

# Anti-Corruption Commission of Sierra Leone

## Capacity Development and Strategy

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## Executive Summary

The Anti-Corruption Commission (ACC) of Sierra Leone has progressed significantly in the 10 years since its creation in 2000. The passage of the 2008 Anti-Corruption Act expanded its powers and mandate and provided greater clarity to its mission. The Commission has now registered significant achievements including the successful prosecution of Ministers of the government for corruption offenses. It is also decentralizing, in following with the broader government, in a slow but orderly fashion. This decentralization, however, requires additional resources that are in short supply.

In fact, the ACC faces significant resource constraints and capacity limitations that are hampering its ability to achieve its goals. Specifically, the ACC is suffering from a severe lack of physical space. It is currently in rented property in downtown Freetown, which lacks continuous electricity, adequate security, and sufficient space. Hiring has been halted due to a complete lack of space for housing staff. Staff of the ACC also needs additional training in investigations, public outreach, asset declarations, and prevention. The ACC is in need of enhanced filing and automation capabilities. This is most clearly seen in the Asset Disclosure system, which currently suffers from logistical and organizational challenges. Even old annual reports cannot be located. The ACC needs greater server space and staff needs additional training in computer systems as hardware and software capacity is increased.

The ACC currently places a major emphasis on the investigation and prosecution of individuals, particularly high ranking officials. While the ACC has achieved notable successes here, this emphasis appears to be coming at the cost of systematically pursuing petty corruption in service delivery sectors where the population sees corruption on a daily basis, particularly the police, teachers, and health sector.

There is comparatively little progress in pursuing prevention, although the Systems and Processes Review department is designed for this and works admirably. Although it audits government agencies and provides recommendations for improved processes, it seems that it could use additional resources and training to aggressively examine problematic processes and provide optimal policy changes.

The ACC places a major emphasis on education and public outreach, with public outreach officers serving in every district of the country. However, the agency needs to increase public awareness of its operations and its exact role and demonstrate how it is being responsive to citizens.

In sum, the ACC is a work in progress that has achieved significant successes, but which also needs to increase its capacity to handle and implement its mandate. With additional training, expanded physical space, and a honed strategy, it will continue to build upon the solid foundation it has built for itself.

## Introduction and Background

The Anti-Corruption Commission (ACC) of Sierra Leone was created with the passage of the Anti-Corruption Act of 2000 and began operations on January 1, 2001. Established primarily to investigate possible instances of corruption and to help prevent corruption, it has evolved to firmly embrace the three pronged approach to fighting corruption pioneered by Hong Kong's Independent Commission Against Corruption which encompasses law enforcement, prevention, and education. Although the Commission slowly increased its capabilities during the first few years of its existence, the pace of reform has increased drastically with the adoption of the 2008 Anti-Corruption Act which replaced the 2000 law that established the ACC.

The Commission was created at a time of instability in the country and at a time when corruption was believed to be systemic and crippling. This corruption was widely seen to be a major cause of the civil war and therefore was seen as a major issue to be addressed during the peace process and the development of the new government. International support was vital during this time and was helped by strong Presidential support. Britain's Department for International Development has been a key partner of the Commission and has played an important role in training the ACC's staff and shaping its priorities. From the beginning, the focus of the Commission has been geared toward the investigation of high-profile corruption cases.

However, the Commission had to rely on the Attorney General to prosecute the cases the ACC had investigated. The 2008 law changed this by expanding the ACC's powers and mandate, and provided greater clarity about its mission while providing the Commission with the power to prosecute its own cases. This change, of allowing the Commission to prosecute cases, eliminated one of the major criticisms of the Commission: that its independence was a mirage due to the fact that the actual prosecution of cases was left to an agency of the government.

In fact, conditions for the ACC deteriorated in 2005 when its Commissioner was removed at a time when there was a growing perception that the Attorney General was unwilling to prosecute corruption cases of high profile individuals referred to him by the ACC. This confluence of events contributed to a sense that the ACC was not independent or capable of combating corruption effectively.

Although the Commission had seen its cases successfully prosecuted prior to 2008, the Commission has now registered significant achievements on its own including the prosecution and conviction of Ministers of the government for corruption offenses. The emphasis of the ACC remains on the prosecution of high profile cases, though it is also working to expand its preventive and educational efforts as well.

