

FEDERAL REPUBLIC
OF SOMALIA

NATIONAL ANTI-CORRUPTION STRATEGY (2026-2030)



JULY

Jamhuuriyadda Federaalka Soomaaliya
Xafiiska Ra'iisul Wasaaraha

جمهورية الصومال الفيدرالية
مكتب رئيس الوزراء

The Federal Republic of Somalia
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Ku: Wasaaradda Cadaaladda iyo Arrimaha Dastuurka **Muqdisho**
Og: Dhammaan Xubnaha Golaha Wasiirrada **Muqdisho**
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UJEEDDO: GO'AAN GOLE EE ANSIXINTA "ISTARAATIIJIYADDA QARAN EE LA-DAGAALLANKA MUSUQ-MAASUQA (2026-2030).

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Ra'iisul Wasaaraha Xukuumadda JFS;

Markuu arkay: Dastuurka Jamhuuriyadda Federaalka Soomaaliya;

Markuu arkay: Warqadda summaddeedu tahay **WCAD/XW/3260/06/26** ee Wasaaradda Cadaaladda iyo Arrimaha Dastuurka kuna saabsan codsiga soojeedinta **"Istaraatijiyadda Qaran ee La-Dagaalanka Musuq-Maasuqa (2026-2030)";**

Markuu arkay: Go'aanka Shirka Golaha Wasiirrada ee summaddiisu tahay **SHGW.15.155.07.26** ee **09/07/2026**, kuna saabsan **"Istaraatijiyadda Qaran ee La-Dagaalanka Musuq-Maasuqa (2026-2030)"** oo uu Goluhu cod buuxa ku ansixiyay;

Markuu tixgaliyay: Baahida loo qabo ka hortagga musuq-maasuqa, isla-xisaabtanka, fulinta Kormeerka iyo ka qeyb-galka dadweynaha ee guud ahaan Qaranka.

Waxa uu meelmariyay:

Qodobka 1aad:

Go'aan Gole

Go'aanka Shirka Golaha Wasiirrada ee summaddiisu tahay **SHGW.15.155.07.26** ee **09/07/2026**, kuna saabsan **"Istaraatijiyadda Qaran ee La-Dagaalanka Musuq-Maasuqa (2026-2030)"** oo uu Goluhu cod buuxa ku ansixiyay.

Qodobka 2aad:
Hirgalin

Waxaa Wasaaradda Cadaaladda loo idmaday in ay hirgaliso, meelmarisana **"Istaraatijiyadda Qaran ee La-Dagaalanka Musuq-Maasuqa (2026-2030)"**.

Qodobka 3aad:
Dhaqangal

Go'aanka Golahu waxaa uu dhaqangalaya marka uu saxiixo Ra'iisul Wasaaraha Xukuumadda Jamhuuriyadda Federaalka Soomaaliya. Istaraatiijiyaddanna waxaa lagu soo saarayaa Faafinta Rasmiga ah ee Dawladda.

Mudane, Hamza Cabdi Barre
Ra'iisul Wasaaraha Xukuumadda JFS

Jamhuuriyadda Federaalka Soomaaliya
Wasaaradda Caddaaladda & Arrimaha Dastuurka
Xafiiska Wasiirka

جمهورية الصومال الفدرالية
وزارة العدل والشؤون الدستورية
مكتب الوزير

Federal Republic of Somalia
Ministry of Justice and Constitutional Affairs
Office of the Minister

SUMMAD: WCAD/XW/3260/06/2026 **Tr: 15/06/2026**

Mudane Ra'iisul Wasaare,

UJEEDDO: SOO-GUDBIN "ISTIRAATIIJIYADDA QARAN EE LADAGAALANKA MUSUQ-MAASUQA 2026- 2030"

Wasaaradda Cadaaladda iyo Arrimaha Dastuurka ee Xukuumadda JFS waxay halkan ku soo gudbinaysaa **"Istiraatiijiyadda Qaran ee Ladagaalanka Musuq-maasuqa 2026-20230"** oo qeyb ka a hawlaha hortabinta u leh Xukuumadda Danqaran ee lagu horumarinayo hufnaanta, isla-xisaabtanka iyo la-dagaallanka musuqmaasuqa.

Mudane Ra'iisul Wasaare, istiraatiijiyaddan waxay xoojinaysaa hawlaha iyo dadaallada Xukuumadda JFS ee ku aaddan hurumarinta hufnaanta adeegyada guud ee qaranka.

Haddaba, waxaan rajeynaynaa inaad si xushmad leh nooga aqbasho, lana horgeeyo Golaha Wasiirrada si ay u ansixiyaan.

Mahadsanid

JAMHUURIYADDA FEDERAALKA SOOMAALIYA
WASAARADDA CADAALADDA & DASTUURKA
SOMALI FEDERAL REPUBLIC
MINISTRY OF JUSTICE & CONSTITUTION

Mudane: Xasan Macallim Maxamuud Sh. Cali
WASIIRKA WASAARADDAA CADAALADDA IYO ARR. DASTUURKA

Ra'iisul Wasaaraha Xukuumadda JFS
Og: Xafiiska Agaasinka Golaha Wasiirrada

=Muqdisho=
=Muqdisho=

CALL TO INTEGRITY, JUSTICE AND ACCOUNTABILITY

Guiding ethical, civic and national commitments for the National Anti-Corruption Strategy (2026–2030)

Qur'anic Foundation

"Indeed, Allah commands you to render trusts to whom they are due and when you judge between people to judge with justice."
Glorious Qur'an 4:58

Prophetic Guidance

"Each of you is a shepherd and each of you is responsible for his flock."
Prophet Muhammad (PBUH) — Sahih al-Bukhari and Sahih Muslim

National Leadership

"The government is starting a revolution to eradicate corruption and promote transparency and accountability. Corruption is the worst disease that affects our society and the government. It causes failure to utilize the country's resources and a decrease in government revenue."
H.E. Prime Minister Hamza Abdi Barre, 18th December 2022

Ministerial Commitment

"We will remove Somalia from the list of countries most affected by corruption."
H.E. Hassan Moallim Mohamud Sh. Ali, Minister of Justice and Constitutional Affairs, Validation Workshop, 15th April 2026

Together, these principles and commitments frame anti-corruption not only as a policy agenda, **but as a moral trust, a public duty, and a national responsibility.**

TABLE OF CONTENTS

LIST OF TABLES V

TABLE OF FIGURES V

EXECUTIVE SUMMARY VI

FOREWORD BY THE PRIME MINISTER IX

A MESSAGE FROM THE MINISTER OF JUSTICE AND CONSTITUTIONAL AFFAIRS X

A CRONYMS AND ABBREVIATIONS XI

CHAPTER ONE 01

BACKGROUND 01

1.1 Introduction 01

1.2 Rationale and Purpose of the NACS 2026–2030 02

1.3 Development Process of the Strategy 03

1.4 Scope of the Strategy 04

1.5 Structure of the Strategy 04

CHAPTER TWO 05

SITUATIONAL ANALYSIS FOR NACS 2026-2030 05

2.1 Introduction 05

2.2 Anti-corruption context and current trajectory 05

2.3 Environmental Scan 08

2.3.1 Macro Environment 08

2.3.2 Microenvironment 11

2.4 Stakeholder Analysis 12

2.5 Pillar-by-pillar assessment under the NACS 2026–2030 framework 13

2.5.1 Legal and policy framework 14

2.5.2 Public sector governance and institutional framework 15

2.5.3 Enforcement, investigation, and judicial effectiveness 17

2.5.4 Integrity and accountability systems 18

2.5.5 Public engagement and political commitment 19

2.6 Root causes, drivers, cross-cutting constraints and opportunities 21

2.7 Implications for NACS 2026–2030 strategy design 22

2.8 Key indicator comparison and priority action matrix 24

2.9 Pillar interdependencies and priority intervention map 26

CHAPTER THREE 29

STRATEGIC DIRECTION 29

3.1 Introduction 29

3.2 Vision and Mission 29

3.3 Core Values 29

3.4 Guiding principles 30

3.5 Strategic Goal 30
3.6 Clarion call 30
3.6.1 Pillar 1 – Legal and Policy Frameworks 32
2.6.2 Pillar 2 – Public Sector Governance and Institutional Framework 32
2.6.3 Pillar 3 - Enforcement, Investigation, and Judicial Effectiveness 32
2.6.4 Pillar 4 - Integrity and Accountability Systems 33
2.6.5 Pillar 5 - Public Engagement and Political Commitment 33
3.7 Pillars and Strategic Issues 33

CHAPTER FOUR 34
STRATEGIC OBJECTIVES, STRATEGIES AND ACTIVITIES 34
4.1 Introduction 34
4.2 Strategic Objectives, Strategies and Activities 34
4.3 Theory of Change 35

CHAPTER FIVE 38
IMPLEMENTATION, MONITORING AND EVALUATION 38
5.1 Introduction 38
5.2 Implementation Framework 38
5.2.1 Implementation Approach 38
5.2.2 Implementation Arrangements 39
5.3 Co-ordination framework 40
5.3.1 Office of the Prime Minister (OPM) 41
5.3.2 National Oversight Committee (NOC) 41
5.3.3 Technical Coordination Committee 41
5.3.4 MoJCA – Secretariat 41
5.3.5 Role of IACC 41
5.3.5 Implementing MDAs, Federal Member States (FMS) and District Levels 42
5.4 Resourcing the Plan 42
5.5 Monitoring and Evaluation 43
5.5.1 Monitoring 43
5.5.2 Evaluation 43
5.6 Reporting and Accountability 43
5.7 Data Management and M&E System 44
5.8 Risk Management 44
5.9 Communication and Stakeholder Engagement 44
5.10 Review and Learning Mechanisms 45

APPENDICES 46
A PPENDIX 1: NACS 2026-2030 COSTED M&E IMPLEMENTATION MATRIX 46

LIST OF TABLES

Table 1: PESTEL Analysis 09
Table 2: SWOT Analysis 11
Table 3: Stakeholder Analysis 12
Table 4: Cross-pillar snapshot of status, evidence and priority action 24
Table 5: Strategic Objectives, Strategies and Activities 34
Table 6: Projected financial resource requirements (US $ Thousands) 42
Table 7: Risks and Mitigation Measures 44

TABLE OF FIGURES

Figure 1: NACS Pillar interdependencies and priority intervention map 26
Figure 2: Illustrates the transformative agenda of the Strategic Plan 2026-2030 31
Figure 3:Theory of Change NACS (2026-2030) 36
Figure 4: Coordination Framework for Implementation of NACS 2026-2030 40

EXECUTIVE SUMMARY

Corruption remains one of the most serious threats to state-building, public trust, justice, service delivery, and sustainable development in Somalia. It weakens institutions, distorts the allocation and use of public resources, undermines oversight and accountability, and erodes confidence in the State. The **National Anti-Corruption Strategy (NACS) 2026–2030** has been developed in response to this challenge as a renewed national framework for preventing, detecting, and responding to corruption through stronger laws, institutions, systems, oversight, and public engagement.

The Strategy is grounded in a consultative and evidence-based process. It draws on the **End-Term Review of the NACS 2020–2023, the National Corruption Risk Assessment, Somalia's review under the United Nations Convention against Corruption (UNCAC) Implementation Review Mechanism Cycle 1**, a review of relevant legal and policy documents, and broad stakeholder consultations involving Federal Government institutions, Federal Member States, oversight bodies, justice sector actors, civil society, academia, the private sector, and development partners. The Strategy also reflects comments generated through consultation and validation processes, helping to ensure that it is responsive to Somalia's governance realities and implementation needs.

The diagnostic evidence shows that while Somalia has made important progress in public financial management, external audit, selected institutional reforms, and digital systems such as payroll and invoice tracking, major anti-corruption gaps remain. Implementation of the previous strategy was uneven, the Anti-Corruption Commission remained non-operational, key legal reforms were delayed, and anti-corruption systems at Federal Member State and district levels remained weak. The National Corruption Risk Assessment and audit evidence further show persistent weaknesses in whistle-blower and witness protection, asset declaration and verification, conflict-of-interest regulation, procurement planning, internal audit coverage, public reporting, complaints handling, and enforcement capacity. Somalia's 2026 constitutional developments, together with the UNCAC review findings, now provide an important opportunity to strengthen the legal and institutional foundations of anti-corruption reform over the next five years.

The NACS 2026–2030 is therefore designed to move Somalia from fragmented, activity-based efforts toward a more coherent, evidence-based, institutionalized, and results-oriented anti-corruption framework. Its vision is a society driven by ethics and integrity, and its strategic goal is to reduce and prevent corruption through the promotion of integrity, transparency, and accountability across all levels of government and society. The Strategy recognizes that anti-corruption is not a stand-alone agenda. It is closely linked to broader state-building priorities, including justice sector reform, public administration, public financial management, service delivery, federal coherence, citizen trust, and responsible stewardship of national resources.

To organize the national response, the Strategy is structured around five mutually reinforcing pillars. **Pillar One** focuses on legal and policy frameworks, including the strengthening of anti-corruption legislation, alignment with international obligations, and closing key operational gaps in areas such as whistle-blower protection, asset declaration, conflict of interest, and access to information. **Pillar Two** addresses public sector governance and institutional framework issues by seeking to build credible, functional, and legally mandated institutions, strengthen coordination, and progressively localize anti-corruption systems across federal and sub-national levels. **Pillar Three** focuses on enforcement, investigation, and judicial effectiveness, including inter-agency coordination, forensic and investigative capacity, prosecution, adjudication, financial crime response, and credible sanctions. **Pillar Four** addresses integrity and accountability systems through internal controls, ethics programmes, internal audit, procurement integrity, corruption risk management, and a practical monitoring and evaluation system. **Pillar Five** promotes public engagement and political commitment through awareness, citizen participation, safe reporting channels, media and civil society engagement, and visible leadership in support of anti-corruption reform.

The Strategy identifies several cross-cutting priorities for phased implementation. These include strengthening the legal and institutional foundation package early; improving procurement transparency and contract controls; increasing internal audit coverage and audit follow-up; strengthening service transparency and complaints mechanisms; improving inter-agency coordination across oversight, justice, and enforcement bodies; and developing a more credible case pipeline for high-risk corruption typologies such as procurement fraud, payroll fraud, revenue diversion, illegal concessions, and bribery in service delivery. The Strategy also recognizes the need to focus on high-risk sectors and functions, including procurement and concessions, revenue collection, payroll and human resource management, public service delivery, external assistance flows, and the justice and enforcement chain.

