



Annual Report 2021

Executive Summary

President Message



The period, subject of this annual report for 2021, was marked by the completion of the legislative project, materialized, during the extraordinary session of March 2021, by the unanimous approval of the two chambers of Parliament of the Law no. 46-19 relating to the National Authority for Probity, Prevention and Fight against Corruption (INPPLC). This project, accompanied by the Authority for more than two years and despite its long process, was a favorable opportunity to shape a convergence of visions and adherence to the orientations and foundations of this law, with the prospect of

carrying out a dynamic strong anti-corruption based on the involvement of all the authorities, institutions and all the concerned economic and societal actors, in a clear articulation and complementarity of roles and responsibilities.

After this approval and its publication in the Official Bulletin on May 13th, 2021, the entry into force of the Law no. 46.19 has become dependent on the appointment of the Authority Council members and its General Secretary. At the date of publication of this report, i.e., more than three and a half years after the appointment of its president, the INPPLC continues to evolve in a transitional situation, characterized by the absence of activation of its legal framework.

In addition, during this period, and despite of the pursuit of authority's efforts, considering its opinions and recommendations published in its reports remains weak, even almost non-existent, which is not likely to open new desired anti-corruption era, and doesn't allow Morocco to register this scourge in a tangible downward trend, with perceptible impacts, on both citizens and economic actors.

Convinced by the importance of the time factor in building trust and giving credibility to the commitment aimed at a profound change in the fight against the scourge of corruption in Morocco, the Authority has continued, in parallel with the legislative project, to invest all its energy in making the best of this transition period.

In particular, it elaborated and presented its opinions and recommendations concerning several priority areas and issues according to their structuring effect and/or their direct impact on the evolution of corruption in our country.

The results of these studies and the objective analysis of, both quantitative and qualitative, diagnostic data, confirm the unprecedented repercussions of the scourge of corruption on undermining the public trust in the institutions and in the various undertaken efforts and whose consolidation is essential to put the sustainable development on a solid, comprehensive and sustainable path. Moreover, if the transition to a new era of the fight against corruption in Morocco is considered as an inevitable requirement to interact objectively with this analysis and diagnostic data, this transition will take an urgent character in the context of the succession of health, economic and security crises that have become an increasingly heavy burden on national economies and on the social conditions of populations. Indeed, this situation has greatly contributed to raise the level of the national economy's competitiveness needs as well as raising the citizens' legitimate expectations which are becoming more and more pressing. these challenges cannot really be met, in the duration, without a global vision as well as bold and resolute policies dealing with the flaws in the governance system and corrupt practices.

In this regard, it is fair to underline that the importance of the efforts made to develop public policies, including crisis times of, and their translation into several development projects and programs which are citizens and businesses oriented, cannot be underestimated. Also, it should be recognized that the implementation of these policies has enabled our country to make significant progress in several areas, and even to take the lead in certain sectors. However, and in most cases, the level of benefit from the results of these programs and their positive impact on several segments of the population, remains low and intangible. The magnitude of the phenomenon of corruption which is one of the first causes of this inconsistency, continues to weaken the overall dynamics of development and economic growth, to threaten social cohesion and to hinder the visibility which actors and investors have needed; thus, depriving our country of realizing its true potential development.

The repercussions of this reality have been at the center of the attention and the alert of a set of national and international reports which call for its correction through concrete structural measures, as the recent report by Bank Al -Maghrib. Its analysis and its conclusions call for reconsidering the approaches adopted to date and for taking, consequently, stronger measures, with more determination. Such conclusions converge perfectly with those that the INPPLC has never ceased to recall, while emphasizing the absolute necessity of accelerating the effective transition to a new era in the fight against corruption.

In view of this objective, the INPPLC remains committed to mobilizing all its means and capacities, as highlighted by this report, and declares itself ready to work within a framework that aims to fight effectively against corruption to obtain measurable and perceptible results by citizens and economic actors. A framework based on the principles of convergence, synergy and institutional complementarity for coordinated and concerted action between all stakeholders.

In this regard, the INPPLC emphasizes that the profound and inevitable corruption reality transformation in Morocco requires the commitment concretization making responsible governance, the prevention and the fight against corruption, a national priority.

The prioritization of the action should be guided by producing tangible and perceptible impacts for all the concerned populations, leading to a major change that puts the scourge of corruption on a lasting downward trend, with a strategic orientation capable of ensuring the necessary mobilization of the various actors, in an institutional environment marked by strong synergy and interdependence of roles and responsibilities. This environment in which the INPPLC will fully fulfill its constitutional and legal missions, including direct action, supervision, support, coordination, guarantee of monitoring and evaluation. This is how our country will be able to defeat the scourge of corruption, raise itself as a model on the international level and ensure for all of our fellow citizens, current and future generations, the conditions of dignity, prosperity and fulfillment.

Mohammed Bachir RACHDI

**President of the National Authority for Probity,
Prevention and Fight Against Corruption**

Executive Summary

The third annual report of the National Authority for Probity, Prevention and Fight against Corruption (INPPLC) continues to enshrine the Authority's commitment – as a matter of principle and responsibility – to presenting the outcomes of its annual activities. The INPPLC upholds this principle even though the institution still operates with a transitional and exceptional status, given the delay in the entry into force of Law 46-19.

In this context, the bulk of INPPLC's efforts has been to ensure the establishment and consolidation of its new legal framework, while continuing to develop and strengthen the organisational, managerial, and functional foundations of the INPPLC, as well as defining its propositional project and supporting it with diagnostic assessments and evaluations. The aim is to upgrade the scope of INPPLC recommendations so that they become an essential resource feeding into the strategic vision that the State will adopt in the area of corruption combatting and prevention. This effort also serves the goal of achieving a qualitative shift to a new era in the fight against corruption in our country, which will then translate into a direct positive impact felt by the broader segments of society. The consolidated outcome of these efforts is intended to help rebuild confidence among all stakeholders to ensure their engagement going forward.

The INPPLC's 2021 annual report aims, through its diagnostic assessments and propositions, to draw attention to the bold actions needed for a deep and comprehensive review of the anti-corruption system, given that current endeavours have been unable to remove Morocco from the pool of countries that are witnessing deteriorating corruption indicators.

The present report is also reminded that the operating mechanisms of the INPPLC have been finalised and its scope of work and practice has been delineated, and that the end of its interim status, will activate its powers within the framework of legislative and regulatory controls set out in Law No. 46-19. Indeed, with the entry into force of the said law, the INPPLC will be able to optimally carry out its tasks – monitoring, coordination, tracking, and evaluation – and accelerate the transition to a new era in the fight against corruption in our country.

This report also continues consolidating the INPPLC's institutional approach, which is based on the development and diversification of constructive assessment and evaluation processes, in order to offer alternatives through recommendations and proposals, while deepening studies and research into key and priority anti-corruption issues, and delivering thematic reports pertaining thereto.