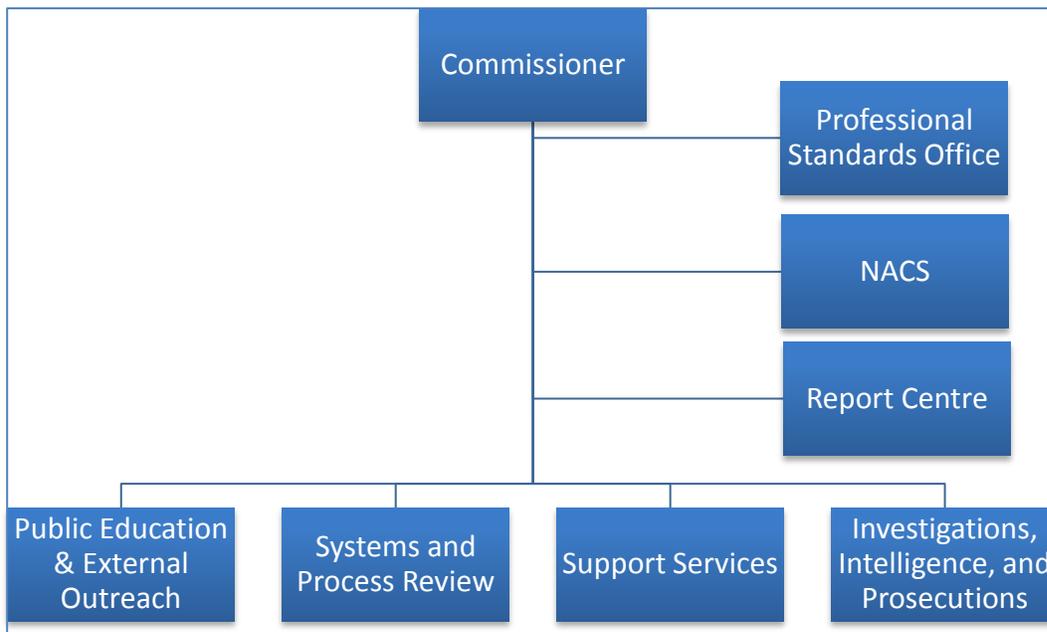
The Commission is also decentralizing its activities, in following with the broader government, in a slow but orderly fashion. It has created 12 district offices across the country. These offices are primarily focused on public outreach and building community support, but a couple of the larger offices now handle investigations and closely assist in prosecutions of individuals in their regions. The Commission's increasing presence in the districts may help broaden its reach and support from the public.

## Organization and Structure of the ACC

The ACC is headed by a Commissioner who oversees all operations of the Commission. The ACC maintains a large presence in Freetown, where its headquarters is located. However, the Commission has recently begun a process of decentralization by establishing district and regional offices across the country. Currently, there are 12 of these offices, though only two have physical office space (the rest are represented by staff that convenes meetings with the public as part of the Public Education and Outreach Department).

The ACC is comprised of four departments and four units within the office of the Commissioner. The four departments of the Commission are the Public Education and Outreach Department, Systems and Processes Review Department, Support Services Department, and the Investigations, Intelligence, and Prosecutions Department. Within the Office of the Commissioner are additional units that include the National Anti-Corruption Strategy, Professional Standards Office, the Report Centre, and the Internal Auditor.

Figure 1. Organizational Chart of the ACC



## Departments and Departmental Performance

### Commissioner's Office

The Commissioner's Office encompasses the Commissioner and the Deputy Commissioner. These two are responsible for setting the strategic objectives and standards of the Commission. Under the Commissioner's direction is the National Anti-Corruption Strategy (NACS) office, which helps the Commissioner coordinate the implementation of the NACS and which also helps draft a new NACS periodically.

The Commissioner's Office also has a Professional Standards Office that helps the Commissioner establish and enhance clear ethical standards for the staff of the ACC. Importantly, this office is also responsible for the administration of the Asset Declaration system of the government, including the distribution, collection, and analysis of these declarations.

