



**THE INSTITUTIONAL CORRUPTION RISK ASSESSMENT REPORT OF THE
LIBERIA IMMIGRATION SERVICE (LIS)**

FOR THE PERIOD 2018/2019, 2019/2020 and 2020/2021

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Liberia Anti-Corruption Commission
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EXECUTIVE SUMMARY

The Liberia Immigration Service (LIS) was established by an act to repeal section 22.11, sub-chapter A, chapter 22 of the executive law, title 12 of the Liberian code of laws revised and section 2.2 of the title 4 of the alien and naturalization law of Liberia as amended, establishing the Bureau of immigration and Naturalization within the Ministry of Justice and establishing in lieu thereto the Liberia Immigration Service (LIS) Act of 2015.

The country's Immigration Service was established to among other things enforce all laws and regulations relating to the immigration, citizen, naturalization and other related matters. Cardinal among the functions of the Immigration Service is to particularly guard and protect the borders and boundaries of Liberia against illegal entry of persons in the country. The Agency is to also manage the country's land, air, sea and other border posts of Liberia. This critical government agency is also obligated to admit and exit all travelers to and from Liberia.

By the chapter and laws establishing the Immigration Service, the agency is to issue visa on arrival and regulate the activities and movements of non-Liberians and issue resident permit to all those having the desire to live in Liberia.

The Institutional Corruption Risk Assessment (ICRA) is a preventive tool use by us anti-graft institutions the world over to test institutions vulnerabilities to corruption. A particular system is placed under test to see whether sufficient safeguards are in place to prevent theft of public resources and the abuse that follows.

In the particular case with the Liberia Immigration Service, the LACC placed a keen attention on few revenue generating sections/units of the LIS. The Risk Assessment Team attempted to evaluate the control mechanism at the head office of the Immigration Service, major ports of entry including the Roberts International Airport, the Freeport of Monrovia and key border entry points. The Risk Assessors also review the operational effectiveness of the country's visa-on-arrival regime, resident permit system, issuance of border passes and the technical readiness of the Immigration system of the country to prevent trafficking in persons at the borders. The LACC also did a quick and brief review of the administrative issues in the Immigration system which could translate into fraud and administrative overlaps which is a key element that leads to corruption.

During the period of the risk assessment of the Liberia Immigration Service, the LACC observed that the Immigration Service has in place little controls to prevent corruption in its visa on arrival program, re-entry permit and the resident permit. There was no documents presented to anti-corruption risk assessors that funds generated from the issuance of visa on arrival and different forms of permit actually find their way in government revenue. The Visa on arrival process is also highly prone to fraud. Applicants for visa on arrival are supposed to send monies in advance to family members who will pay to anyone at the Immigration Service for Visa on arrival processing. There is no clear-cut amount an individual is supposed to pay though individuals arriving pay around two hundred fifty to three hundred United States Dollars(US\$250-US\$300.00).

The administration of the resident permit regime is also technically and operationally chaotic as

any immigration officer can process an individual Resident Permit as seen by the Anti-corruption risk assessment. This is a general recipe for fraud as most immigration officers are basically in the streets looking for clients.

The Liberia Immigration Service was unable to provide a clear data of the number of non-Liberians in the country. The information on how many non-Liberians will inform the government of Liberia on projected revenue to be generated from resident permit issuance.

There is also no system in place at all our borders to prevent trafficking in persons. Children from Liberia, Guinea, Sierra Leone and Ivory Coast transverse our borders on a daily basis for education on either side. There is no database of the number of children that leave from Liberia every day to school in Guinea, Sierra Leone and Ivory coast and vice versa. Corrupt individuals can manipulate the situation and take bribe to traffic children if proper documentation is not in place.

The Liberia Anti-Corruption Commission is proposing several recommendations to the Liberia Immigration Service to correct the huge deficiencies noted. Key among them is that all payments must be done to the Liberia Revenue Authority. VISA-ON-ARRIVAL must be issued on the day an individual arrives and must be paid to a legitimate revenue agent at the point of arrival. Henceforth, all aliens or non-Liberians having resident permit without a flag receipt from the Liberia Revenue Authority will be deemed as in the full practice of corruption.

