the risks of corruption and its adverse impacts on development programs and widening the base of poverty,
8. Mobilize continuous support for anti-corruption effort,
9. Endeavor to motivate the parliament and the Government to follow up, prevent and track corruption perpetrators,
10. Designing programs to stimulate the judiciary accelerates action on cases of corruption pending before the courts,
11. Designing programs that would enhance credibility in the public institutions by highlighting the institutions free of corruption and that give high priority to the values of transparency and integrity in carrying out their activities,

12. Designing programs that focus on corruption issues in the public institutions, highlighting and disclosing names of the institutions saturated with corruption to the public, and
13. Assist to create and promote the culture of loyalty to the home and the community, and priority of the same on all other small interests which, in fact, are fertile environment for the growth of corruption opportunities.

10- The Civil Society

The strategic objective of this component is to strengthen capacities of the civil society organizations and enable them to contribute effectively in community outreach programs to create an environment of anti-corruption activities and strengthen oversight of government activities. Through networking with SNACC, the roles of civil societies, including organizations representing women, are as follows:

1. Mobilization of anti-corruption efforts and participation in community awareness campaigns, workshops and seminars relevant to anti-corruption efforts, creating partnership with and use media in the educational and awareness efforts targeting both the citizens and youth alike,
2. Engagement in community-based coalition against corruption and involving civil society organizations within the permanent and temporary oversight committees and bodies relating to the activities of the integrity and anticorruption system,
3. Periodic consultation with SNACC to coordinate efforts to strengthen the mechanisms for participation of civil society organizations in anti-corruption efforts,
4. Design joint programs with SNACC to build the capacity of civil society organizations in the field of community education and awareness, and monitoring government activities,
5. Demanding the government to publish the financial statement of oil revenues and aspects of disbursement, as well as publishing the draft budget and draft final accounts to civil society organizations in two

special conferences before submission to the House of Representatives, and

6. Demanding the government to publish an annual report on its efforts against corruption in the public administration units with attached list contains the disclosure of corruption cases and the names of perpetrators of corruption whom have been subject to disciplinary and punitive measures, for discussions at a joint meeting includes the Government, the civil society and the media.

11- The Private Sector

The Strategic objective in this section is to promote a private sector free of corruption prices neither in its internal or external transactions. This objective can be achieved through commitment by the private sector to:

1. Inform Supreme National Authority for Combating Corruption and with any data relating to corrupt practices in its dealings with government institutions, particularly in the area of tendering and bidding, and government procurement,
2. Develop codes of conduct for the private sector institutions to include transparency in the internal procedures, and the commitment to ethical and legal rules in financial transactions with government institutions,
3. Standardize accounting and audit systems so as to facilitate the comparison process and enhance transparency in accounting procedures within the institutions of the private sector,
4. Support projects which promote the legislative system transparency in government transactions,
5. Commit to decline giving bribery to public officials in government agencies,
6. Perform its obligations under the terms of contracts signed with government institutions, as well as the agreed technical specifications upon delivery, particularly in the area of construction projects,

7. Translate and abide by the principles of business administration, prepared by Transparency International and the International Organization for Social Accountability, in the operations of private sector's institutions,
8. Network with civil society organizations and supporting their activities, particularly in the dissemination of concepts and principles of business administration to fight corruption, and
9. Support independent media and contributing to training of the journalists working in the economic field and provide them with the tools required to analyze and reveal cases of fraud and corruption.

12- International Actors (Development Partners)

The strategic objective of this component is to strengthen the presence of partners to support development programs and anti-corruption efforts; a matter which requires:

- Create an international coalition to support and fund the activities and efforts of Yemen in the fight against corruption, particularly commitment to contribute in supporting the implementation of NACS components,
- Support SNACC activities and contribute effectively in building its capacity in line with the plan of action submitted by the Authority, and issues of importance in its list of priorities,
- Support SNACC activities with the aim to improve the situation of Yemen in the international indicators and reports concerned with assessment of corruption levels, and
- Support SNACC activities addressed toward interaction with the mechanisms of self assessing the level of implementing of United Nations Convention against Corruption.

CONCLUDING REMARKS

IMPLEMENTATION COMMENCEMENT REQUIREMENTS

Expected Results and Possible Constraints

Through the previous presentation of the NACS components, the roles of National Anti-Corruption Strateby (NIACS) parties, and the operational action plan, it is clear that implementation of NACS requires concerted efforts of all parties, and at the same time, it requires the following:

1. The need for continuous supporting political will to achieve the strategic objectives and components of the operational plan of action, to the extent of progress in the implementation of the components and objectives achievement will be based on size of the political leadership support.
2. A commitment by SNACC and the other parties of the National Integrity and Anti-Corruption system (NIACS) to implement the action plan in line with scheduled priority list.
3. A commitment by NIACS member parties to act in an interactive framework toward integration of roles based on a unified end with different means in line with the nature of each NIACS member.
4. Ensure mobilization of public and media support and community participation in the anti-corruption efforts, which will be achieved only through taking bold steps with rapid and efficient impact confirming the seriousness in the fight against corruption, setting foundations to raise