Implementation of the Strategy will follow a results-based management approach. The Office of the Prime Minister (OPM) will provide overall strategic leadership, while a multi-level coordination framework will support oversight, technical coordination, reporting, and implementation. This includes the National Oversight Committee, the Technical Coordination Committee, Ministry of Justice and Constitutional Affairs (MoJCA) as the central secretariat and reporting hub, the Independent Anti-Corruption Commission in its technical advisory and compliance support role, and implementing Ministries, Departments and Agencies, Federal Member States, and district structures. The Strategy also provides for Annual Work Plans, alignment with national planning and budgeting frameworks, standardized reporting, centralized monitoring and evaluation, and regular performance reviews.

The projected financial resource requirement for implementing the **NACS 2026–2030 is estimated at US$ 11,133.3 thousand,** equivalent to approximately US$ 11.133 million over the five-year period. Financing will require a combination of domestic resource allocation and support from development partners. Implementing institutions will also be expected to identify their resource needs, advocate for budgetary allocation, and ensure that available funds are used efficiently and transparently.

Monitoring and evaluation will be based on a practical and results-oriented framework combining quantitative and qualitative data, with monthly and quarterly monitoring, annual reporting, a mid-term evaluation, an end-term evaluation, and thematic reviews where necessary.

By 2030, the Strategy seeks to contribute to a stronger and more coherent anti-corruption legal framework, more credible and accountable public institutions, more effective detection and adjudication of corruption cases, institutionalized ethics and oversight systems, and stronger citizen participation and public trust. Ultimately, the NACS 2026–2030 is intended to serve as a national platform for protecting public resources, strengthening accountability, enhancing government credibility, and advancing Somalia's wider goals of justice, good governance, and national renewal.



FOREWORD BY THE PRIME MINISTER

Corruption is a major barrier to justice, good governance, public trust, and sustainable development in Somalia. It weakens institutions, diverts resources, undermines service delivery, and erodes confidence in the State. As Somalia advances its national transformation agenda, addressing corruption is central to state-building, economic recovery, and accountable governance.

Corruption is a major barrier to justice, good governance, public trust, and sustainable development in Somalia. It weakens institutions, diverts resources, undermines service delivery, and erodes confidence in the State. As Somalia advances its national transformation agenda, addressing corruption is central to state-building, economic recovery, and accountable governance.

The National Anti-Corruption Strategy (2026–2030) demonstrates Somalia's renewed commitment to address corruption comprehensively and sustainably. It reflects the Federal Government's determination to strengthen integrity in public institutions and ensure governance systems serve the Somali people with fairness, transparency, and accountability.

This Strategy offers a clear framework for action, focused on strengthening institutions, improving accountability, enhancing enforcement, and promoting a culture of integrity. It guides our collective efforts to prevent corruption and ensure responsible management of public resources in the public interest.

Combating corruption requires more than policy; it demands leadership, coordination, and shared responsibility. This Strategy takes a whole-of-government and whole-of-society approach. Government institutions, Federal Member States, oversight bodies, the justice sector, civil society, the private sector, the media, and citizens all play a role in upholding integrity and rejecting corruption in all its forms.

The Federal Government of Somalia reaffirms its commitment to this national agenda. We are determined to protect public resources, strengthen accountability, and build institutions that earn and maintain public trust. I urge all institutions and citizens to support the implementation of this Strategy with unity, responsibility, and resolve.
With sustained effort and shared commitment, we can strengthen public trust, reinforce the rule of law, and build a more just, transparent, and prosperous Somalia.

H.E Hamza Abdi Barre
Prime Minister of the Federal Government of Somalia

A MESSAGE FROM THE MINISTER OF JUSTICE AND CONSTITUTIONAL AFFAIRS (MoJCA)



I am pleased to present the National Anti-Corruption Strategy (2026–2030), which provides a clear framework to guide Somalia's efforts to prevent and address corruption over the next five years.

This Strategy results from a structured, inclusive, and evidence-based process led by the Ministry of Justice and Constitutional Affairs. It builds on the End-Term Review of the previous National Anti-Corruption Strategy (2020–2023), the National Corruption Risk Assessment, the recommendations arising from Somalia's review under the UNCAC and extensive consultations with stakeholders across government and society.

These efforts have deepened our understanding of corruption risks in Somalia and helped us identify realistic priorities for reform. We have benefited from the active engagement of federal government institutions, Federal Member States, oversight and accountability bodies, the judiciary, law enforcement, civil society, academia, and the private sector. Their contributions have ensured that this Strategy reflects both institutional realities and the expectations of the Somali people.

The Strategy takes a balanced, forward-looking approach. It focuses on strengthening prevention, enhancing enforcement and accountability, improving coordination, and promoting public participation. It aims to address current challenges and build systems that sustain integrity and accountability over time. The Ministry of Justice and Constitutional Affairs coordinated the development of this Strategy and facilitated stakeholder dialogue. Its success will depend on continued collaboration, commitment, and clear roles among all institutions. Strengthening coordination and ensuring effective implementation are critical to achieving lasting results.

I sincerely appreciate all institutions and partners who contributed to this national process, including oversight and justice institutions, Ministries, Departments, Agencies, civil society, and other stakeholders whose input strengthened the quality and relevance of this Strategy.

We also appreciate the support from the African Development Bank (AfDB) through the Institutional Support for Economic Governance Project and the Ministry of Finance's role in facilitating this support. We further recognize the technical contributions of Rufmo Consulting Ltd in the assessment, consultations, and drafting processes. This Strategy demonstrates our national commitment to integrity, accountability, and good governance in Somalia. The Ministry remains dedicated to supporting its implementation and working closely with all stakeholders to achieve its objectives.

H.E. Hassan Moalim Mahmoud Sh. Ali
Minister of Justice and Constitutional Affairs
Federal Government of Somalia

ACRONYMS AND ABBREVIATIONS

The table below consolidates the acronyms, abbreviations, and variant initials used across the draft, including those appearing in the implementation matrix and diagrams.

Acronym / Abbreviation	Full Meaning
AfDB	African Development Bank
AG	Attorney General
AML	Anti-Money Laundering
ATI	Access to Information
ATMIS	African Union Transition Mission in Somalia
AU	African Union
AWPs	Annual Work Plans
CID	Criminal Investigation Department
CPI	Corruption Perceptions Index
CRA	Corruption Risk Assessment
CSOs	Civil Society Organizations
GDP	Gross Domestic Product
EAC	East African Community
ETR	End-Term Review
FGDs	Focus Group Discussions
FGS	Federal Government of Somalia
FMS	Federal Member State(s)
FRC	Financial Reporting Centre
FY	Financial Year
H.E.	His Excellency
HIPC	Heavily Indebted Poor Countries
HJSC	Higher Judicial Service Commission
HR	Human Resources

HRMIS	Human Resource Management Information System
IACC	Independent Anti-Corruption Commission
ICT	Information and Communication Technology
IFMIS	Integrated Financial Management Information System
IMCC	Inter-Ministerial Concessions Committee
IMF	International Monetary Fund
IRM	Interim National Procurement Board
IRM	Implementation Review Mechanism
ISO	International Organization for Standardization
IT	Information Technology
JSC	Judicial Service Commission
KII	Key Informant Interview
KPI	Key Performance Indicator
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MLA	Mutual Legal Assistance
MoF	Ministry of Finance
MoIS	Ministry of Internal Security
MoJCA	Ministry of Justice and Constitutional Affairs
MoPIED	Ministry of Planning, Investment and Economic Development
MPF	Multi-Partner Fund
NACS	National Anti-Corruption Strategy
NCRA	National Corruption Risk Assessment
NCSC	National Civil Service Commission
NDP	National Development Plan
NDP-9	Ninth National Development Plan (2020–2024)
NICU	National Integrity Co-ordination Unit

NIMEF	National Integrated Monitoring and Evaluation Framework
NOC	National Oversight Committee
NPA	National Procurement Authority
NTP	National Transformation Plan
OAuG	Office of the Auditor General
OHCHR	Office of the United Nations High Commissioner for Human Rights
OPM	Office of the Prime Minister
PDAD	Post Distribution Aid Diversion
PEFA	Public Expenditure and Financial Accountability
PESTEL	Political, Economic, Social, Technological, Environmental and Legal
PFM	Public Financial Management
PPPs	Public Private Partnerships
PSA	Production Sharing Agreement
SNBS	Somali National Bureau of Statistics
SOPs	Standard Operating Procedures
SP	Strategic Plan
SWOT	Strengths, Weaknesses, Opportunities and Threats
TCC	Technical Coordination Committee
ToC	Theory of Change
TSA	Treasury Single Account
TV	Television
UN	United Nations
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UNICEF	United Nations Children's Fund
UNODC	United Nations Office on Drugs and Crime
VCA	Vulnerabilities to Corruption Assessments

CHAPTER ONE
BACKGROUND

1.1 Introduction

Corruption remains one of the most persistent obstacles to state-building, public trust, effective service delivery, and sustainable development in Somalia. It undermines institutional accountability and transparency, weakens the effectiveness of external and internal audit systems, distorts the allocation of public resources, and erodes citizen confidence in the State. Corruption affects both day-to-day interactions between citizens and public institutions and the broader functioning of government systems, including public finance, procurement, human resource management, justice delivery, and oversight.

Recognizing these challenges, the Federal Government of Somalia developed and implemented the National Anti-Corruption Strategy (NACS) 2020–2023 as the country's first strategic framework for preventing and combating corruption through a coordinated national approach. That strategy sought to strengthen leadership and accountability, reinforce the integrity and capacity of key institutions, protect public resources, promote merit-based public administration, and foster public attitudes that reject corruption. Important gains were recorded during the implementation period, including expanded anti-corruption dialogue, accession to international anti-corruption instruments, progress in selected institutional mechanisms, advances in automation of tax and customs systems, development of codes of conduct in parts of the public sector, and reforms in civil service management.

At the same time, the End-Term Review of the NACS 2020–2023 found that implementation progress was uneven, several reforms were only partially achieved, and several critical actions remained incomplete. Key gaps included the continued non-operational status of the Anti-Corruption Commission, delays in legal reform, weak institutionalization of anti-corruption systems at Federal Member State and district levels, limited public complaints and reporting mechanisms, weak inter-agency coordination, the absence of a robust monitoring and evaluation framework, insufficient investigative and forensic capacity, incomplete civil service reforms, low public awareness, and recurring security pressures that constrained reform continuity.

In parallel, the National Corruption Risk Assessment (NCRA) provided further evidence of corruption vulnerabilities across Somalia's legal, institutional, administrative, and oversight systems. The assessment highlighted weaknesses in the criminalization and enforcement framework, shortcomings in protection for reporting persons and witnesses, incomplete regulation of conflict of interest and gifts management, weak judicial independence in practice, limited specialization in anti-corruption adjudication, weaknesses in procurement regulation, insufficient digitization and financial controls, and limited mechanisms for public participation and private sector integrity.

Regarding asset declaration, however, the newly adopted 2026 constitutional framework should now be read together with this Strategy, since it already introduces relevant constitutional provisions that provide an important foundation for future legal and institutional operationalization. In particular, the revised constitutional text provides for the constitutional independence and oversight mandate of the Office of the Auditor General (Article 177) and reinforces the place of the Independent Anti-Corruption Commission (Article 152) within the framework of independent state institutions. The final Strategy therefore aligns its legal and institutional analysis with these constitutional developments, including the relevant provisions relating to asset declaration, oversight, and anti-corruption enforcement.

These findings are reinforced by Somalia's UNCAC Implementation Review Mechanism (IRM) Cycle 1 review, which confirms that Somalia has made important progress in establishing an anti-corruption and anti-money-laundering framework, while also identifying major implementation and legal gaps that continue to limit effectiveness. The review notes, among other things, weaknesses in the criminalization of certain corruption offences, the absence of effective protection measures for witnesses, experts, and reporting persons, the non-operational status of the Anti-Corruption Commission, inadequate inter-agency coordination, limited disaggregated corruption data, relatively weak enforcement of Convention offences, and the need to strengthen international cooperation arrangements. These findings provide an important international benchmark and should be read alongside the NACS End-Term Review and the NCRA in shaping the priorities of the next strategy cycle.

It is against this backdrop that the NACS 2026–2030 has been developed. The Strategy builds on lessons from the previous strategy cycle, responds to the risks identified through the national assessment process, and incorporates the findings of Somalia's UNCAC review, while reflecting extensive consultations with state and non-state stakeholders. It provides a renewed framework for coordinated anti-corruption reform over the next five years and seeks to move Somalia from fragmented and largely activity-based efforts toward a more coherent, evidence-based, institutionalized, and results-oriented national framework for preventing and combating corruption.

1.2 Rationale and Purpose of the NACS 2026–2030

The development of the NACS 2026–2030 is informed by several interrelated considerations.

First, while the previous strategy laid an important foundation, the End-Term Review demonstrated that major legal, institutional, and operational gaps remain unresolved. These gaps require a more focused and implementable strategy that addresses both unfinished reforms and emerging corruption risks.

Second, Somalia's anti-corruption architecture remains incomplete not because of a total absence of relevant laws, but because the existing legal and institutional framework is not yet fully harmonized, consistently implemented, or sufficiently operationalized.

While Somalia already has important legislation addressing corruption-related prevention, enforcement, sanctions, and asset recovery, further effort is needed to strengthen institutional capacity, improve coordination, raise public awareness, and address specific remaining gaps in areas such as whistle-blower protection, conflict of interest, and asset declaration functions.

Third, the next strategy cycle provides an opportunity to strengthen alignment between anti-corruption reforms and broader national governance and development priorities. Anti-corruption is not a stand-alone agenda; it is closely linked to justice sector reform, public administration, public financial management, service delivery, federalism, political accountability, and citizen trust in government. A credible anti-corruption strategy therefore contributes directly to Somalia's wider state-building and development ambitions.

Fourth, the new strategy responds to lessons learned from implementation. The review of the previous NACS showed the need for stronger institutional mandates, better coordination, phased and costed implementation, more realistic prioritization, stronger monitoring and evaluation, and wider public and stakeholder engagement. The NACS 2026–2030 is therefore designed not only as a policy statement, but also as a practical framework for implementation, learning, and accountability.

Following the broad considerations of the strategic plan, the purpose of the National Anti-Corruption Strategy 2026–2030 is to provide a coherent national framework for preventing, detecting, and responding to corruption in Somalia through strengthened laws, institutions, systems, accountability mechanisms, and public engagement.

More specifically, the strategy aims to:

- strengthen the legal and policy foundations for anti-corruption;
- build credible, functional, and legally mandated anti-corruption and governance institutions;
- improve enforcement, investigation, prosecution, and adjudication of corruption cases;
- institutionalize ethics, integrity, accountability, and monitoring systems across public institutions; and,
- deepen public awareness, stakeholder participation, and political commitment in the fight against corruption.

