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Sector-Based Action Against Corruption

A Guide for Organisations and Professionals

Mark Pyman
Paul M. Heywood

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Political Corruption and Governance

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This series aims to analyse the nature and scope of, as well as possible remedies for, political corruption. The rise to prominence over the last 20 years of corruption-related problems and of the 'good governance' agenda as the principal means to tackle them has led to the development of a plethora of (national and international) policy proposals, international agreements and anti-corruption programmes and initiatives. National governments, international organisations and NGOs all now claim to take very seriously the need to tackle issues of corruption. It is thus unsurprising that over couple of decades, a significant body of work with a wide and varied focus has been published in academic journals and in international discussion papers. This series seeks to provide a forum through which to address this growing body of literature. It invites not just in-depth single country analyses of corruption and attempts to combat it, but also comparative studies that explore the experiences of different states (or regions) in dealing with different types of corruption. We also invite monographs that take an overtly thematic focus, analysing trends and developments in one type of corruption across either time or space, as well as theoretically informed analysis of discrete events.

Mark Pyman • Paul M. Heywood

Sector-Based Action Against Corruption

A Guide for Organisations and Professionals

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PREFACE

This book is for professional people working in organisations and institutions who need to acquire competence in recognising, analysing and dealing with corruption issues. You are likely to be in a position of some responsibility within your institution or sector, a responsibility that may be on a large scale—regional, national or international—or more narrowly focused, such as leadership of a department within a single organisation.

When there are corruption issues affecting the organisation—which can be present in almost all organisations and in all economic environments—it is normal to feel uncomfortable about them or to be tempted not to deal with them. Your prime responsibility, you might argue, is to deliver results, rather than be an expert in corruption matters. Moreover, even if you turn to current guidance on tackling corruption, much of it is too elevated to be useful—pitched at the level of nation-states rather than organisations and institutions.

The two authors, Mark Pyman and Paul Heywood, believe that not only is there a major gap to be filled here but that—in contrast to many existing approaches—people in your position can make a real difference and drive forward progress against corruption through working in a more targeted, focused and delimited way. Both authors have extensive anti-corruption experience: Pyman in private sector leadership roles and later through working with governments, Heywood as one of the world's most authoritative university professors on the subject. They are also the founders of the well-known website CurbingCorruption.com.

Their approach—‘SFRA’—is fourfold. First, you should tackle problems at the level of your specific *Sector* (like health, or policing, or agriculture). At this level you and others have deep knowledge, extensive operational experience and professional networks that can be used to solve, minimise or avoid corruption problems. With a sector-based approach, the manifestations of corruption are more manageable than at a ‘national’ level. Second, you *Focus* on specific corruption issues, not on generalities. You analyse the problem twice over: first into a set of specific smaller problems, then by reframing those into ones where you have a chance of making progress. The book provides many sector-specific typologies of the issues and shows you how to use them and how to build understanding across your teams of which issues matter most in your circumstances and why. Third, you identify the possibilities for *Remediation*, first using eight high-level framing approaches initially to encapsulate the more political options, then by examining the many detailed measures that you can consider, illustrated with more than 60 examples. Finally, using a range of different ‘Lenses’, you can decide on which combinations of broad framings and detailed measures represent the best *Action* to take in your context.

This book also offers guidance on how to build an organisation that can cope robustly with corruption constraints; one where building integrity and countering corruption is built directly into the organisation’s core processes.

Throughout, the approach is intensely practical and results-oriented, designed to enable you and your organisation to deliver results better, and to be able to discuss corruption issues in a structured and open manner.

London, UK
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Mark Pyman
Paul M. Heywood

ACKNOWLEDGEMENTS

Many people have contributed to the approach to addressing corruption that we present in this book. They include many with whom we have discussed the ideas in meetings small and large, in academic and non-academic settings, plus the team that worked with Mark Pyman in building the Transparency International Defence and Security Programme, plus the friends and colleagues contributing knowledge and text to *CurbingCorruption.com*, all of whom have worked without remuneration because they care about this mission.

In alphabetical order we thank Tehmina Abbas, Jim Anderson, Ian Andrews, Yuen Yuen Ang, Julio Bacio Terracino, Claudia Baez Camargo, Maryna Barynina, Monika Bauhr, Festus Boamah, Tobias Bock, Frédéric Boehm, Mike Boisvenue, AJ Brown, Heesu Chung, Tiffany Clarke, Laurence Cockcroft, Paulo Costa, Olly Cover, Liz Dávid-Barrett and colleagues at the Centre for the Study of Corruption, Sam Eastwood, the late Hugh Edleston, Stewart Eldon, Jasmine Elliott, Peter J Evans, Amira El Faky, Mihály Fazekas, Katie Fish, Maria Gili, Mariya Gorbanova, Hiruy Gossaye, Scott Guggenheim, Duncan Hames, Finn Heinrich, Ida Höckerfelt, Alan Hudson and colleagues at Global Integrity, Michael Johnston, Ivo Jongejan, Mushtaq Khan, Ian Kaplan, Nik Kirby, Monica Kirya, Jups Kluskens, Ina Kubbe, Alena Ledeneva, Rob Leventhal, Karolina MacLachlan, Michelle Man, Heather Marquette, Juliette Martinez-Rosignol, Phil Mason, HR McMaster, Rick Messick, Jan-Hinrik Meyer-Sahling, Faith Muniale, Alina Mungiu-Pippidi, Saad Mustafa, David Murray, Birgitta Nygren, Rosa Ines Ospina, Laura Jean Palmer-Moloney, Caryn Peiffer, Susan Pond, Francesca Recanatini, Kirby

Reiling, Hussain Rezai, Jonathan Rose, Susan Rose-Ackerman, Bo Rothstein, Pallavi Roy, Marcela Rozo Rincon, Cheirollah Saraj, Dominic Scott, Andrea Shaw, Steven Shaw, Tom Shipley, Agata Slota, Neill Stansbury, Sarah Steingrüber, Matthew Stephenson, Abdulaziz al Sugair, Fiona Thompson, Johannes Tonn, Matt Tromme, Avgustina Tzvetkova, Sigrid Vasconez, Taryn Vian, Eleanor Vidal de la Bache, Jodi Vittori, Inese Voika, Alan Waldron, Leah Wawro, Janine Wedel, Howard Weissman, Anne-Christine Wegener, Phil Wheatley, Aneta Wierzynska, Maciej Wnuk, Rob Wright, Yama Torabi, Yama Yari, Iftekhar Zaman, Dominik Zaum, Dieter Zinnbauer.

Praise for *Sector-Based Action Against Corruption*

“I highly recommend this book to anyone in a leadership role aiming to drive progress against corruption in a targeted and effective manner. ‘Sector-based Action Against Corruption’ is not just a guide, it’s a strategic companion for professionals seeking tangible results. Its intensely practical and results-oriented approach equips readers with the tools to navigate the complex terrain of corruption, ultimately contributing to the development of organisations with a steadfast commitment to integrity and ethical conduct. The emphasis on focusing on specific corruption issues, identifying remediation possibilities, and using different lenses to determine the best course of action adds a layer of nuance and practicality often missing in anti-corruption literature. The authors go beyond problem-solving by offering guidance on building organizations that can robustly cope with corruption constraints, empowering professionals and organisations to foster a culture of openness and structured dialogue around corruption issues. Special thanks for the mention of Ukraine as a country that, regardless of difficult obstacles, found a way to preserve hope, to heal and gradually change the system.”

—Maryna Barynina, *Head of the Department of Integrity Policy Formation in the Security and Defence Sector, National Agency on Corruption Prevention, Ukraine*

“This book presents the distilled expertise of two leading anti-corruption specialists with decades of experience. It presents considered advice that can be applied immediately. The focus on specific sectors and on shorter and longer practical steps that—cumulatively—can address wider problems is exactly right. I warmly commend it to practitioners in business, government and civil society alike.”

—John Bray, Director, *Control Risks, Singapore*

“Corruption is everyone’s business, and this politically informed book cleverly shows how to tackle it strategically, while staying in your own lane. If you are one of the many people who are uncomfortable with corruption—whether as an issue for your organisation or as an issue that you might have to lead action against—this book will help you immensely. The variety of concrete examples and applications is brilliant. Everyone will find guidance here that they can easily put into action.”

—Sarah Dix, *Chief Technical Adviser, UNDP Lebanon*

“This new book from Pyman and Heywood brings much needed practical insight, with application across both the private and public sectors. I advise many organisations who find themselves having to address corruption; the guidance provided by

this book is exactly what organisations need to be using. I recommend that CEOs distribute it widely among their leadership and managerial cadres worldwide.”

—Sam Eastwood, *Litigation Partner, Mayer Brown, London*

“This excellent book is a practical guide to curbing corruption. Corruption occurs in different ways in different sectors—corruption in health is different to corruption in defence, for example, and the authors very ably lay out diagnostic tools for detecting corrupt behaviours and practical ways of addressing them. This is a book designed for managers and leaders of organisations rather than anti-corruption specialists. It will also be most helpful to policy analysts and teachers and participants in anti-corruption training.”

—Adam Graycar, *Professor of Public Policy, University of Adelaide, Australia*

“Corruption occurs in diverse forms, with varying causes and consequences, in contrasting policy sectors, and yet sector specialists are often offered little by mainstream reform thinking. Generalizations about “governance” do not help them change the basic patterns of leadership in their sectors. Pyman and Heywood develop a fourfold analytical framework emphasizing the sector, a detailed focus upon specific problems, strategies of remediation, and appropriate actions. They offer both general and sector-specific recommendations for reform, highlighting ways of sustaining support for corruption control. The results are challenging and innovative approaches to reform and novel ways to understand corruption itself.”

—Michael Johnston, *Charles A. Dana Professor of Political Science, Emeritus, Colgate University, USA*

“Pyman and Heywood’s excellent book is for anyone who has a role or interest in fighting against corruption within organizations or institutions—which should be most of us! It is an accessible and informative anti-corruption primer, full of valuable suggestions for practice.

So much of the anti-corruption literature tends to be abstract and oriented towards a macro level, contributing to the false notion that addressing corruption is too daunting a task to tackle within an organization or institution and is best left for others—such as political leaders or outside anti-corruption experts—to handle. Pyman and Heywood’s book challenges this by presenting a comprehensive and above all, pragmatic, guide for action for those who are actually best placed to fight corruption—the people who work within the organizations and institutions where corruption is experienced.

One of the most difficult challenges in writing about corruption is to make a such a complex and multifaceted concept understandable and actionable, which is something this book does extremely well. The authors distil their wealth of practical experience from years of global anti-corruption work into a book which nicely balances breadth with depth, contextualizing what corruption is and what it means

to fight against it at different levels of a system, sector, or institution, with a focus on specific anti-corruption reform measures.

The book presents a compelling argument for readers to see themselves as having roles to play in fighting corruption, to take responsibility—and to act accordingly. Using worked examples of the ways that corruption has been addressed by a variety of different actors across a range of sectors and institutions, the authors illuminate potential pathways for planning and action—highlighting useful resources along the way—which readers can take in addressing the corruption they face within their own areas of practice.

The book helps readers understand how they can take individual actions, but even more importantly how they can practically harness support from others in addressing corruption as a shared problem with collective solutions. Highly recommended!”

—Ian Kaplan, *Education Specialist, International*

“This is a unique guide for the busy civil servant who only has time to read *one* book about anti-corruption. Approaching it sector by sector is the way to go. It is very practical and operational advice for how to deal with corruption both for organizational risk management and for programmatic purpose. It is clearly written by people who understand the issues— not least because they have built alliances with professionals in the various sectors over the years. It is a technical book that is communicated in a non-technical, engaging and straightforward way.”

—Marina Kristensen, *Chief Adviser, Danish Ministry of Foreign Affairs*

“This is an excellent guide and a very useful one. The SFRA approach and the focus on gradual change—moving molehills, not mountains—are pragmatic, accessible, and actionable. The tables on corruption typologies by sector are very clear and can be used by practitioners. The Chapter on deciding what is the most appropriate action to take is especially useful: their diagrammatic guidance is brilliant! Strongly recommended.”

—Francesca Recanatini, *Lead Economist, World Bank*

“This book masterfully presents a structured and action-oriented guide, serving as a reflective roadmap for those seeking to bring about significant changes in the public sector. It reminds us that combating corruption goes beyond generic, decontextualized speeches. It's about an attitude that requires analysis and method, and more importantly, a keen and focused perspective. The book distills decades of academic study and experience in the field of corruption, outlining the most modern and proven approaches to address this issue.

The use of powerful analogies and practical examples in the book often makes us feel as if the authors are speaking directly to us and about our reality. Through its pages, the fight against corruption ceases to be a

problem for 'corruption experts' alone and becomes a matter everyone in public service must directly engage with. The authors take you by the hand and walk you through everyday reflections in public service, offering valuable lessons and methodologies to deal with real-world problems.”

—Pepe Tonin, *Director of Studies and Development of Public Integrity, Comptroller General, Brazil*

“As someone involved professionally in countering the environmental degradation of the Amazon Basin, I strongly commend this book of practical guidance for working in situations where corruption needs to be addressed. Corruption’s complexity often immobilizes us, as the task can seem daunting and/or dangerous. Pyman and Heywood’s book deploys an analytical yet thoroughly pragmatic framework to make progress against corruption at the sectoral level, to decide where it is feasible to tackle the various instances where it occurs, and to choose among possible reform actions. The guidance offered is relevant to all those who are involved in public life: decision-makers, administrators, organisation leaders and for the ordinary citizen. Through this book, curbing corruption seems like a more manageable endeavour.”

—Sigrid Vasconez, *Manager, Conservation projects in the Amazon Basin, Internews*

“With this anti-corruption handbook, Mark Pyman and Paul Heywood provide practical, realistic guidance for mid-level leaders whether they be in health care, the military, construction, telecommunications, or other sectors of the economy. For too long, anti-corruption and good governance advice has principally focused on the extremes: either on massive, state-wide reforms to “dekleptify” grossly criminal governments, or admonishments to individuals that primarily boil down to little more than “don’t be corrupt.” Little has been available for leaders who seek to reform their organizations from the inside.

Pyman and Heywood’s pragmatic “move molehills, not mountains” approach is just what is needed. Leaders will be able to use their guidance—complementing their in-depth expertise, credibility within their professions, and their networks of colleagues and subordinates—to assess, prioritize, and enact localized changes. As a result, these reforms are likely to have greater buy-in, be sustainable over the long term, and achieve real improvements in people’s everyday lives and in the politics in which they live.”

—Jodi Vittori, *Professor of Practice, Walsh School of Foreign Service, Georgetown University, USA*

“I find this book extraordinarily useful as a tool to fight corruption effectively. I certainly enjoyed and learned a lot from reading it.”

—Othon Zevallos, *Former CEO, Quito Water and Sanitation Public Company, Ecuador*

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ABOUT THE AUTHORS

Mark Pyman has deep practical anti-corruption experience, having worked in three tough roles over 25 years: Chief Financial Officer in an oil company operating in high-corruption countries, leading Transparency International's global work on corruption in the defence and security sectors, and serving as Commissioner in Afghanistan's Anti-Corruption Committee (MEC). He has facilitated many discussions with governments, organisations and companies on tackling corruption, published regularly on ways to address corruption, and is now the Co-Founder, with Paul Heywood, of the online network CurbingCorruption.com.

Paul M. Heywood holds the Sir Francis Hill Chair of European Politics at the University of Nottingham, UK. His research focuses on political corruption, institutional design and state capacity, and he is author, co-author or editor of 18 books and more than 80 journal articles and book chapters. He is leader of the Governance and Integrity Anti-Corruption Evidence programme (GI-ACE), funded by FCDO. He is a Trustee of Transparency International UK, where he chairs the Research Committee, and a member of the TI International Council.

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Introduction

Abstract This chapter outlines the aims of the book, explains the reform concept that underpins our thinking and provides an overview of the Sector Focus Remediation Action (SFRA) approach. It also explains how we came to write the book and sets out its structure.

Keywords Sectors, Reform, Remediation, Action

This book is for professional people working in organisations and institutions who need to acquire competence in recognising, analysing and dealing with corruption issues. It is action-oriented, enabling the reader to know better how to limit the effects of such corruption on their organisation's functioning and outputs, thereby improving performance, and to build their confidence that many corruption-related problems can indeed be addressed.

They—you—may be engineers, administrators, politicians, heads of marketing or sales or supplies, finance managers, department heads or division management teams. They may work in either the public sector or the private sector, or one of the many hybrids of the two, like joint ventures or public-private partnerships. They may be employees, directors, board members, external consultants, or representatives of organisations or communities. What they all have in common is that their primary responsibility is to deliver results. Those results might be tangible, like

sales or units of production, or they may be less tangible, like policies or new laws from a ministry, or the safe monitoring of processes and progress, or overseeing strategy implementation in the organisation or division. These people are all in a position of some responsibility within their institution or sector, a responsibility that may be on a large scale—regional, national or international—or on a small scale, such as leadership of a department within a single organisation.

Such professional people may well have signed up to ethical obligations, to act with integrity, such as codes of conduct within the working environment, or clauses in employment contracts, or in major contracts with customers and partners, or the ethical requirements that come with belonging to a particular profession. These codes may have included implicit or even explicit obligations to act against corruption. But these obligations usually sit in the background, rarely seen as forming a core part of the job.

Almost all such people feel uncomfortable with corruption issues. Whilst they know the moral opprobrium associated with corruption and probably share it themselves, they know also that corruption is a subject with tricky, hidden depths, like the proverbial iceberg. They may even feel fear about the consequences of taking action against it. Professionally, they probably feel unprepared for working on such issues, because tackling corruption has never been part of their education or professional training.

They may also have an instinctive response that preventing or tackling corruption is not part of their job and question the limits of their personal responsibilities.

On the other hand, there is now a growing category of professionals—usually referred to as ethics and compliance officers—who are not line managers responsible for performance but who do share responsibility for ethics, integrity issues and corruption risks. In some companies they are already represented at leadership level by Chief Integrity or Ethics Officers (World Economic Forum 2021). In a few sectors, such as defence, they have well-established roles and structures, with a sizeable cadre of ethics officers, sometimes numbering in the hundreds across the organisation.¹ However, their impact on tackling corruption has generally been modest,

¹The term ‘organisation’ throughout this book should be read as a broad category. It includes government institutions, private sector companies and departments/divisions/directorates within both. The sense is of an entity that has some capability to influence outcomes and results, either directly or through whatever larger entity they sit within.

in large part precisely because they are often seen as somewhat separate from core business and operations.

Through reading this book and following its guidance, you should be able to improve the performance of your organisation or institution. First, it shows how to analyse where and how corruption is affecting performance, something that is not always obvious or may be ‘hiding in plain sight’. The book contains guidance on disaggregating the problems. Second, it gives you a framework through which you can examine what remediation measures are available for avoiding, preventing or minimising the effect of the corruption on your organisation. Finally, it guides you on how to decide what kinds of action are most likely to be effective.

THE REFORM CONCEPT: MOVE MOLEHILLS NOT MOUNTAINS

Karl Weick, the eminent American thinker on how organisations work, describes how making a problem out to be a big one diminishes the chance of addressing it: ‘The massive scale on which social problems are conceived often precludes innovation, because the limits of bounded rationality are exceeded, and arousal is raised to dysfunctionally high levels. People often define social problems in ways that overwhelm their ability to do anything about them’ (Weick 1984: 40).² The English language has an apt idiom: ‘making a mountain out of a molehill.’ In the context of the guidance in this book, where we propose ways in which you can take useful action against corruption, we think there is a case to be made for doing the opposite. We should focus on the molehills rather than the mountains. Molehills may look small, but the activities of moles can cause damage and disruption on a wide scale. Yet it is feasible, if not entirely straightforward, to mitigate their activities, encourage them to move elsewhere or control them.

We are in no way suggesting that corruption problems are small ones; of course, they are not. However, we *are* saying that when you and your organisation need to tackle corruption issues, you can make progress by managing the problem down to ones of a more viable scale, by prioritising those issues where you have a chance of making progress and by examining actions that are realistic in the circumstances in which your

² Karl Weick is also responsible for introducing the concept of ‘sense making’ to organisations, as a way of understanding how each organisation constructs its own particular reality. We take this up in Chap. 5.

organisation is operating. This book offers encouragement and guidance, with dozens of examples, that modest-scale changes can have significant beneficial effects in limiting the impact of corruption on your operations.

THE REFORM APPROACH: SFRA

Our approach is fourfold. First, we argue you should tackle problems at the level of the specific sector (like health, or policing, or agriculture). At this level you and many others have deep knowledge, extensive operational experience, expertise which can be put to use to solve, minimise or avoid corruption problems. With this sector-based approach, we can address the more manageable manifestations of corruption that becomes impossibly complex at country level. Second, we advise you should focus on specific corruption issues, not on generalities. We provide sector-specific typologies of the issues, show you how to use them and show you how to build understanding across your teams of which ones matter most and why. Third, we set out a two-track approach as to what the matrix of remedial options looks like, using a high-level framing to encapsulate the more political options alongside a wide range of detailed measures that you can consider. Finally, using a range of different ‘lenses’, we take you through how to decide which combinations of broad framings and detailed measures represent the best action to take in your context.

This approach goes by the acronym SFRA, where *S* is for Sector, *F* is for Focus, *R* is for Remediation measures and *A* is for concluding on the best Action in the circumstances. The individual components of the SFRA approach, described in detail in this book, are encapsulated in the following aide-memoire (Fig. 1.1).

IMPORTANT CAVEAT

This book is NOT for all corruption problems. There are some corruption issues, such as top-level political corruption, transnational corruption, the capture of the state by corrupt oligarchs and kleptocrats, the failure of police and judiciaries to apprehend corruption or indeed corruption throughout those bodies that you probably cannot meaningfully tackle from within an organisation: they require different forms of engagement that will not be addressed in this book. This book is not about resolution of such heavyweight problems, though it does give some guidance on survival in such circumstances. Instead, it is aimed at the level and circumstances where most manifestations of corruption take place and are

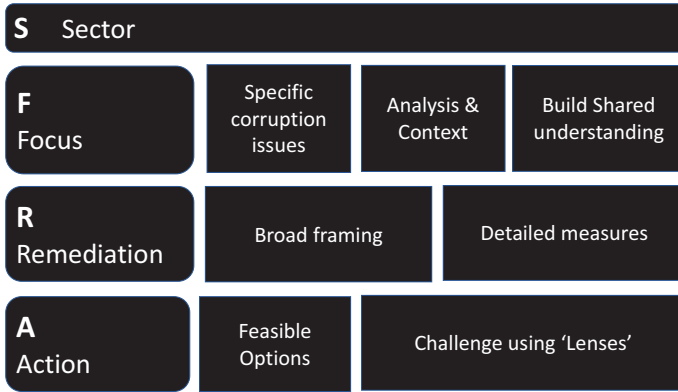


Fig. 1.1 The SFRA approach

experienced by citizens, in which thoughtful people with some responsibility can achieve better outcomes by picking off soluble—or avoidable—corruption issues.

In equipping you with knowledge and guidance on better addressing corruption, we are NOT inviting to put yourself or your organisation at risk. Corruption can be dangerous. On the other hand, much progress can be made against corruption, more specifically in preventing it, without any particular risk exposure. This book always assumes that you and your colleagues will avoid personal risk.

HOW THIS BOOK CAME ABOUT

The two of us have plenty—too much, perhaps—experience of working on corruption and corruption reform.

Mark Pyman has extensive field experience, gained from working in three tough high-corruption environments. First as the Chief Financial Officer for Shell International in several endemically corrupt countries; then founding and leading Transparency International’s global work on corruption in the defence and security sectors; then through being one of the three international Anti-Corruption Commissioners in Afghanistan (MEC). Mark realised that much more progress against corruption was possible by better equipping the people who lead organisations, or who have significant management and operational responsibilities. In his career he has several times had responsibility for organisations where corruption was one of the

factors limiting good performance. As Chief Financial Officer he had to make those judgements about which corruption issues could or should be tackled, and on what basis to prioritise limited remedial resources. He has facilitated leadership discussions in Ministries and other public sector institutions in many countries on how best to address corruption issues.

Paul Heywood has been researching corruption and corruption reform for nearly 30 years. The author, co-author, or editor of many books, journal articles and book chapters on corruption, Paul has been a leader since 2015 of a major Department for International Development (DFID)/Foreign, Commonwealth and Development Office (FCDO)-funded research programme Governance and Integrity Anti Corruption Evidence (GI ACE), designed to deliver new research on ‘what works’ to tackle specific corruption issues in developing countries. He has also been closely involved with the work of Transparency International, both as a Trustee of the UK chapter and as a member of its International Council. Paul has argued for many years that we should get away from a fixation on corruption as a problem best analysed, measured and tackled at national level. Instead, we need a more sophisticated understanding of how and why different types of corruption develop in specific contexts, as well as more targeted and politically informed approaches to tackling particular types of corruption rather than generic ‘solutions’ based on cookie-cutter descriptions of ‘best practice’. Paul has been described by a Public Sector Specialist at the World Bank as ‘one of the very few scholars in the field of corruption research who strives to make his research relevant for us working in the policy arena’.

Since 2017, Paul and Mark have been collaborating to turn this field experience into a workable, practical set of constructs and guidance that can be used by others to tackle corruption. They are also the co-founders of the well-known website [CurbingCorruption.com](https://www.CurbingCorruption.com).

THE STRUCTURE OF THE BOOK

After this Introduction (Chap. 1), Chap. 2 provides what we think you need to know on the basics of corruption. Chapter 3 is about the management systems and processes that organisations can put in place to prevent corruption, plus our thoughts on how you can most usefully think about corruption—not in theoretical or political terms but as an issue that you will often meet in practice. We hope to impart a ‘mental model’, a mindset, that performance constraints caused by corruption issues *can* often be tackled. Building such a mindset and the structures that support it is a big step forward.

Chapter 4 explains our thinking on Sectors; why a sector approach is beneficial, what a sector is and the variety of international anti-corruption expertise that you can now access within many sectors. Chapter 5 goes into detail about how you can focus on specific corruption issues using typologies, how to analyse them, then how to build a shared understanding about which corruption issues should be tackled.

The rest of the book elaborates the remediation approach. Remediation can mean a range of different outcomes, such as managing the issue down to a smaller level, finding a way to avoid the issue entirely, or perhaps even ‘solving’ it. Chapter 6 sets out eight broad approaches for tackling the problems in their political and organisational context, whilst Chap. 7 illustrates the many detailed measures that can be implemented. Chapter 8 provides extensive guidance on how to compare and challenge the merits of the different options, in order to guide your choice of the best action to take in the circumstances. Chapter 9 concludes with Last Words.

We hope you enjoy the book!

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CHAPTER 2

Corruption Basics

Abstract This chapter runs through some key concepts and explains the choice of sectors as the unit of analysis, as well as explaining how to identify and to rank core issues.

Keywords Corruption, Sectors, Unit of Analysis, Issues

DEFINITION

Corruption is an umbrella term that is wildly overused, often to the point of being a synonym for everything that is bad about a country, an organisation, a company, a person. This generic (mis-)use of the word is obviously not helpful.