Expected Results

- ✓ Reforming a considerable part of the legislative framework of anti-corruption system
- ✓ Building the capacity of the National Integrity and Anti-corruption System
- ✓ High degree of coordination between the actors of the National Integrity System to avoid conflict in roles
- ✓ Reform and restructuring of most of the public administrative units
- ✓ High absorptive capacity for loans, aid and external support
- ✓ Improvement in the economic growth rate
- ✓ Improvement the performance of media in the detection of corruption cases
- ✓ Wider participation of civil society organizations in efforts to combat corruption
- ✓ Improvement in Yemen ranking in the indicators of international reports
- ✓ Enhanced credibility of Yemen's efforts in the fight against corruption
- ✓ Greater interaction of donors and development partners with the development issues in Yemen

the credibility of SNACC and the rest of the actors in the national integrity and anti-corruption system. Perhaps the area of illegal contracts and accountability of those who proved to be involved in corruption are both of the most candidates' areas as starting points.

5. Commitment by development partners to support and finance programs and components of the strategy, and continuous monitoring of the implementation process, and participation in the process of annual review of the implementation progress.
6. Establishing a unit to coordinate the efforts made to implement the components of NACS and the executive action plan.
7. Periodic Review and assessment of the achieved progress in implementing NACS components through:
 - a. Formation of a committee under the chairmanship of SNACC and the membership of the other partners to follow up the implementation of the NACS components on an annual basis,
 - b. Measuring corruption from quantitative point of view to be able to identify how to move on the anti-corruption indicator and the country's position, is it moving forward or backward.
 - c. Preparation of an annual report on the status of corruption in Yemen and the efforts made to

Potential Constraints and Risks

- The slow pace of reforming the legislative framework governing the work of the NIACS by the parliament, and the low level of interaction with SNACC proposals on reforming this framework .
- Controversy on the draft law on the right of access to information.
- The slow response of government agencies to implement the contents of the national reforms matrix that leads to questioning the credibility of the anti-corruption efforts in Yemen to the development partners, and incited them to take decisions that deny Yemen from some sources of funding .
- Continued competitive relationship between some of the actors of the system, particularly SNACC, COCA and the Public Prosecution .
- The lack of access by SNACC to adequate support to terminate the monopolistic contracts that are damaging public interests of the national economy .
- The continued loss of credibility in the judiciary by large segments of the society .
- Involvement of the press in the political wrangling between the government and the opposition leads to loss of media impartiality and subjectivity and reduces the credibility of the reports published in press .
- Predominance of critical tone in the speech of civil society organizations, which are actively engaged in efforts to combat corruption .
- Alliance of corruption parties against anti-corruption efforts and in a way that interrupts the bulk of the Strategic Programs, calls into questioning the credibility of SNACC, creates a picture of SNACC to appear as a tool for regime beautifying in the domestic public opinion, as well as the in the outside world.

combat corruption and progress level, as well as level of implementation of the components and programs included in the national strategy to combat corruption. The report should be prepared according to international standards.

- d. Conducting surveys and assessment reports for each NACS component.
- e. Improve assessment indicators and thresholds in the short, medium and long terms.
- f. Conduct an annual review with the participation of all partners to assess the implementation progress at each component level and at the level of the overall framework of the strategy.

**Executive Action Plan of the
National Anti-Corruption Strategy
(NACS)**

2010 – 2014

COMPONENT (1) : PREVENTION AND HINDERING PRACTICES OF CORRUPTION

Strategic objective: Formulation of an effective legislative framework and development of clear administrative and institutional mechanisms to strengthen accountability and the prevention of corruption

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementation Agency	Supporting Agencies	Outputs and assessment indicators
Legislative policies	Eliminating the present conflict and overlap in the roles of the different parties involved in the implementation of the national system of integrity and combating corruption, and coordinating their roles.	Review the legislative framework governing the roles of the different parties involved in the implementation of the national system of integrity and combating corruption	2010-2011	Supreme National Authority for Combating Corruption (SNACC).	- House of the Representatives, Al-Shura Council, Central Organization for Control and Audit (COCA), Prosecution, Ministry of Justice, Ministry of Legal Affairs and office of the presidency.	- Reconsider the definition of corruption, corruption crimes and the investigation authority. - Supporting the independence of the COCA from the executive authority in line with the regional and international agreements to which Yemen is a signed party.
	Limit the legislations	Revise the law No. 6 of 1995	During the period of	SNACC	House of the Representatives,	Amending the articles of law that protect

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementation Agency	Supporting Agencies	Outputs and assessment indicators
	that hinder the anti-corruption efforts.	on the impeachment and trial proceedings of the occupants of the senior executive authority (senior government officials)	constitutional amendments		Al-Shura Council, COCA, Prosecution, Ministry of Justice, Ministry of Legal Affairs, Ministry of Interior and office of the presidency.	high rank officials from being subject to accountability.
	Finalize the legislative framework in support of transparency and anti-corruption.	- Support the draft law of free access to information and the law of video transmission	2010 – 2011	Ministry of Information	- SNACC, House of the Representatives, Ministry of Human Rights, Ministry of Legal Affairs,Media, office of the presidency.	- Enactment of the Law of free access to information.
		- Support the draft law to protect whistle-blowers, witnesses and experts.	2010-2011	SNACC	- House of the Representatives, Ministry of Human Rights, Ministry of Legal Affairs, office of the	- Enactment of whistle-blowers, witnesses and experts. Protection Law. - Issuing the implementing