In response to these objectives, this progress report has been prepared, covering the INPPLC's endeavours in 2021, as per the following five areas:

Area I: Assessing the state of corruption

The INPPLC considers the diagnostic assessment conducted at this stage – based on the findings of relevant international indices, and on its own study, analysis, and update of the sources informing these indices, combined with the INPPLC’s self-designed methodological and organisational instruments – as a preliminary and foundational step ahead of the assessment that will be carried out by the INPPLC’s Observatory. This will also hinge on the strengthening of methodological mechanisms for collecting, producing, and analysing data using modern and updatable tools.

As part of the present interim assessment, the INPPLC monitored the state of corruption at the following levels:

1. The state of corruption at the international level

The INPPLC considered the findings of the 2021 Corruption Perceptions Index (CPI), which confirmed that levels of corruption have not improved globally. A significant percentage of countries around the world – about 131 – have not been able to achieve any tangible progress in combatting corruption, while the scores of 27 others have fallen to their all-time low on the CPI.

According to this general observation, the 2021 CPI sets the overall global score at 43/100; Western Europe and the European Union topped the list with 66/100, followed by Asia and the Pacific with 45/100; the Americas came in third place with 43/100, the Middle East and North Africa ranked fourth with 39/100, Eastern Europe and Central Asia ranked fifth with 36/100, while Sub-Saharan Africa ranked at the bottom with a score of 33/100.

As part of its emphasis on the link between high rates of corruption, on the one hand, and violations of rights and freedoms and the decline in democratic performance, on the other, the 2021 report on the CPI shed light on the multiple manifestations of violations of human rights and freedoms in a number of countries. It noted that these countries recorded a significant decline in the CPI and warned that corruption undermined governments’ ability to guarantee rights, provide public services, achieve justice, and provide safety for all.

The INPPLC found that this was further confirmed by the results of the Freedom in the World report issued by Freedom House in February 2022, which highlighted the downward trend of political and civil rights in the world. The report identified the most important declines in these rights during the last 10 years, highlighting, through a set of graphs, the rates of decline among a number of countries. It was also confirmed by the results of the 2021 Open Budget Index, which recorded a significant drop in terms of rights of participation in the process of preparing and implementing the countries’ financial budgets.

2. The state of corruption at the regional level

The INPPLC found that the Middle East and North Africa region, with an overall average of 39 out of 100 for the fourth year in a row, still suffers from the continued dominance of strong oligarchic interests in the political and economic spheres, and that the restrictions imposed on the civil and political liberties have greatly contributed to the inability of the countries of the region to achieve tangible results in the fight against corruption. Out of the 21 Arab countries covered in this study, only four were able to achieve an average of 50 or higher; They are the United Arab Emirates (69), Qatar (63), Saudi Arabia (53), and the Sultanate of Oman (52).

Although the 2021 CPI linked the spread of corruption in the Arab region to the pressures imposed on civil and political liberties, freedom of expression and opinion, and the freedom of work for civil society organisations, the INPPLC observed the relative nature of this correlation, which is called into question by the advanced results achieved by some countries in the Arab region on the CPI despite their low rankings on rights and freedoms, according to the findings of the Freedom House report of February 2022.

On the other hand, the INPPLC found that the Arab countries' results in the CPI are more in line with the results of the 2022 Index of Economic Freedom, i.e., high rates in the CPI corresponded to positive results in this Index.

At the African level, the INPPLC found that Sub-Saharan Africa, with an overall average of 33 out of 100, ranked sixth and last in the 2021 CPI. Indeed, the Index's findings indicate that corruption is rampant in Africa mainly due to ongoing armed conflicts, power struggles, the increase in terrorist threats, in addition to weak enforcement of anti-corruption laws. These findings also intersect with those of the Freedom in the World report, which confirmed that political crises and power struggles continue to undermine efforts to establish democratic progress in Africa, leading to deteriorating levels of freedom. This is further supported by the results of the Index of Economic Freedom, which confirmed that the absence of any progress in terms of the state of rights, effectiveness of laws and regulations, and efficiency of open markets, are all factors that make Sub-Saharan Africa lag behind the rest of the world. This in turn exposes the countries of this region to major challenges in order to overcome corruption and open the way for raising the level of development they desperately need.

3. The evolution of corruption at the national level

In 2021, it became all too clear to the INPPLC that Morocco, by obtaining a score of 39/100 in the CPI, has confirmed its declining performance on this indicator – a decline that started in 2018 with a score of 43/100, which dropped by two points in 2019 (41/100), then by one point in 2020 (40/100), before declining by yet another point in 2021.

The INPPLC also highlighted Morocco's ninth rank (9) at the Arab level – outperformed by the United Arab Emirates, Qatar, Saudi Arabia, the Sultanate of Oman, Jordan, Tunisia, Kuwait, and Bahrain, and followed by twelve (12) countries – while it ranked in a middling position in Africa, outperformed by eleven (11) countries.

The INPPLC also looked at the intersections – as confirmed by the CPI – between the high rates of corruption, violations of rights and freedoms, and the decline in democratic practice, against the backdrop of the Freedom in the World report findings, which confirmed Morocco’s negative rating in the two indicators on political and civil rights. Morocco also underperformed in the two components of “Judicial Effectiveness” and “Government Integrity”, comprised in the Index of Economic Freedom, as well as in the two factors of “Criminal Justice” and “Open Government”, featured in the Rule of Law Index. In addition, there are noticeable shortcomings in terms of rights related to participation in the preparation and implementation of the State’s annual budget, as highlighted by the 2021 Open Budget Index.

The INPPLC was able to monitor the development of corruption at the national level through opinion polls conducted as part of the 2021 Confidence Index, the results of which confirmed the high permeation of corruption; 95 percent of the respondents considered bribery to be widespread in Morocco; 66 percent of them believe it is very common, and 27 percent think it is somewhat common.

As regards judicial prosecution, the INPPLC noted that the 2020 report of the Public Prosecutor’s Office registered that the direct line to report bribery received a total of 15,743 calls, and confirmed the registration of 164 arrests of suspects in flagrante delicto, in relation to bribes ranging from simple amounts not exceeding 50 dirhams, to relatively high amounts of up to 300,000 dirhams in one case. The flagrante delicto cases included state officials, members of the Royal Gendarmerie, the police, water and forestry members, civil protection and auxiliary forces, mediators, health professionals, justice officials, and equipment and transport employees, among others.

As for the corruption crimes presented to the financial crimes departments, the 2020 report of the Public Prosecutor’s Office confirmed that the number of complaints, denunciations, and reports received by the said departments amounted to 606, of which 367 were in 2020, while 239 were under investigation in 2019. A decision was taken to close 115 of them, reports were completed on 330 others, 68 were referred to jurisdiction departments, and 93 are still undergoing investigation.