The most widely used simple definition, ‘the abuse of entrusted power for private gain’ (usually attributed to the World Bank and/or Transparency International), is good enough for people who are not anti-corruption professionals, even if much debated in academic circles. This definition applies whether your organisation is the perpetrator or the victim; whether one or more people in your organisation are using their positions either to enrich themselves or to benefit others at the expense of the organisation or the people it serves; and whether one or more people in the organisations you interact with—customers, regulators, government, suppliers—are abusing their position to extract gain from your organisation.

The ‘abuse of power’ definition is deliberately broad, acknowledging that the corruption might be entirely in the private sector or the public sector, or between public and private. For example, the role of the private sector in corruption is ambiguous and at times contradictory. As one [anti-corruption expert](#) puts it: ‘The private sector cannot be generally treated either as a victim of corruption or as a perpetrator. It can be one or the other or both, depending on sectors and countries. The private sector is often a victim of some types of corruption and is often vocal against it, and at other times it is primarily a beneficiary, and drives corruption through links with bureaucrats and politicians’ (Khan et al. [2016](#)).¹

Delving Below Generalities

Corruption as a general term may have been overused, but on the other hand, it’s perfectly reasonable that corruption be the umbrella term for a set of items that are taxonomically in the same domain but differ in their specifics. To take an ornithology example, both condors and wrens are birds, but no one would have any difficulty distinguishing between them. Alternatively, to use the ‘corruption is a cancer’ analogy as frequently applied to corruption, cancer always describes abnormal and un-controlled cell growth, but encompasses well over a hundred different types (Heywood [2018](#): 6).

Instead, there has been a tendency in discussions about corruption to develop binary distinctions (grand/petty, political/administrative, systemic/sporadic, individual/institutional, extortive/transactive, need/greed). The World Bank ([2023](#)) gives a three-part taxonomy:

Corruption comes in different forms. It might impact service delivery, such as when an official asks for bribes to perform routine services. Corruption might unfairly determine the winners of government contracts, with awards favouring friends, relatives, or business associates of government officials. Or it might come in the form of state capture, distorting how institutions work and who controls them, a form of corruption that is often the costliest in terms of overall economic impact. Each type of corruption is important and tackling all of them is critical to achieving progress and sustainable change.

¹There is an extensive and still growing literature on how better to define and identify ‘corruption’—but our concern here is to move away from such generic discussions. For those interested, good summaries of the debates are in Kurer ([2015](#)), Rose-Ackerman and Palifka ([2016](#)), Rothstein and Varraich ([2017](#)) and Johnston and Fritzen ([2021](#)).

In this book and in our general approach, we believe that corruption can best be addressed, and acted upon, when the types of corruption are defined issue by issue. An ‘issue’ is a specific problem, not a broad category like grand/petty, political/bureaucratic, institutional/individual and so forth. We try to be specific about the corruption type so that you can start to direct remedial actions against it. So, ‘corruption due to a non-meritocratic civil service’ would not be a useful corruption type because it is so broad. Similarly, ‘collusion’ is not a helpful description of a corruption type because it is so general.

In contrast, we break down corruption into more detailed and therefore more manageable manifestations. How do we do this? First, we separate corruption issues that are different from one sector to another by treating each *sector* differently. For example, in police organisations, there can be corruption issues at a *high political level*, such as allowing organised crime in specific areas or ensuring that independent oversight is permanently weak; corruption in the *management* of the police service, such as improperly promoting some officers or permitting poorly performing officers to stay in lucrative positions; corruption and lack of integrity in *personal behaviour*, such as evidence tampering or demanding illegal fines and so on. Similar differentiation exists in every sector: thus, the corrupt police behaviour examples above are quite different from pharmaceutical-related corruption types within the health sector, which again are different phenomena from the corruption related to passing school exams within the education sector.

Second, although some of the corruption issues are clearly sector-specific, as discussed above, others that seem to be generic also have significant differences from one sector to another—for example, the corrupt diversion of salaries *en route* from a government ministry to its employees, or promotions that are driven by corrupt payments not by merit. Whilst these are certainly widespread phenomena, not specific to any sector, the modalities by which the specific instance of corruption takes place and is facilitated are usually very different from one sector to another. The needed reforms are similarly likely to be different from one sector to another. Our experience is that this is true for all the ‘generic’ types of corruption, whether it be corruptly influencing policy, favouritism in appointments and promotions, small-scale facilitation payments and so forth.

Later, in Chap. 4, we provide more detail on how specific corruption issues in any particular context are identified, prioritised and evaluated.

THE UNIT OF ANALYSIS

This book is about addressing and/or preventing specific corruption issues that impact the performance of an organisation in any given sector. Whether the issue is a cabal of people in the human resources division who are corruptly putting poorly qualified people into key roles, or the falsification of water contamination data so as to avoid remedial expense or regulatory penalties, we can make progress by focusing at this level of detail in order to manage, or prevent, or minimise, or even solve their effects on performance. *The unit of analysis is therefore the given sector in which particular corruption issues are impacting performance.*

Working at this detailed level is NOT the norm. In most of what you read about corruption, the standard unit of analysis is the nation-state. This national focus—reflected in corruption indices that rank countries globally and recommended steps for change in country x or y—makes some sense for politicians, for political economists and for those challenging the status quo, like Transparency International, given a state’s dual claim to sovereignty and legitimate authority. But such a macro-level focus is of little or no use to those working in, or leading, organisations who desire to reduce the constraints that specific corruption issues may be placing on their performance.

The marked contrast between a national-level focus and our proposed sector-based focus when addressing corruption is illustrated in the two diagrams below. An influential framework for anti-corruption, Transparency International’s National Integrity System (NIS) approach reflects a belief that corruption can best be tackled in a holistic and systemic way. Figure 2.1 shows all the 13 key national institutions elements identified by TI as ‘pillars’ that together underpin this anti-corruption approach.

The NIS entities are overwhelmingly public sector ones; just one pillar marked ‘Business’ connects directly with the private sector. As we discuss in Chap. 4, this public sector focus does not offer a realistic reflection of how today’s world works. Furthermore, the private sector, if given the right incentives, is also where much of the ability to take remedial action resides.

Figure 2.2, on the other hand, demonstrates how using a Sector approach to the unit of analysis leads to a quite different, and we think more useful, ecosystem. Clearly, a sector approach is ‘one level down’ from the national approach, which improves the ability to make a difference. Secondly, though still complex, all the elements are interrelated

Legislature	Supreme Audit Institution
Executive	Anti-Corruption Agencies
Judiciary	Political Parties
Public Sector	Media
Law Enforcement Agencies	Civil Society
Electoral Management Bodies	Business
Ombudsman	

Foundations: Politics – Society – Economy - Culture

Fig. 2.1 The pillars of a National Integrity System. Excerpted from Transparency International 2011, ‘National Integrity System background rationale and methodology’. At https://www.transparency.org/files/content/nis/NIS_Background_Methodology_EN.pdf

The Sector-focused approach

<p>Sectors Examples: Commerce, Defense, Education, Health, Public Works, Shipping, Tax. (For full working list of Sectors, see Figure 4.1)</p>	
<p>Each Sector usually comprises:</p> <ol style="list-style-type: none"> i. Sector Minister, Ministry, related agencies ii. Sector Regulatory agencies, Monitoring agencies iii. Local government sector agencies iv. Public-private hybrid agencies in the sector v. Companies and sub-contractors in the sector vi. State-owned Enterprises in the sector vii. Sector Industry Associations viii. The sector professional training establishments ix. The professional sector associations x. International sector entities xi. Citizen organisations active in the sector xii. Advocacy organisations active in the sector 	<p>Examples from one sector - health</p> <ul style="list-style-type: none"> • Health Ministry • Medicines agency • Regional Health Authority • Medicines Approval Agency • Medical supplies, drug co's • Privately Financed hospitals • Pharmaceutical Associations • Medical Schools, Health • National Medical Association • World Health Organisation • Patient Associations • EU Centre for Disease Prevention

Fig. 2.2 Possible units of analysis when addressing corruption sectorally

through sharing the same professional domain; in Fig. 2.2 we show in the first column the various different entities that comprise a typical sector. Then, in the second column, we give specific examples of each type of entity in the ecosystem from one particular sector, health.

The unit of analysis remains always within the sector, increasing in scale from individual hospital processes, such as the provision of excessive medical care as a way to benefit health providers or the corruption within an individual hospital, up to health corruption issues that prevail internationally, such as excessive drug prices.

In recent correspondence with Professor Michael Johnston, one of the most respected members of the world anti-corruption community, about organisations taking action against corruption he reinforced this point:

Telling people to forget about whole-country measurements and rankings, and instead to focus on sectors and specific problems within them, is essential advice. My experience with a variety of audiences is that you can't tell people that sort of thing too often as, without constant prodding and reminders, they'll drift back toward more-corruption-vs-less-corruption--full-stop, and toward trying to bite off the entire problem at once rather th'n breaking it down in [...] sectoral and operational ways.

IDENTIFYING CORE ISSUES: THE MERITS OF PEER VOTING

Experts in anti-corruption have, ironically, strengthened the over-emphasis of corruption at nation-state level by amalgamating all forms of corruption into a single value that can then be measured within a jurisdiction. The best-known of these is Transparency International's Corruption Perception Index, or CPI. A discussion on the validity of such single measures is beyond the scope of this book; suffice to say, there are huge and ongoing arguments within the anti-corruption world on the merits or otherwise of such indicators (for an accessible overview of some of the key issues, see Mungiu-Pippidi and Fazekas 2020). If you plan to use this book to improve the performance of your organisation, please stop thinking NOW about single, country-focused indicators of corruption!

For our purposes, the measurement tool that we recommend that you use as a base tool is *peer voting* ranking the relative importance of specific corruption issues using the collated perspectives of people working in or with an organisation. To do so, we list the more significant corruption issues that we think may be impacting performance and then ask the assembled group to rank them. Many different rankings can be done. Which are the issues that are most impacting performance? Which are the issues that are most damaging to the morale and reputation of the

organisation? Which are the issues that can most easily be solved? With only limited resources, what is the rank order of the issues worth working on. In environments where the political risk is high, which are the issues that will be worthwhile, yet also safe, to work on?

Our experience is that it is realistic, and even invigorating, to involve groups of staff and practitioners in such peer voting exercises. Below you will see one such application. The sector in question was defence—both the military and the Defence Ministry—and the country was Taiwan. The opinion group was 100 Taiwanese military Colonels plus a sample of the top leadership of the military and the Defence Ministry of Taiwan. There were 29 defence corruption issues that were being ranked by this group for the damage they were doing to Taiwan’s defence capabilities. As can be seen, secret budgets followed by concerns about single sourcing in procurement, emerged at the two top risks and provided a potential focus for targeted action. Further detail on the peer voting approach is provided in Chap. 5 (Fig. 2.3).

TAIWAN – PEER VOTING ON DEFENCE CORRUPTION RISKS TOP 10 RISKS, 160 OFFICERS, COLONEL RANK & ABOVE, MAY 2014

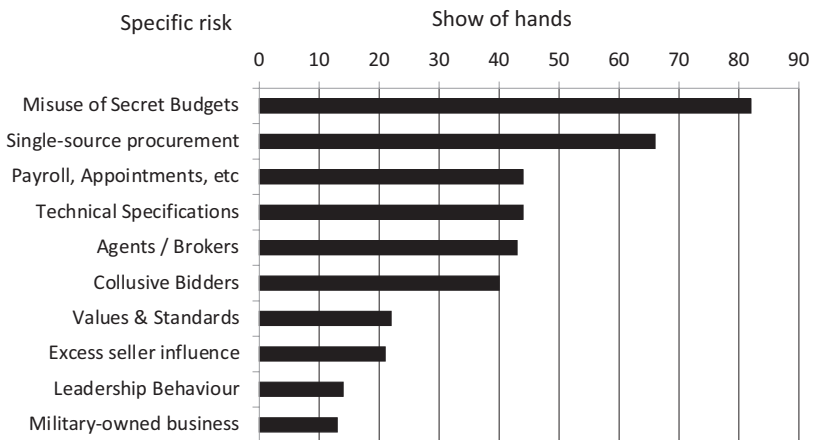


Fig. 2.3 Quantification of corruption issue importance. Example from Taiwan of peer voting to identify the top ten defence corruption risks. Transparency International. From Pyman 2021 *Curbing Corruption in Defence and the Military*. <https://curbingcorruption.com/wp-content/uploads/2021/06/210618-Curbing-corruption-in-Defence-Military.pdf>

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Corruption Is a Management Issue

Abstract This chapter argues that corruption is as much a management issue as it is a political one, before looking at various management systems that can be explored. It then emphasises the importance of language, as well as context.

Keywords Management, Systems, Language

For those with responsibility for delivering results in organisations, or for units inside organisations, corruption is just one issue among many they may face. Leaders must decide how their organisation can deal with corruption issues where they impact results, identify where they come across them and then take action. To do this, and especially to build a working environment which is effective at limiting corruption opportunities, requires systems and processes just like other management tasks. In other words, *corruption is a management issue as much as, or more than, a political issue.*

This is NOT how corruption is seen by most governments and businesses today. This matters because management accountability is the default way of making change inside organisations. It may be true that the

corruption in question is also a governance issue, and/or a criminal issue, and/or a financial guardianship issue, and/or a political issue, but such framings do not lead easily to action. On the contrary, they can be easily and deliberately misconstrued in ways that lead to impressions of action rather than to substantive change.

An analogy with safety at work is instructive. Fifty years ago, safety was a ‘slogan’ issue for management—you would hear CEOs stating loudly how deeply they cared about safety, whilst not having the systems and processes in place that could prevent accidents and instil safe practices. Those CEOs sounded impressive, and indeed were often sincere, but the words were almost entirely empty of content because there was no management machinery to put that commitment into action. Nowadays safety management is very different. Safety and accidents are well recognised and quantified risk factors. Safety training is part of the professional competence of all staff, from top leaders to field staff. Besides general safety competence of all staff, there are specialist safety groups for the more technical safety issues. This is a model that can be followed.

RELEVANT MANAGEMENT SYSTEMS

There are several management systems and processes relevant to managing corruption risk in organisations.

Training and Education

The first is training and education of professional staff, so that they know about corruption risks in the same way that they know about health risks, safety risks and environmental risks. These risks are relevant to all professions: you can expect a construction engineer to be well versed in health, safety and environment risks related to construction even if they are not central to construction engineering. It is the same with doctors, with water engineers and indeed with most industries.

Few sectors yet have systematically institutionalised education on corruption risks in the same way as can be found in the health or safety or environment sectors, so in practice, responsible organisations organise

in-house training or facilitate training by their staff using the support of professional training organisations. Such organisations have a whole series of anti-bribery training courses available, plus more specialised ones, for example for the legal sector. One such international training organisation is the U4 Anti-corruption Resource Centre (U4) that runs multiple training courses. At the time of writing (September 2023), these include courses on Anti-Corruption Basics, Corruption in the Justice Sector (3 weeks), Addressing corruption in the natural resource sector (4 weeks), Addressing corruption in the health sector (4 weeks), Corruption risk management (2 weeks), Essentials of Anti-Corruption: Development Programming (4 weeks). Many of the courses are available in languages besides English, such as Spanish and Arabic.

Monitoring and Compliance

The second block of relevant management processes is the monitoring capabilities of the organisation: compliance processes, supervision units, internal and external audit processes, together with specialist investigative capabilities. One good public-private sector example of such capabilities is the Global Fund in the health sector (Pyman 2020), which has a risk assessment team, a fraud and corruption investigation team, and a global ethics team, all at or reporting to Board level. Board risks are listed as in-country supply chain risks, programme quality risks, strategic data quality risks, grant-related fraud and fiduciary risks, procurement risks, accounting and financial reporting risks, grant oversight and compliance risks, quality of health products risk and foreign exchange risks. The Global Fund has a substantive policy to combat fraud and corruption, first elaborated in 2017, and has developed a clear set of responsibilities between the different monitoring entities (see Global Fund 2017; Pyman 2020).

A good public sector example is in the Polish military in the defence sector (Wnuk 2008), where they set up a semi-separate unit within the military with the specific job of monitoring all procurement for corruption risk (see box below).

Example**Defence sector—Poland**

At a time when it was recognised that there was considerable corruption within the Polish military and defence forces, the Polish Ministry of Defence (MoD) team identified eight high-risk corruption areas: defence procurement, R&D projects, development projects, disposal of surplus property, conscript procedures, lack of meritocracy in appointments and promotions, and defence investments. The ministry decided to focus on just one aspect of one problem: bribery involving top officials in high-value defence procurements. The chosen solution was a preventive monitoring reform measure, in which the minister established a small but full-time task force of four people inside the MoD with the remit to review and reject tenders and technical specifications where there was a suspicion of bias. This was a low-profile reform, but with a chance of success because the defence minister was supportive of greater integrity as one way of improving the reputation of Polish defence forces in NATO. The reform was largely successful, and the task force has been an established feature of the MoD for more than ten years (see Wnuk 2008; Pyman 2023).

Information and Communication Systems

The manner in which organisations—both private and public—manage information and communicate with their customers and with citizens can have an impact on corruption, in both a positive and a negative way. Encouraging feedback systems can also help to highlight issues as well as close loops. Citizens, through feedback and engagement, can help improve performance in a sector; they can also support implementation and sustainability of the reforms and changes needed.

Specialist Expertise Group In-house

Whilst corruption, in general, is a risk factor within the responsibility of a line manager or director, there needs to be a source of specialist expertise for the trickier issues. In the same way that a corporation may have a specialist environmental group that can advise line managers on

environmental matters, the same is also true of corruption concerns. There are all sorts of possible names for such a group. It might be called an ‘Integrity Unit’. In police forces, it is sometimes called ‘Internal Affairs’. In the Polish defence sector example quoted above, the unit in the Polish MOD is called the Anti-Corruption Procedures Bureau. Or it might sit within the audit department of an organisation.

Clarity of responsibility also forms part of the systems picture. Line managers within an organisation are expected to have overall responsibility for their product, service or outputs, and this includes direct responsibility for corruption issues that might be affecting the performance of their specific department or area within the organisation.

Leadership

The final and most important system/process is leadership. To pursue the ‘safety’ analogy noted above, in any good, safety-conscious organisation the current status of safety matters will be on the leadership agendas at all levels through the organisation. Often, it will be the first item on the daily and weekly operations agendas. It will be the first item for discussion at the monthly senior management meeting. It will be at or near the top of every annual Board meeting agenda.

If an issue never makes it onto the agenda at each leadership level, then it is evident that the issue is not considered relevant or important. Most organisations, public and private, still fail this test in respect of corruption.

In some organisations, the leadership may label the agenda item ‘Integrity Issues’ rather than corruption issues. One of us (Pyman) spent almost a decade working with NATO and NATO staff in developing and seeding thinking about corruption and integrity into NATO forces, especially in building the knowledge of military planners and forces on how to respond to endemic corruption in an operational environment. The senior NATO civilian leading this effort had an apt phrase that she employed throughout the NATO organisations:

We need to get to the point where building integrity and reducing the risk of corruption are embedded into NATO processes—planning cycles, staff assessments, policy reviews, operational planning, procurement—so that it becomes part of the organisation’s DNA.¹

¹Susan Pond (retired from NATO in 2019), in conversation with Pyman.

DECLARATIONS OF COMMITMENT

Many organisations commit publicly to acting with integrity and without corruption, even though such statements are quickly seen to be empty if they lack the ‘machinery’ inside the organisation to address issues as they arise. At a sectoral level, many professions require a formal commitment to act with integrity and to speak up about corruption as a condition of membership. At an individual level, some jobs have a similar clause in their employment contracts. Many governments have such clauses within national regulations for individuals in public sector roles.

Do make yourself familiar with what the organisational, contractual and individual commitments related to integrity and anti-corruption are in your organisation/ministry or area of work. Sometimes it can be a good hook for connecting your colleagues into a more formal anti-corruption stance and for building a better shared understanding of corruption and anti-corruption obligations.

In the private sector, there has been an increase in companies that talk publicly about their commitments against corruption, such as the Partnering Against Corruption Initiative (PACI) hosted by the World Economic Forum (2021a); it is also the case that the number of Chief Integrity Officers is rapidly growing (World Economic Forum 2021b). Something similar has been happening with public sector organisations as well (see, e.g. World Bank 2023). But, as noted above, such obligations mean little without effective management systems in place.

WHEN TALKING ABOUT CORRUPTION, LANGUAGE MATTERS

One of the aspects that make corruption as a topic hard to explore within an organisation is that everyone has a different idea of what it is. Part of the reason is a lack of coverage of the topic in the education, professional training and certification that everyone needs to go through, either in the organisation or earlier. But there is also a more fundamental reason, connected with the fact that every profession, from dancing to telecommunications, has its own language, both technical and cultural. Evolved over time and absorbed into the culture of the profession, that language serves the useful function of enabling people within the profession to know exactly what their technical words mean, to understand and be able to use the jargon. In academic research, the term ‘epistemic

communities’—professional networks with authoritative and policy-relevant expertise using specific language—describes how transnational actors influence and operate (Cross 2013), and how they function in sectors such as health (Scott et al. 2018).

This language specificity extends to words such as corruption. In a political context, the term is likely to mean ‘purchase of political influence’. Inside the construction sector it will mostly mean ‘procurement wrongdoing’. In humanitarian aid and development contexts, it usually means failure to safeguard donor funds.

Language also serves the purpose of including or excluding people from a professional community. If those who are examining the corruption problem are from within the same profession, and thereby speaking the same peer-group language, then they will start off already being more-or-less accepted by their peers.

Discussion of corruption inside an organisation thus needs to work with the grain of the professional language, the shared cultural reference point, to be accepted. For example, in the health sector, corruption is mostly spoken of as a ‘risk factor’; conversely, within the defence sector in Saudi Arabia, the accepted phrase to use for corruption is ‘integrity issues’. The aim is not so much to create a defined set of terms as to build a shared understanding of collective experience and knowledge. The ultimate objective is for the whole organisation to share a common understanding of corruption—where it matters, how it matters—and how the organisation can respond to it. Thus, we recommend that you develop the language of curbing corruption in your organisation within the culture of your sector, working with the grain of the professions involved, a process of co-developing that helps to build a shared understanding. Once this process is well on its way, then the organisation will be more able to get on with addressing related issues without external impetus.

Sometimes language is employed not for the purpose of clarity but to dissemble, and this also happens with corruption. We have seen this most often when corruption is referred to as a ‘governance issue’. Historically, this came about through the influence of the World Bank, which was keen around the mid-1990s to act against corruption, but their charter did not support such action: it was seen as being hostile to many of the nations who comprised the Bank’s membership. The way that World Bank management got round that was to frame corruption as a *governance* issue. Since then, this language has spread, and the definition of ‘governance’ in

public policy and development circles has got broader.² The unintended consequence is that for people in leadership and management roles in organisations—for whom the term ‘governance’ is usually limited to the formality of corporate control, as wielded by boards of directors, legal counsel, financial controllers and auditors—corruption problems become equated with financial issues or audit issues. As a result, those in management and functional leadership roles feel justified in leaving the corruption issue to the accountants, the lawyers and the auditors. Of course, there are corporate control issues in relation to corruption (see, e.g. Rose-Ackerman and Palifka 2016; Rothstein and Varraich 2017), but to frame governance as the locus of the problem and the solution, rather than the operational and functional performance of the organisation, is potentially to bypass a large proportion of the leadership cadre from assuming responsibility for remedial action.

Discussing corruption and bringing it into accepted language inside the organisation does *not* mean that we are acknowledging or admitting that we are corrupt. It means the opposite. Corruption thrives on remaining hidden and unspoken about, so bringing it out into the open is a positive step towards anti-corruption. If your organisation has rarely or never previously examined the effect of corruption in reducing performance, you may get this question a lot: giving an unambiguous response is an important task of leadership, demonstrating that the subject is henceforth discussable.

By contrast, this also does not mean talking publicly about any and all corruption issues. All organisations have problems to solve, and they have to make their own judgements of when to work through an issue privately and when to make it public. This applies to corruption issues as much as it applies to any other issues.

Language also matters in building support for change, particularly whether to use ‘corruption’ or ‘integrity’ as the lead concept. ‘Integrity’ has the advantage of a positive connotation, often key for political buy-in, which also makes it easier to avoid the merely legal and criminal perspectives many actors have in the anti-corruption world. However, we need to

² Since 1999, the World Bank has defined governance as the ‘traditions and institutions by which authority in a country is exercised. This includes (1) the process by which governments are selected, monitored and replaced, (2) the capacity of the government to effectively formulate and implement sound policies, and (3) the respect of citizens and the state for the institutions that govern economic and social interactions amongst them’ (Kaufmann et al. 1999).

avoid the trap of simply rebranding anti-corruption measures as pro-integrity ones: the genuine promotion of integrity entails a much broader frame of reference than just the absence of corruption (Heywood and Kirby 2020). We discuss this further in Chap. 6, where taking a corruption or an integrity focus forms part of the broad framing of a reform strategy.

LIKE ALL RISK FACTORS, CONTEXT MATTERS

Corruption resembles most other management-type problems in that there is always a history and a context as to why things are the way they are. The history may be unappealing—a staff member or director decided to help themselves to more than they were entitled; or it may have arisen from unwelcome but irresistible pressure, such as from a powerful person in the environment; or it may be fully understandable—staff have devised a clever but seemingly corrupt solution that fixes an otherwise intractable problem. The history may point to corruption only within your organisation, or corruption between your organisation and others (suppliers, politicians, etc.), or corruption wholly forced upon your organisation by a third party. Similarly, there are all sorts of different contexts—political, social, competitive, cultural. In other words, no judgement of the situation makes sense until you understand, at least to some degree, how and why the situation came about. There are many situations in the health sector, for example, where seemingly corrupt processes have evolved as the only ways to get essential supplies to patients.

Corruption is a problem in any setting, as much in advanced economies as in developing countries. This can be clearly seen in the construction sector, for instance. In the UK, half of a sample of 701 UK construction professionals claimed corruption is common throughout the British construction industry (CIOB 2013). Or in South Korea, where sub-standard materials were used in the construction boom of the 1980s and 1990s (resulting in the collapse of the Sampoong department store in Seoul), or in housing projects in New York City, Japan or Canada (see Wells 2015).

IS THIS REALLY MY RESPONSIBILITY?

Early in 2022 we conducted some research on corruption and corruption reform in the water sector (Martinez Rossignol et al. 2022a, 2022b), looking in particular at the management and distribution of the world's supply of water, such as the unregulated diversions in watersheds. We

asked a cross-section of those who have devoted their professional careers to managing the world's water supply what they were doing to combat corruption in the sector. Interviewees included engineers in water utilities in the USA, Mexico and elsewhere; environmental lawyers; geographers; geologists; ocean economy investors; ecosystem scientists; natural resources managers; plus water anti-corruption practitioners and journalists too. What we found was that the *interviewees were uncomfortable even talking about corruption*.