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementation Agency	Supporting Agencies	Outputs and assessment indicators
		<ul style="list-style-type: none"> - Review the draft executive regulation of Law No. 39 of 2006 to cope with the Act. 			presidency.	regulation of Anticorruption Act. -
	Achieve harmonization among the international and national legislations.	Total review for the laws of the national system of integrity and combating corruption in line with the international legislations ratified by Yemen.	2010 - 2011	SNACC	<ul style="list-style-type: none"> - House of the Representatives, Al-Shura Council, COCA, Prosecution, Ministry of Justice, Ministry of Legal Affairs, Ministry of Interior and office of the presidency. 	<ul style="list-style-type: none"> - Eliminating the conflict between the national legislation and the international ones. - Number of the amended clauses of each Act. - Number of the amended Acts.

COMPONENT (1): PREVENTION AND HINDERING PRACTICES OF CORRUPTION

Strategic objective: Formulation of an effective legislative framework and development of clear administrative and institutional mechanisms to strengthen accountability and the prevention of corruption

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementation Agency	Supporting Agencies	Outputs and assessment indicators
Administrative and regulatory policies	Developing the regulatory structure and simplifying the administrative and financial procedures.	<ul style="list-style-type: none"> - Conduct a diagnostic study on the form and manifestation of corruption in 4-5 government ministries - Propose revision in the administrative systems and procedures of these ministries to minimize the opportunities for corruption. 	2010 – 2012 (annual)	SNACC	- COCA, Civil Service, and selected ministries	<ul style="list-style-type: none"> - Publishing the outcomes of the study. - Proposing amendment to the systems and procedures. - Issuing service manuals provided by the public agencies. - Publishing the administrative guidelines on the websites and the designated areas.
	Promoting the ethics and values of the use of public job/office.	Review the systems and regulations organizing the use of public office and develop a Code of Conduct	2010	Ministry of Civil Service	SNACC	Issue and comply with the code of conduct

COMPONENT (1) : PREVENTION AND HINDERING PRACTICES OF CORRUPTION

Strategic objective: Formulation of an effective legislative framework and development of clear administrative and institutional mechanisms to strengthen accountability and the prevention of corruption

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
Polices of Employment and Appointment	Enhance transparency in the appointment for the public jobs based on the principle of competition, merit and equality of opportunity,	Design programs for competition to occupy leading executive positions (Upper Management).	2010 – 2011	Ministry of Civil Service	- SNACC	<ul style="list-style-type: none"> - Continuous publicity for vacancies. - Possibility to apply for vacant posts electronically. - Publishing the names of the winners. - Well defined Terms of Reference for each job position announced. - The criteria for selection, which should invariably include merit, should be announced.
Monitoring Policies	Developing mechanisms to monitor the administrative and financial transactions.	Activate the role of the control and audit units of the administrative system in the associated control.	2010 - 2014	Ministry of Finance	- SNACC., Civil Service, Organizations of the State's Administrative	<ul style="list-style-type: none"> - Developing a mechanism for coordination between the Control and Audit Units and SNACC. - Provide SNACC with copies of the internal control reports.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
					System, COCA	
		Follow up the role of the money laundering unit in the process of controlling the banking transfers	2010 - 2014	SNACC – Money Laundering Unit	-	- Number of the incoming reports from the Money Laundering Unit.
		Involving the Civil Society Organizations (CSOs) in the process of monitoring the financial expenditures.	2010 - 2011	Ministry of Finance, Civil Society.	SNACC, MOPIC	The CSOs acquire the membership of the financial committees and project's budgets discussion committees.
		<ul style="list-style-type: none"> - Finalizing the representations of financial disclosure. - Critical examination of financial disclosures to identify those civil servants whose assets are disproportionately higher than their incomes. Conduct investigations into the manner in which these civil servants 	2010 - 2012	SNACC	<ul style="list-style-type: none"> - Concerning line ministries and Ministry of Civil Service 	<ul style="list-style-type: none"> - Number of the received assets disclosure representations. - Number of the financial disclosures that have been analyzed. - Number and percentage of civil servants that have assets disproportionately higher than their incomes.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		acquired their assets.				
		Developing mechanisms for reporting of corruption practices in the administrative system and economic units.	2010 - 2011	SNACC – Administrative System Organizations	Line Ministries, Ministry of Civil Service	Establishing a system for reporting corruption cases and publishing its mechanisms.
	Developing mechanisms to monitor the specifications and construction works.	Activating the monitoring role of the Standardization, Metrology and quality control Organization.	2010 - 2014	– YSMO	SNACC	<ul style="list-style-type: none"> - The number of reports received from YSMO by SNACC in which violations of standards were observed. - Number of the consultative meetings with YSMO.
		Review the supervisory role over the construction projects and maintenance works for road projects.	2010 – 2014	Ministry of Public Works and Highways	SN AC C	<ul style="list-style-type: none"> - Number of the consultative meetings with the Ministry of Public Works.