INTRODUCTION

The institutional corruption risk assessment on the Liberia Immigration Service (LIS)) was performed for the purposes of identifying threats and weaknesses in the system and control processes and review of the operational effectiveness of the organization. The LACC's decision to assess the operational effectiveness of the Liberia Immigration Service is consistent with Part V, section 5.2K of the Liberia Anti-Corruption Commission (LACC) Act of 2008 which states " to conduct research, survey and related studies both (1) the dimension, manifestations, and causes and effects of corruption; and (2) the practices, procedures and systems of governance and management that need to be adopted and promoted to combat, eradicate and prevent acts of corruption".

The LACC's action to conduct risk assessment of the Liberia Immigration Service is also consistent with part V(g and h) of the Commission's act which among other things authorizes the Commission to advise and assist public institutions relative to designing and implementing procedures and systems that are appropriate to reducing the likelihood of the occurrence of corruption.

The Liberia Immigration Service is the only institution in the country legally charged with the responsibility of ensuring that there are proper documentation of persons entering and departing the country's land, air, and sea borders. This is an important function for the overall security and economic well-being of the country.

In recent times there have been several concerns in the public especially individuals entering, leaving and non-Liberians residing in the territorial confines of Liberia about issues in the

acquisition of the country's immigration papers. The risk assessment also sought to evaluate the integrity of the system already in place at the LIS that could automatically reject the acts of corruption and expose perpetrators.

The risk assessment reviewed several areas in the operations of the country's immigration architecture. This include a review of the Visa-on-arrival regime, resident permit, border passes used by daily commuters are various ports of entry especially our land borders. There were also reviews of the operational readiness of the immigration services to deal corruption related to trafficking in persons at the borders.

The LACC has got extensive understanding of the country's immigration system while it conducted the risk assessment. There are visible challenges in the system that could lead or is already leading to corruption. There appears to be little or no control in place to deal with corruption which makes the Immigration Service an extremely risky environment for corruption.

The Risk Assessment Team has also raised several recommendations which authorities at the Immigration Office must implement to reduce the risk of corruption at the institution. Key among these recommendations is the ALL payments should only be made to a legitimate government revenue outlet and that any individual (applicants for visa on arrival, resident permit and issuance of border passes not found with a legitimate government of Liberia flag receipt will be deemed as in the practice of corruption and will be prosecuted under the laws of Liberia.

THE OBJECTIVE AND SCOPE OF THE INSTITUTIONAL CORRUPTION RISK ASSESSMENT

To assess whether Liberia Immigration Service (LIS) has an effective institutional framework for preventing corruption at all levels of management whilst managing the budgetary allotments from the government of Liberia. The period of the institutional corruption risk assessment covers fiscal year 2018/2019/ 2019/2020 and 2020/2021.

METHOD OF DATA COLLECTION/RISK ASSESSMENT APPROACH

The approach for the institutional corruption risk assessment covered the Liberia Immigration Service (LIS) interventions across the territorial sovereignty of our nation. The corruption risk assessment took into consideration stakeholder engagement with the senior Management team of the LIS head office and senior officers in five counties bordering Liberia with other countries in the sub region.

1 DETAILED FINDINGS AND RECOMMENDATIONS

1.1 Visa On Arrival

- 1.1.1.1 During the Risk Assessment of the Liberia Immigration Service, it was observed that the VISA ON ARRIVAL process is entirely cumbersome and at the discretion of the Commissioner-General. Though the Immigration Service has an explanation on its website about VISA ON ARRIVAL, this appears not to be practised as visa on arrival is not given at ports of entry. Individuals have to pay in advance through family members or friends to the Immigration Office before arriving in the country which makes the operation different from the Internationally stated policy on VISA ON ARRIVAL.
- 1.1.1.2 There is no clear policy on how to get VISA ON ARRIVAL and a specific cost for every visa issued before arrival. Although official documents from the Immigration office state specific cost for visas on arrival, however, friends and families who process VISA ON ARRIVAL at the LIS office say they pay between one hundred and seventy-five dollars (US\$175.00) to two hundred and fifty united states dollars (US\$250.00) to process their document where in most instances there is no receipt given for these transactions.
- 1.1.1.3 There is no bank facility or Liberia Revenue Authority outlet at the country's ports of entry to receive payment from Visa on arrival. Payments are made to immigration officers. Additionally, the risk assessment team found it difficult to categorize the exercise as visa on arrival as visa are issued before an individual arrives. There would be no uniformity in the application procedures in the absence of a written policy on visas on arrival. In most instances government has been deprived of the needed revenue over the years because investors or business mogul in the world wanting to visit do not have families or friends in Liberia.