1.3 Development Process of the Strategy

The development of the NACS 2026–2030 was informed by a consultative and evidence-based process. This process drew on the End-Term Review of the NACS 2020–2023, the National Corruption Risk Assessment, the findings and recommendations of Somalia's review under the UNCAC Implementation Review Mechanism (Cycle 1), and a review of relevant legal and policy documents.

In addition, the Strategy was shaped through broad stakeholder consultations involving Federal Government institutions, Federal Member States, oversight bodies, justice sector actors, civil society organizations, academia, private sector representatives, and development partners.

These consultations provided important perspectives on achievements, implementation gaps, institutional bottlenecks, corruption vulnerabilities, and priority reform areas for the next strategy cycle.

The draft Strategy was subsequently subjected to a validation process, through which stakeholders reviewed the proposed framework, strategic priorities, implementation arrangements, and monitoring directions. The comments and recommendations generated through the consultation and validation processes were carefully considered and integrated into the final document, helping to strengthen its relevance, ownership, and responsiveness to Somalia's governance realities.

Based on this process, the NACS 2026–2030 is organized around five pillars:

1. Legal and Policy Frameworks
2. Public Sector Governance and Institutional Framework
3. Enforcement, Investigation, and Judicial Effectiveness
4. Integrity and Accountability Systems
5. Public Engagement and Political Commitment

1.4 Scope of the Strategy

The NACS 2026–2030 covers anti-corruption prevention, accountability, enforcement, oversight, and public engagement across the Federal Government of Somalia and, progressively, across Federal Member States and district-level structures. It also recognizes the role of non-state actors, including civil society, academia, media, communities, and the private sector, in promoting integrity and accountability.

The strategy addresses both sector-specific and cross-cutting corruption risks, including those related to legal and policy gaps, institutional mandates, judicial and enforcement effectiveness, public service integrity, public procurement and financial management, transparency in service delivery, citizen oversight, and private sector compliance with integrity standards.

1.5 Structure of the Strategy

This strategy is organized into chapters that present the background and rationale, situational analysis, strategic framework, implementation arrangements, monitoring and evaluation mechanisms, and costed implementation planning for the period 2026–2030.

In response to the corruption risks, implementation gaps, and institutional lessons identified through the End-Term Review, the National Corruption Risk Assessment, and stakeholder consultations, the NACS 2026–2030 adopts a strategic framework anchored in a national vision, mission, strategic goal, and five interrelated pillars. These pillars provide the organizing framework for the situational analysis, strategic direction, strategic objectives, implementation arrangements, and monitoring framework presented in the subsequent chapters.

CHAPTER TWO

SITUATIONAL ANALYSIS FOR NACS 2026-2030

2.1. Introduction

This chapter provides the situational analysis for the NACS 2026–2030. It assesses the broader governance and anti-corruption context within which the Strategy will be implemented, reviews the principal legal, institutional, operational, and public accountability challenges, and analyses the environmental, stakeholder, and system-level factors that influence corruption risks in Somalia. In doing so, it establishes the evidence base for the strategic pillars, priority interventions, and implementation logic of the NACS 2026–2030.

2.2. Anti-corruption context and current trajectory

Corruption in Somalia[1] remains a significant governance and public accountability challenge, closely linked to state-building, insecurity, institutional fragility, and weaknesses in public financial and administrative controls remains systemic and closely intertwined with state-building, insecurity, and fiscal fragility. Evidence from the End-Term Review of NACS 2020–2023, the NCRA, official audit findings, and stakeholder consultations confirms persistent gaps in legal frameworks, institutional mandates, enforcement capacity, public-sector integrity systems, and public accountability.

The new constitutional framework 2026 further strengthens the national basis for anti-corruption reform by affirming accountable governance, prudent stewardship of public resources, independent oversight, and integrity in public office. However, these constitutional commitments still require translation into effective laws, institutions, systems, and enforcement mechanisms.

Somalia's anti-corruption environment is also shaped by broader national security and state fragility risks. Recent national security analysis underscores that weak governance, limited state reach, fragility of public institutions, rule-of-law deficits, and low levels of transparency and accountability can deepen threats to state cohesion, public trust, and national resilience. In this context, corruption is not only a governance and development issue, but also a factor that can aggravate institutional fragility and weaken the State's ability to respond effectively to wider national risks.

Recent reforms and institutional strengthening efforts provide a practical foundation for NACS 2026–2030: (i) steadily formalising public financial management rules and oversight functions (including external audit and publication requirements),[2]

(ii) introducing procurement and concessions oversight processes,[3] and (iii) expanding digital systems (e.g., payroll/HR and invoice tracking) that reduce discretion and improve traceability.[4] However, these reforms have not yet reached sufficient scale, coverage, or enforcement credibility to shift incentives across the public sector.

The evidence base points to five binding constraints that should shape Chapter 2 and the strategy logic:

First, important weaknesses remain in **the legal and institutional framework**, especially in the areas of whistle-blower protection, witness protection, asset declaration and verification, conflict-of-interest regulation, and operational transparency. These weaknesses continue to undermine reporting, detection, investigation, and deterrence. (MoJCA NCRA, Feb 2026; OHCHR dialogue summary on pending draft acts, Executive Summary of the UNCAC IRM Cycle 1 review).[5]

Second, **institutional vacuums and fragmentation**—notably a non-operational/weakly institutionalised Anti-Corruption Commission and uneven integrity architecture across Federal Member States—continue to inhibit consistent prevention, investigation, and sanctioning. (MoJCA End-Term Review (ETR) of NACS 2020–2023, Feb 2026).

Third, **enforcement and judicial constraints** are structural: Somalia's criminal justice system continues to face lengthy processes, limited guarantees for judicial independence, broader structural deficiencies, and coordination challenges across institutions. At the same time, key anti-corruption and criminal justice bodies continue to face gaps in clarity of mandates, independence, training, resources, and technical capacity, including in specialised areas relevant to financial and forensic.[6]

Fourth, integrity and accountability systems are uneven in coverage and maturity: internal audit functions are absent in many institutions, procurement planning remains weak, and key public revenues/expenditures are not consistently substantiated with verifiable documentation.[7]

Fifth, **public engagement and political commitment** are hindered by limited transparency, constrained civic oversight, and competing security and political priorities that reduce the space and attention available for anti-corruption reform.[8]

Implications for NACS 2026-2030 are therefore clear: prioritise sequencing (legal foundations institutional mandates and safeguards operational systems and capacity public oversight and feedback loops) and focus on several **priority areas** for phased implementation, particularly in procurement transparency, complaints and reporting mechanisms, integrity reforms in high-risk sectors, and stronger enforcement capacity. This should include sustained investment in financial investigations, case management, prosecutorial coordination, and judicial safeguards, alongside preventive and transparency measures.[9]

Somalia's anti-corruption context is shaped by the interaction of (i) protracted insecurity, (ii) evolving federal–member state relations, (iii) dependence on external financing and humanitarian response systems, and (iv) limited administrative reach. The UN Security Council[10] Panel of Experts reporting on Somalia has repeatedly linked governance weaknesses with misappropriation risks: it highlights that weak cooperation between the federal centre and regional states creates opportunities for political entrepreneurs and profiteers to exploit institutions, including diversion of public revenues (e.g., fisheries).

At the same time, Somalia's macro-fiscal reform trajectory has created new opportunities for integrity reform. The International Monetary Fund[12] reports that Somalia reached the HIPC completion point in 2023, generating very large debt service relief and enabling access to new financing—an opportunity that increases the returns to strong governance, but also amplifies fiduciary risks if integrity systems do not keep pace.[13]

Evidence from Somali government oversight institutions indicates that corruption and control weaknesses are not abstract: recent official audits identify concrete, quantifiable failures in procurement planning, internal audit establishment, documentation for high-value revenues, and adherence to fiscal buffer procedures.[14] These findings are especially relevant because they are "actionable" for strategy design: they point to specific control points where NACS interventions can reduce discretion, increase traceability, and strengthen consequences.

Somali National Bureau of Statistics (World Bank, 2024a) notes that governance statistics are constrained by weak administrative and survey data availability (limiting consistent measurement across governance dimensions, including "absence of corruption").[15] This has direct implications for NACS 2026–2030 monitoring and evaluation: the strategy's indicator framework must be grounded in administrative data that institutions can realistically produce, verify, and publish.

2.3. Environmental Scan

Strategic planning happens in a context that has implications for its development and executions. It is an imperative that the contextual situation is considered. Consequently, this section delineates both the societal and macro parameters that the anti-corruption strategy hinges on, as well as the immediate micro and institutional factors that have a bearing on the plan.

2.3.1 Macro Environment

The development and eventual implementation of any strategic plan is a function of the context in which it is happening. The crafting and execution of the NACS 2026-2030 has therefore depended on several environmental factors, among them the macro environment. It is these broader environmental parameters that will have implications for the strategic plan in terms of either enabling or constraining the development and implementation of the plan. This section does not therefore deal with the institutional dynamics among Somalia's relevant government agencies, but with the broad and overarching variables.

The internal capacities within the key government institutions involved in the implementation of anti-corruption strategies as well as the stakeholder analysis have been handled in subsequent sections. The synthesis and the triangulation of data between the various analyses have been instrumental in giving a nuanced picture of the state of corruption in the country, culminating in policies, strategies, interventions, and legal and regulatory frameworks to be adopted to counter corruption prevalence.

Table 1 below considers the Political, Economic, Social, Technological, Environmental and Legal (PESTEL) contexts within which the strategic planning is happening. These societal factors incorporate elements of the national, regional and global operating environments.

Table 1: PESTEL Analysis

Dimension	Context Factors	Effects / Implications
POLITICAL	• Enduring political conflicts and disagreements between the Federal Government and FMS • Insecurity resulting from persistent insurgency • Clan-based political system and patronage in government • East African Community (EAC) integration requirements • Political economy characterized by state fragility and weak political structures • Political interference in decision-making • Global and regional political dynamics (Red Sea access, ATMIS/UN political support)	• Inadequate and inconsistent implementation of anti-corruption strategies • Risk of insecurity incidents • Frequent inter-clan strife • Unequal representation in government, limited access to opportunities, and weak meritocracy • Opportunities and obligations arising from East African Community membership • Sub-optimal implementation of government programmes • Stiff competition for proximity to state power • A delicate balancing act in regional and global political dynamics
ECONOMIC	• Limited economic opportunities and high unemployment • Large informal economy and insufficient monitoring of illicit financial flows • Fiscal federalism with unclear division of labour between the Federal Government and FMS • Unfavourable corruption perception indices • Prevalent use of mobile money • Potential future job opportunities linked to oil discovery • Vibrant private sector economic activity • Poor infrastructure and uneven access to quality and affordable energy • Uncontrolled mining and fishing activities around the country	• Risk to realization of the national transformation agenda • Limited resources for key public services • Inadequate oversight over financial transactions • Low revenue mobilization due to unclear fiscal federalism arrangements • Better traceability through the mobile money economy • Risk to foreign direct investment and the country's external image • Positive prospects from the extractive sector

SOCIAL	• Societal normalization of corruption • Limited tangible anti-corruption outcomes • Entrenched culture of patronage and power brokerage • Increasingly active traditional and social media • Engaged civil society organizations • Active youth engagement in societal issues • Inadequate access to business opportunities for women and youth	• A value system that normalizes corruption • Widespread nepotism, favouritism, and continued disenfranchisement of vulnerable groups • Weakened professionalism in public service and reduced merit-based recruitment • Better awareness and flagging of corruption practices • Improved transparency in reform processes • High unemployment among women and youth
TECHNOLOGICAL	• Availability of fibre optic infrastructure • Better IT and mobile infrastructure enhanc-ing digitalization of government services in urban centres, with lower IT infrastructure in rural settings • Rapid technological change • Mobile money enabling a more traceable digital money trail • Limited knowledge of cyber security, heightening the risks of online economic crimes • Digitalization of revenue collection	• ICT offers opportunities for growth • Real-time and cost-effective communication • Increased risk of cybercrime and economic fraud • Improved access to data through mobile money integration and more effective transaction audits • Potential for improved revenue collection through digitalized tax and customs systems
ENVIRONMENTAL	• Unpredictable weather patterns, including frequent floods and droughts • Humanitarian mobilization in emergency situations may facilitate corruption under urgent relief conditions • Land degradation affecting food security in farming and livestock production • Environmental pressures causing land and water disputes • Weak governance of natural resources poses environmental risks • Limited agreements on trans-boundary and underground waters • Disease outbreaks and global pandemic impacts	• Floods and droughts exacerbate vulnerabili-ties, strain limited government resources, and make anti-corruption work more difficult • Food insecurity heightens competition and rent-seeking • Conflicts over scarce resources affect stability and governance • Crises and emergencies undermine effective oversight over resources
LEGAL	• United Nations Convention against Corrup-tion (UNCAC) ratified • Incomplete legal, regulatory, and policy frameworks, including gaps in asset recovery, anti-money laundering, and counter-terrorism financing laws • Some overlaps in responsibilities between the Federal Government, FMS, and different government agencies • Limited independence in the judicial system, including the courts • Petroleum law is in place • Alignment with East African Community legal and policy frameworks on cross-border trade	• Alignment with international agreements and protocols • Weakened anti-corruption measures due to inadequate legal and policy frameworks • Tension and lack of clarity in the division of labour between the Federal Government and FMS • Political interference in anti-corruption cases and weak judicial independence undermine deterrence • Better opportunities for managing the oil sector with the law in place • Harmonization with EAC frameworks supports cross-border trade and adherence to common customs laws

2.3.2 Microenvironment

In addition to the broader environment, an analysis of the microenvironment becomes an imperative. This includes a thorough assessment of the environment within the implementation agencies as well as other relevant entities in the sector. The Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis (Table 2) is therefore applied here. The goal is to capitalize on the strengths and opportunities while rectifying any weaknesses and containing any potential threats.

Table 2: SWOT Analysis

STRENGTHS	WEAKNESSES
• Anti-corruption legal frameworks • Increasing awareness among citizens, media, and civil society • Prevalent use of mobile money • Growing digitalization of revenue collection • International support to improve the governance system	• Inadequate inter-agency coordination • Favouritism and nepotism • Limited institutional capacity — human, technological, and financial • Low public sector wages • E-procurement has not been implemented • Weak enforcement of anti-corruption laws
OPPORTUNITIES	**THREATS**
• Implementation of integrated e-government platforms • Digitalization of public procurement • Active engagement in and implementation of EAC anti-corruption frameworks • Mobile money transactions • Targeted international donor support • Active participation of youth, NGOs, and religious leaders	• Insecurity and frequent conflicts • Informality of the economy • Widespread unemployment, especially among the youth • Widespread data and cyber security risks and inadequate know-how in managing anti-corruption systems and platforms

2.4. Stakeholder Analysis

Table 3 below captures the key stakeholders involved in the NACS 2026-2030 and their anticipated roles.