COMPONENT (1) : PREVENTION AND HINDERING PRACTICES OF CORRUPTION

Strategic objective: Formulation of an effective legislative framework and development of clear administrative and institutional mechanisms to strengthen accountability and the prevention of corruption.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementation Agency	Supporting Agencies	Outputs and assessment indicators
Fiscal Policies	Improve the general level of wages and salaries.	Review the National Strategy of Wage and Salary	2010 – 2012	Ministry of Civil Service	- Ministry of Finance, Presidency of the Cabinet, SNACC,	- Increasing the general level of wages for all administrative ranks.
	Promote transparency on the financial Transactions of the State.	Review the general context of preparation and ratification procedures of the State General Budget	2010 – 2014 (annual)	Ministry of Finance - MOPIC – Ministry of Civil Service – High Budget Committee Ministry of Local Administration	- – Cabinet – House of Representatives, SNACC -	- Publishing the rules of allocation of resources and preparation of the State budget and budgets of the administrative and economic units. - Publicity of the Cabinet meeting concerning ratification of the draft public budget. - Presentation of the overall indicators of the budget for the civil society before referral to the House of Representatives.
		- Regular follow-up of the public expenditures - Develop clear criteria for distribution of the financial incentives of all	2010 – 2014	Ministry of Finance – Ministry of Civil Service –	- COCA – House of Representatives - SNACC	- Publishing the annual financial statement of the government organizations on the websites. - Publishing the list of the financial incentives on the websites, this should include names of the beneficiaries and the financial amounts, on annual basis.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementation Agency	Supporting Agencies	Outputs and assessment indicators
		types.				
		Continuous follow-up of revenues generated from extractive industries.	2010 – 2014	EITI Board	<ul style="list-style-type: none"> - SNACC – COCA – House of Representatives –Ministry of Finance 	<ul style="list-style-type: none"> - Finalizing the legal procedures for establishment of a transparency council for Extractive Industries. - Publicity of the meetings of the council and publishing its meeting minutes on a designated website. - Publicity of the reports of the Transparency councils on the outcomes of its verifications and audit of the revenues generated from extractive industries.

COMPONENT (1) : PREVENTION AND HINDERING PRACTICES OF CORRUPTION

Strategic objective: Formulation of an effective legislative framework and development of clear administrative and institutional mechanisms to strengthen accountability and the prevention of corruption.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementation Responsibility	Supporting Agencies	Outputs and assessment indicators
POLICIES OF AUDIT AND EVALUATION	Strengthen the procedures of prevention and protection against corruption.	Review the practices and procedures for a sample administrative institutions of the government on a yearly basis	2010 – 2014	SNACC	<ul style="list-style-type: none"> - –Ministry of Civil Service – Ministry of Finance - COCA 	<ul style="list-style-type: none"> - Volume of the recommendation provided annually by SNACC to the administrative system of the State to strengthen the procedures of prevention and protection against corruption. - Number of meetings with the administrative institutions of the State with the aim to provide advice for effective and proper implementation of the recommendations for prevention and protection against corruption.
		<ul style="list-style-type: none"> - Annual evaluation of the performance of the administrative institutions of the government in accordance with the standards of 	2010 – 2014	Civil Society	<ul style="list-style-type: none"> - SNACC – Administrative Institutions of the State 	<ul style="list-style-type: none"> - Publish the outcomes of the assessment studies. - Honor the best three institutions on an annual basis, based on the criteria of transparency and integrity.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementation Responsibility	Supporting Agencies	Outputs and assessment indicators
		transparency and integrity. - Preparation of an annual study to assess the performance of a sample of the administrative institutions of the government from transparency and integrity perspective.				
		- Periodic assessment of staff performance in accordance with the standards of transparency and integrity,	2010 - 2014	Ministry of Civil Service	- SNACC – Administrative Units of the State – Civil Service – COCA	- Honor the staff of best conduct in the public institutions of the administrative system, on a monthly and annual basis, based on the criterion of integrity, transparency and disciplinary. - Link promotions with integrity and transparency.