After examining the situation of Morocco in various indices, and considering the parallels between the worsening situation of corruption and the declines recorded by a number of international reports with regard to political and civil rights, the rule of law, the rights to participate in budget preparation and implementation, and the weakness of judicial effectiveness, the INPPLC concluded that the dire repercussions of corruption weaken the development dynamic, impede production structures, and aggravate economic and social imbalances. This was clearly demonstrated by Bank Al-Maghrib (the Moroccan Central Bank) in its 2021 annual report, as presented by the bank’s Governor before His Majesty the King, stressing the need to reconsider the approaches adopted so far and to take stronger and more decisive measures.

As it continues to deepen its objective knowledge of the phenomenon of corruption at the national level, the INPPLC has updated the analytical study it had conducted into the detailed data provided by the main sources of the CPI. Morocco has maintained a consistent score for most data sources feeding into the CPI (4/6), with an improvement of four points in the Varieties of Democracy Project (V-Dem), which includes corruption indicators in the public sector and in the executive, legislative, and judicial authorities.

On the other hand, Morocco recorded a two-point drop in the Rule of Law category of 2021 compared to the previous year, scoring lower on three factors.

From the assessment, the INPPLC deduced several conclusions and general guidelines. It emphasised the necessity of making the governance and anti-corruption area take the lead in formulating and preparing development public policies, to ensure their achievement of set goals. It also stressed the importance of raising the level of trust and engagement in anti-corruption efforts, by ensuring the conditions for promoting a citizenship movement that supports institutional efforts by rejecting and reporting corruption. The INPPLC also recommended the consolidation of new concepts of public service guided by responsible governance. In addition, the INPPLC stressed the importance of deepening objective knowledge of the phenomenon of corruption in order to be able to monitor its manifestations and hotspots, and to consider its causes and effects, in order to combat and prevent it with the appropriate targeted mechanisms. It highlighted in this regard the foundational work that it has undertaken, in preparation for the launch of its observatory, by carrying out and periodically updating an in-depth analysis of Morocco's situation, and developing as well as tracking objective and more accurate indicators.

Area II: The INPPLC's recommendations and proposals, a frame of reference for structural reforms

After recalling the methodological mechanisms that underpin its prerogative to make recommendations and proposals, the INPPLC compiled in this report the outcomes of its monitoring of the level of responsiveness to the recommendations it had made in previous reports. As a reminder, the INPPLC has featured the key components of those recommendations in this report as well, out of conviction that they are still just as relevant. It has also submitted new recommendations – accompanied by thematic reports – on a set of priority matters and projects.

1. Tracking the effect of the recommendations featured in the INPPLC's annual reports

The INPPLC highlighted that the proposals and recommendations included in its various publications reflect the holistic, combined, and integrated perspective of its propositional project, which seeks to instil and consolidate prevention, awareness, mobilisation, and action. This is in preparation of the implementation of these recommendations within the framework of institutional partnership and integration, both of which are necessary to achieving the targeted change.

However, the INPPLC's 2020 annual report noted the almost complete lack of responsiveness from the concerned parties as to the recommendations featured in the 2019 report; indeed, the response – if any – was limited to the INPPLC's recommendations on the review of the National Anti-Corruption Strategy. The INPPLC's 2020 recommendations have largely encountered the same fate, with the sole exception of a response from the Ministry of Foreign Affairs, African Cooperation, and Moroccan Expatriates. The Ministry responded specifically and practically to a recommendation for a draft MoU to establish a mechanism to implement the provisions of Law No. 46-19 on coordinating preparations ahead of Morocco's participation in international and regional events, forums, and meetings pertaining to corruption prevention and combatting issues. The MoU also involves making recommendations to the competent authorities in order to facilitate the Kingdom's continued ratification of, or accession to, relevant international and regional instruments. It also includes tracking the progress in implementing of the Kingdom's international obligations arising from ratified agreements and from reports issued by international and regional organisations in this field.

The INPPLC did not fail to confirm its commitment and readiness to reach out to all the concerned parties for their response to its opinions, recommendations, and proposals, in order to open a discussion about them, examine and adapt them, when necessary, and provide support and assistance to these entities for optimal implementation. This entails mobilising institutional cooperation mechanisms, providing expertise, and ensuring the desired convergence among all stakeholders.

As part of the follow-up of the recommendations and proposals contained in its previous reports, the INPPLC dedicated a chapter in this year's report to reiterate its findings, which revolve around the following:

- Recommendations with a strategic dimension aimed at preparing the public environment for the fight against corruption: These include recommendations contributed as part of the preparation of a new development model, as well as the recommendations aimed at instilling a new dynamic in the National Anti-Corruption Strategy;
- Recommendations for building trust and ensuring broad engagement and mobilisation: They include recommendations to create conditions for enhancing citizens' engagement and consolidating their role in preventing and combatting corruption, recommendations related to monitoring the relations between corruption and human rights, as well as recommendations aimed at supporting Law No. 13-31 on the Right to Access to Information;
- Recommendations for responsible governance and combatting impunity: They include proposals contained in the thematic report on the property declaration system, recommendations on combatting illicit enrichment, and those related to the development of legislation that guides the prevention of cases of conflict of interest. They also include proposals on the protection of corruption whistle-blowers among public employees, as well as recommendations to strengthen institutional referral mechanisms for corruption offenses and acts;

- Recommendations for a new approach to public service based on the rules of transparency, efficiency, governance, and responsibility: They include the INPPLC's proposals submitted as part of its input on the law serving as a charter for public service facilities, the decree serving as a code of values and ethics for employees in public administrations, local communes, and public institutions, and the law on the streamlining of administrative procedures. In addition, they include the INPPLC's vision and proposals in relation to digital transformation and its role in enhancing transparency and combatting corruption.

2. Recommendations on Draft Law No. 01-18 on Amending and Supplementing the Code of Criminal Procedure

As part of the ongoing efforts to align the Code of Criminal Procedure with anti-corruption procedural requirements, the INPPLC has produced a thematic report on its follow-up of the evolution of Draft Law No. 01-18 on Amending and Supplementing the Code of Criminal Procedure. Commending the current endeavours to review this Law, the INPPLC stressed the importance of subjecting such a review to a set of objective determinants, in such a way as to account for the requirements necessary to effectively combat the scourge of corruption, which will entail harnessing various mechanisms of notification/reporting, enquiry, follow-up, investigation, prosecution, and court order enforcement.

The INPPLC proceeded to reading the said draft law from a holistic perspective, examining the relevant provisions currently in force in the existing law, and those presented as part of the proposed amendments, focusing mainly on the following:

■ The components guaranteed to invigorate the prosecution of corruption crimes

In this context, the INPPLC's observations and recommendations focused on adopting an objective and realistic perspective on the statute of limitations in these crimes. It recommended making provisions for the suspension of the statute of limitations in corruption crimes, or at least starting the count from the date of their discovery or, as appropriate, starting the count from the date when the presumed culprit had left their employment (in whatever manner). The INPPLC also recommended excluding the confiscation penalty from the statute of limitations' provisions stipulated under Penalties, either by stipulating a suspension of the statute of limitations in relation to this penalty, or by stipulating a statute of limitations' period that is equal to the one provided for in the Code of Civil Procedure in relation to restitution rulings.