We heard several explanations, such as worries about the vastness of corruption as a concept, the absence of professional anti-corruption training for water professionals, and that the subject was almost never included on professional agendas, not even as a topic of conversation. Our interviewees also questioned the limits of their personal and professional responsibilities. They asked, 'Do we have a responsibility in relation to corruption, whatever its impact on water performance outcomes?' There was an instinctive response that preventing or tackling corruption was not part of the job of a water professional.

Our interviewees did recognise, despite their discomfort, the importance of professionals becoming more attuned to corruption issues, such as by being specific about the corruption risks and the beneficial effects of responsible public sharing of water data. Similarly, they did recognise the need for adaptive, resilient community building, a by-product of which is likely to be limiting corruption. They recognised the role of the technicians, engineers and scientists to produce reliable, complete, unbiased data. But there was pushback against the idea that professionals held some responsibility for improving water performance by speaking up about corruption, or by exploring ways to prevent corruption, or by solving those issues that could be addressed.

We, the authors of this book, have encountered such reactions repeatedly from people we have engaged with on corruption reform over the past 20 years.

- Some were politicians, in government and in opposition, needing to propose and implement anti-corruption initiatives within their sphere of responsibility, but doubtful about what they could achieve.
- Many were public officials, within government or in related agencies, where corruption was constraining their capacity to deliver, wondering how they could be more effective, and with lower political risk, but not at risk to their jobs.

- Some were the leaders of professional bodies and associations, knowing the corruption problems their sector faced and uncomfortable about being required by their membership to remain silent on the subject.
- Many were private sector executives, seeing multiple ways in which corruption was hurting their operations, but nervous of dealing with a subject they perceived their leadership as being conflicted about.

The ‘not my job’ mentality of working professionals is, we believe, one reason why corruption has been able to flourish so easily—corruption always benefits from silence and people looking the other way. It may also be a reason why limited progress has been made against corruption in the last 30 years. Though there are many communities of people who work diligently on addressing corruption—such as anti-corruption agencies, auditors, civil society groups, ethics and compliance officers in companies, national and multilateral aid agencies, researchers—none of these hold positions of responsibility in the organisations and institutions at the core of daily working life. The many people in the category we are focusing on have responsibility for the operation of the individual structures and functions through which our lives operate. Because the job of professionals in such organisations is to deliver performance—products, policies, services—and if that performance is constrained, then it is their duty to examine the constraints and make the trade-offs of whether and how to remove those constraints. Corruption is simply one such risk factor.

A readiness to examine corruption issues and to address them thus *should* thus be part of the role of professionals in organisations. Not a core role—at least we all hope not—but one skill among the many others that a professional should have to ensure they can perform effectively. Indeed, anti-corruption work is complementary to other efforts towards improving an organisation’s performance.

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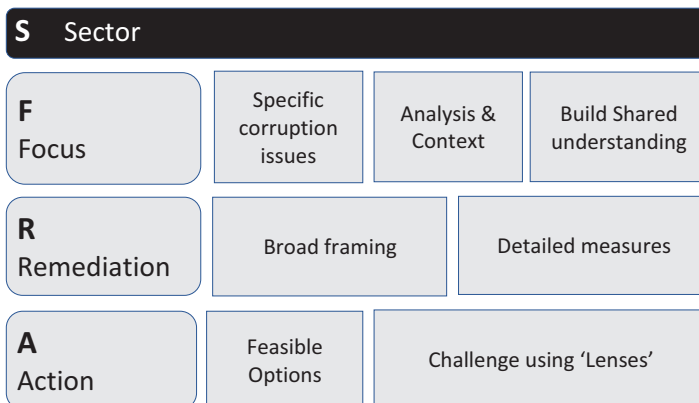


CHAPTER 4

Work Within Your Sector

Abstract This chapter explains why focusing on sectors as a locus for reform makes good sense, provides a definition of sectors and also various examples of international initiatives that offer anti-corruption support at sector level.

Keywords Sectors, Definition, International initiatives



Working with a sector focus responds to a major shift in the structure of modern economic society. There is no longer a clear or easily characterised separation between a government-owned public sector and a privately owned corporate sector. Today, almost every sector of national life is a complex hybrid, including government elements, private elements, and regulatory elements and varieties of public-private cooperation. Working on corruption issues within a sector connects better with the many and various entities that must be engaged.

Some sectors may still be more public than private, such as taxation and policing, whilst others may still be more private than public, such as fisheries or tourism, but the increasing inseparability of public and private via all sorts of mechanisms, such as outsourcing, the dictates of national strategy and the acceptance of executives having multiple roles, has become a core characteristic of most sectors of national life today.

At the same time, the transnational characteristics of each sector have become more pronounced—the major companies are international, the money flows are international, the sector standards are often global—and this offers both scope for solutions and scope for developing international anti-corruption expertise.

WHY SECTORS ARE A GOOD LOCUS FOR REFORM

The best way to locate knowledgeable champions and to identify real solutions is to work within your individual sector (health, education, telecoms, etc.). At this level you find professional pride, deep domain knowledge plus a shared use of language and jargon that everyone works through.

You might be a doctor or hospital administrator, telecoms engineer, transport minister or a divisional head in an energy company. Within your sector—elsewhere within your own group, in other organisations, within the professional bodies—you will find documentation and examples of similar problems that others have found. You will find people who will be only too happy to help you address the problem that you are grappling with, usually without charge—they are almost always pleased to find others working on similar problems. Increasingly, there are specialist groups developing within each sector with deep anti-corruption knowledge that you can access.

Working within the sector brings significant benefit for corruption reformers. When they operate inside a given sector (such as in health,

construction or telecoms), the reformers understand the economic incentives that drive the sector, the language of their sector, the social norms that govern peoples' behaviour and the political specificities in that sector. Greater focus comes from these deeper insights (see Pyman 2020; Pyman and Heywood 2020).

Thus, for reformers working in, say, the electricity and power sector, they would be familiar with corruption issues associated with the power regulatory agencies, the state-owned power entities, the immense leverage of power pricing that are accessible to only a few, the leverage of favourable financial investment terms, the political dimensions of public access to cheap, safe power and so forth. By contrast, a reformer working in health will be attuned to the political power of doctors and of medical device companies, to the immense scale of private payments for health services in poorer countries and its abuse, to the benefits and threats of generic drugs and so on. What we see, as exemplified by these two sectors, is that many of the openings for corruption and therefore the nature of the possible reforms is quite distinct in different sectors. One prescient publication by the World Bank (Campos and Pradhan 2007) did recognise the advantages of disaggregation at this sort of sector level, but the approach did not at the time feed through into the Bank's broader anti-corruption programming.

Even in the toughest corruption environments, where progress may only be possible in tiny steps, there are many improvement measures that can help, and which can form the basis of a much larger improvement when circumstances change.

WHAT IS A SECTOR?

There is no universally agreed upon definition of a sector. In economics, besides the generic terms public sector and private sector, sector tends to mean *industry sectors*, usually as defined in various national and multilateral classifications such as NACE (Nomenclature Statistique des Activités Économiques 2008) and relating almost exclusively to the private sector. In the humanitarian and development world, sector tends to denote the public sector, with reference to those areas of the government expenditure most relevant to humanitarian and development agencies, such as agriculture, construction, education, health, power and water. We use the following definition of sector (adapted and updated from Heywood and Pyman 2020):

Executive, Legislature & Politics Office of President, Prime Minister Parliament Elections & Electoral Management Political Parties Legal Framework	Financial Public Financial Management Taxation Central Bank operation Financial & fiscal oversight Banking Investment Services Insurance Services Financial Services	Utilities Electricity & power Construction & Public Works Telecommunications Water management & supply Sanitation & Waste Aviation Land Transport; Shipping	Military and Defence Other government Foreign Affairs International & Multilateral aid State Owned Enterprises
Security & Public order Judiciary and courts Policing services Law Enforcement Prison Services Prosecution National Security Borders, customs & immigration	Natural Resources Climate & Environment Agriculture Fisheries; Forestry Land Mining & quarrying Oil & Gas Commodities trading Wildlife	Other commercial Professional services (eg legal) Real estate Retail & Wholesale trade Broadcasting & Media Manufacturing - various	Religious organisations Culture, Heritage & Tourism Voluntary sector Horizontal sectors Civil service Public procurement Regional & Local government Oversight entities <i>(incl. Supreme Audit, Anti-Corruption Agencies, Ombudsman, Civil Society)</i>
Public services Education & Higher Education Health Social Protection		Sport Sport associations The Olympics	

Note: Each sector comprises some or all of the following: one or more professions; ministry; government organisations and agencies; commercial organisations, relevant industry and professional associations; sector-related international and multilateral organisations; functional or market regulatory authority; sector professions.

Fig. 4.1 A working list of sectors. From Pyman 2020 ‘Redefining sectors: a more focussed approach to tackling corruption.’ In Adam Graycar (ed.) *Handbook on Corruption, Ethics and Integrity in Public Administration*, Edward Elgar

Sectors are the individual structures and functions through which national life operates. Structures include the legislature, the judiciary, and the civil service. Functions include public functions, such as health, education, policing, and public financial management; economic functions, such as agriculture, telecommunications, mining, construction, and shipping; and the multiple public-private functions that span both public and private, such as sport, infrastructure projects, tourism, and land management. A sector comprises some or all the following: one or more professions, a government ministry, multiple government organisations and agencies, multiple commercial organisations, and the relevant industry associations; one or more multilateral organisations concerned with international application; and a functional or market regulatory authority.

There is no definitive list of sectors, but the list in Fig. 4.1 covers most of the range.

INTERNATIONAL SECTOR RESOURCES

A number of sector-specific transnational initiatives have emerged in recent years. To give an idea of what is nowadays available by sector, below is international material from three diverse sectors: construction, health and shipping. More details are available at Curbingcorruption.com under the relevant sector headings. Multi-sectoral and multilateral international organisations—like the World Economic Forum (WEF), the International

Monetary Fund (IMF), the Organisation for Economic Cooperation and Development (OECD), the World Bank and the United Nations Development Programme (UNDP)—also now have a strong focus on public integrity and anti-corruption and can assist specific sectors and initiatives.

Construction Sector

Global Infrastructure Anti-corruption Centre (GIACC): GIACC is a long-established UK-based centre founded and led by two construction lawyers. They have a huge database of supportive material and templates. ‘They publish a set of 15 detailed a-c standards for construction projects (see list in text box below)’.

- PS 1: Anti-corruption management of the Project
- PS 2: Project selection, design and land acquisition
- PS 3: Procurement
- PS 4: Contract provisions
- PS 5: Contract management
- PS 6: Financial management
- PS 7: Controls for Major Suppliers and Major Sub-suppliers
- PS 8: Raising awareness
- PS 9: Training
- PS 10: Government permits
- PS 11: Independent monitoring
- PS 12: Independent auditing
- PS 13: Reporting and investigation
- PS 14: Enforcement
- PS 15: Transparency

They also provide free online information, advice and tools, for both governments and companies.

CoST Infrastructure Transparency Initiative: CoST is a multi-stakeholder sector-specific initiative, currently with 19 participating nations across four continents. Launched in 2012 with support from the World Bank, ‘CoST grew out of the lessons learnt from a three-year pilot programme which tested the viability of a new transparency and accountability process in eight countries. CoST promotes transparency by

disclosing data from public infrastructure investment’ (CoST Factsheet; see also the review by Basel Institute of Governance 2020)

Open Contracting Partnership: The [Open Contracting Partnership](#) (OCP) has a well-practiced methodology for implementing a policy of cleaner public contracting, engaging stakeholders across government, business and civil society. The technical basis for the guidance is a standard for open data so that all parties can see the key data related to any contract.

U4 anti-corruption resource centre, Norway: U4 has guidance on how to oversee and/or monitor corruption risks in large infrastructure projects: ‘Corruption in the construction of public infrastructure. Critical issues in project preparation.’ (U4 2015).

Health Sector

World Health Organisation (WHO): WHO takes the lead on many good governance initiatives, such as Good Governance for Medicines programme (launched in 2004) and the Medicines Transparency Alliance (MeTA), funded by the then UK Department for International Development (DFID). WHO has also done specific corruption analyses, for example ‘An innovative approach to prevent corruption in the pharmaceutical sector’ (WHO 2021).

Global Network for Anti-corruption, Transparency and Accountability in Health (GNACTA): This Norad-funded initiative is supported by WHO along with a host of other bodies including UNODC, the World Bank, USAID, Transparency International. It seeks to forge strategic alliances and build capacity to tackle corruption in health.

United Nations Development Programme (UNDP) has long worked on anti-corruption in health. See, for example, ‘Fighting corruption in the health sector’ (UNDP 2015), ‘Anti-corruption, Transparency and Accountability: Case Study of Healthcare in the Arab Countries’ (Hunter et al. 2020), ‘A case study of risk-based anti-corruption in the health sector of Tunisia’ (UNDP 2021) and ‘Strengthening Integrity of the Health Sector During the Covid-19 Pandemic and Beyond in Europe and Central Asia Region’ (UNDP 2022).

Development agencies: Development agencies produce analyses of corruption in health, such as ‘How-to Note; addressing corruption in the Health sector’ from DFID (2010). USAID has recently published the [Global Health Anti-Corruption Handbook](#) (USAID 2022), which follows on from earlier work on [anti-corruption programming](#) with health projects (USAID 2014).

Global Fund: The Global Fund, established in 2002 to tackle HIV/AIDS, TB and malaria, is one organisation that has been at the forefront of efforts to eliminate corruption related to its own disbursements (Usher 2016).

Transparency International Global Health Programme: TI's Global Health anti-corruption programme is a global initiative dedicated to tackling corruption in pharmaceuticals and healthcare worldwide.

European Healthcare Fraud and Corruption Network (EHFCN): Founded in 2005, EHFCN is a not-for-profit organisation comprising healthcare and counter fraud organisations in Europe. It published a book (EHFCN 2017) to provide guidance on healthcare fraud and corruption and an overview of policies in place across the continent.

Shipping Sector

Marine Anticorruption Network (MACN): Established in 2011, MACN is a global business network, promoting collective action to eradicate all forms of maritime corruption.

TRACE: A non-profit business association founded in 2001, TRACE is active in shipping anti-corruption. TRACE partners with leading shipping and freight forwarding organisations to raise anti-bribery compliance standards in the industry, conduct specialised training and host industry webinars for global shipping and freight forwarding companies.

World Customs Organisation (WCO): The WCO cooperates with the International Chamber of Shipping and works with the World Shipping Council to support their collaboration with the Container Control Programme to step up the fight against narcotics trafficking. WCO 'has played an active and key role in addressing the complex problem of corruption in [...] Customs' (WCO 2019). WCO offers an online 'Integrity Development Guide', a comprehensive tool designed to provide advice and best practice.

BIMCO: There are many member-based shipping industry organisations, such as Intercargo, Intertanko and shipowners' associations. One that does work on anti-corruption is BIMCO, a large shipping industry membership organisation comprising shipowners, operators, managers, brokers and agents.

Maritime Fairtrade: Set up to tackle corruption in the maritime industry throughout Asia, the organisation uses independent journalism to highlight progress and issues—for example correspondent Lee Kok Leong's interview 'Winning the war against maritime corruption' (see Pyman 2019).

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CHAPTER 5

Focus

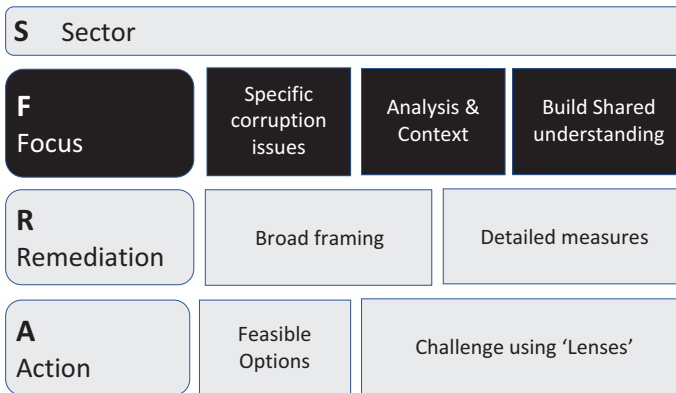
Abstract This chapter explains the Focus element of the SFRA approach, explaining why it is essential to disaggregate specific corruption issues and providing a series of sector-based typologies to help do that. It then offers a range of analysis methodologies and emphasises the importance of building shared understanding of corruption issues.

Keywords Focus, Disaggregation, Typologies, Analysis

One of us (Heywood 2017) made the point some years ago that focus was one of the qualities most lacking in making progress against corruption: *The apparent mismatch between the attention focused on corruption and our collective capacity to make a practical difference naturally raises questions about what might be going wrong. This article identifies three reasons for such a discrepancy: the way in which corruption has been conceptualized in much mainstream academic research, resulting in “magic bullet” solutions based on institutional reconfiguration (hocus-pocus); the tendency of much research and anti-corruption advocacy to concentrate on nation-states as the primary unit of analysis (locus); and the lack of sufficient disaggregation of different types and modalities of corruption beyond crude binary divisions that do not recognize the complexities of an increasingly transnational world (focus)*² [emphasis added].

The second of us came to the same conclusion from a quite different direction, working on corruption with military forces and defence ministries around the world (Pyman 2017a). He realised that without breaking down corruption into very specific, comprehensible issues that organisations could collectively recognise and address, the momentum necessary for addressing the problems would never be developed or sustained.

Our approach developed from these two strong convictions and related experience. The SFRA method identifies three areas of analytical focus:



- First, disaggregate the specific corruption issues and problems. The problems need to be identified and the corruption issues identified as specific constraints. Generalities about corruption, like ‘nepotism’ or ‘collusion’, might be recognisable, but they are usually not actionable. SFRA suggests a powerful and novel way to do this without becoming overwhelmed.
- Second, do your homework in the analysis and quantification of the specific issues. There is nothing specific to SFRA about such analysis—there is plenty of guidance available and we simply list resources you might access.
- Third, build a shared understanding of the corruption issues that you face. This is harder said than done because everyone has a different idea of what ‘corruption’ is. The SFRA method focuses a lot of attention on addressing this, because without it there can be no unity of effort; it also illustrates the power of peer voting for focusing on the relative importance of the issues.

Each element is described in more detail below.

DISAGGREGATE THE SPECIFIC CORRUPTION ISSUES

In order to focus on specific corruption issues, you will either already need to know what the issues are in your organisation/ sector, or you will need to develop a list of them, or you will need to be able to access the lists of issues from others who have been there before you. We think we can help a lot here. We have found that the principal corruption issues in each sector can be disaggregated into around 30–40 different specific issues.

This list, which fits easily on a single page, allows organisations to discuss what corruption issues are present in their particular context, to build a shared understanding of which issues are having most impact. CurbingCorruption.com has developed template lists, which wloped template lists, which we call typologies, providing a concise listing of the more common corruption issues for each sector.

About half of the corruption issues are very from one sector to another. For example, in policing, there are various forms of corruption at a high political level, such as allowing organised crime in specific areas or ensuring that independent oversight is permanently weak; corruption in the management of the police service, such as improperly promoting some officers or permitting poorly performing officers to stay in lucrative positions; corruption and lack of integrity in personal behaviour, such as evidence tampering or demanding illegal fines and so on. Similar differentiation exists in every sector: the corrupt police behaviour examples above are quite different, for instance, from pharmaceutical-related corruption issues within the health sector, which again are different phenomena from the corruption in relation to passing school exams within the education sector.

Other common corruption issues—such as corruptly influencing policy, favouritism in appointments or small-scale facilitation payments—sound the same from one sector to the next. However, our experience is that whilst these common issues may sound the same, they vary markedly from one sector to another. For example, the corrupt diversion of salaries *en route* from a government ministry to its employees may appear to be similar, but the modalities by which the salary diversion takes place are different from one sector to another.

SECTOR TYPOLOGIES

The sector typologies that we propose, and which you can modify as you see fit, are valuable because they put the many diverse corruption issues onto one page. People who believe that corruption is fundamentally a procurement issue, or a finance issue, or a personnel issue, will be shown the other ways that it has impact. The typology is easy to understand and allows everyone to pick out the issues they believe are the most damaging and then enter into constructive discussion on how to address them. It is a powerful tool for building shared understanding among your team and among wider communities.

Of course, the number of possible issues is unlimited, but too much complexity renders a problem much harder to solve. Our experience is that 30–40 different issues is enough to provide granularity, but not so much as to overwhelm with complexity, whilst 50 is about the maximum that a team can encompass.

For example, see the typology in Fig. 5.1 for corruption in policing, which itemises 34 corruption issues. The 34 are grouped in whatever way

POLICY	PERSONNEL	BEHAVIOUR & OPERATIONS
<ul style="list-style-type: none"> 1. Bias in domestic policing strategies 2. Improper allocation and distribution of funds 3. Political interference 4. Influence of interest groups 5. Penetration by organised crime 6. Reaching performance targets 7. Purposefully weak oversight 	<ul style="list-style-type: none"> 13. Poor leadership behaviour 14. Nepotism in payroll, promotions, appointments 15. Theft from salary chain 16. Weak values and standards 17. Criminal activities 18. Personal problems (drugs, gambling, being blackmailed..) 19. False personal asset declarations 20. Biased rotations 	<ul style="list-style-type: none"> 24. Evidence tampering or theft 25. Small bribes from public 26. Uncontrolled operational independence 27. ‘Noble cause’ 28. Levying illegal fines 29. Disclosure of privileged information 30. Misuse of informants 31. Discriminating behaviour 32. Extortion 33. Lack of officer identification 34. Inaction due to ‘Bonds of loyalty’
FINANCE	PROCUREMENT	
<ul style="list-style-type: none"> 8. Improper asset disposals 9. Purposefully weak financial control 10. Illegal private activity 11. Providing private security 12. Facilitation payments 	<ul style="list-style-type: none"> 21. Bias in technical requirements 22. Improper contract award or delivery 23. Misuse of confidential tenders 	

Fig. 5.1 Corruption typology—police services. Transparency International. See Pyman et al. 2012 ‘Arresting Corruption in the Police. The global experience of police reform efforts.’ At <https://curbingcorruption.com/wp-content/uploads/2018/07/Pyman-Cohen-Boardman-Webster-and-Seymour-2012-Arresting-corruption-in-the-police.pdf>

seems to be most useful for those most likely to be tackling them. In most sectors, this results in them being grouped according to whether they relate to Policy, Finance, Personnel, Procurement, and Behaviour and Operations. Some of the issues are wholly sector-specific, as discussed above, such as most of those under the heading *Behaviour and Operations*. Generally speaking, the issues grouped under Policy or Behaviour and Operations tend to be the most sector-specific, whilst those under Finance, Personnel and Procurement tend to be more generic.

It bears repeating that *presenting the possible corruption issues in such a simple way—and on a single page—has a big impact*. Our experience is that it is transformative: suddenly teams can straightforwardly work together to decide whether this or that issue is important or not.

For example, the authors have used the typology of defence and military corruption issues, Fig. 5.2, in discussion with groups from numerous defence ministries and military forces around the world. Most groups are

POLITICAL	PERSONNEL	PROCUREMENT
<ol style="list-style-type: none"> 1. Defence & security Policy 2. Defence budgets 3. Nexus of Defence and National assets 4. Organised crime 5. Control of intelligence services 6. Export controls 	<ol style="list-style-type: none"> 11. Leadership behaviour 12. Payroll, promotions, Appointments, Rewards 13. Conscriptation 14. Salary chain 15. Values and standards 16. Small bribes 	<ol style="list-style-type: none"> 21. Technical requirements/ Specifications 22. Single sourcing 23. Agents/ brokers 24. Collusive bidders 25. Financing packages 26. Offsets
FINANCE	OPERATIONS	<ol style="list-style-type: none"> 27. Contract award/delivery 28. Subcontractors 29. Seller influence
<ol style="list-style-type: none"> 7. Asset disposals 8. Secret budgets 9. Military-owned businesses 10. Illegal private enterprises 	<ol style="list-style-type: none"> 17. Disregard of corruption in-country 18. Corruption within mission 19. Contracts 20. Private security contractors 	

Fig. 5.2 Corruption typology—defence and military. Transparency International. See Pyman 2011 ‘Building integrity and countering corruption in defense and security: 20 practical reforms.’ Transparency International Defence and Security. At <https://curbingcorruption.com/wp-content/uploads/2018/07/Pyman-2011-Building-integrity-and-countering-corruption-in-defence-and-security-20-practical-reforms.pdf>

astonished—it enables them to point immediately, and without sensitivity, to the more critical issues. Similarly, whilst procurement is a common corruption issue everywhere, the detail in the typology table below enables most groups of defence personnel to point to bias in the writing of the technical specifications (Issue No. 21) as the dominant procurement problem. In the Taiwan group, whose results were shown earlier in Chap. 2, the Colonels were clear that they had one problem that bothered them above all others: the syphoning off of funds from the secret budgets by some of the top military leadership (Issue No. 8). A group from another Defence Ministry concluded that the issue most troubling them—not the biggest issue but the one causing the most organisational upset—was the covert selling off of weapons (Issue No. 7).

Typologies for four other sectors are given below: Health, School Education, Higher Education and Land.

Figures 5.3, 5.4, 5.5 and 5.6 in sequence here.

These typologies were first developed by one of us (Pyman) whilst an independent consultant, then with colleagues at Transparency International TI-DS and at CurbingCorruption.com.