COMPONENT (2) : THE LAW ENFORCEMENT AND PROSECUTION

COMPONENT

Strategic objective: to formulate clear and precise procedures to identify and investigate corruption cases and track down the perpetrators.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
PROSECUTION AND LAW ENFORCEMENT POLICIES	Develop effective measures for reporting of corruption cases and exchange of information with regard to detection and investigation.	Establish clear lines of communication between the units that receive complaints and documented communications, on one part, and the SNACC Unit of reporting complaints.	2010 - 2011	SNACC – Units of the administrative system and the economic units – Private Sector	-	- Adoption of mechanisms for communication and exchange of date.
		Develop a mechanism for exchange of information relevant to detection and investigation between SNACC and the remaining parties of the	2010 - 2011	SNACC	– High Authority For Tender Control (HATC) – High Tender Board (HTB) – COCA – Money Laundering Unit	SNACC to receive reports from: - High Authority For Tender Control. - High Tender Board - COCA - Money Laundering Unit.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
	<p data-bbox="323 383 480 716">Development of Mechanisms for investigation and collection of data on corruption cases.</p>	<p data-bbox="505 293 717 378">National integrity and anti-corruption system.</p> <ul data-bbox="505 388 724 1115" style="list-style-type: none"> - Recruit secret agents to handle investigation, data collection and various evidences on the communications received by SNACC. - Establish a clear communication network between the secret agents and SNACC. - Coordination among the agencies involved in investigation and collection of data and evidences. - Recruitment of Effective 	2010 – 2011	SNACC – Ministry of Interior	<ul data-bbox="1073 388 1317 471" style="list-style-type: none"> - Presidential Office, Prime Minister’s Office 	<ul data-bbox="1374 388 1648 996" style="list-style-type: none"> - Number of the secret agents and the institutions they cover. - The number of reports SNACC receives from the secret agents. - The number of investigation and evidences collection process carries out through coordination between SNACC and the other concerned parties. - Nature of the used techniques that rely on the information technology.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		investigation techniques that rely on information technology and systems				

COMPONENT (2) : THE LAW ENFORCEMENT AND PROSECUTION

COMPONENT

Strategic objective: to formulate clear and precise procedures to identify and investigate corruption cases and track down the perpetrators.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
PROSECUTION AND LAW ENFORCEMENT POLICIES	Develop investigation techniques and mechanisms.	Coordinate investigation between SNACC as the competent authority of investigation in corruption cases and the Public Prosecution as the competent authority to take action on corruption cases.	2010	SNACC – Public Prosecution	Ministry of Justice	Designation of a prosecution to plead on corruption cases.
		Recruitment of effective investigation techniques to cope with the technological	2010 - 2012	SNACC	-	<ul style="list-style-type: none"> - Volume of the technological equipments for the investigation sector. - Volume of disbursement on the investigation in

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		development.				SNACC and the used technology equipments. - Number of investigations generally carried out and those carried out using the technology equipments.
	Strengthen the efficiency of jurisdiction to deal with corruption cases.	Strengthen the role of the public prosecution for the prosecution and litigation before the courts.	2010 – 2014	SNACC – Public prosecution –	- Ministry of Justice – Judiciary Council	- The number of corruption cases pending before the prosecutor. - The number of corruption cases referred to the courts.
		- Activate the litigation procedures to ensure quick settlement on corruption issues. - Activate the mechanisms of judicial inspection, to ensure the efficiency and integrity of the judiciary.	2010 – 2014	SNACC – Public prosecution – Ministry of Justice –	- – Judiciary Council, Courts of Public Funds	- Allocation of a special division of the courts of public funds to take action on corruption cases. - The average time of procedures required for corruption cases until adjudication. - The number of judges referred to the discipline due to lack of integrity in dealing with corruption cases.
		Follow-up the	2010 –	SNACC –	- Ministry of Civil Service	- Number of the enforced

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		procedures of litigation and enforcement of the judicial decisions.	2014	Public Prosecution-		<p>judicial sentences out of the total sentences made on corruption cases.</p> <ul style="list-style-type: none"> - Number of people who have been adjudicated on the account of corruption. - Volume of the consequential financial impact of enforcing judicial decisions within and outside the borders of Yemen.

COMPONENT (2) : THE LAW ENFORCEMENT AND PROSECUTION
COMPONENT

Strategic objective: to formulate clear and precise procedures to identify and investigate corruption cases and track down the perpetrators.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agency	Outputs and assessment indicators
REVIEW AND EVALUATION POLICY	Enhance coordination among the bodies involved in the enforcement of Law.	Form committees and units for coordination among the Supreme National Authority to Combat Corruption, COCA, High Authority for Tender Control, High Tender Board, Ministry of Interior, Ministry of Legal Affairs and Money Laundering Unit to hold its meetings each three months or when required.	2010	SNACC	<ul style="list-style-type: none"> - – Public Prosecutor. - COCA - HATC - HTB - Ministry of Interior - Ministry of Legal Affairs - Money Laundering Unit 	<ul style="list-style-type: none"> - Number of the formed committees - Number of the meetings held annually.
		Hold periodic consultative meetings led by SNACC and the rest of the pillars of the national integrity and anti-corruption system.	Continuous (annual)	SNACC	<ul style="list-style-type: none"> - SNACC - rest of the pillars of the national integrity and anti-corruption system. 	<ul style="list-style-type: none"> - Number of the consultative meetings held in a year.