In order to pin down the principle of statute of limitations' suspension, the INPPLC emphasised the need to codify the existing practice in this regard, which is to consider that, once activated, preliminary investigation procedures entail a discontinuation of the statute of limitations.

Also included in this area are the INPPLC's observations and recommendations aimed at referring corruption cases to the appropriate prosecution service, especially considering the Public Prosecutor's discretion under Article 83. These recommendations also seek to include corruption-related crimes that qualify as felonies within the scope of crimes that are mandatorily submitted to the investigative judge. A higher judicial authority must be entitled to conduct a reasoned review of a Public Prosecutor's discretionary decision not to prosecute a corruption crime, even when the crime qualifies as a misdemeanour.

The INPPLC also recommended strengthening the Public Prosecution's power to close cases by adopting some of the controls in force in other jurisdictions, which would endow such a power with greater immunity and relevance.

■ Encouraging reporting and detection of corruption crimes by enforcing safeguards

The INPPLC's observations and proposals in this area centred on strengthening institutional cooperation and integrating efforts of enquiry and investigation work. The INPPLC considered the amendment proposed by the draft revision for Article 21, relating to the possibility for judicial police officers to use specialised officers and employees working in administrations, as an appropriate legislative entry point to include the INPPLC among the bodies concerned with this assistance, in line with the requirements of Law 46-19.

Also included within this area were the INPPLC's observations and recommendations aimed at strengthening the legal protections for whistle-blowers, especially in cases that require a decision to modify or withdraw protection measures by the judiciary, when protection measures are adopted upon the request of the concerned parties. Protections also include non-prosecution upon the disclosure of professional secrets by whistle-blowers who come forward either to the judicial authority or to other entities that are legally mandated to receive complaints and notifications. In this context, the "good faith" principle, stipulated as a condition for whistle-blowers to benefit from protection measures, will have to be reviewed in such a way as to place the burden of proving malicious intent on the party affected by the corruption report.

In the area of promoting reporting and detection of corruption crimes, the INPPLC has contributed recommendations to pin down the wording of the amendment brought to Article 108, by replacing the proposed language in such a way as to cover all corruption crimes stipulated in the Criminal Law and special laws. The INPPLC also proposed to strengthen the role of the investigative judge in ordering the interception of phone calls and all other remote-based communications, and recommended pinning down the content of the warrant to intercept phone calls as relevant to corruption crimes and their specificities.

■ Streamlining the prosecution of corruption offences

The INPPLC's observations and recommendations in this regard focused on strengthening the role of the investigative judge in exposing corruption crimes. It recommended that the mandatory referral of corruption felonies to the investigative judge be stipulated in the law. It also recommended a review of the amendment obligating the investigative judge to refer to the Public Prosecution (for submissions of relevant motions) every time the investigative judge decides to take an investigative action that he deems appropriate. The INPPLC also recommended that the procedure of transferring a case from one investigative judge to another be clearly regulated, while allowing relevant requests to go through the Public Prosecution's discretionary channel.

By the same token, the INPPLC considered that the proposed amendment to Articles 92 and 350 – which requires the claimant filing the case before the investigative or trial judge to

include in their petition information about the identity of the defendant, the facts of the case, the legal characterisation of the offence, in addition to evidence and supporting documents – sets a prohibitive condition that might hinder access to justice and redress.

In the same context of easing restrictions on people aggrieved by corruption offences, the INPPLC confirmed that the stipulation of the amendment included in Article 350 to prevent the aggrieved party from initiating a public case directly before the Criminal Chamber would constitute a real obstacle to those affected by cases of flagrante delicto, which are referred directly by the Crown Public Prosecutor to the Criminal Chamber, pursuant to Article 73 of the Code of Criminal Procedure.

■ Ensuring judicial effectiveness

In this regard, the INPPLC's observations and recommendation focused on reinforcing the amendments of the exceptional jurisdiction rules, by including some officials and categories among the persons covered by these rules, while safeguarding the decisions related to the intervention of the Crown Public Prosecutor in the procedure related to these rules.

Also included in this area are the INPPLC's observations and recommendations aimed at the legislative regulation of the powers to order the freezing or seizure of funds suspected of being related to corruption offences, and facilitating the penal implementation of the confiscation penalty that requires to establish forms of cooperation between the concerned institutions in this field, and setting the institutional framework specialised in managing frozen, seized, or confiscated property from corruption offences.

3. Recommendations on combatting illicit enrichment

The INPPLC affirms that corruption offences are marked by specificities requiring the allocation of appropriate and effective evidence mechanisms; foremost among them is to consider that the significant increase in the assets of a public servant compared to his sources of income during a certain period of his career, in the event of the inability to justify this increase, must be qualified as illicit enrichment and must be criminalised.

■ Constitutional provisions

The INPPLC highlighted the referential dimension of the constitutional provisions on good governance and their role in guiding the legislator towards building a system to combat illicit enrichment in accordance with the good governance requirements and the consolidation of the values of serving public interests, as one of the safeguards of good and rational management of public affairs.

■ International conventions

The INPPLC examined the criminalisation of the disproportionate and unjustified increase in the assets of a public servant in the Arab Anti-Corruption Convention and the African Union Convention on Preventing and Combating Corruption. It also highlighted the importance of the United Nations Convention against Corruption as it constitutes the frame of reference that englobes the perspective of the UN system in terms of criminalising illicit enrichment, deriving the determinants of this behaviour from this Convention.

International jurisdictions

Within international jurisdictions serving as guiding frameworks for the criminalisation of illicit enrichment, the INPPLC focused on the following criminalising determinants of such behaviour, which can be summarised as follows:

- Most jurisdictions under review include this crime in a special law that defines its conceptual aspects, the persons concerned therewith, the penalties prescribed therefor, and the proceedings to take legal action;
- All jurisdictions under review categorise this crime among criminal offenses where enquiry and investigation are entrusted to the Public Prosecution. Some jurisdictions would bring enquiries and investigations related to this crime within the purview of a specialised law-enforcement agency prior to referring it to the Public Prosecution;
- Most jurisdictions under review rely in criminalising illicit enrichment on the observation of a manifest increase in the wealth of the public servant, or in the wealth of his spouse or minor children after holding a certain position or acting in a certain capacity. They also adopt the principle of disproportionate increase compared to the legitimate income of those concerned, as well as the inability to justify such an increase, as a presumption of illicit enrichment;
- Adoption of the principle of increase in wealth or funds as a manifestation of illicit enrichment;
- Adoption of custodial (liberty-depriving) penalties, such as detention, imprisonment, or temporary public-interest labour;
- Adoption of a sentence consisting of a fine equal to the value of the illegitimate gain with the restoration of money acquired through illegal means;
- Some jurisdictions explicitly stipulate that a statute of limitations due to death does not preclude the enforcement of a court order to return the value of the illicit gain;
- Some jurisdictions subject legal persons, such as political parties, NGOs, unions, associations, and government-contracted entities to illicit enrichment laws;
- French legislation recently introduced a mechanism for the recovery of illicitly acquired assets belonging to foreign politicians or their relatives, once a final court order to proceed with the confiscation is delivered. The recovered assets will then be returned to the people of the countries from which they were plundered.