Table 3: Stakeholder Analysis

Stakeholder	Anticipated Role(s)
Federal Government	• Policy formulation • Foster political goodwill • Assent to laws
Parliament	• Enact and amend anti-corruption laws • Provide oversight of anti-corruption reforms and institutions • Scrutinize audit reports and public expenditure • Hold hearings and follow up on corruption findings • Approve budgets and support accountability mechanisms
MoJCA	• Legal and policy reforms • Oversight of anti-corruption laws
Office of the Attorney General	• Policy and legal advice on corruption • Policy oversight
Independent Anti-Corruption Commission (IACC)	• Prevention and detection of corruption. • Receipt, review and investigation or referral of corruption complaints. • Promotion of integrity, public awareness, and compliance with corruption measures.
Ministry of Finance	• Budgetary allocation • Prudent financial management
MoPIED	• Align the Strategy with national planning and development frameworks • Support monitoring, evaluation, and reporting • Mainstream anti-corruption priorities into sector plans
Somalia Police Force	• Enforcement of laws and regulations • Support investigation and prosecution of corruption cases

MDAs, FMS and Independent Offices	• Embed integrity and ethics • Implement audit recommendations • Form anti-corruption committees • Implement relevant digital platforms
Office of the Auditor General	• Audit public institutions • Ensure prudent use of public resources • Follow up on the implementation of audit reports
Development Partners	• Financial support • Capacity-building and technical suppor
Civil Society	• Monitoring corruption • Advocacy and public awareness
Media	• Public awareness • Highlight corruption incidences
Private Sector	• Compliance with anti-corruption laws and regulations
Universities and other academic institutions	• Research on ethics and integrity • Training on ethics and integrity

Taken together, the foregoing analysis confirms that corruption in Somalia is sustained by interconnected legal, institutional, enforcement, accountability, and public engagement deficits. These findings provide the basis for the strategic direction of the NACS 2026–2030, including the vision, mission, strategic goal, and five strategic pillars.

The situational analysis encompasses an appreciation and analysis of the broad societal factors, the internal dynamics within the government, the stakeholder analysis and corruption risk assessment.

2.5. Pillar-by-pillar assessment under the NACS 2026–2030 framework

This sub-section maps the current anti-corruption situation against the five pillars adopted in the NACS 2026–2030 strategy. It examines the main legal, institutional, enforcement, accountability, and public engagement issues under each pillar to show how the evidence from the situational analysis informs the strategic priorities and reform directions of the Strategy.

2.5.1 Legal and policy framework

The legal and policy reform agenda is reinforced by the constitutional commitment to accountable governance, public-resource stewardship, and the establishment of institutions responsible for integrity, oversight, and the rule of law. The constitutional framework therefore provides the normative basis for strengthening anti-corruption legislation, including laws on whistleblower protection, conflict of interest, access to information, and other preventive and enforcement mechanisms.

Somalia has taken important steps in aligning with international anti-corruption norms, including accession to the UNCAC in August 2021 and the incorporation of anti-corruption commitments into national policy frameworks. Somalia's UNCAC Implementation Review Mechanism (IRM) Cycle 1 review has since been completed, and its findings provide an important basis for NACS 2026–2030. The review highlights both progress made and remaining gaps in areas such as criminalization of corruption offences, witness and whistleblower protection, operationalization of the Anti-Corruption Commission, institutional coordination, and international cooperation. The strategic priority is therefore no longer a planned self-assessment or legal gap review, but implementation of the recommendations emerging from the completed IRM Cycle 1 review.[16]

However, the legal framework remains incomplete and unaligned with UNCAC in ways that directly weaken detection, deterrence, and recovery of proceeds of corruption. Three gaps are particularly strategic:

- **Asset declaration and illicit enrichment controls:** The prior NACS (2020–2023) identified asset declaration as a foundational preventive tool, while the NCRA (Feb 2026) highlights weak asset disclosure and illicit enrichment controls as ongoing risk drivers. At the same time, the 2026 constitutional framework already introduces relevant asset-declaration provisions for certain senior offices. The priority should therefore be to build on that constitutional foundation by strengthening the legal, regulatory, and institutional mechanisms needed for effective disclosure, verification, enforcement, and accountability across the public sector. The NCRA (Feb 2026) further identifies the absence of a mandatory asset declaration law as a risk driver, enabling illegal acquisition of wealth and unexplained wealth accumulation (MoJCA NCRA, Feb 2026).
- **Whistleblower and witness protection:** Weak protection for reporting persons, witnesses, and experts remains a major barrier to effective anti-corruption enforcement in Somalia[17] Somalia's UNCAC IRM Cycle 1 review recommends the adoption of effective protection measures against retaliation or intimidation for witnesses and experts, as well as protection for reporting persons against unjustified treatment. In practice, these gaps discourage disclosure, reduce cooperation with investigations, and weaken the flow of actionable corruption cases.[18]

- **Conflicts of interest and trading in influence:** Conflicts of interest and trading in influence remain significant drivers of favouritism and undue influence, particularly in employment, procurement, and public decision-making (MoJCA NCRA, Feb 2026). The key gap is not only the absence of a dedicated legal instrument, but also the lack of sufficiently clear, enforceable, and operational conflict-of-interest provisions and mechanisms across the existing legal and regulatory framework.[19]
- **Illustrative case linkage:** Where legal requirements are ambiguous or unenforced, discretionary decision-making increases. For example, the procurement framework prohibits contract splitting to circumvent competitive bidding thresholds, and auditors have explicitly referenced this legal standard.[20] The persistence of procurement planning and unit establishment failures indicates that "law on the books" is not yet translating into "law in practice" across institutions.[21]

Implication: Chapter 2 should frame legal gaps as operational constraints, not merely compliance issues: without whistleblower protection, asset declaration, and conflict-of-interest rules, enforcement agencies will remain heavily dependent on politically sensitive, discretionary investigations rather than systematic detection.

These findings justify Pillar 1 and Strategic Objective 1 of the NACS 2026–2030, which focus on establishing a comprehensive, enforceable, and internationally aligned legal and policy framework for anti-corruption.

2.5.2 Public sector governance and institutional framework

Institutional architecture has grown but remains unevenly institutionalised. Earlier anti-corruption efforts in Somalia envisioned a whole-of-government and society approach, including an independent Anti-Corruption Commission, a governmental coordination function, and stronger linkages with audit, prosecution, police, and financial intelligence bodies. However, the operational model for the Commission and its relationship with other institutions has not yet been fully clarified or institutionalised in practice. Given the Somali context, where the risk of institutional fragmentation and implementation failure remains high, a priority under NACS 2026–2030 should be to undertake a dedicated study on the operationalization of the Commission and inter-institutional cooperation arrangements, with a view to developing realistic regulations, standard operating procedures (SOPs), and coordination safeguards.[22]

Progress has been more visible in public financial management than in the development of a unified anti-corruption institutional framework. Reforms led by the Ministry of Finance, including the passage of key laws and regulations on public financial management, domestic revenue, procurement, and concessions, reflect a more sequenced and prioritised approach to governance reform, informed in part by Public Expenditure and Financial Accountability (PEFA) assessment processes.

However, the anti-corruption significance of these reforms lies not only in the legal framework itself, but in whether they strengthen integrity across the full public resource chain: tax and customs collection, budget formulation, expenditure control, cash management, procurement, and audit follow-up. In this regard, deeper attention is needed to risk areas such as extra-budgetary resources, parallel accounts, fiscal buffer use, unverified concession revenues, and incomplete financial reporting, all of which weaken traceability and accountability in the management of public funds. NACS 2026–2030 should therefore treat public resource management not only as a reform success area, but also as a continuing corruption risk domain requiring stronger controls, transparency, and enforcement. (IMF, 2024).

Human resource governance reforms provide a concrete opportunity to reduce patronage and payroll fraud risks. A World Bank progress report (Jan–Jun 2024) indicates that Phase II HR audit and biometric registration of remaining civil servants was completed, HR data uploaded into an HR management information system that is live, and jobs mapped to a pay-and-grading system. (World Bank Jan-June 2024 MPF Report). These are high-value controls because they create a verified footing for merit-based recruitment, wage bill control, and disciplinary systems—if accompanied by enforcement and transparency.

Yet governance vulnerabilities persist due to political economy and weak institutional reach. The Governance Statistics Report notes that confrontational politics, insecurity, and the use of the "4.5 clan power sharing" approach instead of meritocracy can undermine government effectiveness and trust. (SNBS, Governance Statistics Report 2023). Similarly, the UN Panel of Experts describes how federalism and governance suffer from election delays and centre–periphery tensions, enabling exploitation of governance weaknesses for self-interest.[23]

Implication: NACS 2026–2030 should treat anti-corruption institutional development as both a federal and subnational governance challenge. The Strategy should provide clearer analysis of state-level institutional realities, define the functional relationship between Federal Government institutions and Federal Member States, and set out how anti-corruption systems can be localized in practice. This includes establishing minimum national standards while allowing context-appropriate state-level arrangements, clarifying mandates and reporting lines across audit, procurement, financial intelligence, complaints handling, and enforcement bodies, and developing practical coordination mechanisms, regulations, and standard operating procedures to support interoperability, accountability, and gradual implementation across all levels of government.

These findings justify Pillar 2 and Strategic Objective 2 of the NACS 2026–2030, which seek to build credible, functional, and legally mandated institutions; strengthen organizational structures; institutionalize anti-corruption systems at federal and sub-national levels; improve transparency in service delivery; and reinforce strong institutional coordination, both vertically across levels of government and horizontally across the key institutions responsible for prevention, oversight, investigation, and enforcement.

2.5.3 Enforcement, investigation, and judicial effectiveness

The enforcement chain is constrained by structural weaknesses in the justice system, inconsistent institutional protection, and limited specialised financial crime capability. Available evidence indicates Somalia's criminal justice system continues to face lengthy processes, limited guarantees for judicial independence, structural deficiencies, inter-institutional coordination channels, and capacity gaps in specialised areas such as forensic audit. These weaknesses reduce the ability of the institutions to detect, investigate, prosecute and adjudicate corruption cases effectively.

Within the available national statistics, there are signals of improving administrative data flows. The Governance Statistics Report presents a breakdown of criminal cases referred to the Attorney General's Office in the Banadir Region in 2022, including a category labelled "Corruption" (72 cases) within a total of 1,678 recorded crime cases. (SNBS, Governance Statistics Report 2023). While this does not show prosecution or conviction outcomes, it is useful for situational analysis because it indicates that corruption is (at least partially) visible in reported crime data and can be tracked as a pipeline indicator—if harmonised nationally and linked to prosecutorial/judicial outcomes. Similarly, in 2023, the Office of the Auditor General of the Federal Republic of Somalia conducted a forensic audit and subsequently prepared a forensic audit report, which was submitted to the Office of the Attorney General. Following this report, approximately twenty-two (22) individuals were prosecuted, and some were convicted of the corruption-related offenses with which they were charged.[24]

Operational case study linkage: Enforcement cannot be divorced from financial governance. When auditors cannot independently verify whether major concession revenues represent the full amount due (because audited financial statements of concessionaires are not provided), potential revenue losses or under-collection are not merely accounting problems—they become enforcement and deterrence failures (non-compliance without consequence).[25]

Implication: The strategy should prioritise "credible consequences" for a bounded set of high-risk corruption typologies (procurement fraud, payroll fraud, revenue diversion, illegal concessions, bribery in service delivery), with measurable outputs across the pipeline: detection → investigation → prosecution → adjudication → recovery and sanctions.

These findings justify Pillar 3 and Strategic Objective 3 of the NACS 2026–2030, which aim to strengthen inter-agency coordination, improve investigative and forensic capacity, and enhance the effectiveness of detection, prosecution and adjudication of corruption cases.

2.5.4 Integrity and accountability systems

Integrity systems are where Somalia has the richest body of actionable, quantified diagnostic evidence—especially from official audits. Three patterns are particularly relevant.

- **Procurement planning and institutional procurement capacity:** The Annual Compliance Audit Report for FY2023 covering 19 audited MDAs finds that 7 of 19 audited entities conducted procurement totalling **US$39,175,442.53** without an approved annual procurement plan.[26] This directly supports the strategy's diagnosis of weak organisational structures and accountability in service delivery and identifies a precise control gap NACS can target.
- **Internal audit function coverage:** The same compliance audit reports that 11 of 19 audited MDAs did not establish an internal audit function as required by the PFM Act, increasing exposure to fraud and errors going undetected and weakening management accountability.[27] This is a systemic integrity weakness: where internal audit is absent, external audit becomes a late-stage control and cannot substitute for continuous assurance.
- **Documentation and transparency of high-value public revenues and fiscal buffers:** The audited annual financial statements for FY2023 highlight that concession revenues amounting to **US$34,261,371** could not be independently verified by the Auditor General because audited financial statements of concessionaires were not provided.[28] The same audit notes that **US$13,484,390** was utilised from the fiscal buffer account, but management did not provide required withdrawal plans and consolidated reports aligned with buffer account guidelines.[29]
- **Structural governance of procurement and concessions:** The Somalia Financial Governance Report 2023 underscores continuing risks from sole-source contracting and highlights the need for stronger oversight institutions.[30] It also reports that the Public Procurement Authority had not yet been established and that limited procurement capacity across institutions constrains implementation of the Procurement Act.[31] This is a major institutional vacuum relevant to pillar design.
- **M&E system maturity:** The National Integrated Monitoring and Evaluation Framework (NIMEF) report asserts that Somalia introduced the national integrated M&E framework to strengthen accountability for NDP-9 and explicitly identifies staff capacity and ICT system needs for M&E functions.[32] The MoJCA End-Term Review (Feb 2026) reinforces that the previous NACS lacked a comprehensive M&E framework and centralised data architecture (MoJCA ETR, Feb 2026). Together, these pinpoint the need for a "minimum viable M&E system" for the NACS itself.
- ***Implication:*** Integrity systems are not one reform; they are an interoperable set of controls. NACS 2026–2030 should propose a "control baseline" for all MDAs (procurement planning, internal audit, transparent reporting, complaints handling, and KPI reporting), then prioritise high-risk sectors for deeper controls, corruption risk management and real-time monitoring (e.g., security procurement, concessions, customs, payroll).

These findings justify Pillar 4 and Strategic Objective 4 of the NACS 2026–2030, which focus on embedding ethics, integrity, oversight, and monitoring systems in public institutions through sustained programmes, a comprehensive M&E framework, and multi-agency oversight arrangements.