POLICY	FINANCE	IN SCHOOLS - Direct
1. Misdirection of education budgets	14. Leakage of central education budgets	26. Payment to obtain a place
2. Misallocation to agencies, projects	15. Leakage of new project allocations	27. Payment to get good grades
3. Over-ambitious curriculum	16. Theft/control of education assets	28. Payment to receive exam results
TEACHERS	17. Bribes to auditors and monitors	29. Payment for exam certificates
4. Teacher recruitment	IN SCHOOLS - Indirect	30. Payment for exam questions
5. Teacher promotion, posts, exit	18. Accepting high absence levels	31. Payment for others to do the exam
6. Licenses & authorisations	19. Teachers bribe for good postings	32. Payment from discriminated students
7. Allocation of teacher allowances	20. Schools used for private purposes	33. Requiring use of certain textbooks
8. Teacher training (TT): selection	21. Theft of school budgets	34. Duress payment for private tutoring
9. TT: grading, exams, graduation	22. Theft of locally raised funds	35. Duress to work for free for teachers
PROCUREMENT	23. High prices for meals, uniforms	36. Teacher requiring sexual favours
10. Textbook printing and distribution	24. School food, repair, maintenance	
11. Infrastructure contracts	25. Resources allocated by politicians to favoured schools	
12. School repair and maintenance		
13. Improper contract management		

Fig. 5.3 Corruption typology—school education. CurbingCorruption. From Pyman and Kaplan 2021 ‘Curbing corruption in school education.’ At <https://curbingcorruption.com/wp-content/uploads/2021/06/210618-Curbing-Corruption-in-School-Education.pdf>



Fig. 5.4 Corruption typology—health. CurbingCorruption. From Pyman 2021 ‘Curbing corruption in health.’ At <https://curbingcorruption.com/wp-content/uploads/2021/06/210618-Curbing-Corruption-in-health.pdf>

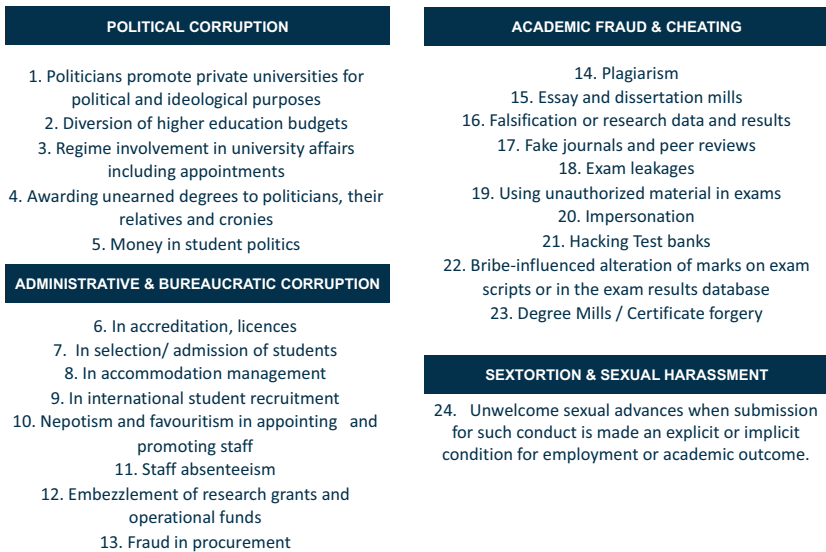


Fig. 5.5 Corruption typology—higher education. CurbingCorruption. See Kirya 2021 ‘Curbing corruption in Higher Education.’ <https://curbingcorruption.com/wp-content/uploads/2021/06/210618-Curbing-Corruption-in-Higher-Education.pdf>

LAND ADMINISTRATION	CUSTOMARY LAND TENURE	LAND USE, PLANNING & INVESTMENTS
<ol style="list-style-type: none"> 1. Bribery and rent-seeking by land administration officials in provision of land information, services and documentation 2. Bribery of judicial authorities 3. Favouritism and nepotism by land in decision-making by land administration officials 4. Elite capture and preferential access to land titling schemes 5. Manipulation and interference of land records, land adjudication and dispute resolution 6. Manipulation of land valuation to secure higher prices and/or reduce compensation payable 7. Fraud and production of false land claim doc'n, certificates and titles 8. Embezzlement of public finance for land administration and land revenues 9. Use of public institutions as a platform for private practice 10. Manipulation in public procurement of land administration services to win private contracts 	<ol style="list-style-type: none"> 11. Abuse of power by chiefs 12. Accumulation of control over land revenues by influential people 13. Multiple allocations of the same plots customary authorities land 14. Conversion of customary and rural land for urban development 15. Reluctance of officials to provide land services 16. National institutions and business interests override local land rights 	<ol style="list-style-type: none"> 21. Capture of profits originating from land conversion and re-zoning 22. Abuse of government officials' discretionary power to propose developments 23. Acquisition of land through state capture and/or by insider information 24. Bribery of government officials by investors and/or developers
	MANAGEMENT OF STATE-OWNED LAND	LARGE SCALE LAND ACQUISITION FOR INVESTMENT
	<ol style="list-style-type: none"> 17. Collusion of government officials by private interests 18. Manipulation of compulsory land acquisition and compensation 19. Inadequate legal framework for conversion to private land 20. Irregular conversion of property classification status by officials 	<ol style="list-style-type: none"> 25. Bribery and manipulation of community leaders 26. Payments of bribes and kickbacks to officials involved in approving land allocations 27. Circumvention of agreed and legally binding consultation procedures 28. Political interference in land acquisition and allocation

Fig. 5.6 Corruption typology—land. CurbingCorruption. From Shipley 2021, <https://curbingcorruption.com/wp-content/uploads/2021/06/210618-Curbing-Corruption-in-Land-1.pdf>

Sector typologies from other sources are also available. For example, the construction typology in Fig. 5.7 was developed by the anti-corruption team at U4 for construction projects. That typology uses a different format but still has the same ‘all on one page’ simplicity (U4 2015).

Make Your Own Typology?

In your own situation, you will have a choice between using one of these template typologies, where they exist, or developing your own, or a combination of the two. This is not a straightforward choice because it is our long experience that the moment you open up the question of what the issues might be—whether to colleagues, a working group or a contractor—you will quickly find yourself with a long, almost endless list of issues. Instead, we advocate that you develop the list in the following order of preference:

1. Use a pre-existing template of the issues in your sector.
2. Ask a group of experienced colleagues to meet together to consider how the nearest suitable typology could be improved for your situation without exceeding 40 issues.

Stages	Risks	Main actors
Project appraisal	<ul style="list-style-type: none"> Political influence or lobbying by private firms that biases selection to suit political or private interests Promotion of projects in return for party funds Political influence to favour large projects and new construction over maintenance Underestimated costs and overestimated benefits to get projects approved without adequate economic justification 	<ul style="list-style-type: none"> Government ministers Senior civil servants Procurement officers Private consultants (e.g., planners, designers, engineers, and surveyors)
Project selection, design, and budgeting	<ul style="list-style-type: none"> Costly designs that increase consultants' fees and contractors' profits Designs that favour a specific contractor Incomplete designs that leave room for later adjustments (which can be manipulated) High cost estimates to provide a cushion for the later diversion of funds Political influence to get projects into the budget without appraisal 	<ul style="list-style-type: none"> Government Ministers Senior civil servants Procurement officers Private consultants (e.g., planners, designers, engineers, and surveyors)
Tender for works and supervision contracts	<ul style="list-style-type: none"> Bribery to obtain contracts (leaving costs to be recovered at later stages) Collusion among bidders to allocate contracts and/or raise prices (potentially with assistance from procurement officers) Interference by procurement officers to favour specific firms or individuals Going to tender and signing contracts for projects that are not in the budget 	<ul style="list-style-type: none"> Procurement officers Private consultants (e.g., supervising engineer) Contractors
Implementation	<ul style="list-style-type: none"> Collusion between contractor and the supervising engineer (with or without the client's knowledge) that results in the use of lower quality materials and substandard work Collusion between contractors and the supervising engineer to increase the contract price or adjust the work required in order to make extra profits, cover potential losses, or recover money spent on bribes 	<ul style="list-style-type: none"> Procurement officers Private consultants (e.g., supervising engineer) Contractors and subcontractors
Operation and maintenance, including evaluation and audit	<ul style="list-style-type: none"> Agreement by the supervising engineer to accept poor quality work or work below the specification, leading to rapid deterioration of assets A lack of allocated funds for maintenance, as new construction takes precedence in the project identification stage for future projects 	<ul style="list-style-type: none"> Procurement officers Private consultants (e.g., supervising engineer) Contractors and subcontractors

Fig. 5.7 Corruption typology—construction. From U4 (2015) ‘Corruption in the construction of public infrastructure: critical issues in project preparation.’ <https://www.u4.no/publications/corruption-in-the-construction-of-public-infrastructure-critical-issues-in-project-preparation-1>

3. Ask a working group to do the same. If you have to bring in a contractor, use one that is familiar with sector-based anti-corruption. We have quoted U4 in this book as one such organisation, but there will no doubt also be others.
4. Engage customers, citizens, users and youth groups.

An example of a recent collaboration in developing a sector typology is shown below. It is for water, a complex sector with the ‘usual’ mix of huge, obvious corruption issues and smaller, technical ones that can nonetheless lead to massive misuse of resources. In this case the typology was authored by a long-time water engineering professional working together with a political economy graduate student; they in turn built their collated view of the issues by interviewing water management professionals in the private sector, in government and in regulation. They focused their topic somewhat regionally by concentrating on water management corruption issues in the USA and in three regions of Mexico. The resulting typology is shown in Fig. 5.8 (Martinez-Rossignol et al. 2022, Martinez-Rossignol and Palmer-Moloney 2022). One aspect of that work was to highlight that interviewees were ‘uncomfortable in the extreme even talking about corruption’. This was the case in both Mexico and the USA, and helped to shape our view that better equipping organisation leaders and managers to discuss and address corruption needs to be an essential part of the corruption-reduction approach.

ANALYSIS AND CONTEXT

Having identified the issues—a major step forward—analysis is needed of the frequency, the importance, the context and the impact of each issue.

Doing a technical analysis can be a two-day exercise, or it can be a six-month one. The quicker way is always attractive. Your own staff are usually aware of the corruption issues, often with extensive experience of working in large, complex, bureaucratic environments. Hence, they are likely to be the best informed about what the corruption problems are, which ones can be tackled immediately and which ones need to be left for later. You might give them the typology from the relevant sector review in *CurbingCorruption.com* and ask a group of them to analyse which are the more relevant ones and their relative importance.

This simple approach has the advantage that you can quickly capture the ‘top of mind’ knowledge of your senior professionals. It has



Fig. 5.8 Corruption typology—water management

disadvantages though: it is likely to focus on the more immediate issues, and it does not help in building broader awareness and, potentially, support for tackling the issues.

Alternatively, you may have access to specialist groups with extra knowledge, like the evidence from internal audit groups, regulatory agencies and professional fraud groups. Possibly combined with other external groups like community groups, private sector associations or civil society, you can get a more inclusive analysis done, still quite quickly. Such an analysis is more public than the internal analysis but has the potential advantage of generating broader support.

At the most thorough end of the spectrum, you can use groups with professional anti-corruption knowledge, preferably with specific sector expertise, as outlined earlier. These groups might be consultancies, or civil society, or think tanks. Such analyses are likely to take from two months to six months. In large initiatives, there are several analytical techniques you can consider, outlined below. There is also an obvious and often sizeable political advantage to having a thorough, independent analysis done of the corruption issues and risks. If you have time and funds, we recommend that you do such an analysis.

Analysis Methodologies

There are many methodologies for corruption analysis, but they all tend to do much the same thing. They identify, in turn, the underlying laws, regulations and guidelines governing the organisation; then the main processes; the key steps (both formal and informal) for each business process; and the strengths and the vulnerabilities to corruption of each step (based on weaknesses in the formal system and weaknesses in the capacity or incentives to implement the formal system).

Finally, they make some estimation of the scale of each type of corruption, usually through survey information. They might be able to access existing surveys that provide information on the perceived scale of the corruption types, or they may commission a survey, or they may do their own. These can be small—a ‘straw poll’ of 50 people—or they can be large. One education sector analysis that Pyman was involved in developed its own data based on 550 interviews. Such analysis techniques include Vulnerability to Corruption Analysis (VCA), Public Expenditure Tracking Surveys (PETS) and Quantitative Service Delivery Surveys (QSDS). There are also others that are more community-based, such as citizen report cards pioneered by the Public Affairs Centre in India.

Vulnerability to Corruption Analysis (VCA): A VCA, which is a systematic analysis of vulnerabilities to corruption, is used to identify problems, select priorities and sequence interventions in a sector-focused approach. Various organisations have provided guidance on how to do such assessments—such as IRI (2018), DFID (2010), USAID (2009) or the European Council (2010)—with the aim of developing concrete insights regarding forms of corruption, sources, implications, extent and vulnerabilities to corruption in particular sectors, agencies and functions in order to develop practical prevention measures. VCAs use a simple methodology focused on analysis of key government business processes. This approach normally involves initial meetings, usually with the most senior members of staff for each area, followed by observations of workplaces and processes, and then follow-up meetings with wider groups of staff to discuss, review and revise information on business processes. Efforts are made to understand both the formal (*de jure*) and informal (*de facto*) processes that are in place and operative. Elements of one such analysis, on the national education system, are shown in the text box below.

Example

The MEC's VCA on education (MEC 2017):

- The analysis covered the whole of the Education Ministry, not just a sub-section.
- Work was based on an analytical set of the 36 education-specific corruption issues.
- The analysis was founded on a wide range of interviews, with segmentation of the target population, conducted with communities in the provinces as well as with central, provincial and district government.
- The analysis included a review of the written processes and relevant laws, to judge the extent of differences in practice.
- The active engagement of the Minister of Education right from the beginning was essential. Without this the assessment could not proceed.
- An active and extensive quarterly follow up over 18 months, with visits to the provinces, active engagement of local stakeholders and publication of findings.

Extensive analyses of corruption issues using VCA were pioneered by Afghanistan's **Independent Joint Anti-Corruption Monitoring Committee**, commonly known as 'MEC'. Funded by international donors, MEC was the premier anti-corruption entity in Afghanistan; it was set up by Presidential decree in 2010 and led by a committee of six (three eminent Afghans and three international experts), and with an Afghan Secretariat of professional staff. MEC has since been dissolved.

Public Expenditure Tracking Surveys (PETS): PETS originated as a World Bank tool in the mid-1990s to monitor budgets and efficiencies in public spending. Often conducted on the basis of national-level expenditure, the tool has also been actively promoted for use by civil society organisations. The World Bank, working with the Transparency and Accountability Program (TAP) and Results for Development (R4D), produced a guidebook to help monitor projects and smaller-scale operations, for instance in health and education (Koziol and Tolmie 2010). Commenting on the application of PETS in education, Poisson (2010) observes: 'PETS surveys aim to "follow the money trail" (mainly non-salary expenditures), from the central ministry of education level right down to the school level. These studies permit the calculation of rates of "leakage" in these flows [...].'

World Bank Governance and Anti-Corruption Diagnostics: Developed in 1998, these World Bank tools enable disaggregation of the corruption issues at both the regional and the sector levels, as well as at country level (Recanatini 2017).

Quantitative Service Delivery Surveys (QSDS): This survey methodology, also developed by the World Bank, seeks to assess quality and performance in resource usage at frontline facility level. A guidebook to assist practitioners in using this instrument (as well as PETS) was developed as part of the World Bank Poverty Reduction and Economic Management data platform (Gauthier and Ahmed 2012).

Political Economy Analysis (PEA)

Those tasked with tackling corruption issues in any given sector are likely to know the context regarding the more political factors driving the corruption. But it may be valuable to consider these factors more formally. Who is gaining from each corruption type and why? Who might gain, who might lose from reducing corruption in this specific area? For each corruption type, who will support action to address it and who are the possible spoilers?

Doing a 'Political Economy Analysis' means that these issues are laid out in a structured way and can help decide which corruption types should

be addressed. In simple terms, ‘Political economy is the study of how politics affects the economy and how the economy in turn shapes politics’ (Frieden and Iversen n.d.)—and that is as true at the sectoral level as it is at national level. Such an analysis can either be formally commissioned or done in-house, and we recommend the following guides:

Whaites et al. (2023) *Understanding Political Economy Analysis and Thinking and Working Politically*

Adapted from work by the FCDO with input from the Thinking and Working Politically Community of Practice (TWP CoP), this guide outlines how to understand and use a set of analytical tools known as Political Economy Analysis, summarising various different types (from light-touch to more in-depth) and provides advice on how professionals can decide on what is most appropriate in a given context, applied to their own specific needs. The guide comprises a general overview of the approach, alongside specific guidance for those undertaking a PEA.

Marquette and Peiffer (2020) *Corruption Functionality Framework* (available at: <https://ace.globalintegrity.org/interactive-framework/>)

A corruption functionality approach helps to explain why corruption persists in a way that other approaches often fall short. Whether the amounts of money involved are big or small, people engage in corruption because they believe that it will work for them in satisfying a need or solving a problem. People can—and do—justify their behaviours based on real or perceived ‘need’; this is why corruption persists. The key, though, for anti-corruption reformers is better understanding how corruption functionality works and—importantly—which functions really do need to be filled and which ones don’t. The framework, shown in Fig. 5.9, comprises the following four steps:

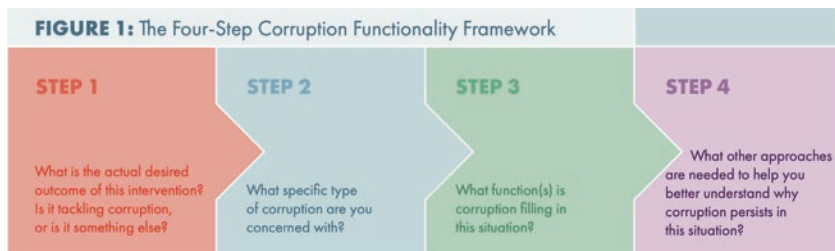


Fig. 5.9 The four-step corruption functionality framework. From Marquette and Peiffer (2020) ‘Corruption Functionality Framework.’ ACE Global Integrity. https://ace.globalintegrity.org/wp-content/uploads/2021/01/GI-ACE_Research-Paper-Corruption-Framework-1.pdf

Whaites (2017) *The beginner's guide to political economy analysis*.

This guide surveys the best materials that are available while also adapting some approaches that incorporate wider ideas on politics and institutions. The guide affirms that there should never be an official 'orthodoxy' for PEA and so the emphasis is on questions, prompts and ideas to help thinking and practice, such as why do we do political economy analysis, and what is it; what kinds of issues and ingredients are often included in a PEA; how do we make sense of the different varieties of PEA; what tools are out there to help us conduct a PEA; what is thinking and working politically?

Hudson et al. (2016) *Everyday political analysis*.

This is a framework for thinking about politics and power called Everyday Political Analysis (EPA). EPA is for anyone who is convinced that politics and power matter but feels less sure of how to work out what they mean for their programmes. This note introduces a stripped-back political economy analysis framework—stripped down to its barest bones—leaving only the essentials needed to help frontline staff make quick but politically informed decisions.

ESID (2015) *Making political analysis useful—adjusting and scaling*.

This approach utilises three types of analysis: (1) agenda-setting analysis aims to establish a shared language and understanding; (2) problem-solving analysis aims to increase rates of implementation; (3) influencing analysis aims to develop a political strategy for change. Each type affects the questions to ask, the intended audience and even their timing. The report encourages organisations to start small and be pragmatic.

There are more guides to political economy analysis; see, for instance, OECD 2015; Hudson and Leftwich 2014; World Bank 2008; Khan et al. 2016. The World Bank organises and funds a training course in Political Economy Analysis by the Policy Practice, which has been running since 2008 (<https://www.thepolicypractice.com/our-online-and-face-face-training>).

BUILDING SHARED UNDERSTANDING

We use the term 'building shared understanding' in reference to understanding three things: corruption in general, the aims of any remediation or corruption-reducing activity, and the corruption issues relevant to this

organisation. Regarding understanding of corruption in general, we have already talked of this in Chaps. 2 and 3.

In relation to our aims, the starting question here is ‘what are we trying to achieve?’ Is it *reduced corruption*? Is it *improved performance of the organisation*? Is it *a broader intent such as signalling determination to act against corruption*? *The more the aim contains multiple objectives, the less chance it will be achieved. We believe that—in most situations—the objective is NOT directly to reduce corruption nor to tackle corruption head-on as a generic problem. Instead, the aim is to reduce the corruption-generating barriers to the achievement of core performance objectives.* This advice is not usually found in handbooks on corruption reform. But we believe that it is crucially important. *Reducing corruption is not an end in itself but a means towards achieving more widely desired objectives in policy or service delivery.*

The team can now have a substantive and informed discussion about what are the corruption issues in their context. In particular, where and how is corruption causing problems in delivering outcomes and results? The follow-up questions are: ‘How do you build on this shared understanding of the issues to get to a shared understanding of which issues can be addressed and which cannot? Which issues are soluble, which issues matter the most, which issues can only be circumvented or minimised, which issues are most risky to address?’

For the second stage of building a shared understanding of which issues matter the most, we advocate *peer voting*—subjective ranking of the issues among knowledgeable players.

To illustrate, we offer an example of a group using the peer voting method, drawn from the defence sector in Botswana. Widely regarded as one of the few success stories in national-level corruption reform, Botswana instituted a wide range of reforms several decades ago, on good governance, land reform and institutional design (Mungiu-Pippidi 2015: 144; Sarraf and Jiwani 2001).

A group of top military officers reviewed corruption issues in defence during a day-long discussion in 2014 facilitated by Transparency International Defence and Security. Having worked through the typology of defence corruption issues as outlined above, they voted on the relative importance of each of them for the Botswanan military. Each of the 30 participants cast votes for what they saw as the three most critical issues. The results are shown below in Fig. 5.10, with the 29 issues listed down the left side and the number of votes received recorded in the horizontal bars.

BOTSWANA – PEER VOTING ON DEFENCE CORRUPTION RISKS

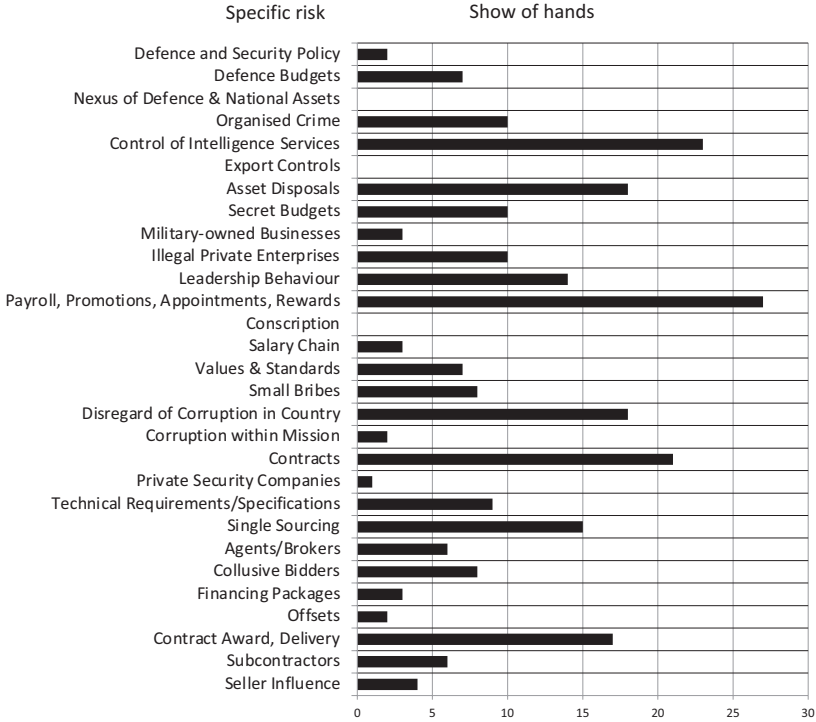


Fig. 5.10 Peer voting by military officers of Botswana on defence corruption risks. Curbing Corruption. From Pyman and Heywood (2020) ‘The Sector Focus and Reformulation Approach (SFRA) enabling politicians, leaders, and managers to formulate practical strategies for corruption reduction.’ <https://curbingcorruption.com/document/pyman-and-heywood-2020-practical-strategies-for-corruption-reduction-the-sector-focus-and-reformulation-approach-sfra/>

The top three concerns were corruption in payroll/promotions/appointments, corruption in control of military intelligence services, and corruption in contracts. The three concerns were the subject of intense discussion, first on whether this ranking was ‘correct’, then on what to do about them (Pyman 2017b).

Using peer voting like this to rank the specific issues, then comparing and discussing the reasons for differences in ranking, is a powerful mechanism for bringing out how the different people around the table view the importance of each individual corruption issue. If you are leading such a discussion, there are two alternative ways to conduct the voting: either openly—asking each person around the table for their top three concerns and tallying the votes as you go round the table—or anonymously, asking each person to submit their three concerns on a piece of paper and then collating them to produce a ranked list of the group's concerns.

How to do the ranking depends on the culture, the level of tension in the room, and your assessment of the group dynamics, given that the room will likely be a mix of victims of the corruption, those participating actively in the corruption, and superiors, subordinates, and outsiders. The choice will powerfully affect the openness and usefulness of the subsequent discussion. Sometimes a closed vote is the only safe way to bring issues out into the open. Other times, in more harmonious environments, open voting is a good exercise in building a common understanding.

From experience of leading and participating in such exercises in many countries (Pyman 2017b), these one-page, peer-voted lists of corruption concerns are revelatory for the participants. They are (mostly) pleased to see discussion of these issues out in the open. They are surprised that it was easier to do than any of them had expected. In more closed cultures, there is relief that those who usually dominate the discussion, the perpetrators and those concerned to keep the subject under wraps, usually the superiors, count for no more than anyone else in the closed voting. In more open or in less tense cultures, there can be amusement at the discomfort of those known to be involved when the ranking is revealed.

Most of all, this technique makes for very active conversations in which the usually taboo discussion of corruption within the organisation/institution/sector becomes discussable. Enabling such exchanges is arguably even more important than whatever the ranking exercise revealed.

The concept underlying our emphasis on building shared understanding and on voting together on the importance of the corruption issues is 'sense-making': the process by which people develop a shared understanding of their collective experiences. The concept, associated most notably with Weick (1995, 2001), was developed in the late 1960s as part of a movement that shifted thinking about organisations away from decision-making and towards how peoples' understanding drives organisations' behaviour.

Similar exercises have been used by others in developing a common approach to corruption reform, for example in the Philippines by Johnston (2010). Klitgaard (2019), also advising in the Philippines, uses the term ‘convening’ in place of sense-making. Sense-making has also come up in the corruption reform literature in the guise of complexity thinking, such as the analysis and understanding of anti-corruption experience in Malawi by Bridges and Woolcock (2017).

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Remediation: Broad Framing

Abstract This chapter introduces the concept of remediation, which entails choosing the strategies to get things done and have a practical effect. It explores how to identify the way that political context and judgement influence sequencing of changes and provides an introduction to a range of broad framing options.

Keywords Remediation, Strategies, Context, Framing

By this point, you have identified specific corruption issues as constraints, decided on what your objective is in tackling these issues, and you have reached agreement on those that need to be addressed. This chapter and the following one are about remediation: adopting strategies to get things done, be practical, have a tangible effect (Heywood and Pyman 2020). That also means accepting that the result will usually be partial—making progress in one area but leaving other problem areas untouched. Approaches that are impossible, theoretical or simply a statement of desire—such as *more leadership commitment is required*—do not constitute strategies.

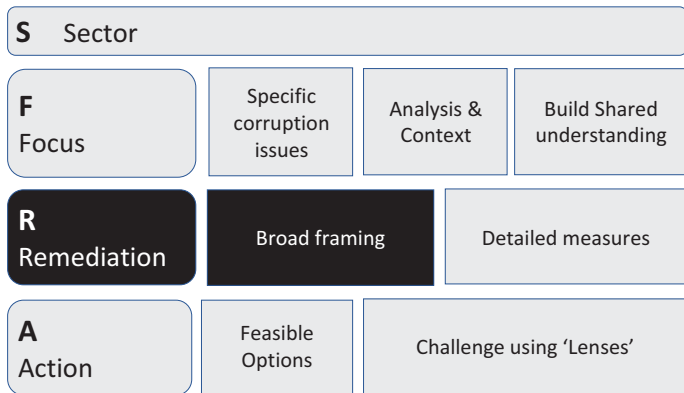
By and large, strategy comes into play where there is actual or potential conflict, when interests collide, and forms of resolution are required. Strategy is required when others might frustrate one's plans because they

have different and possibly opposing interests and concerns (Freedman 2013). And there are always different options on what to do.