**COMPONENT (3) : RAISE THE LEVEL OF AWARENESS, EDUCATION,
CULTURE AND COMMUNITY PARTICIPATION**

Strategic objective: creation of community-based environment supports values of integrity and transparency, and urges the accountability and opposes any culture tolerant with corruption.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
COMMUNITY PARTICIPATION	Building bridges of partnership between the National System of integrity and anti-corruption and the formal national system and informal roles.	Establishing anti-corruption civil society coalition	2010	Civil Society Organizations–	SNACC – Academics – Private Sector.	Launching anti-corruption civil society coalition and organizing its meetings
		Involving the civil society institutions in anti-corruption efforts.	2010 – 2014	SNACC – Civil Society	- Ministry of Social Welfare	- Integrating anti-corruption programs in the work programs and plans of the civil society institutions. - Regular consultative meetings. - Participate in the membership of the Main Committees.
		Establishing partnership with the local councils and	2010 – 2014	SNACC – Local Councils	Ministry of Local Administration	Regular consultative meetings

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		holding joint workshops, as well as joint review of the performance of the executive agencies.				
		Coordinating with the religious scholars and mosques preachers.	2010 – 2014	SNACC – Ministry of Endowment and religious scholars.		Integrating the anti-corruption concepts in the religious discourse and Fridays' sermons.
		Designing community-based awareness program.	2010 - 2011	SNACC – Civil Society –	- Universities – Ministry of Information	- Number of the awareness packages that have been prepared..

COMPONENT (3) : RAISE THE LEVEL OF AWARENESS, EDUCATION, CULTURE AND COMMUNITY PARTICIPATION

Strategic objective: creation of community-based environment supports values of integrity and transparency, and urges the accountability and opposes any culture tolerant with corruption.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
Activating the Role of Media	Strengthen the role of mass media to participate actively in anti-corruption efforts.	<ul style="list-style-type: none"> - Designing community-based awareness programs for each mean of mass media. - Activating the role of the press in anti-corruption efforts. 	2011-2012	SNACC – Civil Society – Mass Media of all types	<ul style="list-style-type: none"> - Ministry of Information 	<ul style="list-style-type: none"> - Columns and articles in the official and private newspapers and websites dedicated to address the phenomena of corruption. - Programs and works periodically in television channels, radio stations, public and private
		Designing periodic anti-corruption programs (in TV and Radio) to highlight anti-corruption strategy promote	2010 – 2014	SNACC – Mass Media, Civil Society	<ul style="list-style-type: none"> - Ministry of Information 	<ul style="list-style-type: none"> - Programs and flashes to raise awareness on the risks of corruption and the associated economic and social impacts. - Pilot programs of corruption practices - Media campaigns on the corrupt practices, symbols and

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		awareness on the risks of corruption and disclose its practices.				adjudications.
		Supporting literatures and publications.	2010 – 2014	SNACC	- Ministry of Information	<ul style="list-style-type: none"> - Regular publication of magazines and leaflets (transparency and integrity). - Prepare and publish an annual report for assessment of corruption in Yemen. - Publishing anti-corruption related studies. - Publishing reports evaluating the performance of the institutions - Preparation of booklets containing the most important contents of anti-corruption laws and the United Nations Convention.
		Involving various Mass Media	2010	SNACC – Mass Media	Ministry of Information	Composing a specialized media team to follow up corruption cases.

COMPONENT (3) : RAISE THE LEVEL OF AWARENESS, EDUCATION, CULTURE AND COMMUNITY PARTICIPATION

Strategic objective: creation of community-based environment supports values of integrity and transparency, and urges the accountability and opposes any culture tolerant with corruption.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agency	Outputs and assessment indicators
Education and scientific research policies	Upbringing the new generations on the concepts of values, integrity, honor and fighting corruption	Integration of the concepts of anti-corruption in the curricula of the primary, secondary and university education.	Review and assessment of education curricula.	Ministry of Education	- SNACC -	<ul style="list-style-type: none"> - Curriculum to accommodate the concepts of anti-corruption. - Preparation of anti-corruption manuals for all levels of education.
		Integration of the concepts of anti-corruption in the curricula of the vocational education.		Ministry of Technical education and vocational training	- SNACC	
		Integration of the concepts of anti-corruption in the curricula and activities of the higher education.	2010 – 2012	Yemeni Universities	- SNACC	<ul style="list-style-type: none"> - The number of lectures devoted to the fight against corruption. - The number of subjects containing the concepts of anti-corruption. - The number of registered thesis dealing with corruption cases.
		Coordination with	2010 – 2012	Ministry of	- SNACC	- Creating a research team and

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agency	Outputs and assessment indicators
		the universities and scientific research centers to direct the scientific research and supporting research activities in the field of combating corruption.		Higher Education – Public and Private Schools – Research Centers		<p>designing a plan of research priorities.</p> <ul style="list-style-type: none"> - Inclusion of anti-corruption issues and concepts in the programs of the universities and research centers. - The number of the joint lectures, seminars and conferences.

COMPONENT (4) : CAPACITY BUILDING

Strategic objective: To build the capacity of the National Integrity and Anti-corruption System.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
Capacity building in the field of infrastructures and general skills	Finalize establishment of the infrastructure and the requirements of capacity building.	Finalizing the establishment of the Training Center.	2011	- SNACC	-	<ul style="list-style-type: none"> - Issuance of the incorporation resolution. - Preparation of the training rooms. - Providing the center with specialized staff. - Adoption of the training plan. - Providing the resources required for the implementation of the programs contained in the training plan.
		Designing a program to build the capacity of SNACC staff in the general skills.	2010 - 2014	SNACC –	- National Institute of Administrative Sciences – Yemeni Universities – Cultural and Languages Institutes	<ul style="list-style-type: none"> - The number of trainees in computer skills programs. - The number of trainees in language programs. - The number of trainees in secretary programs.
		Qualifying the	2010 - 2014	SNACC -	- UNIVERSITIES	- The number of staff enrolled in

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		<p>technical staff of SNACC and enrolling them in the postgraduate programs, inside and outside Yemen, in the fields relevant to SNACC activities and areas of competence.</p>				<p>postgraduate programs at home.</p> <ul style="list-style-type: none"> - The number of the seconded staff to do master's and doctoral degrees abroad.