1.2 Resident Permit Renewal and Adjustments

- 1.2.1.1 During our interactions with senior officers of the LIS head office, it was observed that there is no database of aliens residing in the country. Resident Permit are issued to aliens blindly and at the discretion of the Immigration Officer handling a particular case. There is no information on when an individual arrived in the country, area of residents and personal history of the individual in other territories or countries.
- 1.2.1.2 Although official documents from the Immigration Office state specific cost for Resident Permit and Renewal (Non-African-US\$350.00 and Africans-US\$300.00), however, Aliens who process their permits at the LIS office say they pay between five hundred united states dollars (US\$500.00) to One Thousand United States (US\$1,000) to process their document where in most instances there is no receipt given for these transactions. There is inherent danger associated with the lack of a clear documentation for non-Liberians living in the country. There could be serious gaps in the revenue that reach the government. Extreme discretionary power to immigration officers can be dangerous for the operational effectiveness of the immigration service.

1.3 Re-Entry

1.3.1.1 Under the Liberia Immigration Service Re-entry program, there is again an extreme discretion left with the Commissioner-General and his deputies to the re-entry documents. There is also no clear-cut payment procedure for the re-entry process. Although the Immigration Service stipulated payment is One hundred and fifty United States Dollars (US\$150.00), there are instances where immigration officers use discretion without given applicants official receipts for amounts paid. During the interview process, Immigration officers did not present documents to the team showing that payments are done in keeping with established government regulations including the Public Financial Management laws in the payment of lawful revenue. There were also no documents showing or indicating that online platforms have been used to pay fees for re-entry by applicants.

1.4 Protective and Internal Security

1.4.1.1 The team responsible to do background check on aliens and people of other nationals have no database on where aliens are or whether their documents are expired or need renewal. During the risk assessment, it was observed that agents from LIS used their discretion and move randomly hoping to see someone who has problem with their documentations in the streets and sometimes at hotels. This can be highly dangerous and create fears in the minds of foreigners and possibly investors. This process is also highly discretionary and can be largely selective. In the absence of a well-defined data source that locate aliens, tailing aliens in the streets or at hotels could cause panic in the minds of visitors, especially first-time visitors and possibly investors.

2 IMMIGRATION DETAILS OPERATIONS

2.1 Border Crosser Pass

2.1.1.1 The border crosser passes are used for regular commuters between Liberia and its neighboring countries. Users are to pay a specific amount when leaving and also upon return. However, the Risk Assessment Team noticed several discrepancies in the issuance of the Border Crosser Passes. In many instances, the passes issued are not uniformed and it is not issued at some border points. Immigration Officers also produce no records on accounting for the fundings they received from border crosser passes, though users pay between LD 150-500LD per pass. There are also no security features associated with these border passes that are issued to people commuting between the borders thereby making our country vulnerable.

2.2 Immigration Officers at RIA Detail

2.2.1.1 The operational procedures at the Roberts International Airport (RIA) for Immigration officers are porous and extremely difficult. There are no standing operational procedures (SOP) of what role the Immigration officers are supposed to play during arrival and departure of passengers. In most instances passengers speak of the attitude of Immigration officers being overly generous by trying to provide services to passengers that are not needed. There are tendencies to diminish the professional standings of the Immigration officers.

2.3 Anti-Human Trafficking

2.3.1.1 During the risk assessment process, it was observed that there is a high potential for trafficking in persons especially with children. Children from Guinea, Liberia, Sierra Leone move across the borders of the three countries for schooling daily. Immigration Officers at the borders with the other three countries provided no information or record on the number of students from Liberia that crosses into Guinea and Sierra Leone daily for schooling and vice versa. With Human trafficking at its pick around the world, children from Liberia crossing the borders for education go unaccompanied and there is no responsibility shown by Immigration Officers to ensure the safety of these children. There is also a potential for collusion for the trafficking of children especially with the three sisterly countries. Many families without social and legal protection are the most at risk. Hence, there is no control in place to mitigate the risk associated with the movement of these children.