SFRA looks at strategies for remediation as being a combination of two pieces:

- The broad framing—about judgement, the political context and how changes might be sequenced (this chapter).
- The many detailed measures that can be undertaken, individually or in combination (explored in Chap. 7).

In this chapter we consider the broad framing part of remediation:



For example:

- Might it be most effective to keep the anti-corruption measures below the internal or external political radar, by addressing them incrementally, not all at the same time?
- Or to mainstream the anti-corruption improvements within an existing, larger improvement initiative?
- Or to go all-out to address the corruption issues before those wedded to the status quo have time to organise against the changes?
- Or to tackle just one vital aspect of the corruption issues, even if they are many, so as to concentrate efforts and have a visible result?

- Or be better to make a large emphasis on the corruption aspect, as a possible way to develop support?
- Or would the result be better if the overall anti-corruption approach was reframed as an integrity-building exercise, or as confidence-building, rather than explicitly confronting the corruption?

Consideration of both the politics and possible opposition are relevant to the choice of broad approach. This is less commonly national politics as it is ‘politics with a small p’—the internal politics of the organisation, the politics of the local environment, the politics of special interests within your sector.

The objective of having this stand-back moment is about how the local political circumstances can be navigated so as to have the best chance of delivering the desired change.¹

Besides opponents of the status quo, you will also have passive supporters among those who will not speak out in your support. Many senior figures don’t like the situation they find themselves in, forced to participate in corrupt activities because of how the system they work in operates. So, whilst they will probably not actively support you, they may be ready to quietly support, or at least not to oppose, you, depending on the rest of the group. It is worth seeking their input on what sorts of measures could be put in place without precipitating opposition.

Furthermore, it is valuable to remember that there are always honest, integrity-minded people in organisations, even in the most corrupt environments. Pyman was involved for over a decade in Afghanistan in various anti-corruption efforts—one of the hardest countries to make progress against corruption—yet was regularly astonished at how much substantive progress it was possible to make. See, for example, Pyman and Kaakar (2017) on the creation of the Afghan National Procurement Authority, or Brooks and Trebilcock (2017) on the establishment of the Afghan Anti-Corruption Justice Centre—both, of course, prior to the fall of the country to the Taliban in 2021.

We set out below a range of broad framings that have been used. This list is not comprehensive—circumstances will always be too complex for that—but they indicate options that you can adapt and extrapolate from.

¹For more on how progress in reducing corruption is part of the political contestation process, see Heywood (2017) and Johnston and Fritzen (2021).

SINGLE ISSUE

The first option is that you may choose *not* to have a broad approach at all but to focus all your actions on addressing a single corruption issue that is of concern.

Example

Danish shipping company Maersk. Maersk had the problem, a common one among shipping companies, that captains had to bribe port personnel for their ships to enter and leave port in a timely manner, seemingly a small cost in comparison with the far greater costs incurred by any delay. Maersk developed an active strategy for how to curb this single issue.

The Maersk approach comprised *technology*—a global IT application for recording on the bridge of each ship what gifts were being asked for and given from each ship at each port; stakeholder engagement—*working with the port authorities* in a sustained effort in the ports to gain their support; and training *and culture change to alter the thinking of the ships' captains*. This latter element was the key to success. Captains have a lot of autonomy, and it was much easier for them to hand over some small gifts to ensure swift passage through the port than to run any risk of delay, which is disproportionately more expensive. The captains were the key authority group within the company who needed to see the possibilities and the benefits of a change. The change was enabled through training: educating the captains in how they could refuse such requests face-to-face without giving offence.

Figure 6.1 shows the results of the initiative. The horizontal axis is time, the vertical access is the number of gifts given out each month as the ships entered ports around the world. As the initiative is implemented, the number of cartons of cigarettes and bottles of whiskey that captains had to give out plummeted. The outcome is better business as well as a stronger corporate culture for Maersk, better reputations for these ports and a global reputational gain for Maersk (Pyman 2019a).



Fig. 6.1 Reduction in gifts from ships' captains. Courtesy of Maersk. From Pyman 2019c 'Changing corporate behaviour requires new skills and a different focus.' International Bar Association Anti-Corruption conference, Paris, June 2019. <https://www.markpyman.com/wp-content/uploads/2020/10/190623-Pyman-IBA-conference-speech-2019-ChangingCorporate-Behaviour.pdf>

BROAD FRONT

Broad front framing is when a wide range of detailed anti-corruption measures are enacted. This may be because a given organisation (or the public more generally) may be clamouring for action against corruption, or when the leadership believes that a multi-pronged approach is necessary. Downsides include that such drives are hard to manage because they rely on motivating a diverse group of actors, and they are prone to run out of energy.

They are also a favourite tool for those who wish to appear active, but in reality aim to subvert the initiative, expecting precisely that it will either collapse under its own weight or run out of steam.

Example

The Bulgarian government of 2009–2013, led by the centre-right GERB party, was focused on anti-corruption, Bulgaria having just had some of its EU funding cut off due to lack of progress on tackling corruption. The focus was especially strong in the Ministry of Defence, whose senior leadership had already developed an anti-corruption strategy in 2008, whilst in opposition, ready to implement in 2009 were they to be elected. Besides large-scale staff changes, the new leadership strategy was broad reform across a wide range of areas which included:

- Immediately establishing an anti-corruption council in the Ministry of Defence (MoD) as the key leadership change body.
- Introducing transparency into the decision-making process as a basic weapon against hidden practices related to abuse of position-in-office for personal gain.
- Developing the strategic documents of the defence policy and the modernisation of the armed forces under the condition of clear accountability to the citizens regarding the ways of spending the defence budget.
- Putting into law that any contract over €50 million should be approved by the parliament.
- Developing an Ethical Code of Conduct for military and civilian personnel.
- Introducing specialised training in anti-corruption practices.
- Implementing rules on preventing and determining conflicts of interest.
- Changing the internal rules on publication because everything was confidential or secret and nothing was published on the MoD website.
- Changing the rules for so-called ‘special procurement’ for secret tenders.
- Creating a strategy for the management of surplus property and publishing on the webpage the complete list of MoD and military real estate.

Though positive evidence of the impact of these changes was found in the relatively good scoring of Bulgaria in the Transparency International Government Defence index in 2013 and 2015 (TI-DS 2015), the reforms failed in the end, being reversed by the government that followed in 2013. The successes and failures of the initiative have been described in some detail by the former Bulgarian Deputy Defence Minister (Pyman and Tzvetkova, 2013).

NARROW FRONT

The narrow front framing seeks to avoid the above problems. In the public sector, this approach is safer, given the frequency with which government ministers can be replaced. Limited time in office does not stop ministers from working hard to have a positive impact against corruption in their ministry: either from a genuine desire to see improvement or because they were being pressed hard by their president, prime minister or chief executive to deliver promised improvement. Pyman's observation from Afghanistan from the period 2014–2018 was that the reform-minded ministers had thought hard about how to reduce corruption in their ministry/sector and were implementing well-chosen narrow strategies (Pyman 2018, 2019b).

Example

Improvement of electricity access in Kenya and Ghana. Both countries' electricity companies are perceived by the public as being systemically corrupt, yet the electricity access rate has risen spectacularly, as shown in Fig. 6.2, following a series of 'problem-solving' measures, focused on improving access to electricity through reducing corruption constraints.

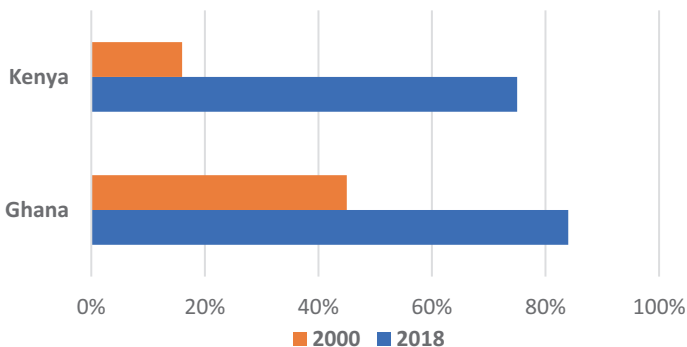


Fig. 6.2 Percentage national access by citizens to electricity in Kenya and Ghana; year 2000 versus 2018. Global Integrity. From Pyman and Boamah 2019 'Usain Bolt meters: reform successes in the electricity sector can go fast, but only the failures are reported.' At <https://ace.globalintegrity.org/usain-bolt/>

In Ghana, led by a new Minister for Energy, the measures included the frequent monitoring of electricity infrastructure, introduction of pre-paid metering systems, improved revenue collection/tariff payment mechanisms, establishment of legal frameworks to punish criminals involved in power thefts, effective oversight roles of civil society organisations (CSOs) and vibrant media engagement in the procurement of electricity infrastructure. The success was not just the purview of the minister but was pressured by a series of fierce anti-corruption campaigns by CSOs and the media. For more information, see Pyman and Boamah (2019) and Boamah (2020).

RADICAL CHANGE

We know that radical change often fails; indeed, it's why we talked in the introduction about tackling molehills not mountains. But there are sometimes arguments in its favour.

- (i) When there is a political opening, you may have one chance to make a significant change; perhaps following an election, or after the disgrace of a major political figure, or after a national disaster aggravated by corruption. Such openings rarely stay open for long.
- (ii) In similar vein, if your anti-corruption programme is part of the reason for claiming power or being in power, you have to show rapid change—even if not on fundamental issues—before the electorate becomes too disappointed.
- (iii) There can also be reasons for large-scale change even when there is no major political angle. Staff in large organisations can become expert at subverting change initiatives, whether in a top-flight multinational commercial organisation or in an under-performing ministry. They know how the changes are supposed to work and they know how to seem to cooperate, how to delay, how to sow the seeds of internal dissent, how to ensure the first few steps fail and other ways to kill an initiative. Making a large-scale change, such as cutting off large pieces of a ministry so that each can be tackled as smaller fiefdoms, can be a way to pre-empt such subversion.

Such an approach was used, for instance, in Georgia in relation to land sector, police sector and education sector reforms (see Pyman and Heywood [2020](#), Pyman [2017b](#)).

Example

Land sector reform in Georgia, 2004. After the peaceful ‘[Rose Revolution](#)’ and the change of government in Georgia in late 2003, democratic and legal reforms developed, especially in the land sector. Many public sector bodies were [rapidly rebuilt and reformed](#), and the effects were immediate: corrupt practices, once endemic, quickly declined. The 2004 ‘[Law on State Registry](#)’ was the starting point for many of these changes, as it dismissed the old state registries. The National Agency of Public Registry (NAPR), which handled property transactions and land rights, was reformed into a self-financing body with a digital repository and streamlined processes of registering land and transactions. A similar change was made to the Civil Registry, which handled birth certificates, passports and personal identities. Georgia digitised the land ownership registry, the cadastre and its paper maps. Registration processes were simplified to increase efficiency but also to reduce the risk of corruption. Several tasks, such as managing sales of state properties, were distributed to different institutions.

A 2012 World Bank report highlighted Georgia’s pragmatic approach to reform, noting, ‘In some cases, processes that used to involve bribes were simply formalized and made legal.’ Previously, for example, paying a bribe could speed up the processing of documents. The new system still offered rapid processing for a higher fee, only now the fees went to the agency rather than filling the pockets of corrupt civil servants. Further detail about this example is available at the U4 Anti-Corruption Resource Centre ([2022](#)).

LOW-PROFILE

There are many environments where it can be counter-productive to emphasise corruption issues or to draw attention to the fact that the reform measures are aimed at tackling corruption. This might be because the organisation is dominated by people unwilling to discuss corruption,

or countries where the word ‘corruption’ is too loaded with cultural meaning, or hostile political regimes, where low-profile (or incremental) reforms are likely to be the only ones that will be tolerated or be safe to implement.

Example

Defence sector corporate reform in Saudi Arabia. The Saudi Arabian defence company AEC, with a turnover of \$500 million, was determined to show the country and its international partners that Saudi companies can work successfully without corruption. Whilst hardly mentioning corruption, because in Saudi Arabia it is more accepted to speak of building integrity than countering corruption, they implemented tough measures that would be categorised as anti-corruption in most other contexts.

They had the common Saudi problem that hiring decisions were often influenced by the princely relatives of applicants pulling strings with the Royal family. Their solution was in two parts. First, they set up a training academy, in which applicants learnt maths, English and business management. Applicants knew from the beginning that the final course exams would be entirely meritocratic and that most applicants would not get through. Second, the chief executive spoke with the King, to gain his advance agreement that special pleading from royal relatives of applicants would not be accepted. Once Saudi society realised that this company would work only on a meritocratic basis, the princely complaints stopped. Corporate morale and business performance rose, and international customers were convinced (Pyman 2019a).

Many corruption problems are more complex to solve than you expect, involving a range of stakeholders and often some difficult political choices. Choosing an incremental or low-profile framing softens this risk. It enables you to see how one reform measure turns out before you move on to the next; it enables you and your team to learn the mechanics of implementing corruption reforms with an ‘easy’ first few tasks before taking on larger challenges; if you work within a ministry and there is no major political

angle to the changes, then the corruption reforms will probably best happen the same way that most improvement reforms happen inside large organisations—slowly and steadily.

Multilateral organisations usually advise that you should choose incremental change. Here, for example, is a comment in a European Commission-led toolbox for practitioners engaged in public administration reform: ‘An incremental approach, with provision for feedback and adjustment along the way, may reduce uncertainty and thus opposition. This process of continual change tallies with the concept of “obliquity”, which recognises that goals are often achieved indirectly, not as intended. Senior public servants, either elected or appointed, set out the reform objectives as the overall direction of travel, the administration makes steps towards the desired destination, and takes the most appropriate paths on the way, learning from experience: there is no precise road map to the future’ (European Commission 2017: 211).

MULTI-PARTY COLLABORATION

It is almost a cliché today that corruption reforms must involve several parties, but we also know that it is difficult to get different groups to work together efficiently because of problems of free riding on the efforts of others, potential differences in or conflicts of interests and perspectives, and other issues. It thus becomes important to try to build trust and collaboration to promote collective action, as argued by the Basel Institute of Governance (2020). A framing that starts from the concept of multi-party action may be the best route to success. This means a directly political approach that aligns the competing interests, as expressed by Khan (2016: 1): ‘In societies that have widespread rule violations, high-impact anti-corruption is only likely to be feasible if the overall strategy succeeds in aligning the interests and capabilities of powerful organizations at the sectoral level to support the enforcement of particular sets of rules.’

Example

Health sector in the Philippines: the Sin tax. A diverse range of partners, including doctors and health-related organisations, led reform against tobacco, via the so-called ‘Sin tax’, which addressed corruption issues in tobacco as well as the health issues (Sidel 2014).

It was a classic coalition of parties with different interests. The reform coalition included diverse components, namely:

- Reform champions within the administration, in departments, agencies and the Office of the President.
- Reform champions within Congress.
- Reform entrepreneurs: activists, experts, policy wonks, NGOs and academe.
- Advocacy groups, allied associations, organisations and pressure groups.
- Media outlets: investigative journalists, reporters, social media and Internet websites.

Plus, the coalition made ‘allies of convenience’ with groups who were mostly hostile to reform and anti-corruption efforts, such as British American Tobacco (BAT) and San Miguel Corporation, which openly sought to ‘reform’ a tiered tax classification scheme which inhibited the entry of their products into a market monopolised by others. In the event, the passage of the bill secured billions of pesos in annual new tax revenue for the government and contributed to growing investor confidence in the Philippines. The Sin Tax reforms had significant health implications as well. The passage of the bill has also helped to strengthen political capacities, knowledge and connections among a network of ‘reform entrepreneurs’ within the administration, in Congress, and in civil society. More detail on this example can be found in Development Leadership Programme (2018).

BUNDLING

This framing, described in more detail in Heywood and Pyman (2020), is a deliberate bundling of specific reform measures where some of the individual measures will be seen through a polarised political lens and face resistance. Well understood by politicians, such a framing may allow the broad package of reform measures to be approved even whilst individual ones are strongly opposed by particular groups.

Example

US state ballots on anti-corruption 2018. There has been surprising progress with anti-corruption ballots in the USA at state level, even during the Presidency of Donald Trump and in strongly Republican states. The bundling strategy included placing a balance of different items on the ballot paper (up to 8), some appealing more to the left, others appealing more to the right. The language varied, depending on the state. In Alaska, the answer was focused on integrity ('Alaskans for integrity'), but in other states it was best to call the message anti-corruption directly, because conservatives preferred this to 'campaign reform', which was seen as left-wing phrasing. Local activist NGOs like the 'Badass grandmas' of North Dakota gave the campaign a real sense of being locally owned and non-political (Forbes.com 2019).

SIGNATURE-ISSUE

One of the dilemmas of corruption reform is that the more fundamental changes—typically technical, administrative or organisation reforms—take a long time to come to fruition and therefore carry the risk of running out of energy before they are fully achieved or are likely to be sustainable, as well as having little public visibility. Therefore, to maintain public as well as organisational support for change, it can be advantageous to lead with something different, irrespective of whether it is a 'large' issue or a small one, and to make this different issue the main lead element of the strategy.

Example

Health sector reform in a European country. In one EU country, the Health Ministry was keen to make better progress against the impact of corruption on healthcare for patients. The plan had a substantive part, comprising better management information availability and transparency, more robust stock management, stronger controls over high pricing of medicines, stronger controls over corruption in medical practices, strengthening control over semi-separate health agencies, better clinical auditing and strengthening sanctions. However, the minister, who was the driver of the change, argued persuasively that substantive changes gained little or no credibility with the public and that the campaign had to be fronted by initiatives that individuals could easily recognise. Two such ‘signature’ issues were under consideration: providing public information outside hospitals regarding waiting lists (patients could bribe their way up the list) and public information showing the presence or absence of doctors in each of the main hospitals (highlighting doctors registered as present in the hospitals, but actually out treating patients in private clients) (Pyman 2017a).

KEEPING-UP-HOPE

As outlined in Heywood and Pyman (2020), a low-ambition strategy may be the most suitable framing in hostile environments. The purpose is not to have material impact—almost by definition the reforms would be shut down if they did have an impact—but to continue to give hope to those working in the system that change is still being contemplated and that they should not despair.

Such a framing does have a strategic logic to it, namely that unexpected events can quickly change the dynamics. In the meantime, a well-chosen set of small measures can expose a large number of people to how a non-corrupt working environment may be possible. The example below from Ukraine in 2008 falls into this category.

Example**Anti-corruption training for the Security Sector in Ukraine**

In a political regime hostile to anti-corruption reforms, such as Ukraine around 2008, the only way for an organisation to address corruption issues was to choose remedial measures that seemed to be of low importance and therefore not a threat to vested interests or corrupt political groups. The purpose of such a low-ambition reform measures is mainly just to keep alive hope that there is some pressure for reform, even if subdued. Typically, such measures involve capacity-building and training. These can be a much more powerful approach than some would anticipate.

In Ukraine from 2008 to 2014, there was some desire among senior people in the Ukraine Security Service to improve trust and performance by reducing corruption, but there was zero political will for reform. These senior individuals had a well-developed sense of what reforms they could implement without making their political masters nervous and without either getting them fired or placing them in deeper danger. Their chosen tools were to implement wide-spread anti-corruption training (because training is very low-profile politically), organise day-long discussion of the problems among the mid ranking leadership and second senior staff to anti-corruption organisations. See Pyman (2017).

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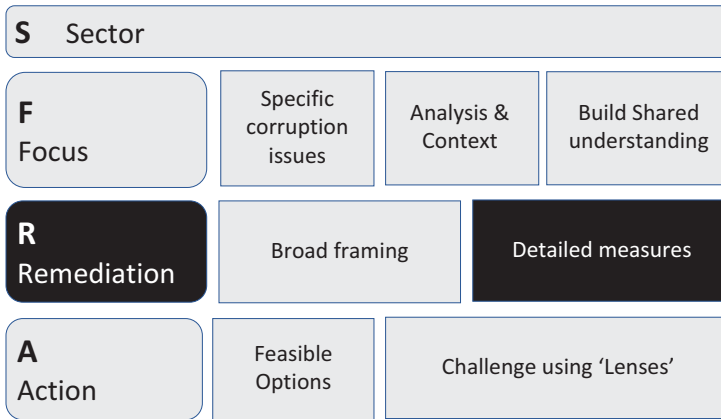
Remediation: Detailed Improvement Measures

Abstract This chapter outlines eight categories of detailed remediation measures, to show how to go about generating plausible possibilities for taking action. The chapter provides a wide range of concrete examples that offer additional guidance.

Keywords Remediation, Measures, Action

This is not yet ‘decision time’; rather, it is about generating plausible possibilities. Later, in the ‘A’ (Action) stage of SFRA, we will review the merits and disadvantages of the different measures and how they are narrowed down to final choices.

This is the longest and most detailed chapter in the book, outlining 8 categories of detailed remediation measures, with 64 sub-categories and 65 examples. The purpose of putting together so much material is not to bombard you, nor to present these cases as examples of ‘best practice’, but to show you that there are many more options for action than you were probably aware of, and to provide inspiration from what others have done.



Do start with an open mind on what constitutes an improvement measure. Most people make two mistakes about anti-corruption measures right at the beginning.

- They think that anti-corruption is about the *consequences* of corruption—catching and punishing wrongdoing—whereas more effective reforms are about *prevention*, either by avoiding the problem in the first place or by monitoring to flag up possible problems early.
- They default to thinking that solutions lie with ‘the authorities’—external bodies like the police or the judiciary, or internal bodies like the auditors or the finance people. Occasionally, this is the case, but more often you make better progress using your own operational capabilities and knowledge.

We define the following eight improvement measure categories:

1. **Functional measures:** Improving processes, systems and controls. This is where the largest number of the measures are focused on operations.
2. **People-centred measures:** Building support for change, building coalitions, working directly with affected communities.
3. **Monitoring measures:** Increasing the availability of control data to third parties, creating or strengthening oversight groups, whistleblowing.

4. **Justice and rule of law measures:** Prosecuting, raising confidence, improving laws, legalising payments where it makes sense.
5. **Transparency measures:** Making visible what others might wish to keep hidden.
6. **Integrity-related measures:** Harnessing the power of integrity to motivate people, instilling pride and commitment.
7. **Civil society measures:** Creating space for external voices to press against corruption and to help drive change.
8. **Incentives-based measures:** Aligning stakeholders, based on behavioural economics, and ‘nudge’ improvements.

These categories are of course not mutually exclusive. Anti-corruption is strengthened and more deeply institutionalised by leveraging measures which have several effects and/or are cross cutting.

FUNCTIONAL IMPROVEMENT MEASURES

Technical, administrative, financial, systems and institutional reforms tend to be the largest set of measures and to get the most attention; they are often—beneficially—mainstreamed within broader reform initiatives. Functional reforms make sense, especially when they involve systematising or digitising something that previously relied on many human-to-human interactions. However, exclusive attention to technical measures alone is a high-risk strategy: technical solutions often fail, they can be slow, they can be deliberately slowed down and sometimes they are used by political leaders as an impressive-sounding excuse for making little real change—more form over function. So, use functional reforms, but in combination with other approaches, and with sufficient prior analysis. Here are some examples.

Improve the Administrative Processes Closest to Service Delivery

Reforms could include simplification, reducing procedural complexities, automating cumbersome procedures, improving controls, reducing waiting times. Such reforms will rarely address the most severe corruption issues, but improving such processes can be the quickest way to gaining public support, which in turn allows further reform.

Improve Financial Management

This entails improving all the processes around financial management, including accounting and auditing, for instance by making treasury operations clearer and more controlled and making budgets, and the spending against them, transparent. For example, strengthening Public Financial Management (PFM) is an effective anti-corruption measure available to officials (Johnsøn et al. 2012).

Improve Financial Management Processes

Whereas improving PFM is a high-level activity, there are other more modest reforms to improve the integrity and transparency of basic financial management processes that will also make corruption harder. These include proper budgeting processes, making annual budgets public, tracking the spending against those budgets, etc. These small changes can be powerful.

Improve Management Information Systems (MIS)

Improving an organisation's management information system is core to better institutional control of corruption. It is astonishing how many government entities have terrible MIS, preventing effective management and enabling extensive corruption. MIS reform has been shown to be effective in constraining corruption in many cases, but it is best if done through small projects, as the success rate of large-scale IT reform is very poor. Sometimes, if the problems are acute, a simple parallel system is the best, quickest and most motivating way forward.

Example

EU country health sector: With a decades old MIS system and no prospect of funding for improvement, corruption routinely went undetected and unreported. No comparisons between hospitals and services were possible. Decent MIS data are essential, not only for efficiency but also for reducing corruption risks, as it allows comparisons between hospitals, pharmacies, specific units, etc., to identify which are working well or badly and why. This ministry made the bold decision to stop the antiquated system and to develop an alternative. Staff reported on how very much better it was, especially in giving comparative data between medical facilities for the first time (Pyman 2017a).

*Consider Radical Organisational Reform, For Example,
of a Particular Ministry*

Government ministries can become corrupted in whole or in part, or, at the least, tolerant of questionable behaviour. Sometimes, improvements can best be made through organisational reform, such as the removal of a division, or splitting the ministry into separate parts, or conversely, amalgamating overlapping agencies. This process needs a serious organisational analysis, but there are plenty of experts who can do this. Usually, it is better to do change in smaller steps, but sometimes such wholesale reform is the only way to eliminate structural corruption problems.

Consider How New Technology Might Help

There are more opportunities than ever before to reduce corruption by the introduction of new technologies. Among the now many well-known examples are e-procurement, web-based portals and trackers, various open data initiatives and mobile phone-based reporting apps. It is worthwhile scanning equivalent sectors in other countries to see how they are using these technologies.

*Mainstream the Functional Reforms Within Broader Ministry or
Organisation Reform Efforts*

It is nearly always a mistake to treat anti-corruption as a stand-alone effort. More progress will be made by introducing anti-corruption efforts within broader mainstream sector reform programmes.

PEOPLE-CENTRED IMPROVEMENT MEASURES

In the words usually attributed to Margaret Mead, ‘Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it’s the only thing that ever has.’

Networks and coalitions come in all shapes and sizes and creating one could be as simple as building up a team of committed people around you in your area of responsibility. Or it could be on a larger scale, collaborating with groups across the sector, whether private or public, and with professional associations in the sector, such as doctors or engineers. Or it could be working with civil society organisations (CSOs) or in collaboration with relevant international initiatives. Or it could be from particular

groups of people returning to work in the organisation/ministry from elsewhere, enthused by the prospect of positive change. For an example in Oman, involving returnees from Zanzibar, see Hunt and Phillips (2017: 6).

Build Your Initiative Around the People That Live in the Affected Area or Are Involved in the Relevant Sector

Anti-corruption initiatives that are developed together with the affected communities can expect a better success rate than those devised by a small group working alone within government or within an organisation's senior management. You will not just raise awareness and develop community ownership of the plans that way but also prepare the ground for community oversight.