2.5.4. Public engagement and political commitment

Public engagement is central to detection and deterrence in fragile settings because citizen reports, media scrutiny, and civil society oversight compensate for limited state capacity. However, the evidence indicates that public engagement is constrained by both information access barriers and civic space pressures.

- **Access to information:** The Governance Statistics Report states there has been a lack of progress in drafting an access-to-information law, concluding that citizens are effectively denied access and that opening government data remains unaddressed—despite constitutional recognition of the right of access to information. (SNBS Governance Statistics Report 2023). This is directly relevant to anti-corruption: without access to budgets, contracts, audit follow-up, and service standards, citizens cannot practically hold institutions accountable.
- **Legislative trajectory and risk:** Access-to-information reforms are both politically salient and technically sensitive. The NACS should not only advocate for "a law", but for a rights-compatible framework and implementable regulations.
- **Engagement progress and limitations:** The MoJCA End-Term Review (Feb 2026) reports that around 50 public engagements were conducted on anti-corruption progress and that ethics training for police reached large numbers (MoJCA ETR, Feb 2026). These are important outputs, but Chapter 2 should treat them as insufficient without accompanying institutional feedback loops (complaints intake, case tracking, public reporting, and protection mechanisms).

Implication: NACS 2026–2030 should position public engagement as a two-way accountability system: awareness-raising must be paired with safe reporting channels, service-level transparency, and demonstrable consequences for corruption reports.

These findings justify Pillar 5 and Strategic Objective 5 of the NACS 2026–2030, which seek to strengthen public awareness, stakeholder engagement, political commitment, and corruption prevention across both public and private sectors.

2.6. Root causes, drivers, cross-cutting constraints and opportunities

Evidence across pillars points to a coherent set of root causes and drivers that determine "what will work" in strategy design.

1. **Security-driven discretion and parallel financing:** Insecurity increases emergency procurement, security-sector opacity, and incentives for informal taxation and diversion. IMF reporting notes that Somalia issued emergency procurement guidelines (July 2023) to define emergency situations and permissible methods, aiming to create safeguards against wastage while allowing urgent procurement—highlighting both the necessity and the risk profile of security-linked spending.[33]

2. **Federal–member state dynamics and fragmented accountability:** A recurring risk is uneven application of rules and weak cross-level enforcement. The UN Panel of Experts describes how weak centre–periphery cooperation enables exploitation of governance weaknesses (e.g., diversion of fisheries revenues). (UN Security Council, 2023). Integrity reforms must therefore be designed as "federalised minimum standards with interoperability", not only as federal rules.

3. **Political economy and patronage incentives:** As the SNBS report notes, clan-based power sharing structures and non-meritocratic governance can reduce effectiveness and trust, increasing susceptibility to patronage hiring and influence trading. (SNBS Governance Statistics Report 2023). This is reflected in governance reforms where HR audit, biometric registration, and pay-and-grading mapping are treated as critical reforms to disrupt patronage and payroll manipulation. (World Bank Jan-June 2024 MPF Report).

4. **Capacity constraints and data gaps:** Procurement capacity constraints are explicitly documented in the Financial Governance Report 2023, including unmet requirements for procurement unit establishment and the absence of the Public Procurement Authority. (Somalia Financial Governance Report, 2023). Similarly, national governance statistics systems are still limited by lack of administrative/survey data, constraining the ability to measure progress and diagnose problems. (SNBS Governance Statistics Report 2023).

5. **Digitalisation opportunities:** Digital controls are a concrete opportunity to reduce discretion and improve traceability. The World Bank confirms HRMIS "go-live" and full mapping of positions to pay-and-grading following HR audit and biometric registration, providing a platform for payroll integrity, head-count control, and merit-based management (World Bank Jan-June 2024 MPF Report). IMF reporting similarly references expansion of invoice tracking and procurement process reforms, reinforcing the strategic value of E-Systems.[34]

6. **External financing and aid diversion risk:** Somalia's humanitarian and donor-financed environment create additional integrity challenges. UNCAC IRM Cycle 1 review notes that corruption risks in Somalia extend to international aid, including diversion through "gatekeepers" who can monetize access, dilute aid flows, influence who receives assistance, and capture services intended for vulnerable communities. The same analysis also highlights Somalia's continued dependence on external aid and recommends stronger coordination with mechanisms such as the Post Distribution Aid Diversion (PDAD) task force, including improved transparency, secure reporting channels, and stronger capacities for tracking and tracing aid received. The NACS should therefore incorporate integrity safeguards for externally supported programmes and strengthen the transparency, accountability, and control systems through which such resources are managed.

2.7. Implications for NACS 2026–2030 strategy design

The following implications are supported by the evidence above and align with the strategy pillars.

1. **Prioritise a legal-and-institutional "foundation package" early:** Without whistle-blower and witness protection, asset declaration with verification and sanctions, conflict-of-interest rules, and access-to-information legislation/regulations, the strategy will remain reliant on discretionary, politically sensitive enforcement (OHCHR Report, 2024)

2. **Sequence integrity controls before (and alongside) high-profile enforcement:** Somalia's audit evidence shows large, traceable control failures (procurement planning, internal audit absence, documentation gaps for concession revenues and fiscal buffers). Addressing these systematically will reduce opportunities for corruption while building a stronger evidence base for investigations.[35]

3. **Target a small number of high-risk "use cases" for credible enforcement:** To avoid overreach, focus on a bounded set of corruption typologies with high fiscal impact and high public salience—procurement fraud, payroll fraud, revenue diversion, concessions irregularities—then publish pipeline metrics: allegations received, cases screened, investigations opened, prosecutions filed, convictions, asset recovery, and administrative sanctions. (SNBS Governance Statistics Report 2023).

4. Build federalised interoperability and minimum standards: Procurement and internal audit weaknesses are not just federal issues. Establish minimum governance standards for all MDAs and FMS counterparts (procurement plan publication, internal audit function, audit follow-up, complaints intake, and reporting), while supporting harmonised procedures and shared digital infrastructure. (Somalia Financial Governance Report, 2023).

5. Define quick wins that are measurable within 6–12 months: The Strategy should identify a limited number of priority areas for phased implementation. To support realistic monitoring, these actions should, where feasible, be tracked using existing administrative data generated by government systems and oversight bodies, rather than relying primarily on new or resource-intensive data collection arrangements.

    - annual procurement plans and contract awards published for pilot MDAs;[36]
    - internal audit units established (or shared service arrangements adopted) for priority MDAs;[37] , with clear policies, mandates, and SOPs to guide their operations;
    - an audit recommendation tracker introduced and published, starting with procurement and treasury controls, with clear SOPs for follow-up, reporting, and enforcement.)[38]
    - a case-tracking dashboard developed and operationalized for authorized institutional use, with appropriate safeguards for confidentiality, access control, and data protection;
    - publication of guidelines/SOPs already adopted (e.g., emergency procurement guidance, concessions oversight SOPs).[39]

Institutionalise an M&E system designed for Somalia's data reality: Build a "minimum viable NACS M&E" aligned with NIMEF principles—few indicators, defined owners, clear verification indicators, and public reporting cadence—rather than a wide indicator set that cannot reliably be produced. (MoPIED, 2024).

2.8. Key indicator comparison and priority action matrix

Table 4: Cross-pillar snapshot of status, evidence and priority action

Pillar	Indicator	Status	Evidence source	Recommended priority action
Integrity & accountability	Annual procurement planning	7/19 audited entities procured US$39.2m without an approved procurement plan	Office of the Auditor General of Somalia, 2024	Mandate procurement plans for all MDAs; publish plans and compliance dashboards; enforce sanctions for non-compliance.
Integrity & accountability	Internal audit function coverage	11/19 audited MDAs lacked internal audit function required by PFM	Office of the Auditor General of Somalia, 2024	Establish internal audit as a minimum institutional standard; adopt shared-service internal audit arrangements where staffing is constrained; and support these arrangements with formally endorsed internal audit policies, approved charters, annual plans, and clear SOPs to guide implementation and accountability.
Integrity & accountability	Concession revenue substantiation	Auditor could not verify if US$34.26m concession fees were the full amounts due (audited statements not provided)	Office of the Auditor General of Somalia, 2024	Require audited financial statements for concessionaires; publish compliance status; align IMCC oversight and audit follow-up.
Integrity & accountability	Fiscal buffer governance	US$13.48m used from buffer account without required withdrawal plan/reporting provided	Office of the Auditor General of Somalia, 2024	Strengthen TSA/buffer governance: publish rules, require approvals and documentation, and audit buffer utilisation annually.
Public sector governance & institutions	Procurement authority capacity	Public Procurement Authority not yet established; limited procurement capacity across FGS and FMS.	Somalia Financial Governance Report, 2023	Operationalise the Public Procurement Authority in accordance with the Public Procurement and Disposal Act, strengthen procurement certification processes, and deploy intensive procurement capacity-building in priority MDAs to improve compliance, professionalism, and oversight, including targeted conflict-of-interest declarations for procurement staff.

Pillar	Indicator	Status	Evidence source	Recommended priority action
Enforcement & justice effectiveness	Justice system integrity constraints	Underfunding and limited specialised expertise constrain reforms; pay delays create corruption risks	MoJCA Consultation Workshop, 2026	Create specialised financial crime capability across the full enforcement chain, with a clearly defined role for the Financial Reporting Centre in financial intelligence and suspicious transaction analysis, alongside strengthened capacity for investigators, prosecutors, and judges. This should be supported by stronger inter-agency coordination, protection for justice personnel, and ring-fenced resourcing for high impact casework.
Public sector governance & institutions	HR/payroll integrity controls	HR audit and biometric registration completed; HRMIS live; positions mapped to pay and grading	World Bank Jan–June 2024 MPF Report	Use HRMIS as an anti-corruption control: publish payroll headcount integrity metrics; enforce recruitment and disciplinary rules; integrate with asset declaration regime when enacted.
Enforcement & justice effectiveness	Recorded corruption cases (pipeline proxy)	In Benadir 2022, the 'corruption' category shows 72 cases among 1,678 referred crime cases	SNBS Governance Statistics Report 2023	Standardise national corruption case classification and case duration backlog; publish quarterly pipeline statistics (reports → prosecutions → convictions).
Legal & policy framework	Whistleblower / witness protection	Draft act reported awaiting Cabinet adoption (as of 2024); protection gap persists	UNCAC IRM Cycle 1 Review Executive Summary, 2025;	Fast-track whistleblower and witness protection law; establish interim protection procedures and safe, confidential reporting protocols.
Legal & policy framework	Access to information	NBS reports lack of progress on ATI law; citizens effectively denied access in practice	SNBS Governance Statistics Report 2023	Enact a rights-compatible Access to Information (ATI) law and implement its regulations; publish core transparency datasets, including budgets, procurement information, and audit follow-up reports; and create structured mechanisms for civil society engagement in implementation and public oversight.

Integrity & accountability / governance	Audit transparency obligations	OAG law requires reports to be accessible to the public and published within one month after submission to Parliament; criminal suspicion referrals to Attorney General	Office of the Auditor General of the FGS, Law No. 14, 10 Sept	Publish an annual audit recommendation tracker and related follow-up actions; formalise referral protocols and feedback loops between the Office of the Auditor General and prosecutors; and support Parliament's scrutiny role through clear procedures for tabling, reviewing, hearing, and following up audit reports.

2.8. Pillar interdependencies and priority intervention map

The diagram below summarises how weaknesses and reforms interact across pillars and identifies priority interventions that address multiple pillars simultaneously (legal foundations, institutional mandates, operational controls, enforcement credibility, and public accountability).

How weaknesses and reforms interact across pillars in the NACS 2026–2030 framework

Cross-cutting drivers and constraints

Insecurity and emergency spending; Federal–FMS fragmentation; patronage and political economy; low capacity and weak incentives; low digitisation and weak system integration; data gaps and limited transparency.

↓

These shape incentives, institutional performance, and corruption vulnerabilities

System-level corruption risk environment

Procurement and concessions; revenue and tax administration; payroll and HR; public service delivery; justice and enforcement chain; externally financed programmes and aid flows.

These create risk exposure across the five strategic pillars

Pillar 1 – Legal and Policy Frameworks	Pillar 2 – Public Sector Governance and Institutional Framework	Pillar 3 – Enforcement, Investigation, and Judicial Effectiveness
Laws, regulations, sanctions, cooperation tools; whistle-blower and witness protection; asset declaration; conflict of interest; gifts; access to information; MLA and UNCAC alignment.	Mandates and structures; vertical and horizontal coordination; Federal–FMS standards and localisation; staffing, resourcing, and service transparency; institutional architecture.	Detection, investigation, prosecution, and adjudication; financial crime and AML coordination; judicial integrity; protection of justice personnel; asset tracing and recovery; case management.

Pillar 4 – Integrity and Accountability Systems	Pillar 5 – Public Engagement and Political Commitment
Procurement controls and transparency; internal audit and audit follow-up; disclosure systems; corruption risk management; M&E dashboards; ethics, SOPs, and control baselines.	ATI and service transparency; secure reporting channels; public awareness; citizen oversight; media and civil society engagement; visible political commitment.

These pillars require coordinated, cross-cutting action

Cross-cutting priority intervention packages

1. Legal foundations	2. Institutions and coordination	3. Priority control measures
Whistle-blower and witness protection, asset declaration, conflict of interest, gifts, MLA, and access to information.	Operational architecture, regulations, SOPs, referral protocols, and Federal–FMS minimum standards.	Procurement plans and awards, internal audit coverage, audit follow-up, revenue reconciliation, and corruption risk mitigation.

4. Credible enforcement	5. Public accountability and political commitment
Financial investigations, case management, specialised justice capacity, judicial integrity, AML coordination, and asset recovery.	Secure reporting channels, civic awareness, citizen feedback, media and civil society engagement, parliamentary scrutiny, and visible follow-through.

These interventions address cross-pillar gaps and improve implementation coherence

Expected early results / near-term outcomes

Clearer legal and institutional foundations; stronger Federal–FMS coordination; reduced discretion and stronger controls in procurement, revenue, and other high-risk functions; improved internal audit coverage, audit follow-up, and corruption risk management; a more credible corruption and financial crime case pipeline; safer reporting arrangements; stronger public accountability, transparency, and institutional responsiveness.

CHAPTER THREE
STRATEGIC DIRECTION

3.1. Introduction

The Strategic Directions are derived from the National Transformation Plan (NTP) 2025-2029, which envisions a Somalia with stable and inclusive governance, and international instruments obligating Somalia to establish mechanisms for the prevention and combating corruption and promoting good governance. It endeavours to fulfil Somalia's regional and international obligations in the fight against corruption and institutionalisation of good governance. This Chapter presents the strategic goal and the Strategic Pillars that enable the realisation of the vision.