2.4 Assets, Fleet and Logistics Management

2.4.1.1 During the risk assessment, the Liberia Immigration Service presented no policy on its fleet management. There is also no information or data on the total number of assets specifically vehicles in the fleet of the Immigration Service. There were instances where some assets assigned to the Immigration Service have not been properly coded. There is a potential of high-level collusion and in most instances where individuals can own government assets without proper records on their conditions and locations.

2.5 No Coordination Between Human Resource Department and The Recruitment and Vetting Committee

2.5.1.1 Recruitment of personnel at the Liberia Immigration Service is not the responsibility of the Human Resource Department. The function is assigned to a committee in the immigration service. During the Risk Assessment, it was observed that there is no coordination between the Human Resources Department and the ad-hoc Recruitment and Vetting committee. There are also no standing operations procedures between the two sides on their different roles and responsibilities.

2.6 Recommendations

2.6.1.1 The Liberia Anti-Corruption Commission Risk Assessment Team has made the following recommendations;

2.6.1.2 The Liberia Immigration Service and its officers should refrain from coming in contact with payments for Visa on arrival. All payments for visa on arrival should be handled directly by the Liberia Revenue Authority where applicants will receive flag receipts that are stamped in keeping with government financial regulations. The Liberia Revenue Authority should work with the Liberia Immigration Service and different banks in the country to create outlets at the ports of entry for the issuance of visa on arrival. Immigration Officers should issue Visa on arrival only based on genuine payment receipts from the applicant only upon arrival. No payment should be made in advance through family members or an officer at the LIS head office or detail except through a legitimate online platform that generate

- government revenue receipts.
- 2.6.1.3 Agreed upon Visa on arrival fees should be published in newspapers, printed and placed at all major ports of entry and distributed at all of Liberia's missions and consulates abroad and place on the website of relevant organizations including the Liberia Immigration Service and Liberia Revenue Authority. There should be no confusion on the actual amount an applicant should pay to reside in Liberia
- 2.6.1.4 No Immigration Officer should help aliens or other non-nationals process their resident permits. Resident permits should be issued to applicants by the Liberia Immigration Service only upon the presentation of a genuine payment receipt. These payments must be done directly into government revenue with genuine flag receipts. The Liberia Immigration Service should create a clear database on the number of aliens in the country, when they entered the country and their current residence. No alien or non-Liberian should ever pay resident payment fees to an Immigration officer for processing. Alien in Liberia without genuine government of Liberia flag receipt for their residency in the country will be considered as in the full practice of corruption and will be subject to criminal prosecution. The Liberia Revenue Authority should work with the Liberia Immigration Service to create payment Apps and collaborate with banks for aliens and non-residents to easily pay their resident permit fees.
- 2.6.1.5 Agreed upon resident permit fees should be published in newspapers, printed and placed at all major ports of entry and distributed in communities where there are high concentration of aliens. There should be no confusion on the actual amount an alien should pay to reside in Liberia
- 2.6.1.6 All foreign nationals trying to make re-entry into Liberia must use the Liberia Revenue Authority Online platform for the payment fees associated with re-entry. This is after the applicant has satisfied all the requirements for re-entry into Liberia as stipulated by the Liberia Immigration Service. Re-entry candidates must present their generated and verified online payment receipt upon arrival at the ports of entry. The Liberia Revenue Authority and the Liberia Immigration Service should work to reduce stress associated with paying legitimate government fees.
- 2.6.1.7 Agreed upon re-entry fees should be published in newspapers, printed and placed at all major ports of entry and distributed to foreign missions and Liberian consulates around the world. There should be no confusion on the actual amount a re-entry applicant pays to re-enter Liberia.
- 2.6.1.8 The Protective and Internal Security architecture at the Liberia Immigration Service is a good effort but in the absence of a clear database on the residency of aliens and non-Liberians, the process can be chaotic and open to discretionary powers. The Risk Assessment Team recommends that the proper scrutiny be first conducted at Liberia's ports of entry and appropriate documentations are done for those entering the country. Additional security mechanisms should only be conducted by the Protective and Internal Security system for those who will use illegal ports of entry or those who intentional by-

pass established procedures.