The principle of shifting the burden of proof

In order to establish an objective perspective on the principle of shifting the burden of proof in criminalising illicit enrichment, the INPPLC stressed that reconciling the criminalisation of illicit enrichment with the preservation of the presumption of innocence requires invoking the jurisprudence and some legal provisions, at the national and international levels, which have established the principle of shifting the burden of proof from the Public Prosecution to the accused in certain crimes and procedures.

Based on the aforementioned jurisprudence and provisions, the INPPLC concluded that the legislator's shifting of the burden of proof in the crime of illicit enrichment is considered a justified and inevitable legislative choice, and a judicial measure that ensures the effective prosecution of this crime, emphasising the need to establish objective and procedural safeguards to achieve balance between the right of the state to protect its security and that of its society, and the right of citizens to prove their innocence and protect it from any type of abuse.

■ Legislative trends

With a view to envisioning the appropriate and effective legislative trends to combat illicit enrichment, the INPPLC shed light on the pertinence of considering illicit enrichment a separate offence with its substantive provisions, manifested in its criminal elements as well as its imprisonment and financial penalties proportionate to the gravity of each case, in addition to its procedural rules that allow to investigate, examine, and prove the case. The INPPLC stressed the importance of clearly identifying the desired goals of this legislation; ensuring the legal integration of a set of texts to strengthen the safeguards of the effectiveness of the criminalisation of illicit enrichment; and consolidating the cooperative dimension required at the institutional level to detect offences, conduct enquiries, investigate, and examine potential cases of illicit enrichment in an objective and impartial manner.

4. Recommendations to promote corruption reporting

The INPPLC conducted a thematic study aiming at establishing an appropriate and effective perspective for the system of reporting acts of corruption, based on upgrading this system to constitute a contributing factor to the desired societal transformation, in which the elements of a successful collective response to corruption acts take shape.

To this end, the INPPLC emphasised that enshrining this perspective should be based on showing the diagnostic reality of this reporting. The INPPLC found that there is a significant drop in the rates of the reporting of acts of corruption, whether by physical or legal persons, or even other employees. The study concluded that there is a clear reluctance to report these acts, resulting mainly from insecurity and fear of pressure and forms of reprisal, the difficulty of obtaining evidence and information related to acts of corruption, the lack of confidence in the efficiency and effectiveness of the efforts made by the government or by law enforcement authorities, as well as the lack of collective awareness of the general harm these acts of corruption cause to society.

In its evaluation of the corruption reporting mechanisms available for individuals and institutions, the INPPLC noted that the legislator fell short of regulating and penalising, when necessary, potential breaches of the principle of obligation and promptness in reporting corruption offences, under Article 42 of the Code of Criminal Procedure, similar to applicable provisions when such breaches occur in terrorism crimes and felonies that prejudice state integrity and public order. The INPPLC drew attention to the need to restrict the adoption of the required penalty for breaching the obligation of reporting acts of corruption promptly, by ensuring two essential elements: the necessary protection from various types of retaliation,

and refraining from taking actions against employees, be it disciplinary or criminal, on the grounds of disclosing professional secrets, if they report corruption acts that come to their knowledge while performing their duties.

The INPPLC also identified the obstacles that prevent the optimal implementation of the principles of obligation and promptness in referring observed crimes to the Public Prosecution by the General Inspectorates. The INPPLC emphasised the importance of stipulating, in the terms of reference regulating these inspectorates, the principle that referral to the hierarchical authority does not preclude referral to the Public Prosecution, when applicable. It also stressed the importance of making a provision that obligates the hierarchical authority receiving the inspectors' reports to activate the referral procedure, whether to the financial or criminal judiciary, in the event of suspicions of crimes that entail financial or criminal penalties. In addition, it underlined the importance of giving the General Inspectorates a margin of initiative to carry out flash inspections, in response to emergency cases where action must not be delayed by the procedure of having an order issued by the hierarchical authority.

As for the reporting entrusted to the Court of Auditors, and as part of commending the methodology adopted by the Public Prosecutor's Office in dealing with the reports of the financial courts, the INPPLC recommended its adoption and implementation in disciplinary decrees issued against a group of officials in local communities and published in the Official Gazette. In this regard, the INPPLC stressed the importance of channelling the efforts of the Public Prosecutor's Office towards studying these decrees, within the framework of a specialised committee, with the request of detailed information from the concerned authorities regarding potential breaches that may be discovered therein, in order to activate the referral procedures for acts that may require initiating criminal proceedings. In addition, it drew attention to the importance of stipulating the mandatory referral of deviation cases related to financial discipline or de facto management that exist before ordinary courts, to financial courts, similar to what is applicable in some international jurisdictions.

Regarding the evaluation of the safeguards adopted to protect whistle-blowers, the INPPLC noted a number of grievances; The legal protection does not apply to whistle-blowers for all acts of corruption stipulated in the general criminal law and special criminal laws; The protection granted to whistle-blowers does not extend to members of their families and relatives; Cases that require a decision to amend or withdraw protection measures by the judicial authority are not identified; And the possibility to challenge this decision for victims, experts, and witnesses, or to request approval for whistle-blowers is not provided, especially in cases where protection measures are taken upon their request. This is in addition to the gap related to the absence of a precise stipulation on the entity to which an employee must report to benefit from the provisions related to avoiding prosecution, whether disciplinary or criminal, on the ground of disclosing professional secrets.

As part of its assessment of the national protection system, the INPPLC cautioned that this system is limited to protective measures of a judicial nature, in the complete absence of an administrative protection from forms of professional retaliation that the whistle-blower may

be exposed to when he reports acts of corruption. In addition, deficiencies in the necessary procedures and mechanisms that guarantee the effectiveness of whistle-blower protection have also been noted.