### *Asset Declaration System*

The Asset Declaration system was created by the 2008 Anti-Corruption Act and requires all public officials to declare their assets annually (totalling approximately 50,000, though numbers are quite uncertain at this time). The Office is now in its third year of operating this system. All declarations are confidential and not publicly available. Currently, due to a lack of storage capacity, the Asset Declaration office is incapable of organizing declarations so that they can easily be identified and examined. They are stored in piles on the floor of various offices thereby making it almost impossible to locate, let alone analyze, a specific individual's declaration. As such, the first few years of the asset declaration system have been marked primarily by an effort simply to get public officials to submit their declarations to the Commission, an admittedly important first step.

The Commission has recently rented additional space to store the declarations it has already received and it has requested extensive training from international donors. As a result, the Asset Declaration system seems to be on course to have an adequate filing system in place by the time the next round of declarations are submitted in March 2012.

The Commission has also expressed a desire to create an online or electronic submission system so that physical storage becomes less of a problem. However, such a system will be costly to implement in the short-term and may be out of reach for the ACC for the time being. Furthermore, the agency is interested in creating a system to verify the accuracy of small subset of declarations and is working with international donors to develop this capacity.

## ***Report Centre***

The Report Centre, which remains under the direct control of the Commissioner, is responsible for receiving all complaints from the public and from other government agencies. It then refers these complaints to the relevant Department within the ACC. It collects these reports from the public in a number of different ways, ranging from a dedicated hotline it maintains, to receiving reports in person, to receiving them by postal mail or email. Interestingly, the Centre also takes reports through stories in newspapers. In 2010, the ACC received 880 reports from the public, of which only 238 ended up being corruption-related reports. The Commission refers non-corruption reports to relevant ministries or government agencies as appropriate.

The low proportion of corruption-related reports to non-corruption related reports suggests continued confusion on the part of the public about what constitutes corruption and what the ACC's jurisdiction is. This has been acknowledged within the ACC, and the Public Education and External Outreach Department (described below) is continuing its efforts to educate the public about corruption and the ACC.

## **Public Education and External Outreach Department**

This department seeks to raise public awareness of corruption to facilitate demand for ethical behavior by public officials and to encourage the public to refrain from participating in corrupt behavior. It achieves this in a number of ways including disseminating information through the media, producing pamphlets, and by building community coalitions and integrity clubs in schools. It also holds outreach meetings in districts throughout the country. In all, there are 27 staff members of this department, with a number of them stationed in the 12 district offices that have been established. The Department is divided into two units with complementary mandates.

### ***Public Education Unit***

The Public Education Unit focuses on interfacing with institutions of the government and civil society to help members of those organizations understand corruption and to help them address the unique circumstances of their organizations that may make them susceptible to corruption. This often takes the form of Public Education Meetings which are designed to educate officials in Ministries, Departments, and Agencies (MDAs) of the government on the best policies and reforms for combating corruption within their agencies. However, in 2010, this unit only held meetings with five institutions, primarily universities.

### ***External Outreach Unit***

This unit is responsible for outreach to media, the public, and communities. It has forged partnerships with radio stations and a TV station to carry discussion programs or

documentaries about the ACC and corruption. These programs run for 30 minutes once a week and are held in three different languages so as to reach the majority of the population. However, the majority of the programs are held in Krio, which is the majority language of the country. The unit also tries to work closely with print media, though as the ACC notes, only about 30% of the population is literate, so this strategy is targeted at public officials and civil society organizations.

The External Outreach Unit has also fostered the creation of integrity clubs in 27 primary and secondary schools and universities across the country. The unit meets with the clubs on a regular basis and has created modules to help them come up with activities and to create ways of educating students about corruption and ethical behavior in their lives while fostering ever increasing demand for and to foster increasing demand for integrity in government service.

Furthermore, this unit held 24 community meetings in the Freetown area and an additional 6 meetings in districts across the country. These meetings are designed to elicit community feedback and to inform communities about corruption, the ACC's role, and the role they can play in combating corruption, from reporting corruption to the ACC to demanding integrity from public servants.

It appears, however, that this unit has achieved mixed results. The concept of corruption has become widely understood by the population, but is now expanding to encompass almost all un-ethical behavior, including cheating at sports and cheating on exams in school. This may be compounding the phenomenon observed by the Report Centre which receives more complaints about non-corruption related events than complaints about corruption. As such, this unit has a significant amount of work to do to convey the exact role the ACC plays in the fight against corruption. It is important that the ACC manage expectations about its role and performance so that the public does not unnecessarily lose faith in the ACC.