Build a Critical Mass of Committed Supporters Inside Your Ministry or Organisation

Most people in most organisations hate corruption but feel trapped and disempowered by it. Being clear that your team is genuinely committed to making a difference can change the organisation's culture to one with a much lower tolerance of misbehaviour. It can inspire people to work with you and to put in much more than 'normal' efforts. If you are in a leadership position, then your potential to influence others and to reach a wide audience is large.

Example

Building Up a Strong Justice Ministry, Taiwan, 1998–2010.

The continued efforts of successive Ministers of Justice and senior staff had a large impact on the development of Taiwan's anti-corruption policies. One component was socialisation in elite universities, in this case National Taiwan University (NTU), where national-level lawyers, prosecutors and judges are groomed, thereby contributing to the diffusion of meritocratic values. A second component was the establishment in 1998 of the Prosecutor's Reform Association (PRA) by reform-minded prosecutors—this was a milestone in Taiwan's transition to ethical universalism. The creation of the PRA was

(continued)

Example (continued)

motivated by news reports of politicians trying to interfere with several prosecutorial investigations. A third component was the replacement of key persons in the judicial system to inspire a ‘change in bureaucratic culture’. One Minister commented, ‘If I influence a couple of hundred, out of 1000 prosecutors, then the atmosphere will change completely.’ Finally, after several years of campaign-style crackdowns on corruption, the Minister shifted the focus from persecution to prevention and initiated a risk assessment system that rated risk according to how likely a particular line of work was to provide incentives for corruption. Arguably, the professionalisation and independence of Taiwan’s judicial system has been the single most important achievement in Taiwan’s anti-corruption reforms (see Goebel 2015).

There is a deeper rationale at work here. In general, corruption is a subject that is intentionally not discussed among professional groups. There is the fear that you might be showing yourself to be naïve, or that you will show yourself not to care about the topic, or that your colleagues may be involved, or that you may be outcast for raising such a sensitive issue.

Do take ‘building commitment’ seriously. Ask someone to open these discussions across the organisation. Our experience of such discussions in numerous professional leadership groups, from global companies to health leadership teams, from clean Scandinavian countries to conflict-affected countries, indicates that initial reluctance to engage in open discussion about corruption can change quickly once you make it clear that this is not a taboo subject and that your purpose in tackling it is constructive not punitive, because it will actively improve the public’s access to quality services.

*Set Up One or More Forums Where People Can Discuss Tackling
Corruption Issues and Demonstrate Their Commitment*

Sometimes people—public officials, citizens, whoever—are ready to help but don’t have a forum around which to congregate. Such forums also show participants from across an organisation or across government that

they are not alone with their corruption problems. It is easy to set up informal or advisory discussions forums, and you can advance from there. In some societies, relevant forums already exist, such as education or health *shuras* in Islamic countries, or think tanks within professional sectors, such as the International Bar Association's anti-corruption committee. It's easy to organise your own.

***Bring National Civic Groups on Board and Collaborate
with Civil Society Organisations***

It has become much more common in the last 20 years for government officials to engage professionally with NGOs, even in sensitive areas like police and national security. There is more acceptance of enlisting citizens for change, as well as responding to citizens who are determined to achieve change. Engaging with external groups can feel risky if it is not currently common in your country/organisation, but their commitment can make a major difference in building support and credibility for the changes you want to bring about.

***Bring in Experts from Transnational Initiatives Specific
to the Sector or Corruption Problem***

There is a trend now in anti-corruption for transnational centres of anti-corruption expertise to be developing sector-by-sector. As already discussed in Chap. 4 such centres exist in construction, in health, in shipping and elsewhere such as in defence (TI-DS), education (IIEP-UNESCO) and police (DCAF). Several are very good, and they can be used to influence and improve national norms. They are easily contacted via their websites for advice.

***Bring in Anti-Corruption Experts from Industry Bodies
and Associations***

Today, in part driven by Environment, Sustainability and Governance (ESG) criteria, many companies are actively looking for ways to improve their image and reputation by working with government to reduce corruption. This is true both nationally and internationally. They may be doing it for the wrong reasons—wanting to make themselves look good without doing anything much—but there is now a lot of experience of positive examples, as the examples in this book show.

An easy way to initiate contact is to reach out to the industry association relevant to your sector (for instance, Chambers of Commerce and Industry, the Chemical Industries Association, the Medical Devices Manufacturers Association and so on).

Similarly, companies in the G20 countries have a formal anti-corruption group, called the B20 Integrity and Compliance Task Force coordinated by the Basel Institute on Governance, which actively supports anti-corruption initiatives such as open registries of the beneficial ownership of companies.

Actively Search Out Possible Coalitions

For each corruption issue, it is useful to ask what combination of people and/or organisations need to come together to solve the issue? Which government agencies should be involved? At what level? Which companies or industries? Which local authorities? Bring them together and you will likely find more dimensions to the corruption issue than you were previously aware of, but also more ideas on how small, diverse measures from different groups can help address the corruption problems.

Enlist International Development People

In countries where funding is provided by partners from other nations, multilateral partners (like the World Bank, OECD or UNDP, or bilateral donor partners such as FCDO, USAID or the EU) have considerable power that you may be able to leverage against corruption. Contact the relevant people in the local office of the agency or the local embassy.

MONITORING IMPROVEMENT MEASURES

Monitoring and oversight mechanisms are important for controlling corruption in a lasting, sustainable way, such as through auditors, regulatory agencies or independent organisations within civil society. But these reforms have a disappointing history, often quickly becoming ineffective. The reasons are all well-known: lack of budget, staffed by people unchanged from predecessor organisations, institutional neglect, deliberate marginalisation, being subverted in the political environment, denied access to key people and records, bribed or threatened. Finding ways to get multiple forms of independent scrutiny into action should therefore be a core part of any anti-corruption strategy.

Review and Strengthen Core Operational and Financial Controls

Within an organisation, the accepted way of making sure it works within its mandate and in a well-controlled manner is for controls to be established at three levels:

- (i) Operational management control. The managers are responsible for the day-to-day controls on all the processes within an organisation: both their own management controls and procedural internal controls.
- (ii) Risk management control, compliance controls and overall financial controls. These are supervised outside of the line of management.
- (iii) Internal audit.

It is important to ensure that such an oversight structure (or a functional equivalent) is in operation in your organisation to ensure it is pursuing its purposes properly. The process elements of such an oversight structure are exemplified by the ‘Three lines of defence’ model in Fig. 7.1 from the Institute of Internal Auditors (2020).

Demand More from Your Internal Audit Function

Organisations and governments worldwide often under-resource and marginalise internal audit departments. This may be due to cost cutting but can also be a deliberate action to remove one of the semi-independent sources of scrutiny. Strengthen internal audit processes and/or show publicly that you are investing them with much greater authority. For example, prior to the current war, the audit department in Ukraine’s Defence Ministry has led the anti-corruption drive, and the ministry has been public in publishing its audit result (Barynina and Pyman 2012). Conversely, in endemic corruption environments, the internal audit department can become an epicentre of corruption, precisely because of its semi-independent function, and can be hard to remove. In such circumstances, you need to restructure the department and most likely bring in new people.

Commission-Focused Audits and Reviews

Internal audits are not usually focused on corruption, but focused audits, regular intrusive review and/or active follow up of corruption risks can make problems visible. They also signal a change in the culture and show that certain areas of the system are being targeted. There are lots of

The IIA's Three Lines Model

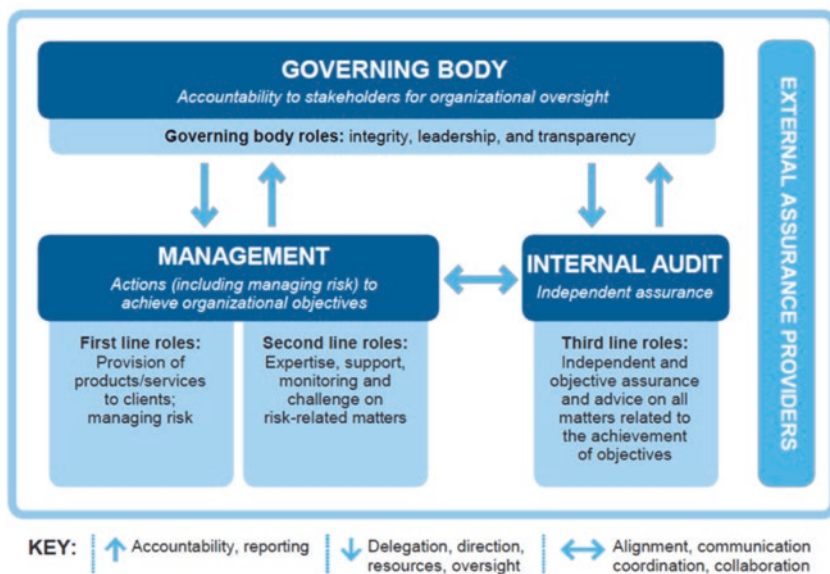


Fig. 7.1 The three lines of defence model. Institute of Internal Auditors 2020. From Position Paper: The three lines of defence. <https://www.iaa.org.uk/resources/corporate-governance-basic-overview/application-of-the-three-lines-model/>

examples where such reviews have been a catalyst for change. A good example is the Global Fund in the Health sector, and their reports are made public—see their Audits and Investigations reports via their website (Global Fund 2023).

Demand More from the External Auditors

Look at how effective external audit is in pointing out corruption problems in your country. Sometimes a national Supreme Audit Institution (SAI) can be excellent (Dye and Staphenurst 2020; Jeppesen 2019) and can bring a useful external focus to particular sectors and problems; however, more often it is slow and ineffective and can itself become a vehicle for extortion, threatening organisations with high penalties unless bribes are paid. Decide whether your SAI might be used constructively, or shamed into action, or is just too much effort. In more economically

developed countries, external commercial audit is usually reasonably effective, though it suffers from the oligopoly that controls the audit profession. In some countries, the external commercial auditors can also be part of the corruption problem.

Consider Pressing for a Formal Commission of Inquiry

Sometimes, if you are in a position to do so, it makes sense to establish a public Commission of Inquiry about a specific corruption issue, to address known but unexplored problems. For example, this has been one way to publicise and address corruption in police forces around the world and has also been common in health sector corruption.

A detailed analysis of the rationale and potential benefits of choosing such a reform measure in Uganda has been made by Kirya (2011). Although this review is at a national level, her conclusions are also useful for inquiries at sector level. Here is her overview: ‘The findings suggest that the global anti-corruption framework signified by the good governance agenda is hindered by various factors such as the self-interest of donors, the moral hazard inherent in aid and the illegitimacy of conditionality [...]. This in turn causes aid-recipient countries such as Uganda to do only the minimum necessary to keep up appearances in implementing governance reforms. They also served to appease a public that was appalled by the various corruption scandals perpetrated by a regime that had claimed to introduce a fundamental change. Nevertheless [...] they also constituted significant democratic moments in Ugandan history by allowing the public—acting through judges and the media—to participate in holding their leaders accountable for their actions in a manner hitherto unseen.’

Encourage Monitoring by Citizen Groups and NGOs

Some countries, notably in Latin America, have a very active tradition of citizen engagement, and they are likely to be already active on anti-corruption scrutiny (see Balan 2018). In other places, you may need to encourage them or find ways to support them. It also helps to seek to build up a conversation across the public and civil society so that they better understand your intent.

There are good examples of community monitoring in the education sector, such as in Uganda, where most success was achieved when the communities had some say in the choice of the monitoring criteria, and in the Philippines with textbook counting initiatives (Transparency International 2017; U4 2019).

Citizen Report Cards

Pioneered by the Public Affairs Centre in India, report cards are a specific citizen-driven method used to generate information on the quality and efficiency of a public service as perceived by users. See, for example, the use of Scorecards in the education sector in Ghana (Transparency International 2017). There are many other examples of their use, such as the World Bank's Water and Sanitation Project Karachi (2010), or the Forest Transparency Project organised by Global Witness (2010), as well as several online toolkits on how to use them.

Strengthen the Regulators and the Relevant Professional Agencies

There is usually a wide variety of regulators and nominally independent agencies involved in governance, for example examination boards in the education sector or police complaints commissions in policing. Such independent agencies may be effective but usually need boosting. Sometimes, a professional elite gains control of them, and such monopoly control can easily veer towards corruption, so this is something to watch for before engaging with them.

Actively Exploit the International Peer Review Mechanisms

The international community has set up peer review mechanisms through UNCAC (UNODC 2015), through the OECD Anti-Bribery Convention and through Group of States against Corruption (GRECO) for EU countries (GRECO 2016). Usually these are relatively narrow in scope and proceed in a slow, bureaucratic fashion out of the public eye. If you or your organisation is able to exert influence on these bodies, consider pressing them harder, for example to do a really energetic review of the sector.

Actively Exploit Sectoral Country—Comparison Mechanisms and Indexes

There are examples of anti-corruption comparisons within individual sectors, and some of these have detailed methodologies for comparing the sectors across countries. Transparency International Defence and Security's Government Defence Integrity Index (GDI) offers a good example, assessing defence corruption vulnerabilities in detail across 130 countries. This can be an effective way of monitoring your national sector, by comparing it with their peer organisations in other countries.

Whistleblowing Measures

Finding safe ways for people to speak up is vital, and whistleblowing is now recognised as an important mechanism to support integrity in organisations. However, whistleblowing mechanisms are usually weak or may exist on paper only, and the whistleblowers most often end up suffering. Yet they are vital in identifying and calling out corruption: the challenge is to find a way in your context to make them effective and to publicise this.

Possible actions include examining if there is a part of your organisation/directorate/ministry that is already doing something good and building on it, and considering contracting a civil society whistleblowing group to operate an independent sector-specific whistleblowing system.

In a few countries (for instance, Australia, Ireland, South Africa, South Korea, the UK and the USA), whistleblowing laws are generally seen to work well. National legislation on whistleblowing laws/systems has become more widespread, with some of the new ones are being energetically implemented, such as in Italy, Slovakia, Saudi Arabia and Tunisia.

More information is available at CurbingCorruption.com, as well as from the National Whistleblower Centre (in the USA), Protect (in the UK), Whistling While They Work (in Australia) and the Whistleblowing International Network (WIN, a global network established in 2018). See also Brown et al. (2022) and Worth (2018).

Example

The Netherlands has had a ‘House of Whistle-blowers’ within the government since 2016 for complaints by both employees and non-employees (Denklow 2016), though it has experienced some problems. An increasing number of companies, such as Lockheed Martin Corporation (the USA) and Maersk (Denmark), have also set up whistleblowing/complaints systems that are seen to be working well.

JUSTICE AND RULE OF LAW MEASURES

Routine prosecution of corruption cases, reflecting judicial independence, is one of the hallmarks of a jurisdiction that has control of corruption and is a key element of achieving success against corruption: ‘Reducing corruption to the status of exception in a sustainable way thus defines a

successful evolution’ (Mungiu-Pippidi and Johnston 2017: 9). In general, there is a close link between the rule of law and lower levels of corruption (Mortera-Martinez 2021). However, prosecutions are also high risk: they can be very slow, often taking many years to come to court, and they can be unpredictable, as powerful individuals often find ways to escape prosecution or conviction or else bounce back after receiving nominal punishment. Worse, in countries where the judiciary is corrupt, this tends to mean that corruption reform will take decades (World Bank Development Report 2011: 109).

Demanding that corruption be prosecuted more vigorously may be a tactical response to public pressure, but it is unlikely to be a major part of your approach. Prevention and avoidance are easier and lower risk. In addition, prosecuting corrupt individuals as a strategy, on its own, does not address root causes of corruption. Nonetheless, below we list various Rule of Law-type measures that can be explored.

Exert Pressure Via Discipline, Sanctions and Penalties

Civil and administrative penalties sometimes hold out more hope of impact than prosecution. It is worthwhile examining in detail what disciplining and sanctioning options you have, whether they are being used to the maximum extent, how they might be strengthened and how they can be adapted to prioritise corruption cases. The priority may be to move a corrupt person from their job—to allow that directorate to improve—and to sanction the individual so that s/he is not simply placed somewhere else in the organisation.

Call Out Corruption

Do not underestimate the effect that can be had just by speaking openly and publicly about corruption problems. The most famous example is probably when the then head of the World Bank, James Wolfensohn, spoke about corruption in 1996, after decades of silence: the effect was transformative, with the Bank then becoming a lead player in global anti-corruption efforts. Countries such as Georgia and Estonia have had great success, partly by government-wide emphasis that curbing corruption was their top mission of the government, but then implementing reforms sector by sector, such as in land, education and police, in the case of Georgia. Colombia has been following a similar path, with defence sector reform a major part of this.

As the Norwegian Prime Minister commented at the annual OECD Integrity Forum in March 2018, ‘Naming and shaming is good’ (Solberg 2018). Sometimes, everybody knows that what is going on is corrupt, but no one dares to be the first to say so: speaking out or putting a senior individual under investigation can be dangerous, but it can also change the culture. Sometimes the dynamics of large organisations can be changed if it becomes clear that sanctions or disciplinary action will be taken.

Carry Out a Legal and Constitutional Review

In the 1990s, calling for new laws or new regulations against corruption was a first port of call for reformers and now most countries have comprehensive laws relating to corruption and the other relevant subjects such as access to information, whistleblowing and conflict of interest. Nonetheless, there are still multiple areas where reform of law is vital and where gaps, overlaps and ambiguities allow the corrupt to escape justice.

Within sectors—health, education, telecoms, etc.—there are also always weaknesses in primary laws, secondary regulation and local regulation. There will also be new forms of corruption, some of which may start off being legal, and new ways in which the corrupt are bending the current laws in their favour, which will need additional regulation.

Suggestions from officials on how the laws can be improved need critical review. It is normally unwise to plan on making lots of regulatory changes, as these can get bogged down and thereby seen to be making no progress, so changes need to be carefully prioritised for effectiveness. It can be helpful to involve outsiders in the review: civil society or non-government legal experts as well with knowledge of anti-corruption impacts.

Encourage Relevant Research by Academics

In difficult environments, where there is no encouragement for open analysis, an alternative can be to encourage academic research on specific corruption issues within the rule of law. Such research may build the foundations of a proper understanding of where the weaknesses are and how they can be better addressed. There have been a number of academic programmes in recent years looking at how to tackle corruption more effectively, notably ANTICORRP and the FCDO-funded Anti-corruption Evidence (ACE) Programme, some of which has a rule of law focus.

Researchers recently examined data on police-related bribery in South Africa. In one province, Limpopo, bribery fell by almost 15% between 2011 and 2015, while the rate in the rest of the country fell by on average less than 4% (Peiffer et al. 2018). This bribery reduction in Limpopo's police took place during the time that the national government led an unprecedented high-level anti-corruption intervention in several provinces, but a specific intervention in Limpopo, unrelated to the police, affected bribery levels dramatically and quite quickly. The research suggests the police in Limpopo may have been especially reluctant to engage in bribery because of uncertainty as to whether they were also under investigation and because of the heightened anti-corruption action. The bribery reduction in the police was likely an unanticipated 'benign side effect' of a separate intervention.

Encourage More Transparency in Policy Making

It is just a fact of life that those with power or access to power will seek to influence the law and official policy for their own benefit and that in many cases they will succeed. Be alert for this in each corruption issue you are taking on.

The OECD (2017c) has produced a report on addressing policy capture. Although they don't have any magic solution to prevent it, the report is detailed and wide-ranging and may be helpful to you in arguing for change. For example, the report provides clear evidence that increased transparency of policy making relates to increased trust in politicians—see Fig. 7.2.

'Corruption-proofing' Statutes and Regulations

According to Wijesinha (2018), 'So-called corruption proofing is an ex-ante preventive measure that entails review of the form and substance of legal acts (principally statutes or regulations) to minimize the risk of future corruption. It is a new strategy in the anti-corruption toolkit. As of 2015, 13 countries had enacted some form of corruption proofing: Armenia, Albania, Azerbaijan, Kazakhstan, South Korea, Kyrgyzstan, Latvia, Lithuania, Moldova, Russia, Tajikistan, Ukraine, and Uzbekistan.'

However, this measure and the next one below are only likely to be available to you if you are a justice organisation or similar.

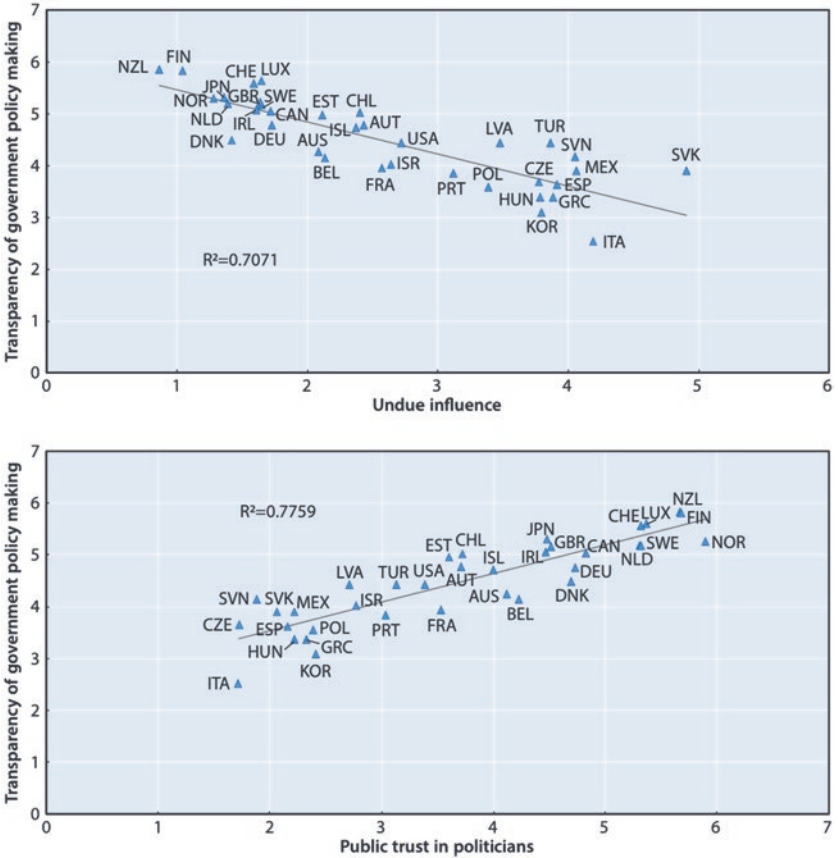


Fig. 7.2 Correlation between public trust in politicians, level of perceived undue influence and transparency in government policy making 2014–2015. (Source: OECD (2017c) Preventing policy capture. Integrity in public decision making. https://read.oecd-ilibrary.org/governance/preventing-policy-capture_9789264065239-en#page4)

Investigation and Prosecution

The best example of a focus on these measures is the reforms by the Taiwan justice officials (see Section above on ‘Build a Critical Mass of Committed Supporters Inside Your Ministry or Organisation’). This exemplifies the importance of improved performance of justice organisations.

On a larger scale, there is some evidence of an increase in the number of prosecutions for corruption of top politicians, notably ex-presidents and prime ministers—from Latin America (where sitting or former presidents have been prosecuted for corruption in Colombia, Costa Rica, Brazil, Ecuador, El Salvador, Guatemala, Honduras, Panama and Peru) to Europe (where two former French presidents have been convicted of corruption, an Austrian ex-chancellor was convicted, leading Spanish politicians were sent to prison and a former Bulgarian prime minister was detained), Israel (where a sitting prime minister was indicted and put on trial), South Africa (where a former president was sentenced for corruption), South Korea (where former presidents were given lengthy jail terms for corruption).

However, caution is needed: many convicted politicians are subsequently able to resume their career and then act against judicial independence (Menaldo et al. 2021)—as happened, for instance, with the International Commission against Impunity in Guatemala (CICIG).

TRANSPARENCY IMPROVEMENT MEASURES

Along with independent review and monitoring, transparency is one of the core tools in reducing corruption. Corruption problems naturally thrive when relevant data is not made public. Amongst the measures to consider are the following:

Identify Service Data That Needs to Be Transparent

This can be very simple such as publishing hospital waiting lists for surgery or publishing how much of the primary school education budget is received by each school. This reform type is both context- and sector-specific, so you need to brainstorm with colleagues on what data would most show up corruption or improper influence.

Advocate for Engagements with Public Officials and Public Bodies to Be Made Public

If public money is being used, then there should be a presumption that the interactions should be public. Examples include senior public officials having their engagements calendar online (e.g. European Commissioners) or new contracting and procurement procedures that require all contracts,

progress reports, tender submissions and so forth to be available online (see Open Contracting Partnership, for example).

This reform approach has been recognised through an international collaboration, the Open Government Partnership (OGP). OGP provides an international platform for domestic reformers committed to making their governments more open, accountable and responsive to citizens. It now has about 100 countries as members. However, though transparency is a valuable tool, it also has its limits and some counter-productive implications. It has been easy for many countries and sectors to seem to comply, putting a lot of data online, whilst continuing to obstruct—so much so that some people have referred to open government as ‘political theatre for the corrupt’ (Matic 2015). So, there is more to this than just transparency, or open data, alone (for a detailed analysis of the limitations of transparency, see Alloa and Thomä 2018). Also, even if relevant data is publicly available, it may not be widely accessed or understood and therefore efforts towards raising awareness and educating the public in making sense of data will complement data transparency initiatives—this is discussed further below.

*Advocate for National, Regional and Project Budgets,
and the Spending against Those Budgets, to Be Public
and Transparent*

This is not yet the case in many countries or sectors. The Open Budget Survey—an NGO that seeks to ensure public budget systems work for people rather than special interests—showed that in 2021, just 31% of the 120 countries they work with provided sufficiently detailed information to understand how their budgets address poverty.

Consider Making Internal and External Audit Reports Public

External audit reports ought to be public, though many are not.

Internal audit reports are more commonly not public. There is some good justification for this—making them public could lead to problems being kept under wraps rather than reported, or to the internal auditor not being trusted by the persons responsible for the activity (owners of the processes) being audited. Equally, the managers of the organisation may pressure the internal auditors so that nothing significant is noted in the reports. But the opposite problem is equally real: if reports are not public,

they can be buried and marginalised. The Internal Audit Standards body (IPPF) and the ‘Three lines of defence’ model, both provide for reporting exclusively to the management body.

Watch Out for When Transparency Does Not Work as Intended

Transparency may be good, but it is not a panacea. Often data and reports are made transparent, but the underlying corrupt behaviour still does not change, especially if the public and NGOs are uninterested in examining and acting on the data or lack experience in interpreting and utilising such data. Look especially where your organisation already has transparency, and it is not having much effect: what more do you need to do? For example, the answer may be to encourage third parties to make more use of the newly transparent information. Some countries in Latin America are a long way down this path. They have extensive transparency of government data, but the volume has vastly exceeded the capacity of third parties or the public to review it. Brazil is one such example (see Power and Taylor 2011 and Aranha 2018). Transparency can thus backfire. An empirical study by Bauhr and Grimes (2014), exploring the effectiveness of transparency measures to enhance accountability and curb corruption, concluded that ‘an increase in transparency in highly corrupt countries tends to breed resignation rather than indignation’.