In considering the determinants and normative specifications that set a comprehensive and integrated policy for reporting acts of corruption, the INPPLC began by stressing the importance of creating the appropriate environment to ensure the success of this policy and to consolidate the safeguards of its gains, in a manner that includes the following determinants and elements:

- Entrench the principles of reporting; as this is a manifestation of citizenship, a right, and a duty that may entail disciplinary or criminal responsibility for certain types of persons, such as employees;
- Set controls that guarantee efficiency and the protection of rights, especially through a balanced and flexible handling of the requirement of “good faith reporting” and the safeguarding of the reputation of the persons reported, by stipulating the punishment of persons who deliberately submit false allegations;
- Facilitate and encourage reporting, particularly through the optimal use of new technology, and the adoption of a reward system for whistle-blowers whose reporting may lead to the recovery of crime proceeds of significant value;
- Define a broad notion of what is a whistle-blower, in accordance with the UN Convention against Corruption;
- Expand the notion of the whistleblowing employee, by adopting the broad criminal concept of the public servant;
- Expand the list of acts of corruption covered by reporting, through the adoption of the principle of expansion that includes every behaviour that constitutes a criminal or disciplinary infraction, or is concerned with the intervention of the Authority in accordance with the provisions of article 3 of law no. 46-19;
- Foster reporting relations between institutions, by laying the foundation for cooperation, strengthening relations between national institutions and law enforcement authorities, and encouraging cooperation between the latter and private sector institutions;
- Establish multiple levels of entities entrusted with receiving reports about corruption offences;
- Make a list of the types of possible retaliations that the reported persons or his allies may use against the whistle-blower, and take the necessary measures to deter and punish the perpetrators, when necessary;
- Establish an effective institutional framework to ensure the protection of whistle-blowers from possible forms of retaliation in their workplace or in their commercial and professional dealings, as the case may be, whether in the public or private sector.

Area III: INPPLC officers and their mandate

After examining the determinants that govern the practical execution of its powers to receive reports, complaints, and information, and to carry out enquiries and investigations, and recalling the controls and precautions that guarantee the completion of these tasks in a legitimate and objective manner, the INPPLC recalled its initiative, where it established the first group of officers who will carry out these tasks, and who are highly experienced and work within the authorities and institutions that have a direct role in the field of enquiry and investigation. It has also striven to take the following initiatives:

1. Rules and procedures

The INPPLC, as part of developing the draft rules of procedure, set forth binding procedural and practical controls, guaranteeing the practice of these tasks in compliance with the principle of legitimacy and the rule of law, the respect of human rights and freedoms, and the safeguard and ensuring of the adherence to INPPLC's legal principles. It also drafted a guide of the procedures for various tasks and activities, and attached them with standard forms and templates that guide and document each stage of the procedure.

By setting forth the above-mentioned controls, the INPPLC sought to activate the tasks of enquiry and investigation of acts of corruption based on the principle of balance between the requirements of effectiveness and efficiency and the requirements of legality and objectivity, thus providing solid pillars for the INPPLC to undertake the following:

- **Receiving and examining reports and complaints and responding to the information that reaches the INPPLC**, through the exclusive assignment of this task to the officers' body, and the development of mechanisms to control complaints and reports' fulfilment of acceptance requirements, in addition to the controls that guarantee the optimal implementation of the principle of immediate intervention, and the procedures that guarantee immediate interaction with the facts received by INPPLC which require its intervention as part of automatic response.
- **Handling reports, complaints, and information, and carrying out enquiries and investigations**, by setting precise relevant determinants, while defining and assessing the roles and responsibilities of the officers charged with executing these operations with professionalism and full adherence to the procedures and the rights and freedoms of the subjects of the enquiries and investigations. Also, controls pertaining to the cases that require the involvement of judicial police officers in the enquiries and investigations carried out by the INPPLC officers should be set forth, in addition to controlling the processes of entry into the professional offices and premises of persons of private law, and the mechanisms on which the implementation of coordination between the INPPLC and the Public Prosecutor's Office to control how the officers access seized items is based. The INPPLC also outlined procedures for its response to requests from public authorities to conduct any administrative investigation into special facts, as well as procedures for

submitting requests to intensify enquiry and investigation into acts that constitute a case of corruption, in addition to regulating procedures and mechanisms for the INPPLC to conduct enquiries and investigations regarding financial or administrative violations, which the Public Prosecution had previously decided to preserve, and to coordinate in this regard with the Public Prosecutor's Office.

- **Ensuring an objective and positive effect of the outputs of the INPPLC officers' work**, by defining the controls related to the completion of reports and minutes regarding the operations carried out by them, and setting the templates that guide them, in addition to the procedure for managing and dealing with potential cases where their powers are ignored, and establishing the governing procedures to take the appropriate decisions regarding the presented facts. The INPPLC also specified a procedure for referring the minutes related to the cases in which the complainants or whistle-blowers benefited from the protection measures, as well as the procedure related to the possibility of taking legal action as a claimant in the event that the Kingdom's Judicial Officer does not submit his civil claims, in coordination with the latter, to manage the deadlines, so that the opportunity to submit civil claims is not missed.
- **As part of its preparation for the draft Statute of its officers, the INPPLC was keen to bolster the capabilities of these officers with key principles governing their obligations, rights, and career paths**, in order to avoid any possible missteps in their practice. It structured their mandates around a set of principles that underpin their obligations and rights, as well as the disciplinary mechanisms that would be activated in cases of malpractice, provided precise job descriptions for their tasks and duties at various hierarchical levels, and specified the knowledge, professional know-how, practical skills, personal abilities, academic qualifications, and projected results expected from them. The INPPLC has also put in place mechanisms to safeguard officers from all forms of conflicts of interest or dual mandates (double jobbing), offering them professional and social guarantees that would shield them from various types of attacks they might face while performing – or due to performing – their duties. In addition, the INPPLC has laid down the rules that guarantee the appropriate selection of officers at the time of appointment and during their tenure, with precise specifications for selecting the best qualified personnel to join this institution.

2. Officers' fit-for-purpose training

The capabilities of officers are being upgraded through a dedicated training regimen, both theoretical and practical, covering all legal, financial, and accounting aspects, as well as enquiry and investigation techniques to accomplish the tasks at hand. A set of training modules on the notions and manifestations of corruption, covering various dimensions of Law 46-19 as well as other relevant legislative texts, has also been developed.

The contents of the training regimen and its various modules have been defined, combining theory and practice, and strengthening cooperation ties and partnerships with some of the

most prominent national specialised training institutions and institutes, as well as with regional and international bodies and organisations. This is in addition to holding talks and working sessions with other training centres and institutions with a view to concluding further cooperation agreements.

Area IV: Consolidating the foundations of the strategic dimension of preventing and combatting corruption

In fulfilment of its pivotal and guiding role in preparing, coordinating, and tracking the implementation of national anti-corruption strategies, the INPPLC updated and presented its assessment of the National Anti-Corruption Strategy, accompanied by recommendations to galvanise the letter and spirit of this Strategy. It has also launched a research expansion process that would help in laying down the methodological foundations for assessing the expected and observed effects of the Strategy, to create new dynamism for deep change in preventing and combatting corruption.

1. Recommendations to give new momentum to the National Anti-Corruption Strategy

The INPPLC commended the general objectives and choices on which the National Anti-Corruption Strategy is based, as well as the ten thematic programmes structuring it, noting that this work mainly aims to give this Strategy stronger organisation and content with higher accuracy and legibility, and to establish a governance framework that guarantees optimal leadership which ensures the commitment of actors at all levels and the contribution of their activities in achieving the objectives of the Strategy.