## **Systems and Process Review Department**

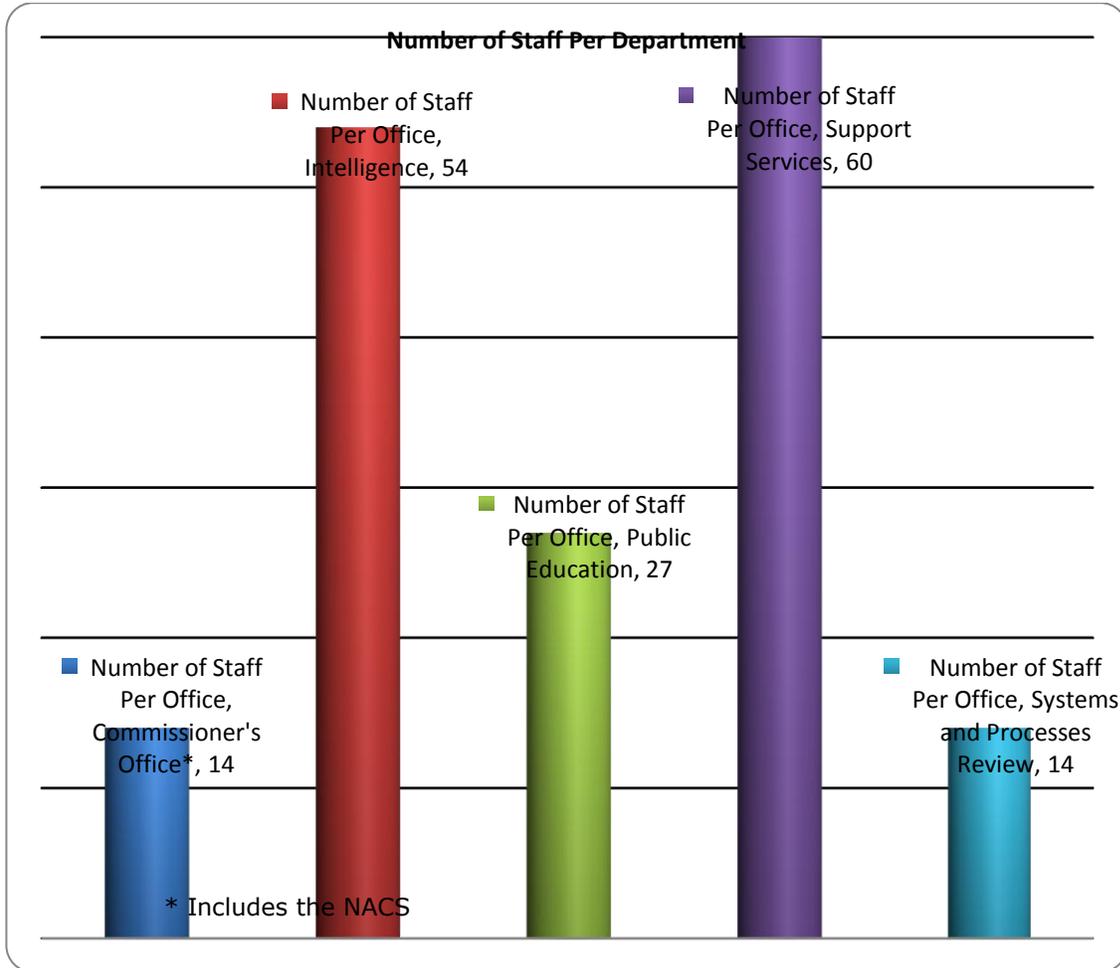
Previously named the Prevention Department, the Systems and Process Review Department (SPRD) is responsible for identifying vulnerabilities in government processes that provide opportunities for corrupt behavior and then recommending policy changes. With a total of 14 staff, the SPRD is divided into three sub-units that have complementary remits.

The Report Centre, which is housed in the Office of the Commissioner and described above, refers relevant reports to the SPRD for review. Depending on the issues involved, these reports may be referred to any of the three units within the Department.