INTEGRITY IMPROVEMENT MEASURES

Integrity is a magical word. Coming from Latin (*integritas*) and then French (*intégrité*) in the Middle Ages, its meaning combines good moral character of the individual and wholeness of a larger entity in one single word. Strengthening integrity is a positive action and one that strikes a strong chord of pride in people.

Traditional approaches to tackling corruption—based on the creation of more rules, stricter compliance and tougher enforcement—have been of limited effectiveness (Heywood and Rose 2016). Increasingly, attention has been focused on fostering public integrity as a strategic and sustainable response to corruption: ‘Integrity is one of the key pillars of political, economic, and social structures and thus essential to the economic and social well-being and prosperity of individuals and societies as a whole’ (OECD 2018).

However, the word ‘integrity’ is too often taken to mean just an absence of corruption; in practice, there are many ways to behave without integrity whilst not being corrupt. Instead, it is important to explore what it means to have integrity and where to focus efforts in promoting it: should it operate just at the level of individual officers or within broader units (departments, ministries, whole governments)? Increasingly, anti-corruption reforms are pitched in terms of ‘integrity’, but without exploring the real implications of the term and its organisational requirements (see Heywood et al. 2017; Heywood and Kirby, 2020). The military is one sector in which there has been much emphasis on ‘integrity’ as an anti-corruption approach, as explored by Wong and Gerras (2015) in a critical analysis of the decline of US army integrity. The [Defence Integrity Framework](#) of the Canadian military approach (Government of Canada 2021) or NATO’s ‘Building Integrity’ initiative and the NATO publication (Pyman and Wegener 2010, NATO 2020) offer examples of constructive approaches. For recent overviews, see two reports from the U4 Anti-Corruption Resource Centre (Jenkins 2022; U4 2023).

Amongst specific measures to consider are the following:

Improve the Quality of Your Management Cadre

There are many things that can be done to improve staff integrity within your sector or in your area of responsibility. You may have significant control over recruitment, over promotions, over sanctions and over discipline of your officials. You may be able to make larger changes, such as ensuring that the exams used to control entry are properly reviewed and marked. Recent evidence underlines the importance of strong control of the exam system (see Oliveros and Schuster 2018). Ensuring fairness in these areas within your responsibility is a prime example of integrity management. Staff respond positively and are then less ready to engage in corrupt practices. Distrust, disaffection and apathy are likely to flourish in institutional environments which lack clearly meritocratic processes.

Integrity approaches in government and large organisations are seen to have developed from the Scandinavian civil service and the UK Civil Service in the nineteenth century, as they moved towards meritocracy-based recruitment and developed norms of professional service (see Mungiu-Pippidi 2015 or Johnston 2008). Since then, most national public servants receive training and guidance in good ethical behaviour, and Colleges of Government teach the values—although recent research by

Schuster et al. (2020) and by Meyer-Sahling and Mikkelsen (2019) suggests that such ethical training often has only limited real-world impact and that ‘best practice’ management techniques can have paradoxical impacts.

In similar vein, companies have developed their management systems to control corruption and comply with anti-corruption laws, many of them simultaneously embracing a values approach with their workforce. They too recognise that compliance-only approaches are limited and insufficient. There is plenty of guidance on developing programmes on both compliance and ethics approaches in companies, and how to develop the two in tandem.

*Consider How the National Religious Authorities Can Have
a Useful Impact*

The norms of most societies and of all major religions include acting with integrity; religious leaders and their institutions, of whatever faith, exert the principal force in promoting and maintaining good personal conduct in many countries. Religious authorities may already be deeply engaged on integrity and anti-corruption in their countries, but often are not. There may well be scope to bring them in. This may be true sector by sector, as well as nationally.

Example

In the defence sector in Norway, it is the Lutheran military pastors who are responsible for ethics and integrity in the Norwegian military.

*Establish a Small Integrity Unit or Transparency Unit Within
Your Organisation/Ministry*

Having people in place full time to advocate and/or coordinate change can make a real difference. Think how you can do this in your organisation/ministry. Such units, even if comprising only a few people, can have significant impact.

Example

One such unit, an innovation in the Ministry of Defence of Poland, was established in 2007 and is still in place. It started as an anti-corruption task force analysing weak/corrupt areas of the MOD. The group whittled the eight priority areas down to just three: high value procurement, high rank officers, and abuse of power. On procurement, they proceeded to make a whole series of reforms, including more transparency, less single source procurement, better operational testing, more electronic auctions, as illustrated in Fig. 7.3.

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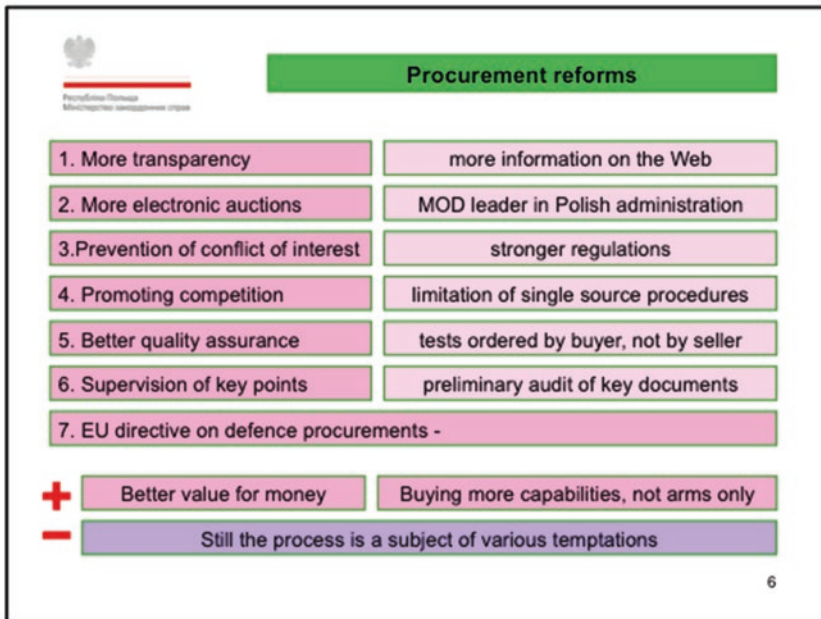


Fig. 7.3 Poland defence procurement reform. From Wnuk 2011 Building Integrity in defence; the Polish experience. See <https://curbingcorruption.com/wp-content/uploads/2023/10/Wnuk-2011-Building-integrity-in-defence-the-Polish-experience.pdf>

Example (continued)

This sounds straightforward, but was not, and did not happen easily. For example, suspicious orders kept being re-submitted to the full-time anti-corruption methods task. The task force was then established as a permanent ‘Procedures’ unit. It comprised only four staff, and the team was headed by a man who had previously been a civil society activist working for Transparency International Poland. They were committed and had the support of the Minister of Defence (Wnuk 2008: 29–30; Wnuk 2011; Pyman 2017b: 520)

Set Up an Ad-hoc ‘Integrity Committee’ or ‘Integrity Advisory Group’ in Your Organisation

This would be a way of marking the importance you place on ‘integrity’ in your organisation. It might not work, or it might just become a talking shop—in which case, abolish it again. On the other hand, you might be able to use such a group to change peoples’ perceptions of the importance of building integrity and of using pride in these values to tackle corruption. There is no prescription as to what such a function may look like and what it should do. The OECD, for example, has reviewed the pros and cons of ethics committees versus dedicated integrity/ethics units or advisors and the various reasons why they may not succeed, such as lack of continuity, diffusion of responsibility or lack of know-how (see OECD 2019, 2021). Nonetheless, a dedicated integrity function such as in the Polish defence experience presented above (a unit/person in the second line of assurance) can definitely contribute both to showing credible commitment and to promoting work on strengthening the internal organisational culture.

Set Out an ‘Integrity Framework’ for the Organisation

You could gather a group to design a specific integrity strategy and call it an ‘integrity framework’ for your ministry/organisation. Heywood and Kirby (2020) discuss what it means to develop a robust commitment to organisational integrity and why this goes beyond just instituting anti-corruption measures.

The OECD is now actively pushing an integrity-based approach to tackling corruption. In their view, a public integrity system, as recognised by the OECD Recommendation on Public Integrity, is the foundation of

trust in governments, institutions and the whole of society. Although the OECD is working with a national-level perspective, their 13 recommendations can easily be translated or applied to a specific sector or even to a specific organisation. Do use the related volumes: *OECD Public Integrity Handbook* (OECD 2017a, 2020) and the *OECD Public Integrity Indicators* (OECD 2023a) on what an integrity approach to tackling corruption means in practice.

Figure 7.4 shows OECD’s model of the pillars of a public integrity system—accountability, culture and system.



Fig. 7.4 The three pillars of public integrity according to OECD. *OECD Public Integrity Handbook*, OECD Publishing, Paris, <https://doi.org/10.1787/ac8ed8e8-en>

Train Your Leadership Team in Integrity and Anti-Corruption

People in senior positions and leadership roles often need help in how to communicate values. You could set up periodic round tables with your senior colleagues to discuss integrity issues and communicating values. If you think training would help, there are many people and consultancies that can provide this sort of training. This approach doesn't work so easily if the senior leaders are all either corrupt or insincere. But, even then, such training nonetheless can make a difference, as was seen with military and security officers in Ukraine before the Maidan revolution of 2013 (Pyman 2017b: 523–524).

Extend Integrity/Anti-Corruption Awareness Raising and Training More Widely

You can consider general anti-corruption education for officials; anti-corruption education for young people in schools and universities and building the capability of locally accountable community oversight bodies. Such development programmes can be a useful measure, especially if they reach a critical mass of people or officials, and in environments where it is hard or dangerous to pursue more direct impacts. This is one way to show that at least something is happening, however modest, especially in highly corrupt environments.

But be careful how you do this: research suggests that awareness raising can also unintentionally backfire, reducing confidence, even in settings where the messages are mainly positive in stressing successes against corruption (see Peiffer 2017a, 2017b; Cheeseman and Peiffer 2021, 2022).

Conduct Ethics/Integrity Surveys of Staff and Use the Results

Many governments nowadays conduct annual surveys of their public officials. They can be an excellent way to add ethics/integrity questions (if not already there), to give feedback to staff on the results and the changes you will be making. You may already have a sectoral survey of staff, in which case you can add questions. Even traditionally closed organisations like Defence Ministries have started doing this: for instance, the US Department of Defense contracted a 2010 survey and follow-up study to assess ethical culture and design and implement a values-based ethics programme (US Government Accounting Office 2015). In several European countries, staff assessments are used as a way of monitoring integrity among their public officials (Lamboos et al. 2016).

Consider Radical Change to Personnel to Raise Integrity

Sometimes the better solution has been to dismiss a whole cadre of corrupt officials and to hire new officials, such as happened in Georgia and Estonia. Or to dramatically restrict the mandate of the whole organisation, such as happened with the High Office of Oversight and Anti-Corruption in Afghanistan, and to start anew.

Introduce Integrity into Your Community Via Media

The NGO Accountability Lab supports change-makers to develop and implement positive ideas for integrity in their communities, unleashing positive social and economic change. They have developed many ideas, such as the global campaign ‘Integrity Icon’ (previously ‘Idol’) that uses TV, radio and social media to ‘name and fame’ public officials who demonstrate integrity. The initiative is just a few years old, but is now active in 15 countries (DRC, Liberia, Mali, Mexico, Morocco, Nepal, Niger, Nigeria, Pakistan, South Africa, Somaliland, Sri Lanka, Ukraine, the USA and Zimbabwe). Alongside more traditional forms of media, social media is an increasingly viable way of promoting integrity and related initiatives.

Advocate for Longer-Term Societal Change Through Education

There is evidence showing that one of the most important factors in reducing corruption for Western democracies was universal education (Uslaner 2017; Uslaner and Rothstein 2012). The impact of universal school education, it has also been argued, was one of the drivers of the more recent reductions in corruption in South Korea (see Mungiu-Pippidi and Johnston 2017: 218). Other relevant elements of education in the progress against corruption include the education of elites abroad (as in cases such as Botswana, Chile, Georgia, South Korea) and the role of universities as islands of resistance to corruption (as in Estonia and Georgia—see Mungiu-Pippidi and Johnston 2017: 238). However, the research shows that universal education is effective only if in concert with other approaches; of itself it is not sufficient, as seen in the less positive experiences of Greece and Italy (see OECD 2017b).

Review the Effectiveness of Integrity Standards and Codes of Conduct and Improve Them

Codes of conduct and standards may exist in your organisation, but in too many cases they are not enforced, and this laxity has become accepted. You could commission an objective report into how such codes are operating. It will most probably be highly critical, but that's the point: it gives you ammunition to push for improvement, a change that is likely to be supported by staff. Spectacularly critical reports can have an impact, such as *Lying to Ourselves: The Demise of Military Integrity* by Wong and Gerras (2015) about falling standards in the US army.

Review and Call Out Conflicts of Interest

Conflict of interest is an important but difficult aspect of integrity. Many people do not recognise what constitute conflicts of interest or try to rationalise them away. Making them explicit can help to make real to your staff what these conflicts are, how they can merge into corruption and how they may evidence a lack of integrity in your organisation. An example would be in relation to improving recruitment and promotion practices, where such conflicts are often responsible for non-meritocratic decisions by line managers.

Ask Stakeholders About 'Fairness' as a Basis for Solving a Corruption Issue

Fairness is one of the elements of integrity, and this can be a more useful lens for 'reducing corruption'. For example, where you have citizens paying for small services or stuck in waitlists, and both are subject to corruption by the responsible bureaucrats or officials, it can be helpful to explore solutions that are accepted as 'fairer' even if there is still some residual corruption.

Make Building Integrity a Key Part of Your Strategy, Alongside Fighting Corruption

Building integrity can be more motivating than the more negative-sounding aim of reducing corruption, though this varies from society to society. There are pros and cons to this. In some cultures, it really is counter-productive to speak directly about corruption, but this approach

can also be used by officials to justify working on ‘easier’ issues, such as training and capacity development, rather than tackling the tougher elements of the problems.

CIVIL SOCIETY MEASURES

Civil society organisations (CSOs) are widely seen as playing a crucial role in tackling corruption, and it is worth exploring how to bring them on board as collaborators where possible. We mentioned in Chap. 4 some examples of international sectoral networks that support anti-corruption initiatives. Indeed, many civil society organisations have deep experience in working collaboratively with other organisations. Examples include Transparency International’s close cooperation with Siemens on the latter’s Integrity Initiative (TI 2016); the UN Global Compact that works with CSOs to promote anti-corruption within companies; Business Action Against Corruption (BAAC), which seeks to use collective action against corruption in Nigeria as part of the Convention on Business Integrity; the Partnering Initiative that seeks to facilitate cooperation between CSOs and businesses to tackle corruption and improve transparency in supply chains; Fair Trade CSOs that seek to ensure producers in developing countries receive fair compensation free of corruption; various social auditing organisations that work with companies in manufacturing, agriculture and other sectors to conduct audits of ethical and environmental practices that can uncover corruption.

Collaborative working can be highly effective, helping to raise awareness of key issues, develop policy proposals, engage in monitoring and reporting, protect whistleblowers, support capacity-building, provide oversight and watchdog functions, as well as research and data collections, and even initiate legal action. In some cases, formal collaborative agreements are set up to promote anti-corruption initiatives. For instance, the UK Anti-Corruption Coalition brings together leading anti-corruption organisations, including CSOs, INGOs, academic institutions and media organisations.

On the other hand, there is some evidence that stand-alone civil society projects may be less effective. An analysis by Mungiu-Pippidi (2015) of some 471 civil society projects in Eastern Europe in the period 2000–2010 showed that only about a third had any traceable impact. These projects were the ones that targeted corruption directly and concretely, that were done in collaboration with journalists, and set up by grass roots

organisations rather than by donors. An analysis by the Partnership for Transparency Fund of 200 civil society projects that they sponsored came to similar conclusions. Successful projects needed to: (i) focus on a single set of problems and not be over-ambitious, (ii) start only when the problem is well understood, (iii) be non-confrontational and patient, (iv) work with key champions of reform within the power structure and (v) seek to reform the official accountability system with the evidence gained from the project (Landell-Mills 2013: 230–231). However, this section does not attempt to discuss in depth how civil society organisations can effect change and improvement, because this book is targeted at options for other types of organisations.

Nonetheless, it makes sense to explore possibilities for engagement and collaboration with civil society actors where appropriate. This will involve identifying the right CSOs with an appropriate track record in anti-corruption work, establishing a clear purpose for the engagement, initiating genuine two-way dialogue rather than a list of requirements, offering financial support where appropriate, sharing information openly, and establishing systems to monitor the effectiveness and progress of the collaboration. By working together, CSOs and other organisations and institutions can leverage their respective strengths and resources to promote transparency, integrity and ethical practices, contributing to a more accountable and corruption-free environment. For more information on CSOs, see U4 (n.d.), UNODC (n.d.), Grimes (2008).

Where possible, it also makes sense to work with media outlets and journalists who specialise in anti-corruption reporting to advocate for specific measures or to expose particular issues. Indeed, media reports on corruption have taken centre stage in recent years at the global level, especially in relation to a series of data leaks such as the Panama, Paradise and Pandora Papers, the Lux Leaks and Credit Suisse Leaks, the FinCEN files and so forth. Bodies such as the Organized Crime and Corruption Reporting Project (OCCRP) and the International Consortium of Investigative Journalists (ICIJ) have played a major role in exposing transnational networks of corrupt activity, involving money laundering and illicit financial flows. Whilst it is not especially practical for individual organisations and companies to work directly with such international networks, it can be useful to explore how judicious collaboration with relevant media outlets can support your anti-corruption efforts. This, of course, assumes you are operating in an environment where there is a mainly free and independent media, something that cannot always be

taken for granted and is under increasing threat even in democratic jurisdictions from malign forces seeking to exploit social media tools to promote ‘fake news’.

INCENTIVE AND NUDGE IMPROVEMENT MEASURES

Economists have long argued that successful implementation of any policy requires that the preferences of all those involved be appropriately aligned with achieving the goals of that scheme. There is a raft of economic measures that have a place in reducing corruption. Examples include more competition, more consumer choice, better information, fewer layers, firm incentives, better banking rules, the role for technology, spill-over and demonstration effects and so on. These measures can all have significant impact on corruption. For example, criminal law measures can act as incentives not to be corrupt, such as legalising payments where criminalisation makes no sense and is driving perverse behaviour. For a broader discussion, see Rose-Ackerman and Palifka (2016).

However, in its application to tackling corruption, the incentives approach has had a mixed reception, as it is often unclear who is the agent and who is the principal. Furthermore, monitoring agent behaviour and holding agents accountable are particularly difficult in the public sector. This has led to some arguing that corruption represents a ‘collective action’ problem, in which individual interests and incentives may not align with those of the wider group, leading to a lack of cooperation even when all would benefit. The debate between Principal-Agent and Collective Action approaches is well worn and not always very helpful (Heywood 2017), but at sector level it is arguably easier to see how specific incentives can help to re-align policies to promote less corruption.

One example of the application of incentives to reduce corruption in particular sectors is from the work of Khan et al. (2016) and Khan (2017) through the SOAS-ACE (School of Oriental and African Studies) programme funded by the FCDO. They have examined in detail mechanisms for reducing corruption in the Bangladesh energy sector, the Bangladesh garments sector and the Nigerian power sector. Another example is from corruption reduction efforts in the forestry sector, for example in Ecuador, where they combined a new government decree with the ability to monitor logging activities based on verifiable indicators (see Kishor and Damania 2007). In these cases, the objective of the incentives is not directly to ‘reduce corruption’ but to make the sector more productive.

Nudge Measures

Of great interest to organisations are the possibilities of using ‘nudges’ as a tool for changing behaviour. Instead of controlling how people behave by taking away their freedom to choose, they are changing the decision-making context in a way that leads people to make different choices, thereby ‘nudging’ them towards a desired behaviour.

A ‘nudge’ is a means of encouraging or guiding behaviour, but without mandating or instructing, and ideally without the need for heavy financial incentives or sanctions. We know what it means in everyday life: it’s a gentle hint; a suggestion; a conspicuous glance at a heap of clothes that we’re hoping our kids might clear away. Research in social and cognitive psychology has led to new thinking on how people make decisions. We are not rational choice individuals, as mainstream economists would have it. Rather, we are influenced by our context and our emotions, and our decision-making ability is prone to errors in remembering, predicting and deciding between options. Further, research has shown that these errors are often not random but predictable.

This in turn has led to a rapid growth of so-called ‘behavioural science’, based on the idea that we operate in conditions of ‘bounded rationality’ (Simon 1982). Amongst its insights are ways in which small changes in people’s decision-making context can have large impacts on behaviour.

In the UK, for example, to increase savings for retirement, the government has instituted a policy where employers automatically enrol their employees in pension schemes. Employees can opt out of the scheme if they want to—that is, they are under no obligation to remain enrolled. However, simply by making enrolment in a pension scheme the ‘default’ option, employers have increased uptake of pension schemes significantly.

Nudging is appealing for several reasons. First, nudges are often relatively cheap as compared to other policy tools. Changing the default option, for example, may simply entail changing one sentence and one tick box on a form. Relatedly, nudges can be easy to implement. Implementing them often does not require legislative changes or multiple approvals. In contexts where the bureaucratic processes and inefficient governance slow down change, this can be particularly beneficial. Third, nudges may work in contexts where increasing the level of control over people’s behaviour can actually backfire. Higher levels of regulation and monitoring do not necessarily lead to reduced corruption. In fact, restricting people further may signal to them that they are not trustworthy or work to make them

feel resentful, driving them to behave more unethically. Control and punishment may also reduce people's internal motivation to act ethically.

Finally, the design of nudges is based on an understanding of human psychology. As a result, nudges may be more effective than policies that forget to take the 'human' element into consideration. Nudge theory recognises that people are not always rational and that they won't necessarily act logically, and that information or awareness alone won't necessarily change behaviour. People do not always carefully weigh up the costs and benefits of acting unethically, factoring in the risk of getting caught and the potential punishment.

The theory also accepts that multiple drivers—the physical context, individual psychology and those around us, to name a few—impact on behaviour. For example, there are many reasons why people may be dishonest or corrupt, such as feeling social pressure to conform, losing self-control due to exhaustion, or a sense that they deserve the spoils of a corrupt behaviour because they are being treated unfairly. Even well-meaning individuals who are informed about corruption and its consequences may fail to make the right ethical choices sometimes. A nudge-based approach acknowledges these aspects of human psychology and responds to them.

Below are examples of nudges that can be used to reduce corruption—either on their own or as applied alongside other more traditional methods. While based on behavioural science research, nudges by their very nature are highly context-specific and should be tested when used in new environments and situations.

If you want to read more generally about this topic, we recommend the field-defining book on the theory by Thaler and Sunstein (2008) and a book about its application in political practice in the UK by Halpern (2015). The application to tackling corruption is also well covered in a publication by the OECD (2018). The OECD is currently extending its work in this area, in response to ever more countries becoming interested in a behavioural perspective on addressing corruption. Since the 2018 report, the OECD has worked on applying this perspective in Chile (OECD 2022), in Romania (OECD 2023b) and on leadership in Brazil (OECD 2023c). The OECD is also exploring the relevance of behavioural theory for improving the management of conflicts of interest.

On a related tack, new research on the potential pitfalls of awareness-raising about corruption is also worth exploring: see, for example, Peiffer and Cheeseman (2023).

Nudge Mechanisms

Pre-Commit to Integrity

People are more likely to be ethical when doing an activity if they ‘pre-commit’ to behaving ethically before starting that activity. For instance, documents that ask people to sign an ethical statement committing themselves to truthfulness usually have that statement at their end—the individual only signs it *after* having filled out the rest of the document. People are more likely to be honest in filling out forms if they sign such statement at the beginning of the document, *before* filling in the rest of the form.

Use Public Commitments

Public commitments have been shown to be very powerful in driving behaviour. One way to increase honesty is to have individuals commit to integrity verbally or in writing (and ideally both) in front of colleagues and the public.

Such commitments work through at least two mechanisms. First, people tend to want to act consistently for their own sake, to promote a clear narrative of who they are: if they say they are honest, then they are more likely to want to act like an honest person. Second, people want to act consistently in front of others due to social pressure: if they say they are going to act with integrity in front of their colleagues, they may be embarrassed to then not act with integrity in front of those colleagues.

Example

When new employees first join your organisation, as part of their induction, in an all-staff meeting you can ask that when they introduce themselves to everyone in a staff meeting, then they also make a verbal commitment to acting with integrity.

■ *Make Being Dishonest an Active Choice*

People are more likely to be dishonest by omission rather than commission. That is, they are more likely to leave out information that results in them being dishonest than to actively provide false information; it is simply easier to feel like an ethical person when omitting to admit to something.

Use Timely Reminders to Promote Integrity

Sometimes people simply need to be reminded to act ethically. This is in part because everyone has a limited amount of self-control (or willpower). During stressful periods, when time and resources are short, self-control is diminished, and people are much more likely to succumb to temptation. Sending people reminders about ethics during at-risk procedures can lead them to act more ethically.

Example

Send out simple text messages or written notes saying things such as ‘Thank you for your honesty’.

Have People Create a Clear Plan on How to Tackle a High-Risk Activity

Having a step-by-step plan, even for an ‘easy’ activity, significantly increases the chances of the activity getting done. For example, people have been shown to be more likely to vote in person if they think through a specific plan as to how they will get to the polling station on the day—they may decide on what time they will leave work, what mode of transportation they will take and whether they will take their children with them.

Example

If the objective is to manage a fair, ethical procurement process for a government contract, an official may make a plan that includes ‘being offered a bribe by a bidder’ as an obstacle. The plan could then include a formal signed requirement such as ‘If I am offered a bribe by a bidder, then I will refuse it and report the incident to my supervisor.’ While this may seem simple, it can be a highly effective way to ensure that in a stressful moment, or when willpower is depleted, the official does not cave in to temptation.

Inform People That the Desired Behaviour Is the Norm

We are social creatures, and those around us have a huge impact on how we behave. What others do gives us information about what might be best for us, and peer pressure leads us to want to conform to what we believe others think we should be doing. Social norms are the common and

expected ways of behaving within a particular social group, and most people try to conform to such norms.

Example

When there is a high, but imperfect, adherence to a desired social norm, advertising this high level of adherence can lead those who are non-compliant to change their behaviour. For instance, if you know that 92% of staff in a particular ministry truthfully declared X in the previous year, you can send a letter or email to all staff informing them that 92% of ministry officials did X. The desired behaviour can be reinforced by rewarding commitment to the norm through public recognition. For example, every month you can email all staff in the ministry a list of all the individuals who did X.

What is clear in any context, however, is that you need to be very careful about highlighting high levels of corruption, because doing so may be promoting a negative norm—making people feel it is common and thus acceptable to act corruptly. Recent work by Cheeseman and Peiffer (2021, 2022) has shown that anti-corruption awareness-raising efforts may be backfiring, as instead of encouraging citizens to resist corruption, they may be nudging them instead to ‘go with the corruption grain’ and undermining their commitment to the social contract (notably, a willingness to pay tax).