- 2.6.1.9 The frequency of movement among Liberians at Liberia's land borders are extremely high. The lack of proper documentations and accounting systems for the issuance of Border Passes and the associated fees collected is troubling. The Liberia Revenue Authority should be the only legal authority to collect fees from the commuters moving through our borders. The payment system should be easy and friendly to local people considering all the factors in the local environment. The high penetration of Mobile Money system across the country could be an area of study for the Liberia Revenue Authority for the payment of border passes.
- 2.6.1.10 No Immigration Officer should receive fees for border passes. The Liberia Revenue Authority should develop strategies to ensure that fees pay are for extended period of time.
- 2.6.1.11 Agreed upon border pass fees should be published at ports of entry and placed in simple and readable language consistent with the local conditions of people using the borders. There should be no confusion on the actual amount one should pay as border pass fees.
- 2.6.1.12 The Liberia Immigration Service should create a log for all children and school going kids leaving and entering Liberia daily. These logs will track number of children that leave or enter Liberia daily for school, play or farming. The leadership of the Liberia Immigration Service should ensure that Liberian, Guinean, Sierra Leonean and Ivorian Children are accounted for daily as they transverse our borders for school, farming, and play. The Liberia Immigration Service should conduct additional training for staff at the borders on issues of trafficking in persons and its associated dangers including its link to corruption.
- 2.6.1.13 The Liberia Anti-Corruption Commission recommends that there should be clear operational procedures among all departments in the Liberia Immigration Service. The removal of the recruitment activities from the function of the Human Resource Department is in contravention of the Civil Service Agency regulations except there are established agreements between the CSA and the Liberia Immigration Service. The LIS should also develop a policy on fleet management in the entity.

2.7 Conclusions

- 2.7.1.1 Unequivocally, LIS does not have visible and adequate anti-corruption measures and policies in place to address issues of vulnerabilities and opportunities for corruption occurring in all the departments, sections or units. Every level of operation within LIS is plagued with either high, medium or low of corruption threat. Seemingly, Protective and Internal Security, Inspectorate, Alien Registration, Resident Permit and Adjustment, Re-entry, Renewals and Visa on arrival of the operations and naturalization departments respectively are highly vulnerable to corruption. In addition, Assets, Fleet and Logistics Management, Recruitment and Vetting Sections under the department of administration are associated with high corruption risk. However, different corruption risk mitigation measures, including Mitigation Plan would engender the desired paradigm shift and compliance for the promotion of transparency and accountability in every sphere of LIS operations. In addition, these measures will position LIS to embrace transparency and

accountability, rule of law and good governance and boost its revenue generating capacity.

APPENDIX

APPENDIX :1 DEAPRTMENTS AND SECTIONS IN LIS

| Department | Section |
|----------------|--|
| Administration | <ul style="list-style-type: none"> ▪ Human Resources ▪ Finance ▪ Legal Affairs ▪ Training and Manpower Development ▪ Planning and Research ▪ Internal Audit ▪ Procurement ▪ Assets, Fleet and Logistics Management ▪ Communication and Public Affairs ▪ Information and Communication Technology and Records management ▪ Recruitment and Vetting |
| Operations | <ul style="list-style-type: none"> ▪ Protective and Internal Security ▪ Migration ▪ Immigration Support Unit ▪ Anti-Human Trafficking ▪ Inspectorate |
| Naturalization | <ul style="list-style-type: none"> ▪ Registration ▪ Resident Permit and Adjustment ▪ Re-entry ▪ Renewals ▪ Visa on arrival |

APPENDIX: 2 PARTICIPANTS OR RESPONDENTS

| No. | Name | Role | Department/Division |
|-----|----------------------|----------------------------------|---------------------|
| | R. Yealay Bieh | Planning and Research | |
| | Ida S. Tiahaja | Renewal | |
| | Prince Kollie | Re-entry | |
| | Joseph S. Harmon | Professional Standard | |
| | Everson Giemeyan | Fleet Management | |
| | Patrick L. Dolo | Protective and Internal Security | |
| | Vanmuyah(Deputy HR) | Human Resource | |
| | George Suome | Training & Manpower Development | |
| | Josiah S. M. Gbusseh | Procurement | |
| | Broderick T. Nenneh | Finance | |
| | Samuel Y. Mulbah | Logistics | |
| | Stanley Perry | Visa on Arrival | |
| | Alpha J.M. Boyee Saw | Resident Permit | |