This Department has relatively few staff members despite its important role shaping policies MDAs to prevent corruption from occurring in the first place. As noted previously, the ACC has placed a large emphasis on investigating and prosecuting high profile cases of corruption

and has recorded numerous successful prosecutions. However, the Commission needs to examine the role of the Systems and Process Review Department in the ACC’s overall agenda of reducing corruption.

Figure 2. Number of Staff Per Department



### Systems and Process Review Unit

The SPRD unit examines MDAs on a periodic basis or due to a recommendation arising from an investigation, or as a result of a report filed with the ACC that suggests a review is warranted. These reviews are detailed and examine issues ranging from procurement policies, human resources policies, records management, and financial management in MDAs. After their analysis is done, the SPRD produces a draft report which details its findings and recommendations, which it then provides to the MDA and to civil society organizations and international donors. With their input solicited, the SPRD then finalizes its report and sends it to the MDA for implementation.

### ***Monitoring and Compliance Unit***

This unit monitors the implementation of recommendations made in Systems and Process Review reports to MDAs. Under the law, the MDA is required to begin implementing the recommendations in the report within three months of receiving the final version of the report. If no action has been taken within three months, the MDA can face possible sanctions.

### ***Policy and Ethics Unit***

This unit is responsible for developing public policies that support ethical procedures for government processes and MDAs. In this capacity, for instance, it reviews proposed legislation and policies of the government to provide recommendations for how they can best foster the development of ethical behavior in the public sector. Importantly, this unit also seeks to improve service delivery by government agencies by performing its own audits and by supporting the development of Codes of Conduct for MDAs. It also aims to improve anti-corruption policies in both the public and private sectors to foster economic growth in the private sector.

This unit also provides training for local government officials to provide them with the skills to effectively formulate and implement public policies. In 2010, the unit trained a total of 78 individuals from 14 Local Councils. Although related to the SPRD unit, the Policy and Ethics Unit focuses on Codes of Conduct, improving proposed legislation and proposed rules by MDAs, and training local government.

### ***Investigations, Intelligence, and Prosecutions Department***

This department is the most operational of the ACC, with the responsibility for investigating and prosecuting cases of corruption that are referred to it through complaints, tips, or any other means. The Anti-Corruption Act of 2008 has played a key role in the development of this department because it provided the ACC with the power to prosecute corruption cases; a power the Commission did not have prior to 2008. This department currently has a staff of 54, with the majority of staff being investigators or intelligence officers.

The Department is divided into three units; the Investigations Unit, Intelligence Unit, and Prosecutions Unit. However, the Department recently re-organized itself to create unified teams to handle cases from start to finish, thereby reducing barriers between investigators and prosecutors of cases. The individual units remain; however, there is increased continuity for individual cases now. The Department plans to add a Financial Crimes unit to enhance its ability to handle the types of specialized cases involving sophisticated money laundering and accounting crimes.

Although this Department lies at the core of the Commission's enforcement capacity, it continues to work closely with other departments in the Commission. For instance, there have been occasions when the ACC has received numerous complaints from citizens about perceived corruption offenses that turn out simply to demonstrate a misunderstanding of the law by citizens. In such instances, the Department will work with the Public Education and External Affairs Department to meet with citizen groups and educate them about the jurisdiction of the ACC and the roles it can and cannot play to help citizens.

Additionally, the Department will work with the Systems and Processes Review Department when it handles cases that reveal weaknesses in an MDA's rules or processes that are providing opportunities for corruption. This cooperation is a particularly powerful tool for the Commission because it enables it to translate reactive enforcement of the law into proactive policies that can prevent future abuses.

### *Investigatory Capacity*

The Commission has worked tirelessly to expand its ability to investigate and prosecute corruption throughout the country and places a strong emphasis on winning high-profile cases. Its investigators and prosecutors all have prior law enforcement experience.

The vast majority of investigations performed by this unit are prompted by complaints made to the Commission's Report Centre, which receives tips and complaints about possible corruption cases through its hotline, in person, by mail, and by email. The Investigations Unit evaluates the merit of complaints before opening an investigation and prioritizes cases based on a framework it has developed which reflects the government's priorities and policy preferences. The areas it prioritizes are: National Security (focusing on the Sierra Leone Police, Office of National Security, and the Central Intelligence Security Unit), Public Procurement, Revenue Collection, and Delivery of Essential Services (Ministries of Education, Health and Sanitation, and Youths and Sports).