COMPONENT (4) : CAPACITY BUILDING

Strategic objective: To build the capacity of the National Integrity and Anti-corruption System.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
Capacity building in the field of protection and prevention	Strengthening the capacity of the agencies responsible for protection and prevention of corruption.	Designing a program to identify the requirements and technical installations of the units working in the field or protection and prevention of corruption practices.	2010	SNACC	-	<ul style="list-style-type: none"> - Preparation of the needs document and the technical installations of the SNACC protection and prevention units.
		<ul style="list-style-type: none"> - Providing the financial disclosure sector, technical monitoring and inspection, the fiscal and economic units, and units of the administrative system of the State with the technical staff required to perform their activities. - Providing the financial disclosure sector with the required installations. 	2010 - 2011	SNACC	-	<ul style="list-style-type: none"> - The number of qualified technical personnel specialized in the analysis of financial disclosure representations, periodic comparison of the disclosed assets, oversight and inspection, the economic and fiscal units and units of the administrative system. - The technical installations and equipments used to input the data of the financial disclosure

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
						representations, saving, analysis, oversight and inspection, financial units and units of the administrative system.
		Design a program of training requirements for the staff of SNACC and the remaining parties of the national system; protection and prevention.	2011	SNACC – COCA – Ministry of Finance – Ministry of Civil Service	- – COCA – Ministry of Finance – Ministry of Civil Service, Public Prosecution	- Preparation of training needs identification document for the staff of SNACC and the remaining elements of the National System concerned with protection and prevention of corruption.
		Preparation of training manuals in the areas listed in the training requirements; while taking the following into account: (- analysis of the financial disclosure representations – Technical control and inspection programs - budgets analysis - Procurement and warehouses - Personnel Management – Concluding financial and administrative contracts.	2010 – 2011	SNACC	-	- Number of the manuals being prepared.
		The training of SNACC staff in the field of protection and prevention of corruption practices, in addition to training on the computer skills and English Language skills.	2010 – 2014	SNACC	- – Institution of the administrative system and the economic units	- Number of training courses implemented for each program. - Number of the trainees in each program.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		Training the staff of control and inspection department, financial affairs, personnel affairs, tenders committees and public relations departments in the administrative system of the State and the economic units on the values of integrity and the mechanisms of protection and prevention of corruption.	2010 – 2014	SNACC	<ul style="list-style-type: none"> - – Institution of the administrative system and the economic units 	<ul style="list-style-type: none"> - Number of training courses implemented for each of the targeted units. - Number of the trainees in each program.
		Workshops, seminars and lectures for public officials on the values of integrity, combating corruption, reporting mechanisms and codes of conduct	2010 – 2014	SNACC	<ul style="list-style-type: none"> - Universities 	<ul style="list-style-type: none"> - Number of the workshops, seminars and lectures in each unit. - Number of the targeted personnel in each program

COMPONENT (4) : CAPACITY BUILDING

Strategic objective: To build the capacity of the National Integrity and Anti-corruption System.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
Policies of capacity building in the field of Law enforcement	Strengthening the capacity of SNACC and the remaining pillars of the National System concerned with prosecution and enforcement of law.	Designing a program to identify the technical requirements and installations for SNACC sectors involved in the prosecution.	2010	SNACC	- Attorney General Office	- Preparation of the technical requirements and equipments document.
		<ul style="list-style-type: none"> - Providing investigation and prosecution sector with the required technical staff capable of handling the pending cases with SNACC (Detection and investigation fields). - Providing investigation and prosecution sector with its need of the technical installations required for verification and investigation activities. - Providing the sector of legislations and development of the administrative regulations with the required technical staff specialized in the 	2010 - 2012	SNACC -	- Public Prosecution, Ministry of Interior - Ministry of Legal affairs – Ministry of Civil Service - High Institute of Jurisdiction	<ul style="list-style-type: none"> - Size of the technical staff in the Legislations and systems Development sector. - Volume and type of the technical equipments used in the investigation and detection sector.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		legislations and administrative systems.				
		Designing a program to identify the training requirements for prosecution and enforcement of law which should consider the needs of SNACC, Public Prosecution, COCA, High Authority for Tender Control, High Tender Board, Ministry of Interior, Ministry of Legal affairs and judges of the public funds courts.	2010	SNACC -	<ul style="list-style-type: none"> - Public Prosecution - Courts of Public Funds - COCA, High Authority for Tender Control - High Tender Board - Ministry of Interior - Ministry of Legal affairs 	<ul style="list-style-type: none"> - Preparation of the training requirements document.