With regards to the proposed areas for developing and strengthening the Strategy, the INPPLC stressed that the new dynamic requires a series of adjustments, improvements, and re-framing processes, in a manner that ensures consistency, convergence, and readability; prioritises projects and procedures based on their structured role and comprehensive effect, and their ability to achieve tangible results and the feasibility of their implementation throughout the year; allows the development of a system of comprehensive indicators that cover all dimensions of the Strategy; and develops the system of governance by defining the ergonomics, roles, and responsibilities of its various bodies and levels of officials required to mobilise and activate each of the links of the governance chain.

After recalling a series of achievements made as part of this Strategy, the INPPLC noted the shortcomings that prevented the Strategy from achieving the expected effect and changing the evolution curve of the state of corruption in Morocco. It touched upon the weak mobilisation of the relevant actors, the lack of effective coordination and monitoring of programmes and projects, the dominance of sectoral management at the expense of programming logic, the absence of a clear methodology for setting priorities and targeting based on the overall impact, the persistence of a lack of informed planning of National Strategy's budgets, the dominance of legislative procedures without adequate support for their effective implementation,

the failure to couple the Strategy with an appropriate communication scheme that gives credibility to the adopted policies and allows for mobilising citizens, economic actors, and other concerned parties to fight corruption, and, due to a combination of all these factors, the failure of these achievements to have a tangible impact on the state of corruption.

In order to overcome the various shortcomings and further stimulate and accelerate the implementation of the Strategy's procedures, the INPPLC proposed to institutionalise the coordination of programmes, through the establishment of an institutional framework for cooperation, consultation, and integration between the INPPLC and the Government, as well as the various stakeholders in national strategies and public policies. The INPPLC also proposed a review of the National Anti-Corruption Committee Decree, in accordance with the constitutional requirements and those stipulated in Law 46-19, through ensuring convergence and synergy between the roles and responsibilities of the Government and the pivotal tasks that the INPPLC is required to undertake in this field. In addition, it proposed stipulating the creation and activation of standing committees headed by both the minister in charge of the concerned programme and the INPPLC President, as well as identifying focal points and ensuring their strong and continuous participation to guarantee the monitoring of the coordinated implementation of the programme's projects, clarification of funding sources with the inclusion of an anti-corruption budget programme in the departmental budget, and setting deadlines for implementation and identifying potential actors for each project.

The INPPLC did not miss the opportunity to stress the importance of objective communication about achievements, especially those impacting all other stakeholders, with a focus on successful experiences in this field. The INPPLC emphasised the use of communication to attain two main goals; The first is to give credibility to the National Anti-Corruption Strategy, especially by instilling the dynamism of engagement and highlighting achievements and impact, while the second is to seek support from the large public, the media, and civil society.

2. Methodological foundations for assessing the expected and observed impact of the National Anti-Corruption Strategy

The INPPLC stressed that the various achievements must be leveraged and followed by actions to overcome shortcomings. This will enrich the National Strategy with a next-generation approach to identifying and managing projects and programmes, while ensuring convergence and integration among actors within an institutional framework that guarantees the clarification of roles and responsibilities per each stakeholder's mandate.

The INPPLC noted that it has continued to proposing strategic directions for the policy on corruption prevention and combatting, as well as the mechanisms and measures to ensure their implementation. This should provide a solid basis for the anticipated version of the National Anti-Corruption Strategy, which will be headed for the long term. These directions will be practically translated into medium-term action plans, with priorities set, monitored, and assessed annually.

In order to achieve these goals, the INPPLC insisted on the need for adopting an assessment-based approach to cover all dimensions of implementation, convergence, integration, and impact measurement, and for assessments to become a strong lever for guiding decision-making based on continuously enriched, objective, and reliable data. In this regard, the INPPLC emphasised the importance of corruption-risk evaluation studies, as these allow for the identification of existing risks that must be mitigated by targeted measures. Here, the INPPLC recalled its cooperation with some sections of the Head of Government's Office in drafting a comprehensive standard guide for corruption-risk mapping to be disseminated across public sectors and institutions.

The INPPLC also recalled, as part of highlighting the importance of impact assessment, that it has launched an ambitious project to develop a working methodology for objective and rational assessment of the Strategy's impact. The main existing approaches in strategy assessment were analysed and made compatible with the characteristics and constraints associated with impact assessment in a field as complex as preventing and combatting corruption, considering Morocco's national context and accumulated experiences over the past two decades. The INPPLC also stressed that the goal is to lay the preliminary groundwork for establishing a foundation for impact assessment, which will be refined and enriched with a set of indicators, supported by openness to other sources of data and the execution of the required studies and surveys.

The INPPLC also discussed indicator-based impact assessment, emphasising the need to move towards employing these indicators in an aggregating and intersectional framework with other additional data to form an advanced view of the level of success of the National Anti-Corruption Strategy, highlighting the methodology it has developed to determine the necessary indicators for impact measurement, which it categorised into three levels: immediate-result indicators (outputs), intermediate results (initial effects), and final results (impact assessment).

In the same context, and in order to enhance the stock-taking dimension of the National Anti-Corruption Strategy, the INPPLC focused on the CPI and other detailed indicators from sources relevant to the INPPLC's scope of interest, based on its "In-depth Study of the Corruption Perceptions Index". By answering a set of precise questions, the analysis aimed to determine the extent to which the CPI can contribute to assessing the expected impact (pre-implementation) of the planned procedures and projects as part of the various programmes of the Anti-Corruption Strategy, without losing sight of the various constraints of such an approach.

The INPPLC also emphasised the complex nature of strategy assessment, in particular the difficulty of measuring the impact of a complex phenomenon such as corruption through a single indicator or index, as well as the difficulty of addressing the assessment of the Anti-Corruption Strategy's impact independently of other public policies, stressing that the surveys as well as the thematic and sectoral studies that will be undertaken by the INPPLC will contribute to improved and more accurate indicators for measuring the impact and

effect of the National Anti-Corruption Strategy on the one hand, and to the development of new innovative indicators through the accumulation of data and analysis, on the other hand.

Area V: The INPPLC's functional activities

With a view to providing it with the necessary tools to exercise its powers of preventing and combatting corruption in an optimal manner, the INPPLC continued its national cooperation and management of its relationship with its regional and international environment, as well as the establishment of its working rules and mechanisms that guarantee the strengthening of the mechanisms of institutional governance and its effective and sound management, both in terms of regulating its administrative and financial organisation and strengthening its information system and equipment.

1. National and international cooperation activities

■ National level

The INPPLC has made cooperation in the financial sector an essential means to keep pace with the targeted dynamic for the private sector in general. In 2021, it continued to implement the cooperation agreement in the area of preventing and combatting corruption in the sector, signed in November 2019 by the INPPLC, Bank Al-Maghrib, the Moroccan Capital Market Authority (AMMC), and the Supervisory Authority of Insurance and Social Welfare (ACAPS). This led to a number of training and awareness initiatives in the form of a wide awareness campaign for the benefit of more than 160 directors and representatives of nearly 120 institutions from the financial sector, the development and publishing of a guide on combatting bribery for actors in the financial sector and aimed at presenting and clarifying the conceptual foundations regarding all dimensions of corruption and the mechanisms to combat it.