The Chief Investigator reports little outside interference in its work and little political pressure to handle cases in a particular manner. However, such pressure does seem to present itself to the Commissioner and to lower level investigators from time to time.

Unfortunately, despite the high level of prior experience of its staff, the Department still suffers from a lack of equipment and training in the latest investigatory techniques. In fact, the Department reports that recordings it has made of suspects committing criminal acts have been of such poor quality due to the equipment being used, that the evidence was dismissed in court. This type of capacity issue extends to the vehicles the Department uses for operations, which must be shared with the rest of the Commission and can therefore inhibit the Department's ability to pursue suspects in a timely fashion.

The average cost of filing a corruption case is \$1,000, while it costs the ACC approximately \$2,000 to investigate cases.

## Enforcement Capacity

With the passage of the 2008 Anti-Corruption Act, the ACC gained the power to prosecute cases of corruption. Previously, it had referred all cases it had investigated, which it believed warranted prosecution, to the Attorney General or State Councils depending on jurisdiction. The ACC currently has eight prosecutors. Although all have prior experience, they too face capacity constraints on the tools available to them to facilitate their jobs. For instance, they do not currently have access to legal databases to perform legal research in preparation for their cases. However, despite this, they have successfully prosecuted a number of cases in the two years the ACC has now had the power to prosecute.

The ACC currently enjoys a high level of cooperation from other government agencies and outside entities during its investigations. Furthermore, it relies on the Sierra Leone Police to detain all suspects the ACC arrests because the ACC does not have the facilities for holding suspects. Furthermore, banks and agencies are reported to provide requested information in a timely fashion during investigations.

Table 3. Number of Cases Handled

Year	Total Cases Investigated	Total Referred for Prosecution	Total Prosecuted	Total Convictions	Total Acquittals
2009	122	24	9	11*	2
2010	116	20	5	8*	2

\*There are more convictions than prosecutions due to cases carried over from prior years.

## Performance

The Investigations, Intelligence, and Prosecution Department has achieved notable successes in prosecuting individuals of corruption. The ACC has placed a heavy emphasis on this unit and has pushed hard to achieve high profile successes, such as the prosecution of Ministers of the government. This is due, in part, to the framework it has adopted for the selection of which cases to pursue (discussed previously). This framework understandably places an emphasis on particularly sensitive areas of the government and areas that are particularly vulnerable to large scale corruption. However, this emphasis on higher profile cases appears to be coming at the cost of systematically pursuing petty corruption in service delivery sectors (despite the inclusion of the service sector in its framework for selecting cases) where the population sees corruption on a daily basis, namely the police, teachers, and health sector.

Targeting petty corruption in the service sector would present both opportunities and costs for the ACC. On the one hand, it could risk eliminating or reducing the publicity that has garnered it a certain level of acclaim among both the international community and the

public for prosecuting high ranking officials. On the other hand, a new strategy might reduce the prevalence of the corruption that affects the daily lives of the public, improving quality of life, economic opportunity, and increase popular support for the ACC.

## Support Services Department

This department is responsible for providing administrative support services to the rest of the Commission. It is comprised of four units; the Finance Unit, Human Resources Unit, Information Technology Unit, and Administration Unit. These services are provided across the entire ACC, including the regional offices. Currently, there are 60 staff members in this department, representing the largest department in the ACC.

### Finance Unit

The department manages all of the ACC’s financial records as well as budgeting, payroll, and all other payments. The ACC uses a Medium-Term Expenditure Framework budgeting process (a three year rolling budget) with extensive consultations with each department of within the Commission, then with an external Finance Committee, which includes the Ministry of Finance, Members of Parliament, and civil society organizations.

The budget for the ACC has risen steadily in the past few years and continues to rely on international donors. However, that international support has varied considerably from year to year and created an environment of some uncertainty. But, the overall trend has been positive and has provided the ACC with an increasing ability to hire staff and expand its operations.