| No. | Name | Role | Department/Division |
|--|------------------------|---------------------------------------|---------------------|
| County-Level Representation/Ports of Entry | | | |
| Grand Cape Mount County | | | |
| 1 | Saxon Tamgbo | Bo-Water, Grand Cape Mount County | |
| 2 | E. Folley Massaley | Robertsports, Grand Cape Mount County | |
| 3 | Office David S. Kollie | Robertsports, Grand Cape Mount County | |
| Nimba County | | | |
| 1 | Yea Dolopay | County Commander | |
| 2 | George Mistonpeamie | Yekapa Border | |
| 3 | Jenkins Gaye | Loguatuo Border | |
| 4 | Edward Dacoseh | Ganta Border | |
| 5 | Robert Gibson | Ganta Border | |
| Grand Gedeh County | | | |
| 1 | Andy Russ Gborley | County Commander | |
| 2 | | | |
| | | | |
| | | | |
| Maryland County | | | |
| 1 | Victor Allison | | |
| 2 | Thomas G. Smith | Deputy County Commander | |
| 3 | Willie Gbesi | | |

APPENDIX 3: Based on CRA, the identified corruption risk summary is provided below

Table 1: Corruption Risk in Liberia Immigration Service (LIS)

| A | . The Administration Department of LIS | H | M | L |
|---|---|---|-----|---|
| | Human Resources Section | | ✓ x | |
| | Finance Section | | x | |
| | Legal Affairs Section | | | x |
| | Training and Manpower Development Section | | x | |
| | Planning and Research Section | | | x |
| | Internal Audit Section | | x | |
| | Procurement Section | x | | |
| | Assets, Fleet and Logistics Management Section | x | | |
| | Communication and Public Affairs Section | | | x |
| | Information and Communication Technology and Records Management Section | | | x |
| | . Recruitment and Vetting Section | x | | |
| B | The Operations Department | H | M | L |
| | Protective and Internal Security | x | | |
| | Migration | | x | |
| | Immigration Support Unit | x | | |
| | Anti-Human Trafficking | | x | |

| | | | | |
|----------|--------------------------------|----------|----------|----------|
| | Inspectorate | x | | |
| C | Naturalization Department | H | M | L |
| | . Registration | x | | |
| | Resident Permit and Adjustment | x | | |
| | . Re-entry | x | | |
| | Renewals | x | | |
| | Visa on arrival | x | | |

APPENDIX 4: Corruption Risks Based on Time

| Corruption Risks | Immediate/ Short Term | Medium Term | Long Term |
|---|--------------------------|----------------|--------------|
| Corruption risks related to the overall administrative practices and functions of LIS | x | x | x |
| Corruption risks related to the Operation Department of LIS | x | x | |
| Corruption risks related to the Naturalization Department | x | | |

APPENDIX 5: Main Corruption Risks Summary

| Principal actors | Risk area | Corruption risks |
|---------------------------|---|---|
| Naturalization Department | Registration Resident Permit and Adjustment . Re-entry Renewals Visa on arrival | <ul style="list-style-type: none"> ○ Discretionary rules and regulations. ○ Discretionary policy implementation and enforcement in issuance of permits, and visa projects, etc. to friends and favorable people. ○ Possibility of bribery, influence peddling, conflict of interest, etc ○ Risks associated with weak institutional and legal setting, and reporting practices especially in sectors like Visa on arrival, resident permit and adjustment, renewal etc. ○ Weak formulation of anti-corruption measures. ○ Weak institutional reform and mechanisms ○ Interpretation of law and regulations in favor of party of interest ○ Possibility of avoiding compliance with regulations. |
| The Operations Department | Protective and Internal Security, | ○ Discretionary |

| Principal actors | Risk area | Corruption risks |
|-------------------------------|---|--|
| | Immigration Support Unit and Inspectorate | management and administration. <ul style="list-style-type: none"> ○ Discretionary rules and regulations. ○ Possibility of bribery, influence peddling, conflict of interest, etc. ○ Limited checks and balances. ○ Possibility of avoiding compliance with regulations. ○ Possibility of harassment ○ Discretionary policy implementation and enforcement in awarding contracts, permits, concessions, projects, etc. to friends and favorable people. ○ Chances of submission of false reporting |
| The Administration Department | Procurement Section, Recruitment and Vetting Section and Assets, Fleet and Logistics Management Section | <ul style="list-style-type: none"> ○ Discretionary rules and regulations. ○ Possibility of bribery, influence peddling, conflict of interest, etc. |