3.2. Vision and Mission

The Strategic Plan is developed to achieve the vision and mission as stated below:

NATIONAL ANTI-CORRUPTION STRATEGY (2026–2030)	
VISION A society driven by ethics and integrity	**MISSION** To promote integrity, transparency, and accountability in public life by strengthening values and institutions, enforcing laws, and fostering citizen engagement to prevent and fight corruption.

3.3. Core Values

The Strategic plan shall be anchored on the following Core Values:

- Integrity
- Transparency
- Accountability
- Inclusivity
- Equity

3.4. Guiding principles

The Strategic plan is guided by the following key principles:

- Rule of law
- Due process
- Federal coherence
- Inclusion
- Evidence-based action

3.5. Strategic Goal

Reduce and prevent corruption through the promotion of integrity, transparency, and accountability across all levels of government and society

3.6. Clarion call

The fight against corruption is not only a legal and governance obligation, but also a faith-based and ethical imperative. The Glorious Qur'an condemns bribery, injustice, betrayal of trust, and abuse of authority, while affirming justice, honesty, accountability, and responsible stewardship. These teachings provide a strong moral and normative foundation for anti-corruption efforts and remind us that integrity is both a public duty and a matter of faith.

Surah Al-Baqarah (2:188)

"And do not consume one another's wealth unjustly or send it [in bribery] to the rulers in order that [they might aid] you to consume a portion of the wealth of the people in sin, while you know [it is wrong]."

Transformative Agenda of the Strategic Plan 2026–2030

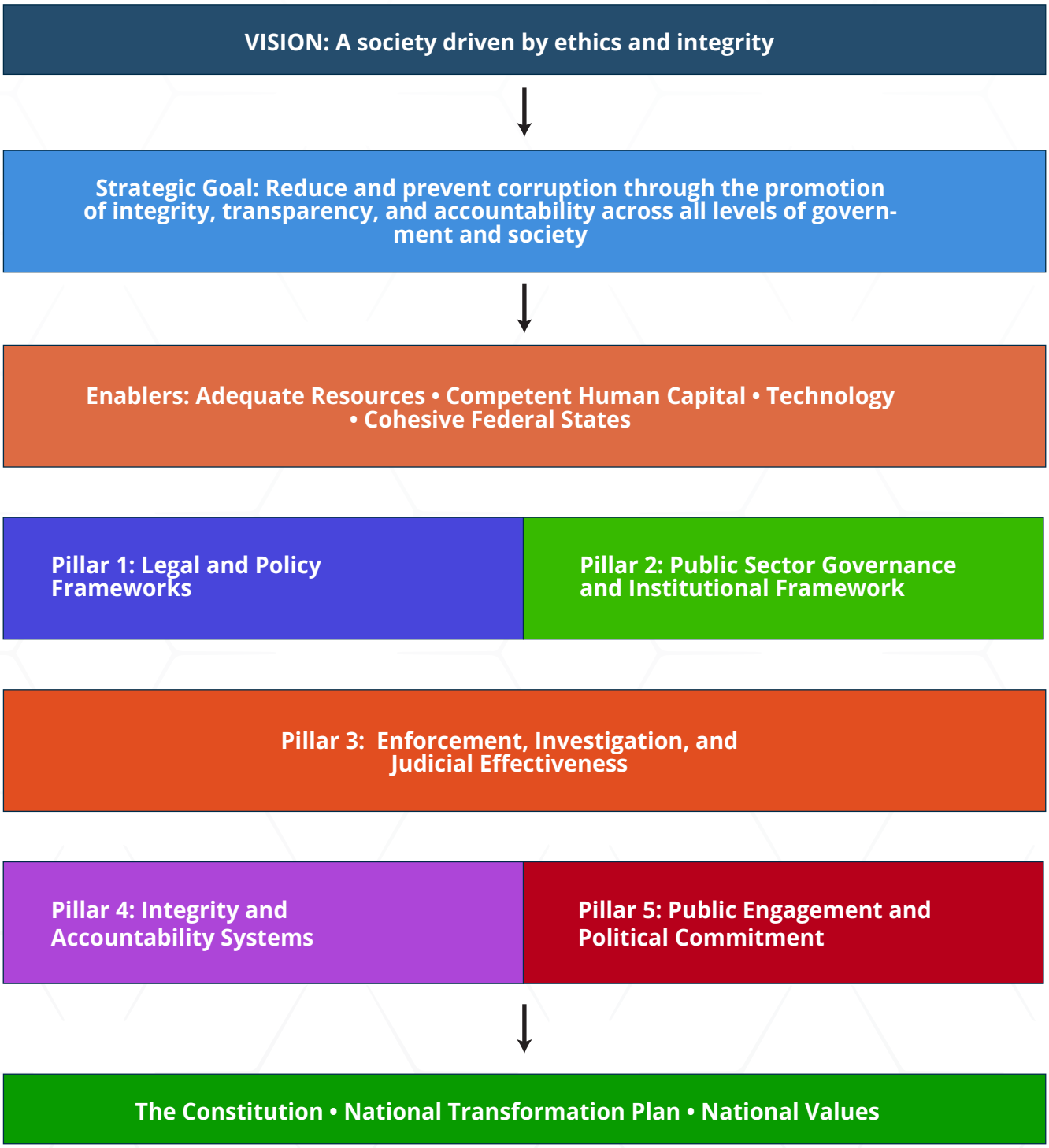


Figure 2: Illustrates the transformative agenda of the Strategic Plan 2026-2030

The strategic issues are results of the review of the NACS 2020-2023, the outcome of the NCRA and the analysis of the internal and external environments in the implementation of the retired Strategic Plan.

3.6.1. Pillar 1 – Legal and Policy Frameworks

The promotion of good governance and the fight against corruption requires strong enabling legislation and policy frameworks. As a state party to UNCAC and AUCCPC, Somalia is obligated to enact clear, enforceable, and internationally aligned legislation to support the fight against corruption and promote good governance. The review of the NACS 2020-2023 and NCRA identified the following strategic issues under this pillar:

i. Absence of a consolidated anti-corruption legal framework;
ii. Weaknesses and inadequacies in existing anti-corruption laws; and,
iii. Gaps in alignments of laws with the international obligations.

3.6.2. Pillar 2 – Public Sector Governance and Institutional Framework

Strong and accountable institutions in the public sector are the backbone of good governance and effective service delivery. The realization of the national transformation agenda is premised on stable, reliable, inclusive, and transparent institutions in Somalia. Under this pillar, the focus will be on six strategic issues.

i. Non-operational Anti-Corruption Commission;
ii. Weak organizational structures across public institutions;
iii. Limited institutionalization at the Federal Member State and district levels;
iv. Delays and inconsistencies in civil service reforms;
v. Human resource constraints, recruitment freezes, and incomplete pay/grading reforms;
vi. Weak transparency and accountability in service delivery; and,
vii. Weak vertical and horizontal coordination among institutions.

3.6.3. Pillar 3 - Enforcement, Investigation, and Judicial Effectiveness

Enforcement of the laws is key in combating corruption and bad governance. Effective investigation and adjudication of corruption cases reduce the prevalence of corruption by creating the deterrence effects of the law. Gaps in investigation, prosecution and adjudication of corruption and economic crimes have been observed as one of the major challenges in the implementation of the NACS 2020-2023. Under this pillar, focus will be given on the following strategic issues:

i. Weak inter-agency coordination and slow judicial processes;
ii. Limited investigative, forensic, and technical capacity; and,
iii. Absence of harmonized enforcement mechanisms.

3.6.4. Pillar 4 - Integrity and Accountability Systems

Enhancing systems of accountability and integrity are critical not only to promoting effective service delivery but also to enhancing public confidence and trust in government. It is in regard that this is considered a strategic pillar in achieving effective governance. The following strategic issues are distilled under this pillar:

i. Limited institutionalization of ethics and integrity systems.
ii. Weak monitoring and evaluation systems for anti-corruption initiatives.

3.6.5. Pillar 5 - Public Engagement and Political Commitment

Citizen involvement in decision-making in public affairs is a principle of good governance. This can be achieved through political goodwill and commitment in engaging the public on governance matters. Two key strategic issues have been identified under this pillar:

i. Low public awareness and limited stakeholder engagement.
ii. Limited political commitment and security challenges diverting attention/resources.

3.7. Pillars and Strategic Issues

This national strategic plan will pursue a transformative agenda in the promotion of good governance and the fight against corruption in Somalia, supported by five strategic pillarsas diagrammatically presented below:

CHAPTER FOUR

STRATEGIC OBJECTIVES, STRATEGIES AND ACTIVITIES

4.1. Introduction

This chapter presents the strategic objectives, strategies, activities and the Theory of Change.

4.2. Strategic Objectives, Strategies and Activities

Table 5 presents the strategic objectives, strategies and activities that will be implemented during the five-year Plan period.

Table 5: Strategic Objectives, Strategies and Activities

Strategic Objective	Strategy	Priority Activities
1. To strengthen legal and policy frameworks	Establish a comprehensive, enforceable, and internationally aligned legal and policy framework	1. Amend existing anti-corruption legislation: Somali Penal Code; Somali Penal Code Procedure; Evidence Law; Anti-Money Laundering Act. 2. Enact new anti-corruption legislation: Anti-Corruption and Economic Crimes Act; Anti-Bribery Act; Mutual Legal Assistance Act; Whistleblower Protection Act; Asset Declaration Act. 3. Domesticate international conventions: African Union Convention on Preventing and Combating Corruption; Makkah Al-Mukarramah Convention of the Member States of the Organisation of Islamic Cooperation on Anti-Corruption Law Enforcement Cooperation.
2. To strengthen Public Sector Governance and Institutional Framework **2. To strengthen Public Sector Governance and Institutional Framework**	Build credible, functional, and legally mandated institutions	1. Reconstitute the Anti-Corruption Commission. 2. Establish FMS integrity units. 3. Strengthen functionality, independence, resourcing, structures, mandates, and the coordination framework of institutions. 4. Establish the Higher Judicial Service Commission. 5. Develop the legislative framework for, and establish, the Office of the Ombudsman.
	Promote transparency, accountability and integrity in institutions	1. Approve and operationalize the amended civil service law. 2. Strengthen implementation of the Code of Conduct and Discipline in all institutions. 3. Develop and operationalise an asset declaration regime with verification and sanction procedures in all institutions. 4. Enhance service transparency. 5. Conduct an annual citizen corruption perception survey and publish the findings

Strategic Objective	Strategy	Priority Activities
3. To strengthen Enforcement, Investigation, and Judicial Effectiveness	Enhance investigation, prosecution, and adjudication of corruption	1. Strengthen inter-agency coordination. 2. Build forensic and investigative capactity. 3. Harmonize enforcement frameworks. 4. Provide training on corruption and economic crimes to prosecutors and judges. 5. Achieve timely completion of corruption cases in court. 6. Establish and operationalise anonymous whistleblowing platforms. 7. Establish specialised anti-corruption courts.
4. To institutionalize integrity and accountability systems **4. To institutionalize integrity and accountability systems** **4. To institutionalize integrity and accountability systems**	Embed ethics, integrity, and accountability Enhance corruption prevention in public and private sectors	1. Implement sustained ethics programmes. 2. Appoint integrity officers in institutions. 3. Conduct corruption risk assessment among public sector institutions. 4. Establish corruption prevention committees in public institutions. 5. Develop and operationalize end-to-end integration using blockchain technology in PFM, e-procurement, and revenue administration. 6. Conduct corruption prevention training for the private sector.
	Embed ethics, integrity, and accountability Enhance corruption prevention in public and private sectors	1. Establish M&E focal points. 2. Develop a comprehensive M&E system with dashboard. 3. Establish multi-agency oversight teams.
5. To enhance public engagement and political commitment	Strengthen citizen participation and political support	1. Implement public awareness campaigns. 2. Engage civil society and academia. 3. Create integrity platforms/clubs within youth groups, learning institutions, religious groups, and other social groups. 4. Establish platforms for engagement with media and other non-state actors. 5. Create a public complaints mechanism: an accessible, efficient, and credible complaints channel. 6. Strengthen political commitment.

4.3. Theory of Change

The NACS 2026-2030 Theory of Change is grounded in the understanding that weak legal framework, ineffective institutions, limited enforcement capacity, poor governance systems and low citizen engagement drives corruption. If Somalia strengthens its legal and policy frameworks, builds effective institutions, enhances enforcement and judicial effectiveness, improves governance systems, and engages citizens, then corruption will be reduced and public trust increased (Figure 3).

STRATEGIC GOAL

Reduce and prevent corruption through the promotion of integrity, transparency, and accountability across all levels of government and society in Somalia

▲ **Contributes to**

OUTCOMES

1. Stronger and more coherent anti-corruption legal and policy framework | 2. More credible, functional, and accountable public institutions | 3. More effective investigation, prosecution, adjudication, and sanctioning of corruption | 4. Institutionalized ethics, integrity, oversight, and monitoring systems | 5. Stronger citizen participation, public trust, and political commitment in anti-corruption reform

▲ **Achieved through**

OUTPUTS

• Priority anti-corruption laws reviewed, enacted, harmonized, and domesticated | • Anti-Corruption Commission and related institutions operationalized and better coordinated | • Investigation, prosecution, judicial, and forensic capacities strengthened | • Ethics programmes, integrity systems, oversight teams, and M&E mechanisms established | • Public awareness platforms, stakeholder partnerships, and corruption reporting channels expanded

▲ Produced by

STRATEGIC INTERVENTION PATHWAYS / PILLARS

PILLAR 1 LEGAL AND POLICY FRAMEWORKS	PILLAR 2 PUBLIC SECTOR GOVERNANCE AND INSTITUTIONAL FRAMEWORK	PILLAR 3 ENFORCEMENT, INVESTIGATION AND JUDICIAL EFFECTIVENESS	PILLAR 4 INTEGRITY AND ACCOUNTABILITY SYSTEMS	PILLAR 5 PUBLIC ENGAGEMENT AND POLITICAL COMMITMENT
• Review existing laws • Enact new anti-corruption legislation • Domesticate UNCAC / AUCPCC obligations • Strengthen frameworks on whistle-blowers, conflict of interest, asset declaration, gifts, MLA	• Reconstitute Anti-Corruption Commission • Clarify institutional mandates and structures • Establish sub-national integrity units • Advance civil service, HR, and service transparency	• Strengthen inter-agency coordination • Build forensic and investigative capacity • Harmonize enforcement frameworks • Improve case management and judicial effectiveness	• Implement sustained ethics programmes • Establish ethics and M&E focal points • Develop centralized M&E and reporting systems • Form multi-agency oversight mechanisms	• Conduct public awareness campaigns • Engage civil society, academia, media, and communities • Strengthen political commitment and leadership • Promote public/private

▲ Responds to

KEY CORRUPTION AND GOVERNANCE CHALLENGES

• Absence of a consolidated anti-corruption legal framework • Delays in enactment of key legislation and weak domestication of international obligations
• Non-operational Anti-Corruption Commission and weak institutional mandates
• Weak public sector governance, HR systems, and service transparency
• Weak inter-agency coordination, slow judicial processes, and limited technical capacity • Weak ethics, integrity, oversight, and M&E systems • Low public awareness, limited stakeholder engagement, and inconsistent political commitment • Security pressures, fragmented federal arrangements, and resource constraints

ASSUMPTIONS

• Sustained political commitment exists • Parliament and Executive support legal reform • Federal and FMS institutions cooperate • Security conditions allow implementation and oversight | • Adequate financial, technical, and human resources are mobilized • Stakeholders remain willing to participate • Institutions generate usable monitoring data • Reform sequencing remains realistic and manageable

Figure 3:Theory of Change NACS (2026-2030)

CHAPTER FIVE

IMPLEMENTATION, MONITORING AND EVALUATION

5.1. Introduction

This chapter presents the framework for the implementation, coordination, monitoring and evaluation of the NACS 2026-2030. It details the mechanisms that guarantee the planned activities are implemented successfully, progress is tracked systematically, and outcomes are achieved in a clear and accountable manner.