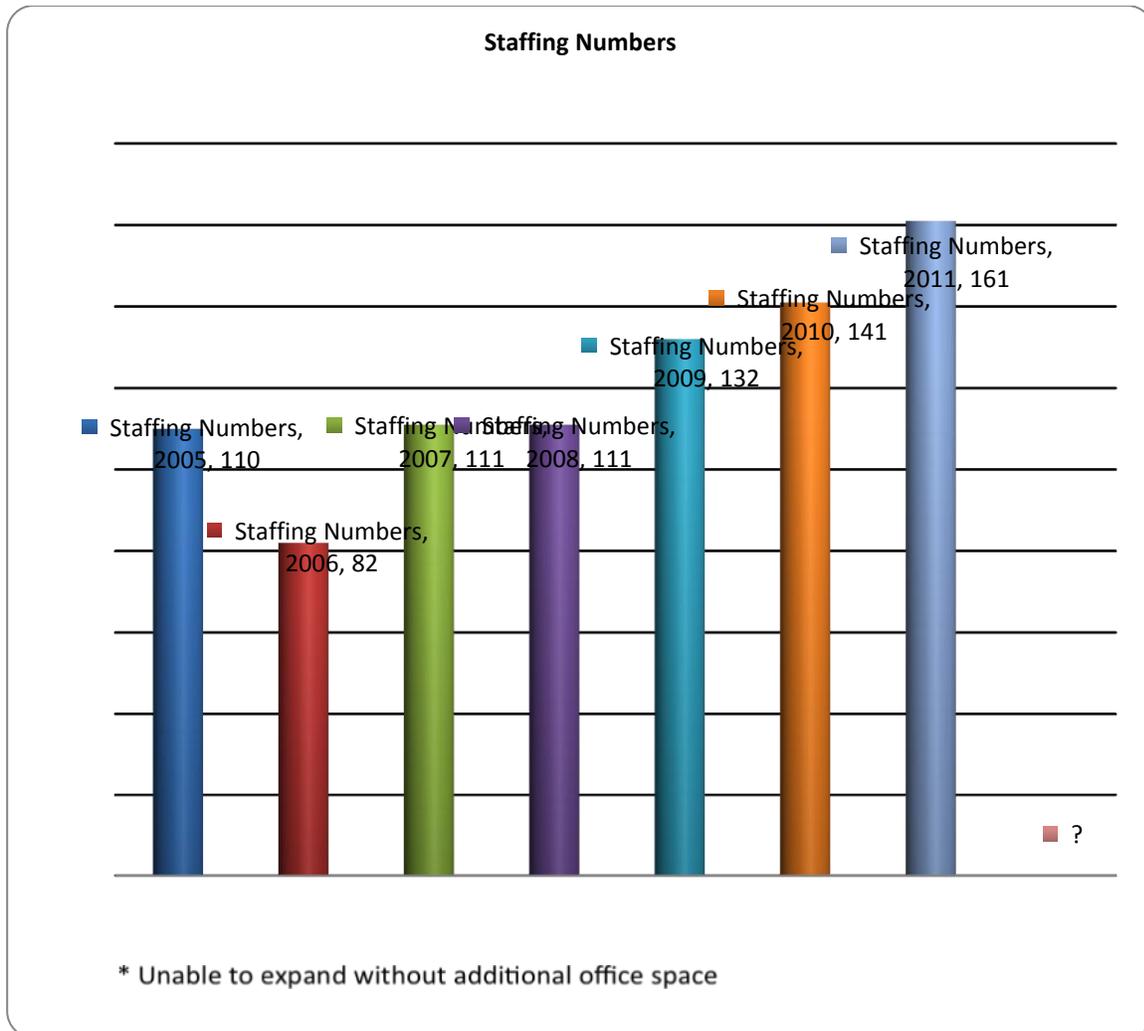
Table 2: ACC Budget

Year	Total Budget	Donor Support	Donor Support as % of Total Budget
2007	3.52 billion Leones	690 million Leones	19.60%
2008	5.95 billion Leones	659.6 million Leones	11.09%
2009	11.07 billion Leones	2.8 billion Leones	25.29%

### Human Resources Unit

This unit helps develop the HR Strategy and Action plan while also handling the recruitment and training of staff. It has played an integral role in the ACC’s efforts to gradually increase number and quality of its staff to enhance its ability to effectively perform its various functions. However, due to increasing space constraints within the ACC’s facilities, the Human Resources Unit is unable to hire additional staff at this time, restricting the expansion of the ACC and jeopardizing its ability to meet its mandate.