Workshops were organised for exchanging experiences and expertise between the members concerned with the above-mentioned agreement. As for sectoral studies and analyses, a project has been completed to map the risks of corruption in the banking sector. A draft guidance note has also been prepared, in which Bank Al-Maghrib defines the binding conditions for credit institutions in order to establish a system to monitor corruption and determine the minimum requirements that must be met by the system. The main points of the draft guidance note have been brought up for consultation with the relevant credit institutions and shared with the authorities concerned with the above-mentioned agreement. The guidance note was approved and published in May 2022.

■ International level

the INPPLC's activities were characterised by its balanced and effective participation in the proceedings of the 9th session of the Conference of the States Parties to the United Nations Convention against Corruption (COSP), which was hosted by Egypt. This 9th session adopted the resolution submitted by the Kingdom on the prevention of corruption, as it would open new prospects for leveraging the Marrakech Declaration, especially with regard to the compatibility of national strategies with crisis situations, and making the prevention of corruption a lever for the integrated and sustainable development plan.

At the 9th session of the COSP, the INPPLC took part in a number of parallel events and official meetings. These included the meeting between the INPPLC President and the Executive Director of the United Nations Office on Drugs and Crime (UNODC), during which the parties supported the proposal to organise a forum for anti-corruption bodies in Africa and other relevant organisations to take stock of the progress made in implementing the provisions of the Marrakech Declaration.

In addition, the INPPLC participated in the meetings of the 13th session of the United Nations Convention against Corruption Implementation Review Group. The Kingdom of Morocco, in the presentation of its statement, affirmed its voluntary involvement in the mechanism of country reviews, as reviewing and reviewed country.

Also with regard to the implementation of the United Nations Convention against Corruption, the INPPLC took parts in the efforts of the **Working Group on the Prevention of Corruption**. The statement of the Kingdom of Morocco expressed the firm stance which considers that the effectiveness of the adopted policies, whether in terms of the prevention of corruption or the fight against it, must be based on the principle of coordination and integration between government agencies, governance bodies, law enforcement authorities, private sector institutions, and civil society organisations.

■ Arab level

the efforts of the INPPLC were characterised by its active participation in all the activities of the Arab Anti-Corruption Convention, namely through the chairmanship of the Commission of the second and third sessions of the Conference of the States Parties to the Arab Anti-Corruption Convention.

In 2021, the INPPLC continued the implementation of the action plan that was developed during its tenure. Two Arab scientific meetings were organised; The first meeting was a scientific symposium on “Strengthening integrity and preventing corruption risks amid the Corona pandemic”, while the second meeting was a scientific symposium on “Finding substantive and technical mechanisms for the optimal implementation of the Arab Anti-Corruption Convention”, at the initiative of the National Anti-Corruption Commission in the Kingdom of Saudi Arabia.

2. Strengthening the INPPLC’s functional and organisational capacities

In 2021, the INPPLC continued to strengthen its human resources, rationalise its financial and administrative management, and reinforce its IT system and equipment.

■ Human capital strengthening

In 2021, the INPPLC recruited – through secondment – a group of highly qualified professionals, tasked with receiving reports and complaints, conducting enquiries and investigations, and forming the core group of the officers’ body. Those talents were performing similar duties in such institutions as the Court of Auditors, the General Directorate of Territorial Surveillance (DGST), the General Directorate of National Security (DGSN), and the Customs and Indirect Taxes Administration.

■ Training and skill development

Several training courses were also held on critical topics for the INPPLC, such as cybercrime and corruption prevention, design thinking and user experience, lean management and agility, digital project management, digital communication and e-reputation, as well as innovation and new methods of project management within public administration.

The main objective of these training courses, benefitting a cohort of INPPLC employees, is to enhance the capabilities of human resources in project implementation and supervision.

■ Financial and budget management

Regarding financial and budgetary management, the total 2021 appropriations amounted to 45 million dirhams, broken down into equipment and miscellaneous expenditures (30 million dirhams), and capital appropriations (15 million dirhams). The overall committed expenditures during 2021 amounted to more than 20 million dirhams, with an increase in capital expenditures by 490 percent compared to 2020, as well as a 37 percent increase in total payments compared to 2020. The INPPLC's overall expenditures on public orders amounted to approximately 10.5 million dirhams, covering public procurements, agreements, ordinary-law contracts, and order bonds, thus registering an increase of 79 percent in the share of procurements compared to other contractual formats.

The INPPLC's expenses made in the framework of the advance payments, has seen stability in payment authorisation requests, which amounted to 800,000 dirhams, while the expenditure amounts paid for by this framework decreased by 12 percent compared to 2020. These payments mainly covered transportation expenses and overseas assignments, which previously constituted the larger share of the registrar's expenditures.

■ Information systems enhancement

The INPPLC has begun to set up its digital strategy aimed at harnessing innovation and modern technologies for the continuous improvement of its management process and the amelioration of the services it provides to its employees on the one hand, and the development of working mechanisms that enable it to achieve the desired goals related to preventing and combatting corruption on the other hand. This strategy consists of six areas concerned with enhancing the means of communication and access to information, achieving an internal digital transformation to simplify procedures and facilitate management and administration, enhancing the promotion of the values of integrity, enhancing digital infrastructure, strengthening digital security and trust, reinforcing digital resources and capabilities, and achieving a digital transformation aimed at supporting the INPPLC's missions with regard to the promotion of the values of probity and the fight against corruption.

The INPPLC has also launched a project to create the "National Portal for Integrity", which aims, in particular, to enable citizens, businesses, civil society, and international organisations to have simplified and smooth access to relevant data, reports, studies, initiatives, and procedures. This portal will include information produced by the INPPLC, including reports, studies, and the like, as well as information obtained through monitoring and vigilance

systems, and information in the possession of other partners and stakeholders which will be made available via the portal. In addition, the portal will include a host of virtual spaces such as “projects and initiatives”, “probity: reality and evolution”, “statistics”, “remote services”, “documentaries”, and “press”.

As part of its openness to the world and promotion of its communications capabilities, and in order to overcome some of the technical constraints faced with the previous iteration of its online portal, the INPPLC has undertaken urgent measures to upgrade this portal, by re-designing the user interface, re-structuring and re-organising the contents, providing a new solution for publishing new materials, and changing the hosting platform.

Additionally, as part of its efforts to keep pace with an increase in staff, the INPPLC has strengthened its IT infrastructure by acquiring a set of computers and IT equipment. It has also bolstered maintenance procedures for its IT room and, being cognizant of the security risks surrounding IT systems, it has reinforced protections and firewalls across its entire IT ecosystem. Also, the INPPLC has fitted its conference room with the necessary devices and systems, namely audio-visual equipment.