5.2. Implementation Framework

This framework outlines the implementation approach and arrangements that will be used for effective execution, coordination and monitoring of the Plan.

5.2.1. Implementation Approach

The National Anti-Corruption Strategy will be implemented using a result-based management approach that guarantees all activities contribute to clearly defined outputs, outcomes, and overall strategic objectives. The strategy will be implemented through, a) Annual Work Plans (AWPs) and budgets, b) Alignment with national planning and budgeting frameworks, and c) Institutional performance management systems.

While the identified strategies and activities are all important in the realization of the NACS 2026-2030 objectives, prioritization and sequencing of the activities and programmes is a necessity in achieving the overall goal of the strategy. To that end, the following constitute the transformative flagship programs and actions that need to be successfully executed over the next 12-24 months to facilitate the implementation of the remainder of the plan:

- Legal and policy frameworks – the enactment and amendment of laws and policies that facilitate the anti-corruption effort
- The re-constitution and operationalization of the Independent Anti-Corruption Commission (IACC)
- Inter-agency co-ordination – the synergy between the federal leadership commitment offered by the PMO in marshalling whole-of-government support, the technical anchoring of MoJCA, the efforts of the FMSs, and the co-ordination as well as advisory from the AICC is an essential pre-requisite for success

- Professionalization of the civil service - institutionalization of an inclusive, dedicated, service-oriented and merit-based civil service
- Application of high-end technology in digitalizing government services – embedding blockchain technology that offers end-to-end visibility and transparency of key government functions, including procurement, PFM, and revenue mobilization. Blockchain has unique capabilities such as distributed ledgers, security of the systems, immutability of records and transactions and the concept of smart contract underpinned by in-built algorithms
- Comprehensive M&E system with dashboard to track the implementation of the plan

5.2.2. Implementation Arrangements

The Office of the Prime Minister will have the overall responsibility to ensure the NACS 2026-2030 is implemented as planned. The Ministry of Justice and Constitutional Affairs (MoJCA) will be the lead implementing agency and supported by the Independent Anti-Corruption Commission. Other implementing agencies will include:

i. Attorney General's Office (AGs)
ii. Criminal Investigation Department (CID)
iii. Higher Judicial Service Commission (HJSC)
iv. Federal Government of Somalia (FGS)
v. Federal Member States (FMS)
vi. Financial Reporting Centre (FRC)
vii. Office of the Auditor General (OAuG)
viii. Interim National Procurement Board
ix. Ministries, Departments, and Agencies (MDAs)
x. Independent Anti-Corruption Commission (IACC)
xi. Independent oversight institutions

5.3. Coordination Mechanism

The framework will have two coordination levels: a Leadership Level chaired by the Prime Minister through the Office of the Prime Minister (OPM), and a Technical Level chaired by the Permanent Secretary of the Ministry of Justice and Constitutional Affairs (MoJCA). Ministries, Departments, and Agencies (MDAs), Federal Member States, and district-level institutions will remain the implementation arm of the Strategy.

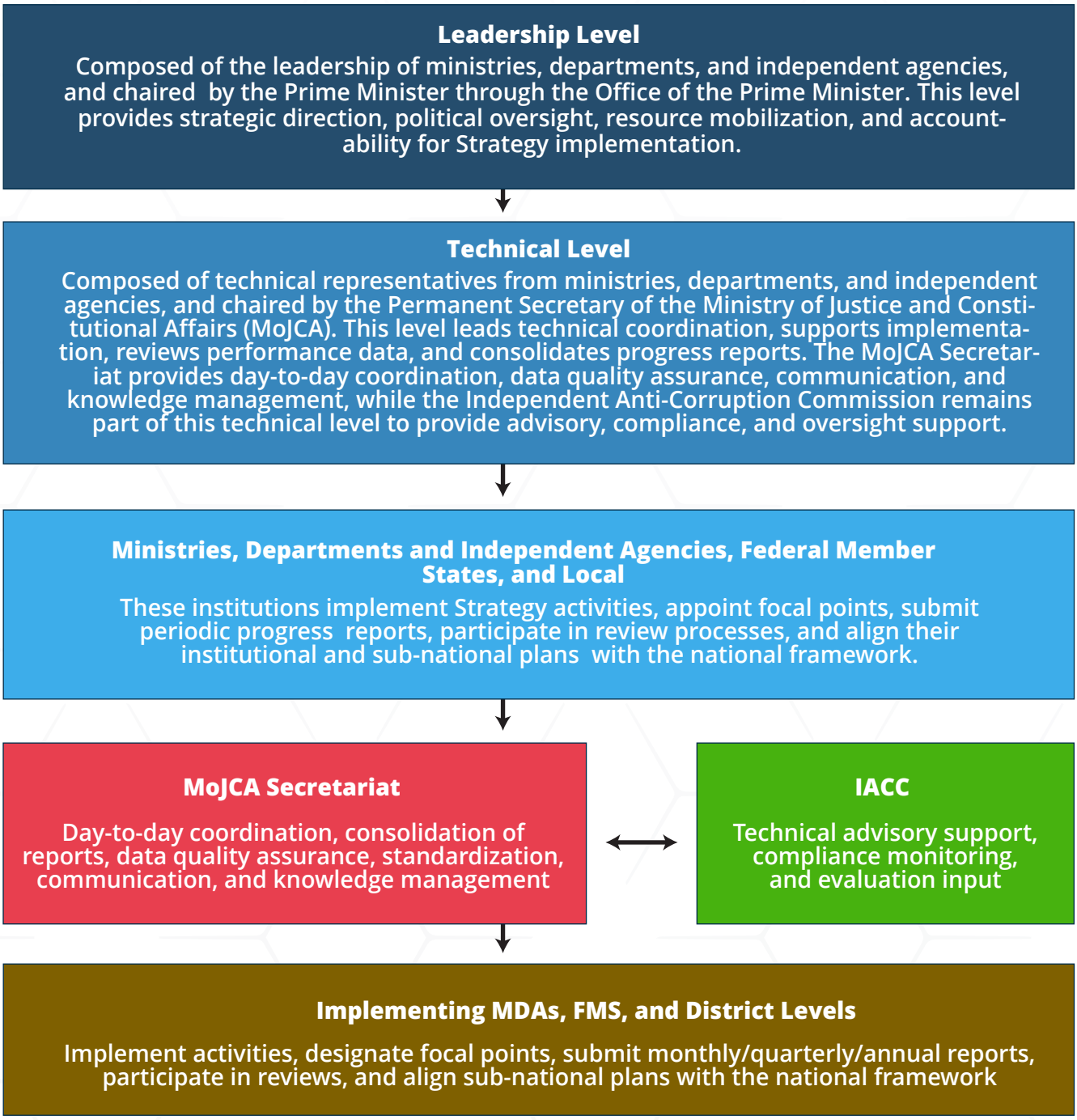


Figure 4: Coordination Framework for Implementation of NACS 2026-2030

Note: The IACC provides technical advisory support to the coordination mechanism and supports compliance monitoring and learning, while MoJCA remains the central secretariat and reporting hub.

5.3.1. Leadership Level

The Leadership Level consists of the leadership of ministries, departments, and independent agencies, and is chaired by the Prime Minister. This level provides strategic direction, political oversight, and accountability for Strategy implementation. It ensures that implementation is aligned with national priorities, that high-level challenges are addressed, and that institutions remain accountable for their assigned responsibilities. The key responsibilities of the Leadership Level include providing overall strategic guidance; reviewing overall implementation progress; guiding policy and institutional reform; resolving high-level inter-ministerial challenges; supporting resource mobilization; promoting political commitment; and ensuring that anti-corruption reforms remain visible and prioritized within national governance and development.

5.3.2. Technical Level

The Technical Level will consist of technical representatives from ministries, departments, and independent agencies, and will be chaired by the Permanent Secretary of the Ministry of Justice and Constitutional Affairs (MoJCA). This level will lead technical coordination, support implementation, review performance data, verify the accuracy of progress data, and consolidate progress reports. It will also identify emerging challenges and propose effective corrective actions to be escalated to the Leadership Level when strategic decisions are required.

The Technical Level will include the MoJCA Secretariat and the Independent Anti-Corruption Commission. The MoJCA Secretariat will provide day-to-day coordination and reporting, while the Anti-Corruption Commission will provide advisory, compliance, and internal oversight support within the same technical framework. This arrangement ensures that the Strategy is managed through a streamlined, integrated, and effective mechanism rather than through multiple overlapping committees.

5.3.3. MoJCA Secretariat

The MoJCA Secretariat will serve as the central coordination and reporting hub within the Technical Level. Its responsibilities will include providing administrative and facilitation support to the Technical Level; carrying out day-to-day coordination of Strategy implementation; receiving, reviewing, and consolidating progress reports from implementing institutions and Federal Member States (FMS); supporting monitoring, evaluation, communication, and knowledge management; organizing consultation meetings and review workshops; and facilitating data quality assurance and the harmonization of reporting processes.

5.3.4. Role of the Independent Anti-Corruption Commission at the Technical Level

Once reconstituted and operationalized, the Independent Anti-Corruption Commission will participate in the Technical Level and provide technical support in advisory, compliance, and oversight functions. Its role will include providing advice on anti-corruption interventions, supporting compliance monitoring and integrity assurance, contributing to evaluation and learning processes, and helping strengthen confidence and technical quality in the implementation of anti-corruption measures.

5.3.5. Implementing MDAs, Federal Member States (FMS) and District Levels

The role of Ministries, Departments and Agencies (MDAs); Federal Member States (FMS); and District Levels is the implementation of the Plan at national and sub-national levels. Specifically, they will implement assigned activities in line with the Plan, prepare and submit monthly, quarterly, and annual progress reports to MoJCA (Secretariat), designate focal points for coordination and reporting, participate in review meetings and provide implementation feedback and ensure alignment of sub-national plans with the national framework.

5.4. Resourcing the Plan

Successful implementation of the plan requires the effective identification, mobilization, and allocation of resources. These resources include financial, human, physical, and technical inputs. The FGS plays a central role in ensuring that the plan is adequately resourced, both through domestic funding and by mobilizing support from development partners. Implementing agencies also bear significant responsibility in this process. They are expected to identify resource needs, actively mobilize support, and advocate to the executive and parliament for sufficient budgetary allocation. Furthermore, they must ensure that allocated funds are efficiently utilized to support and deliver the planned programmes. The projected financial resource requirement for the implementation of the NACS 2026–2030 is estimated at **US$ 11,133.3 thousand (equivalent to approximately US$ 11.133 million)**, as detailed in Table 6 below.

Table 6: Projected financial resource requirements (US $ Thousands)

	Strategic Objective	2026 – 2030 (US$ Thousands)					Total (US$ Thousands)
		2026	2027	2028	2029	2030	
1.	To strengthen legal and policy frameworks	100.0	147.0	145.0	100.0	0.0	492.0
2.	To strengthen Public Sector Governance and Institutional Framework	77.2	445.1	586.8	532.6	701.6	2,343.3
3.	To strengthen Enforcement, Investigation, and Judicial Effectiveness	248.0	307.0	432.0	293.0	234.0	1,437.0
4.	To institutionalize integrity and accountability systems	103.0	3,361.0	580.0	673.0	727.0	5,444.0
5.	To enhance public engagement and political commitment	113.0	226.0	280.0	334.0	387.0	1,340.0
	Total	**641.2**	**4,486.1**	**2,023.8**	**1,932.6**	**2,049.6**	**11,133.3**

Note: Figures are expressed in US$ thousands.

5.5. Monitoring and Evaluation

To ensure effective monitoring and evaluation (M&E) of the NACS 2026-2030, the FGS will build and adopt a results-based Monitoring and Evaluation system that continuously collects and analyses data to assess the extent in which a project, program, or policy is being implemented against expected outcomes. The M&E implementation matrix annexed in the appendices clearly identifies outputs, outcomes, and key indicators to monitor and evaluate during plan implementation period. The outputs and outcomes will be measured using quantitative and qualitative data obtained from primary and secondary sources. The FGS will pursue to automate the monitoring and evaluation function to ensure efficiency and effectiveness.

5.5.1. Monitoring

The monitoring approach for the NACS 2026-2030 will be continuous and results-based, tracking progress against defined indicators and set targets. The reporting mechanisms will include:

i. Monthly and Quarterly Monitoring Reports
ii. Annual Performance Reports

5.5.2. Evaluation

Evaluation of the NACS 2026-2030 will be undertaken to assess relevance, effectiveness, efficiency, impact and sustainability of the planned activities. The following types of evaluation will be undertaken:

a. **Mid-Term Evaluation:** This will be conducted in the mid years (21/2) of the Strategic Plan implementation to assess progress and recommend adjustments for the remaining period.
b. **End-Term Evaluation:** This will be conducted at the end of the Plan period to measure overall achievement of objectives, assess impact created and inform the next plan formulation process.
c. **Thematic Evaluations:** This will focus on specific areas such as legal reforms, institutional performance, or service delivery, to assess the progress being made.