Figure 3. Staffing Numbers



### Information Technology Unit

The Support Services department handles all Information Technology support services, from the procurement of IT solutions, to training staff, to maintaining these services. Due to the possibility of power outages at the ACC's facilities, the IT Unit maintains continuous back up file storage at an off-site location that maintains constant power. However, server space is limited and needs to be expanded while secure database systems can be strengthened to ensure the integrity of investigations and prosecutions. The IT Unit has worked hard to implement a new database management system, but staff needs additional training on document and file management processes to ensure full and proper record keeping throughout the ACC. Staff members sometimes are unable to locate key files, such as historical annual reports of the Commission.

## *Administration Unit*

Finally, all transportation and facilities issues are handled by this department. The present condition of the ACC's facilities is inadequate to the Commission's mission so the ACC is currently seeking funding to build a permanent complex to house its operations in Freetown. The Commission has rented additional space in one of its present buildings to try to gain sufficient storage space for the asset declarations it is receiving every year, but even this additional space will not be sufficient for long. Furthermore, the buildings are not able to maintain constant electricity supply because the back-up generator they currently have is small and is not always operational.

Security for the ACC's buildings and staff is provided by the Sierra Leone Police as well as by a private security contractor. This involves guards stationed at the entrances to the building as well as body guards for the Commissioner and prosecutors within the Commission due to the increasing security risks facing these officials as a result of the ACC's prosecution of corrupt officials. However, security procedures appear limited and raise potential concerns about the security of the Commission's headquarters and sensitive files, in addition to the safety of its officials.

## **Monitoring and Evaluation**

The ACC currently produces annual reports for review by Parliament and the public which helps increase its accountability to its various constituents. However, the ACC would benefit from a systematic examination of the types of data it collects about its own activities and the creation of a standardized set of indicators that can be compared from year to year, both within the institution and by external stake holders. These indicators need to be developed or institutionalized within every department and across the district offices. It is clear that the Commission already collects much of this data, but it does not report it in a consistent and readily understood fashion.

Currently, the Investigations, Intelligence, and Prosecutions Department collects a rich set of information on how many cases are referred to it, how many are investigated, and how many are prosecuted, but it doesn't report the same information from year to year. The Systems and Process Review Department could benefit from indicators measuring whether the reforms it recommends to MDAs in its reports are being implemented. The Monitoring and Evaluation Unit within the SPRD is positioned well to collect more of this data and facilitate its annual reporting.

These indicators should ideally be reported in every annual report of the ACC. This will provide both the Commission and other stakeholders with vital information for understanding the performance of the Commission, seeing trends over time, and identifying areas in need of reform or additional resources.

## Conclusion

The ACC has worked tirelessly to increase its capacity to fight corruption throughout Sierra Leone. In doing so, it has set clear strategic priorities in its allocation of scarce resources, often in conjunction with international donors that hoped to stabilize the country in the immediate aftermath of the civil war. Principally, this has meant the Commission has focused on prosecuting high-level offenders, seeing these prosecutions as the most effective means of combating corruption and demonstrating its effectiveness to the public. Its pursuit of these cases has produced notable convictions of high level officials.

However, the Commission remains thinly staffed on its prevention function and, to a lesser extent, on its education function. Furthermore, the ACC's pursuit of high-profile cases seems to have come at the expense of prosecuting lower level corruption in the service sectors that the public interacts with on a regular basis, thereby risking a gradual loss of support among the public as they see little change in their daily lives.

Compounding this situation is a continued lack of capacity. This shortage is most pronounced in the facilities the ACC occupies, which are insufficient and now prevent it from hiring additional staff and properly filing its records. The Commission has hired highly experienced staff across its departments, but staff could use additional training in the latest investigatory, organizational, and research techniques.

The ACC is a work in progress that has achieved significant successes, but which also needs to increase its capacity to handle and implement its mandate. With additional training, expanded physical space, and a honed strategy, it will continue to build upon the solid foundation it has built for itself.