COMPONENT (4) : CAPACITY BUILDING

Strategic objective: To build the capacity of the National Integrity and Anti-corruption System.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
<p>Capacity building in the field of Law enforcement</p>	<p>Strengthening the capacity of SNACC and the remaining pillars of the National System concerned with prosecution and enforcement of law.</p>	<p>Designing training manuals for prosecution and law enforcement field, taking the following into consideration:</p> <ul style="list-style-type: none"> - Receiving and analyzing complaints and communications; - Scrutiny of data and documents; - Detection and collection of evidences; - Investigation and seizure; - Litigation and prosecution; - Procedural and technical dimensions and aspects of litigation; and - Follow-up the judicial proceedings and enforcement of sentences. 	<p>2010 - 2011</p>	<p>SNACC - Public Prosecution – COCA –</p>	<p>- Yemeni Universities – High Institute of Jurisdiction</p>	<p>- Number of prepared training manuals for the targeted groups.</p>

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		<ul style="list-style-type: none"> - Preparation of trainers team. - Training the trainers. 	2010 - 2011	SNACC - Public Prosecution – COCA –	- Yemeni Universities – High Institute of Jurisdiction	<ul style="list-style-type: none"> - Formation of the training team. - The number of trainers preparation programs.
		Training the targeted groups.	2010 - 2014	SNACC and its Partners	-	<ul style="list-style-type: none"> - Number of the implemented programs. - The number of Trainees.

COMPONENT (4) : CAPACITY BUILDING

Strategic objective: To build the capacity of the National Integrity and Anti-corruption System.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
CAPACITY BUILDING TO RAISE AWARENESS, EDUCATION, CULTURE AND COMMUNITY PARTICIPATION	Strengthening the capacity of the formal and community frames working in the field of awareness, education, culture and community participation	<ul style="list-style-type: none"> - Designing programs to identify training needs in the field of awareness, culture and community participation which cover SNACC, National coalition parties, Civil society organizations, women's frames, educators and members of the local councils, religious scholars and mosques' preachers 	2010	SNACC – National Coalition of Civil Society Organizations – Mass Media – Yemeni Women Union – Woman National Committee – Women Studies Center –	<ul style="list-style-type: none"> - Ministry of Endowment and Guidance – Ministry of Education – Ministry of Technical Education – Local Councils – Ministry of Higher Education. 	<ul style="list-style-type: none"> - Preparation of training Needs Document
		<ul style="list-style-type: none"> - Designing programs to identify the equipment and technical requirements of the Media sectors, civil society, international cooperation, SNACC training centre, National Coalition, civil society organizations and women's frames. 	2010	SNACC – National Coalition – Civil Society – Woman frames	<ul style="list-style-type: none"> - Ministry of Information 	<ul style="list-style-type: none"> - Preparation of the technical requirements and installations document.
		Providing Media, civil society and international cooperation sectors and training center with	2010 - 2011	SNACC and its Partners		<ul style="list-style-type: none"> - Number of the technicians working in the

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
		the technical staff and equipments.				Information and civil society sectors. <ul style="list-style-type: none"> - Volume of the technical installation used by the information sector. - Volume of the technical installations of the training center. - Volume of the training cadre.

COMPONENT (4) : CAPACITY BUILDING

Strategic objective: To build the capacity of the National Integrity and Anti-corruption System.

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
CAPACITY BUILDING TO RAISE AWARENESS, EDUCATION, CULTURE AND COMMUNITY PARTICIPATION	Strengthening the capacity of the formal and community frames working in the field of awareness, education, culture and community participation	<ul style="list-style-type: none"> - Designing training manuals in the field of awareness, culture, community participation and International Cooperation (teachers, journalists, Civil society organizations, local councils, mosque preachers and women frames). 	2010 - 2011	SNACC – Women frames – Yemeni Universities.	<ul style="list-style-type: none"> - Ministry of Education – Ministry of Technical Education – Ministry of Information – Civil Society – Local Councils – Ministry of Endowment 	<ul style="list-style-type: none"> - Preparation of training manuals for the targeted groups.
		<ul style="list-style-type: none"> - Preparation of a trainers team. 	2010	SNACC – Civil Society – Yemeni Universities - Women Frames.	<ul style="list-style-type: none"> - Ministry of Education – Ministry of Technical Education – Ministry of Information – Local Councils – Ministry of Endowment – 	<ul style="list-style-type: none"> - Formation of the training team. - Number of the trainers preparation programs.
		<ul style="list-style-type: none"> Training the targeted groups (teachers, journalists, Civil society organizations, local councils, mosque preachers and women frames). 	2010 - 2014	SNACC – Civil Society – Yemeni Universities - Women	<ul style="list-style-type: none"> - Ministry of Education – Ministry of Technical Education – 	<ul style="list-style-type: none"> - Number of the training programs implemented annually. - Annual number of

Policies	Short term objectives	Detailed Policies and procedures	Implementation period	Main Implementing Agency	Supporting Agencies	Outputs and assessment indicators
				Frames.	Ministry of Information – Local Councils – Ministry of Endowment –	the trainees.