5.6. Reporting and Accountability

The reporting structure for the NACS 2026-2030 is designed to promote accountability, coordination, and timely decision-making across all levels of implementation. Implementing institutions will submit their reports to the Secretariat (MoJCA) for consolidation. MoJCA will submit the reports to TCC while TCC will be submitting the reports to the National Oversight Committee (NOC). NOC will subsequently be submitting the reports to OPM. Annual Reports will be submitted to the relevant government authorities. Accountability mechanisms may involve institutional performance contracts, public disclosure of reports, independent audits and reviews, and parliamentary or oversight body engagements where applicable.

5.7. Data Management and M&E System

Data management is essential to ensure that data collected and used in monitoring and evaluation (M&E) processes is of high quality, reliable, valid, and ethically sound to contribute to evidence-based decision-making and ultimately lead to program improvement. For effective data management the following will be done:

i. Establish a centralized Monitoring and Evaluation (M&E) system;
ii. Assign M&E focal persons in all implementing institutions;
iii. Standardize data collection and reporting tools; and,
iv. Ensure data quality assurance and validation.

5.8. Risk Management

Table 7 presents the foreseen risks and their mitigation measures.

NO.	Key Risks	Mitigation Measures
01.	**Political transitions and instability**	Strengthen political commitment and ownership
02.	**Limited financial resources**	Mobilize and diversify funding sources
03.	**Institutional capacity constraints**	Build institutional and technical capacity
04.	**Security challenges**	Adopt flexible and adaptive implementation approaches
05.	**Misinformation, politicization, or public mistrust undermines anti-corruption reforms**	Proactive public communication, regular publication of progress, factual public reporting, stakeholder engagement, and strong feedback/complaints mechanisms

5.9. Communication and Stakeholder Engagement

To ensure systematic information sharing and inclusive stakeholder engagement that supports performance monitoring, accountability, and evidence-based decision-making, communication and stakeholder engagement will be done through:

i. Dissemination of progress reports to stakeholders;
ii. Public awareness and communication campaigns;
iii. Engagement with civil society, academia, and media; and
iv. Citizen feedback and grievance mechanisms.

Communication and public engagement under the NACS should also take account of the risks posed by misinformation, politicized narratives, and low-trust information environments, which can weaken public understanding of anti-corruption reforms and undermine citizen confidence in institutions.

5.10. Review and Learning Mechanisms

To promote regular performance reviews and institutional learning that support adaptive management and continuous improvement of programme outcomes, review and learning mechanisms will be carried out through:

i. Annual strategic review meetings;
ii. Documentation of lessons learned;
iii. Adaptive management based on evidence and performance data; and
iv. Continuous improvement of implementation strategies.

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APPENDICES

Strategies	Activities	Performance Indicator	Output Targets					Expected Outcomes	Outcome Indicators	Responsibilty	Expected Budget (US$ Thousands)				
			2026	2027	2028	2029	2030				2026	2027	2028	2029	2030
Strategic Objective 1: To strengthen legal and policy frameworks															
Establish a comprehensive, enforceable, and internationally aligned legal and policy framework	Amend existing anti-corruption legislations	Key laws are amended: The Penal Code, the Procedural Code, AML law and the Evidence Act	1	1	1	1	-	Effective and internationally aligned policy and legal framework	Number of laws amended	**MoJCA** Parliament	5	5	5	5	-
	Enact new anti-corruption laws in compliance with international obligations.	Whistleblower Protection Law Anti-Corruption and Economic Crimes Act Mutual Legal Assistance Law / Act (MLA) Corrupt Practices Act Anti-Bribery Act Public Officers' Ethics Act Leadership and Integrity Act Corporate and Private Sector Integrity Act	1	1	1	1	-		Number of laws enacted		5	5	5	5	-
	Domesticate international conventions	Key laws aligned with the UNCAC and AUCPCC	-	1	1	-	-		No. of laws aligned		-	4	4	-	-
		The implementation review of UNCAC finalized	1	-	-	-	-				-	2	-	-	-
		Deposit the accession instrument of AUCPCC	-	1	-	-	-		The ratified instruments deposited						
Strategic objective 2: To strengthen Public Sector Governance and Institutional Framework															
Build credible, functional, and legally mandated institutions	Reconstitute Anti-Corruption Commission	Anti-Corruption Commission reconstituted	1	-	-	-	-	Anti-corruption institutions are operational and effective at national and sub-national levels Effective Investigation of Corruption allegations	Anti-Corruption Commission operational No. of corruption allegations investigated. No. of corruption cases successfully concluded	**MoJCA** MoF	38	-	-	-	-
		Budget and office infrastructure allocated	1	-	-	-	-				7.7	7.7	7.7	7.7	7.7
		Staff of the defunct Anti-Corruption Commission redeployed	1	-	-	-	-				-	-	-	-	-
		No. of new staff recruited and trained	5	10	15	20	30				4.5	9	13.5	18	27
	Establish FMS integrity units	No. of FMS integrity established and operationalised	-	-	3	4	-		Integrity units established at states & districts	**FMS** MoJCA	-	-	77	77	150
		No. of unit staff recruited and trained	-	-	15	20	10				-	-	25	33	17
		No. of units equipped with tools and office space	-	2	3	-	-				-	11.4	17.1	2.9	2.9
	Strengthen functionality, independence, resourcing, structures, mandates and coordination framework in institutions	Structures and mandates of institutions reviewed and strengthened including judiciary, legislature, executive, etc.	-	1	-	-	-		Organizational structures of key institutions clarified % of institutions with clear mandates	**AG's Office** MoJCA All MDAs HJSC MoF National Service Commission	-	154	-	-	-
		Approved organizational charts and reporting lines	1	-	1	-	-			All MDAs	1.5	-	1.5	-	-

		Develop and implement standard operating procedures (SOPs)	-	1	-	-	-			All MDAs						
		Results-based performance management systems developed	-	-	1	-	-			All MDAs						
		Coordination framework among all institutions including FMS and District levels established	1	-	-	-	-			MoJCA All MDAs						
	Establish the Higher Judicial Service Commission	Higher Judicial Service Commission established								**AG's Office** MoJCA						
	Develop legislative framework for and establish the Office of the Ombudsman	Legislative framework developed and office of the Ombudsman established	-	-	1	-	-			**MoJCA**	-	-	70	-	-
Promote transparency, accountability and integrity in institutions	Approve and operationalize the amended civil service law	The amended Civil Service Law enacted and operationalized	-	1	-	-	-	Increased ethics and integrity among public servants Public sector is professional, merit-based, and accountable	% public institutions applying code of conduct % public institutions undertaking integrity compliance audits	Ministry of Labour and Social Affairs	25	-	-	-	-
		% public sector staff signing annual	20	40	60	80	100	HR based on merit and transparency	Promotions based on formal performance evaluation	The National Service Commission					
		% vacancies publicly advertised	20	40	60	80	100	HR based on merit and transparency	Recruitment through competitive process	The National Service Commission					
		% HR-related complaints resolved versus	20	40	60	80	100	HR based on merit and transparency	HR-related complaints received and resolved	The National Service Commission Office of the Ombudsman					
		% ministries/a-gencies implementing Human Resource Management Information System (HRMIS)	20	40	60	80	100	HR based on merit and transparency	Recruitment through digital platforms allowing audit trails	The National Service Commission					
	Strengthen the implementation of Code of Conduct and Discipline in all institutions	No. of institutions implementing the code of conduct and discipline	-	50	80	90	100			The National Service Commission	-	38	62	69	77
	Develop and operationalise an asset declaration regime with verification and sanction procedures in all institutions	Asset declaration regime with verification and sanction procedures developed and	-	-	1	-	-			IACC All MDAs FMS	-	-	38	-	-
		No. of government personnel filed and declared assets	-	-	2000	3000	3000				-	-	-	-	-

	Enhance service transparency	% government agencies publishing information	20	40	60	80	100	Increased accountability of public officials	% increase in number of published audit reports	Office of the Auditor General					
		No. of institutions with citizen service charters that are published and operational	20	30	40	50	60	Enhanced public service transparency	% increase in public sector entities with functional service charters	Office of the Auditor General	60	90	120	180	
		No. of institutions with complaint reporting mechanisms	20	30	40	60		Enhanced public service transparency	% increase in public sector entities with complaints mechanisms	AG IACC	30	45	60	90	
		No. of complaints addressed													
	Conduct annual citizen corruption perception survey and publish findings	No. of annual citizen corruption perception		1	1	1	1	Enhanced transparency and trust among citizens	% improvement in corruption perception	IACC		135	140	145	150
Strategic objective 3: To strengthen Enforcement, Investigation, and Judicial Effectiveness															
Enhance investigation, prosecution, and adjudication of corruption	Strengthen inter-agency coordination	Coordination framework developed	1	-	-	-	-	Improved investigation and prosecution of corruption cases	One framework developed.	MoJCA, IACC AG's Office OAuG	40	-	-	-	-
	Build forensic and investigative capacity	Forensic labs for investigative agencies established and equipped	-	1	1	-	-			IACC CID AG's Office OAuG	153	-	38	-	38
		No. of specialised training on forensic investigations conducted	-	2	2	2	2				-	23	23	23	23
		No. officers trained	-	10	10	10	10				-				
		No. of completed forensic investigation cases	-	30	30	30	20				-	230	230	230	153
	Provide training on corruption and economic crimes to prosecutors and judges.	Improved prosecution of corruption cases	1	1	1	1	1		No. of capacity development training.		30	30	25	30	10
	Harmonize enforcement frameworks	Review and develop enforcement frameworks	1	1	-	-	-		No. of enforcement SoPs, Guidelines and frameworks reviewed and developed		25	24	-	-	-
	Establish specialised anti-corruption courts.	Specialised anti-corruption established	-	-	1	-	-	Achieve timely completion of corruption cases in court.	Average Case Disposal time	Judiciary MoJCA	-	-	77	-	-
		No. of anti-corruption cases concluded	-	-	-										
	Establish and operationalise anonymous whistleblowing platforms	Anonymous whistleblowing platforms established and operationalised	-	-	1	-	-			AG's Office OAuG IACC CID MoJCA	-	-	30	10	10
		No. of allegations reported through anonymous platforms	-	-	50	100	150				-	-	-	-	-

Strategic objective 4: To institutionalize integrity and accountability systems															
Embed ethics, integrity, and accountability	Implement sustained ethics programs	No. of ethics programmes conducted	2	4	6	8	10	Integrity and ethics systems are functional and sustainable	Continuous ethics and integrity	MoJCA Ministry of Religious	19	38	56	75	94
		No. of institutions reached	20	30	40	50	60								
		No. of persons sensitized	40	60	80	100	120								
	Appoint integrity officers in institutions	No. of integrity officers appointed	10	20	30	40	50			MoJCA All MDAs	5	10	15	20	25
Enhance corruption prevention in public and private sectors	Conduct corruption risk assessments	No. of public entities undertaking	-	40	60	80	100	Reduction in vulnerabilities and high-risk areas	% reduction in vulnerabilities and high-risk	IACC All ministries, Agencies and Independent Offices FMSs		40	50	80	80
	Establish corruption prevention committees in public institutions	No. of ministries and agencies with corruption prevention committees	40	60	80	100	100	Improved integrity	% decrease in the number corruption cases	All Ministries, Agencies and Independent Offices	20	30	40	50	50
	End-to-end system integration using blockchain technology[48] in PFM, e-procurement and revenue administration developed and operationalized	No. of ministries and agencies integrated as blockchain nodes	-	5	10	15	25	Transparent and prudent PFM Efficient and transparent procurement processes Efficient and transparent tax	% reduction in inflated project costs % reduction in procure-ment-related complaints % increase in tax to GDP ratio	OPM Ministry of Finance Ministry of Ports and Maritime Transport Office of the Auditor General FMS	-	3000	300	300	300
	Conduct corruption prevention training for the private sector	No. private sector firms trained on corruption prevention	100	150	200	250	300	Improved ethics and integrity compliance	% improvement in corruption perception index	IACC MoJCA	20	30	40	50	60
Enhance monitoring of anti-corruption programmes	Establish M&E focal points in institutions	No. of institutions establishing M&E	20	30	40	50	60			MoJCA MoPIED All MDAs	15	23	31	38	46
		No. of officers appointed as M&E focal persons	20	30	40	50	60				-	-	-	-	-
		No. of staff trained on monitoring and evaluation	20	30	40	50	60				24	36	48	60	72
	Develop a Comprehensive M&E system with dashboard	Centralized M&E system with dashboard developed	-	-	1	-	-				-	154	-	-	-

Link Sources:

[41] in addition to the initial functions to be connected as Blockchain nodes in year [2], more will be integrated in year [3] and beyond. These include government conces-sions, public private partnerships (PPPs), and public land management system".

Strategic objective 5: To enhance public engagement and political commitment															
Strengthen citizen participation and political support	Implement public awareness campaigns	No. of Media campaigns conducted	4	4	4	4	4	Improved ethics and integrity compliance Enhanced citizen knowledge about corruption	% improvement in corruption perception index	IACC National Integrity Co-ordination Unit (NICU) MoJCA Ministry of Religious Affairs and Endowment					
		No. of community town halls conducted	8	16	24	32	40			MoJCA IACC. Ministry of Religious Affairs and Endowment	18	36	55	74	92
		No. of social media engagement conducted	4	8	8	8	8				10	20	20	20	20
		No. of public panels (organised discussions) conducted	2	4	4	4	4			MoJCA IACC Ministry of Religious Affairs and Endowment	25	50	50	50	50
	Engage civil society and academia	No. of partnerships with Civil Society	10	20	30	40	50	Improved ethics and integrity compliance Enhanced citizen knowledge about corruption	% improvement in corruption perception index	IACC National Integrity Co-ordination Unit (NICU)	25	50	75	100	125
		No. of partnerships with universities	5	10	15	20	25	Improved ethics and integrity compliance Enhanced citizen knowledge about corruption	No. collaborative research and training on corruption	IACC NICU	10	20	30	40	50
	Strengthen political commitment	No. of high-level advocacy forums conducted on anti-corruption	2	2	2	2	2	Anti-corruption as a national priority	Adoption of national anti-corrup-tion strategy Enactment of anti-corrup-tion laws Anti-corrup-tion agenda embedded as a priority in national planning Re-establish-ment of the Independent Anti-corrup-tion Commission (ACC)	Ministry of Justice and Constitutional Affairs Ministry of Planning, Investment and Economic Development Federal Member States IACC I NICU	25	50	50	50	50
		Amount of annual budget allocations for						Political commitment	Anti-corruption budgetary allocation	OPM Parliament Ministry of Finance	641.2	4.4861	2,023.8	1,932.6	2,049.6



END



Waxaa diyaariyey: Wasaaradda Cadaaladda & Arrimaha Dastuurka 2026