Enforce the Rules That Are Easier to Enforce First

When people see that their peers have violated one social norm, they are more likely to violate another. To encourage pro-social behaviour in one area, therefore, it is important to demonstrate it in others. And this can be done by ensuring correct behaviour in more observable spheres.

Example

To reduce the theft of office supplies or stamp out other forms of petty corruption in an office, it might be useful to ensure that pro-social norms within the office are followed. For example, you might want to make sure that offices are clean and tidy, making it clear that leaving a mess is not accepted. Enforcing rules that are easier to ‘see’ and enforce than many forms of anti-corruption can lead to a reduction in corruption itself.

Use to Your Advantage the Fact That People Overweight Small Probabilities

People tend to overweight small probabilities. That is, they perceive a small probability of something happening as being much greater than it is.

Example

When resources to carry out audits are very limited, you can alert people that anyone could be audited, but that only randomly selected individuals or organisations will be. The chance of being monitored, even if very small, may act as a large deterrent.

Use Images to Prompt Honesty

Being watched makes people more honest. Simply placing pictures of two eyes over ‘honesty jars’ that people put money into to pay for a snack, tea or other items increases the amount of money people pay.

Test Different Types of Messages to Increase Compliance

It is possible to experiment with various types of letters or emails to elicit compliance with diverse regulations, not only tax compliance. A nearly identical letter can have small variations to test which type of framing is most effective. One letter can simply ask for compliance. The second can use a social norms nudge, informing people that a high percentage of their fellow citizens have complied. A third can threaten sanctions and a fourth can remind the individual of the ethical reasons for compliance.

Personalised Messages

Personalised messages are more effective in eliciting action than non-personalised messages. This is why marketers use recipients’ names in emails whenever they can. Despite people knowing that they are receiving a mass-generated email that has gone out to thousands of people, personalisation makes us pause slightly longer when we see the message, increasing the chances of us reading the rest of the email and paying more attention to the content.

Change the Timings of Major Decisions

Scarcity of time and money leads to reduced self-control. For individuals who only rarely act unethically, these moments may be when they are most likely to succumb to temptation and make a decision that is self-serving at the expense of integrity. As a result, major decisions where corruption is possible should be made when decision-makers are least likely to have reduced self-control.

Example

In contexts where civil servants are paid little, they might start having financial worries in the days before getting their monthly wage. This is a period of scarcity and risk to their self-control. As such, you should schedule the times for final evaluations of bids and the announcement of tender outcomes for when the decision-makers involved are most likely to have more money—such as a few days after they get paid. This may reduce the decision-makers' inclination to change the bid scores in a way that results in the winning bidder being chosen based on bribes or other improper influence instead of on merit.

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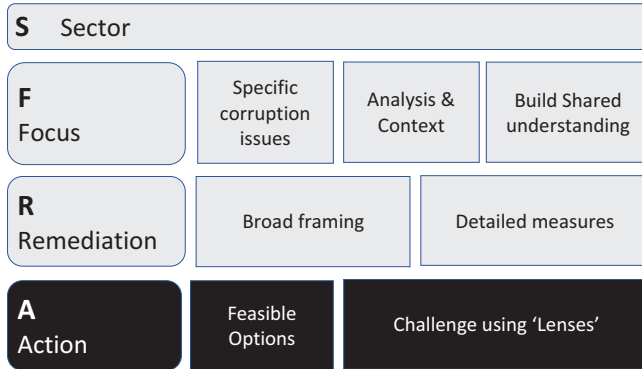
Deciding What Actions to Take

Abstract This chapter explains how to decide on concrete actions, drawing on the broad framing and detailed measures outlined in Chaps. 6 and 7. It introduces the SFRA Matrix to provide guidance on selecting options and offers a range of different ‘lenses’ that can help determine the most feasible choices.

Keywords Actions, Broad framing, SFRA Matrix, Feasibility

Those in positions of influence in organisations are experienced in making judgements, usually with incomplete information and often between unappealing choices. But our experience is that many decision-makers feel much less at home when making judgements about corruption-related issues.

We suggest you can test for the most prospective approach through a two-step exercise. First, setting out combinations of the broad framing and possible detailed actions, which we call *feasible options*, then examining the merits and drawbacks of each through a series of what we call *lenses*.



Both steps are explained in this chapter.

FEASIBLE OPTIONS AND THE SFRA MATRIX

We use the term ‘feasible options’ to mean those combinations of broad framing and the possible specific measures which you think could work.

In Chap. 6 we put forward eight possible broad approaches, and in Chap. 7 we worked through eight different categories of specific remedial measures, with multiple examples of each. The combinations can be represented on a sort of chessboard—an eight-by-eight matrix—as shown in Fig. 8.1.

The reform strategies that have already been mentioned in this book can be placed on the SFRA matrix (see Fig. 8.2). OECD guidance, for example, is for a broad framing, using mostly integrity-based measures. Here are some specific examples:

- The defence reforms in Bulgaria 2012: a broad-based framing using functional reforms, plus greatly increased transparency.
- Defence reforms in Burundi, on the other hand, represented a narrow framing and narrowly focused on a few functional improvements, plus greater defence budget transparency.
- Georgia’s early anti-corruption strategy in 2004: rapid, intensive, concentrated on major functional change in the key sectors of land, policing and education.
- The health sector in Greece in 2018 (see Pyman and Heywood 2020) proposed a low-profile framing based on functional improvements, plus a public campaign to give people hope that change really might happen, utilising a public monitoring measure.

The SFRA Matrix

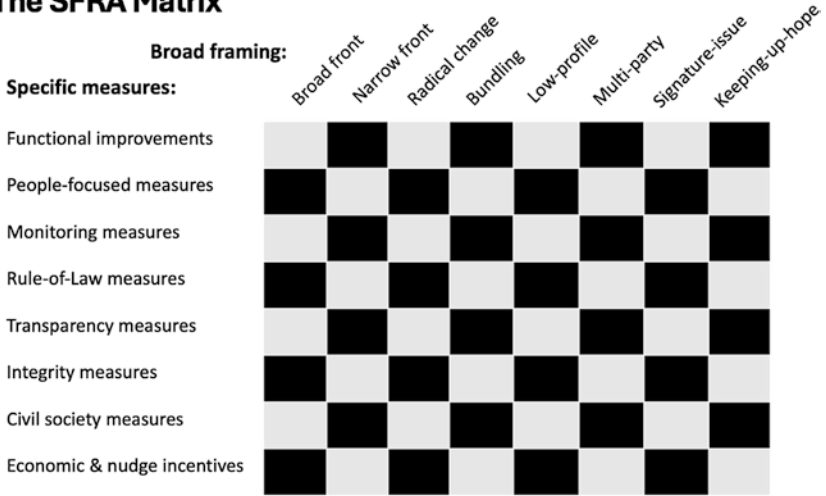


Fig. 8.1 The SFRA matrix of options, showing possible combinations of broad framing and specific measures

The SFRA Matrix

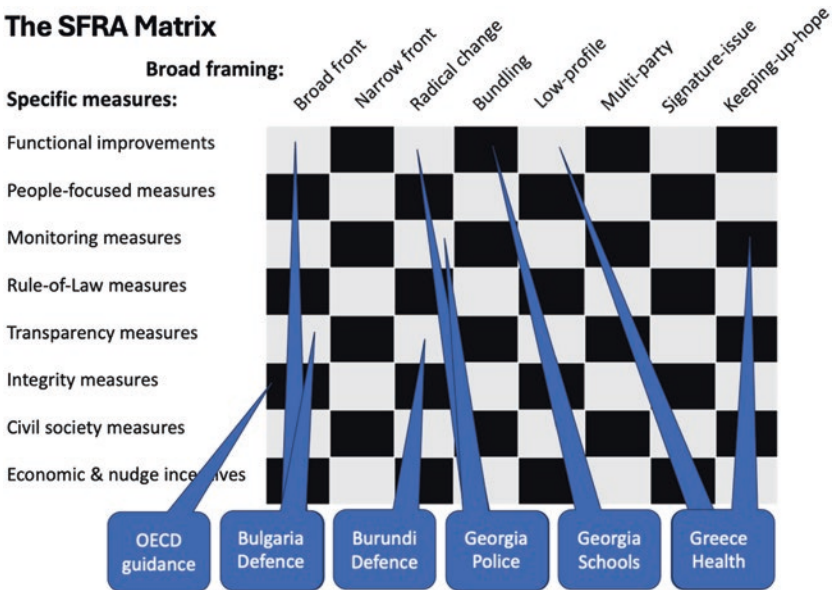


Fig. 8.2 The SFRA matrix, showing the options being proposed or implemented from sector reforms discussed in the text

Note that the two axes are rarely mutually exclusive. For example, even though a wide range of specific measures can be identified in response to the individual corruption issues, the context may mean that only a few low-profile reforms can be considered. Conversely, as with the OECD recommendation, specific integrity-building measures may form the bulk of a broad framing that stresses the importance of integrity.

Place Your Options on the SFRA Matrix

The SFRA matrix is simple enough that you can have a group discussion about the merits of different options, yet sophisticated enough to allow discussion of both the detailed measures and the broad framing at the same time.

NOT 'Best Practices'

Working with the SFRA matrix has a further benefit, in that it keeps the discussion away from the 'best practices' dogma, which has been one of those trite clichés in the anti-corruption world for too long. The point, at this level of strategy, is not whether a particular measure or approach is 'best practice' or not; the point is whether the group judges that these are the right sort of measures and approaches in these circumstances.

Moreover, it is helpful for flagging up the importance of understanding *trade-offs* between alternative policy interventions in order to avoid unintended consequences.

LENSES—SCRUTINISE AND CHALLENGE THE OPTIONS

Having some feasible options is a good place to get to, especially if you have been able to discuss within your team their merits, risks, and relative chances of success. But you still need to make a choice of which approach to go for, not just make a long list of omnibus reforms and controls to tick off. You need to think carefully about how to make those choices, in light of your particular context. You also need to be careful about the language

you use to describe the preferred choice. How you describe it—the language, the terminology and the points of reference—and how you sell those choices to your stakeholders matters a great deal.

Our guidance is to scrutinise your options according to a number of different challenges: how you present the approach, how you frame it, how complex it is, how resilient it is to upset, who wins and who loses, how aligned it might be with other initiatives and so forth. Through doing so, we think you will quickly see that some options look much better, and can be more easily sold, than others. Think of this as seeing the options through different sets of specialised spectacles or ‘lenses’.

Here are our ten lenses. You don’t need to use all of them, but we find that they do help in getting to the way forward that has the most chance of success:

1. Dialectical lens
2. Branding lens
3. Politics and power lens
4. Timeframe lens
5. Skill and motivation lens
6. Plan and programme lens
7. Multiple-paths-to-reform lens
8. Government alignment lens
9. International lens
10. Sequencing lens

DIALECTICAL LENS

A dialectical lens means exploring contradictory choices, which forces you to choose between them. It provides another framework to help you and your colleagues debate the merits of the possible options. Here are some alternative preferences.

Preventive Strategy or Disciplining Strategy?

The quick answer to this choice is that a preventive strategy is better, easier and cheaper. A good example would be e-procurement, which has shown significant results in reducing corruption in multiple sectors. There are also no situations where a purely disciplining strategy has been seen to be successful over time. That said, you must have discipline options available, and these require some thought.

First, prosecutions: this is less of a choice than it may look when working within a sector, for the simple reason that you have little control over the way your country's investigative and prosecution processes operate. You have one big lever—to recommend staff, contractors or others for investigation and prosecution when this has not been the habit of the organisation in the past—but that's about it.

Second, sanctions and dismissal of staff: this is a crucial area to examine because disciplinary measures are often less used. There can be different reasons for this—the procedures are slow and cumbersome, or they are biased in favour of certain groups, or they have been marginalised with insufficient, poor-quality staff and so on—but you should plan so that some of your reform measures address how disciplinary measures can be strengthened or used more effectively. Another example would be implementing a robust disciplinary code, with clear outlawing of corrupt actions, that all within a sector (health, education, etc.) agree to abide by.

Incremental Progress or Large-Scale Change?

We have already discussed these two possible broad approaches in Chap. 6. 'Incremental' is usually favoured because corruption problems are more complex to solve than you expect, involving a range of stakeholders and often some difficult political choices. We too favour this incremental approach—tackling molehills rather than mountains. But, as we discussed in Chap. 6, there are occasionally powerful arguments for the alternative. When there is a political opening, you may have one chance to make a significant change, perhaps following an election, or after the disgrace of a major political figure, or after a national disaster aggravated by corruption. Such openings rarely stay open for long. There is also an in-between strategy: to start with small changes to build momentum and credibility, moving on to larger change projects if the first smaller ones go well and/or if opportunities emerge for a sudden larger change. Academic research has

identified this approach as the more common route to success: ‘change will occur gradually and punctuated equilibria will be the rule’ (Mungiu-Pippidi and Johnston 2017: 76).

Prioritise Fighting Corruption or Building Integrity?

There has long been discussion over whether active anti-corruption measures—such as controls and sanctions—are more effective than measures that promote and incentivise good behaviour by individuals (cf. Heywood and Rose 2016). The simplest and most common answer is that both are necessary, and this means that the question becomes one of striking the right balance between them. This will vary depending on the cultural context.

Fighting corruption: Being explicit about corruption has advantages. In some countries the word ‘corruption’ is easily used in public, discussed, and argued over. But in other countries the word corruption has only the most negative connotations, of possible personal involvement and therefore likely punishment and disgrace, and few leaderships in such situations would want to prioritise ‘anti-corruption’. In some countries it is not only a sensitive topic but one that carries real risk to life, with increasing numbers of investigative journalists and civil society activists killed in recent years.

Furthermore, using nice words like ‘improved governance’ and ‘integrity’ when you really mean tackling corruption can demonstrate immediately a lack of political energy to tackle the real problem, or a justification for more technical reforms such as process improvement, rather than tackling the tougher sides of the problems. Integrity measures—capacity-building, training, codes of behaviour and so forth—can appear insubstantial and often focus on areas where it is hard to demonstrate impact.

Building integrity: Integrity is an attractive personal attribute, and more motivating for individuals than the negatively loaded ‘reducing corruption’—see the discussion in the Section on ‘Integrity improvement measures’ in Chap. 7. Behavioural research also shows that people respond well to appeals to their integrity (Halpern 2015; OECD 2018).

Such moral appeal has been shown to be even more effective than a reminder of the threat imposed by a punishment. These findings are in line with the understanding that most people view themselves as moral

individuals: ‘When reminded of moral standards, actions are adjusted accordingly to reduce the dissonance between self-concept and behaviour’ (OECD 2017: 70).

Focus on Routine Day-to-day Corruption or High-Level Corruption?

In ‘developed’ countries there is usually little day-to-day corruption in interactions with public officials, so this choice has an easy answer. In ‘developing’ countries, however, both are prevalent, and often the two are linked because the corrupt high-level groups control hierarchies of bribery that go all the way down the levels of the organisation to extracting money from citizens.

This is a big and tricky strategic question. If your answer is ‘both’, then you risk having such a wide range of objectives as to be unlikely to succeed at any. However, there can be a more nuanced answer. A strategy can have several public-facing elements which are easier to achieve, whilst at the same time having some lower profile, slower reforms that will have longer-term impacts. An example was given in the health sector, where a public-facing reform is on a day-to-day issue, reducing corruption in surgery waiting lists through making those lists available and prominent for the public, and a substantive reform is to put in place a proper stock management system of medicines.

Engage the Public, or Keep the Reforms Private and Public Expectations Low?

Engage closely with the media, or keep them at arm’s length? This is a critical question that can make or break the initiative. In a government context, it is a complex question with a whole ‘communications plan’ of its own and also depends on the nature of the media in the country, as well as on the nature of the reform objective and plans. It is an area to ask for the assistance of any communication professionals that you have in your organisation.

Narrow or Broad Focus?

Narrow is attractive—focus, concentrating on one issue, with the chance, perhaps, to ‘solve’ the issue, as in the single-issue example given in an

earlier chapter of Maersk's shipping reform. There are many other examples given by the NGO Integrity Action, who are champions of solving specific corruption problems through narrow framings, using community monitoring to keep track of how many have been satisfactorily 'fixed'. As the 'fixes' build up, they help support broader improvements in the community as well as restoring trust.

Substantive Reforms or Giving People Hope?

This is a choice because officials are often drawn to substantive reforms, but they have a nasty habit of turning out to be expensive, slow, and not delivering what was hoped for. Going for simpler reforms, often unkindly called 'cherry-picking', can be a better choice because they give people hope that corruption reduction is actually possible. Especially in countries and sectors where the government is very bureaucratic and rule-bound, the chance of a technocratic change being successful is low and people know this.

Substantive Reforms or Improving Monitoring?

This is a slightly different choice: the drawbacks of substantive reforms are like the above case, but the alternative is instead to focus on strengthening ways of monitoring and responding to cases. People are realistic, and they know when a system is inflexible, so they may respond more positively if it becomes clear that individual grievances and abuses of the system are being flagged up and more actively addressed. This could be as simple as the CEO of an organisation and its leadership team, or the Minister responsible, being available for one whole day every week to hear the complaints of citizens.

Improving Service Delivery or Saving Money?

Citizens may say they want both, but they are most likely to want improved service delivery. Yet, for example in health, there are often huge sums of money to be saved for reuse in national health systems by reducing corruption in procurement, in medicine pricing, in reducing unnecessary operations, or illicit resale of products and drugs, or health insurance scams. Establishing an anti-corruption programme involves recognising this complexity.

BRANDING LENS

Besides deciding between alternative actions, how do you want to ‘brand’ the initiative? Is it best to be seen as ‘tough’, with an anti-corruption message, even though there may be plenty of integrity-focused measures? Or do you want to show that the initiative is a positive, motivating one? There is no right answer. In the defence sector, for example, NATO chose a message of ‘Building Integrity’, as did the Defence Ministry of Saudi Arabia, whilst the Ukraine and Afghan Defence Ministries chose messages of anti-corruption (Pyman 2017).

This same choice exists for strategies at the national level. Out of 41 national anti-corruption strategies reviewed in 2017 and 2018, more than half had an approach of preventing corruption only. Eleven plans referred in some significant capacity to both preventing corruption and building integrity as a dual approach to anti-corruption. Only one country strategy, Taiwan, had a tone that focused primarily on integrity. The other balance of note was a combination of preventing corruption and ‘promoting transparency’ in Estonia, Lithuania and Turkey (Pyman et al. 2017, 2018).

Similarly, is it better to be seen as focusing on a single key issue and promising to solve it, or better to show that you are addressing the corruption problems ‘thoroughly’? Again, there is no ‘right’ answer. For example, in the same study of country strategies, 33 of the 41 strategies were broad in scope and 8 were narrow in scope (Pyman et al. 2017).

POLITICS AND POWER LENS

This is different from both the previous lenses in that it focuses directly on the politics and the power issues that are often the hidden drivers of corruption enablers and constraints. Here are some politics and power ways to examine your options.

Look at the Winners and Losers from the Different Options

Arguments over the gaining, losing and sharing of benefits are the essence of politics. The argument and the resistance are all the greater when the benefits are illicit ones—‘rent-seeking’, in the language of economists. You are likely to know the political context, but it can be valuable to challenge your options by asking the following questions:

- Who may be gaining from each corruption issue, and why?
- Who might gain and who might lose from reducing corruption in this specific area?
- What sources of leverage are there for the reform group?
- What advantages might they have that they can use?

A useful way to look in more depth at this is to use the ‘Corruption Functionality Framework’, discussed above in the ‘Analysis’ section of Chap. 5 (Marquette and Peiffer 2020).

Look at How ‘Political Will’ Might Vary Between the Options

‘Political will’ is usually an unhelpful lens for framing or scrutinising the options, too often being presented as an un-analysed magic bullet. A better frame is to analyse the different options in the light of what can be achieved with different levels of political support. A useful perspective comes from the man who headed the corruption reforms in the Polish Defence Ministry (Wnuk 2008): when you have high political support, go for the reforms that are most fundamental and hardest for successor politicians to undo; where there is minimal political support, possible improvement options will be those that are less ambitious, or focused on just one thing, or where you encourage outside groups, like civil society groups, to build reform momentum. Reformers have shown many times that tactical reforms can occur successfully under conditions of limited political will, even in the most unfavourable situations of endemic corruption or violence, such as improvements in public procurement in Ukraine through initiatives like ProZorro (McDonough 2017). For more on understanding politics and political will as the process of making change, see Developmental Leadership Program (2018).

Look at How National Regime Type Might Favour Some Options Over Others

Regime type matters in respect of corruption reform. Johnston (2008, 2010, 2014) was the pioneer of such analyses, where he concludes that there are four distinct syndromes of corruption, each associated with different political regimes, as shown in the table below:

<i>Syndrome</i>	<i>Political regime</i>	<i>Examples</i>
Influence markets	Mature democracies	The USA, Japan, France, Uruguay
Elite cartels	Consolidated/reforming democracies	Italy, Argentina, South Africa
Oligarchs and clans	Transitional regimes	Russia, Philippines, Mexico
Official moguls	Undemocratic	China, Kenya, Indonesia

Regime type also impacts the likelihood of success or failure of specific reform measures. One such example, where the same reform was implemented in two different political regimes with quite different results, is ‘I Paid a Bribe’ (ipaidabribe.com), a citizen-driven initiative created in India for collating petty bribery reports via a web-based portal. It had a significant early effect in India and remains active, although its long-term efficacy remains open to question. Chinese online users copied the initiative, but they failed after three months, not only because of state repression but also because Chinese netizens did not have the relevant experience and know-how to make it work. Ang (2014) has done a detailed comparative analysis of how the differing contexts led to the failure of I-paid-A-Bribe in China.

Look at How Sectoral Industry Structures Favour One Option Over Another

Each sector is different, with quite different incentives. These differences can be large and indeed larger than the differences between countries. An analysis by Khan et al. (2016) found different corruption syndromes for different industries within a single country. They illustrate this with four case studies of the different corruption regimes: three different industries in Bangladesh (power, garments, electronics) where the different industry structures led to quite different sorts of corruption, and a fourth one in the Land Administration (Fig. 8.3).

Look at Whether Major Disturbance to the Social Equilibrium Might Favour One Option Over Another

At times of significant disturbance, the normal reluctance to change may be replaced by a willingness to accept extraordinarily rapid change. For

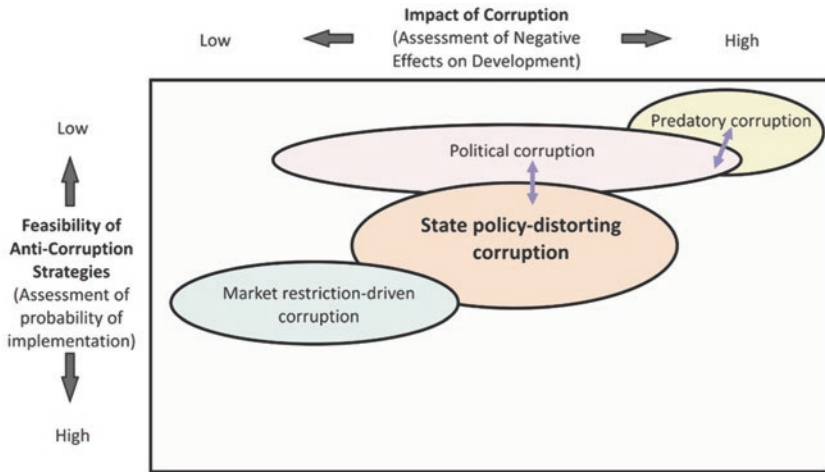


Fig. 8.3 Feasibility and impact of anti-corruption from Khan et al. 2016

example, some of the most dramatic reductions of national corruption, such as in Georgia and Estonia, happened because the political leaders believed—rightly—that their people were ready for rapid, radical action against corruption, and that the unusual political circumstances provided an opportunity, even whilst the outside specialists were advising a slow, cautious approach. If this is present in your situation, then much of the normal guidance on how to do corruption reform does not apply.

Test the Options Against Your Sources of Advantage

Organisations have all sorts of features that can be turned to advantage when seeking to reduce corruption. The biggest of them all is to tap into the pride and professionalism of the various professions working in the sector. Most professionals want to do a good job and look on in despair when their organisation is viewed as corrupt. Thus, possible sources of advantage need to be considered explicitly at this stage of reviewing the reform options.

Compare the Different Sources of Power in Each Option

Power helps individuals, organisations and coalitions to shape their environment. It can be a positive and productive force, as opposed to negative and controlling. Taking power seriously means you should take time to recognise its different forms (Lukes 1974; Isaac 1987). Analysing power means identifying the powerful individuals who get to decide at key decision-making points—so-called *visible* power. Second, it can mean identifying who or what sets the decision-making agenda. For example, *hidden* power can determine what issues are taken off the agenda behind closed doors and never openly debated or voted on. Or third, the most structural and ‘insidious’ form of power is that which shapes people’s desires, values and ideological beliefs in the first place. *Invisible* power like this can influence people without them even realising it—as in the acceptance by both men and women of gender roles, such as authority to speak in public meetings, that is a deeply ingrained form of power in many societies.

TIMEFRAME LENS

The choice of timeframe is not just a technical, programming matter. It is also about motivation (too long a timeframe causes loss of momentum); about opportunities for delay (a relaxed timeframe allows all sorts of delaying tactics to be established); about alignment or misalignment of the reforms with other significant events in an organisation’s life or purpose.

The timeframe can be a party political one also. The timing of the electoral cycle has all sorts of impacts—for example much government activity slows down about 12 months ahead of upcoming elections; or a newly elected government may also cause your plans to be changed. If you are developing a sector strategy for a ministry, for example the timeframe would normally need to be a maximum of 2–3 years, because of the imperative to show results within the lifetime of the parliament.

A key challenge in relation to timeframe is to recognise when opportunities for action arise. Identifying a propitious political moment for implementing reforms relies on a combination of detailed knowledge of the political economy of the setting in question, the nature of the reform measure proposed, and—in some cases—an element of luck. Some internal political circumstances, such as elections or other enforced changes in leadership, offer key moments to promote change; sometimes, external

events such as global commodity price changes or even a pandemic can create windows of opportunity for change. Being able to spot such potential windows is crucial, but moments of change can be highly unpredictable.

Social science concepts, such as the ‘Overton window’, or ‘window of discourse’, seek to explain how a policy idea is viable only if it falls within what is seen as a politically acceptable range at a given time. The idea, shown schematically in Fig. 8.4, was developed by Joseph P Overton, a US policy analyst, and the window describes how ideas become more or less politically viable according to where they are seen on a six-point spectrum that runs from ‘unthinkable’ to ‘policy’. To move the Overton window requires proponents of policy change to shift what is seen as acceptable, ensuring that an idea comes to be seen as sensible and popular in order for it to be adopted as policy.

In addition to taking advantage of the right political moment, the broader timescape of anti-corruption reforms is important. Rather than just focusing on the timing of interventions, we need also to consider how long it will take to understand their impact. Some types of reform may be expected to have a rapid impact; others may take decades to achieve their intended effect. Using a longer timeframe to evaluate the success of

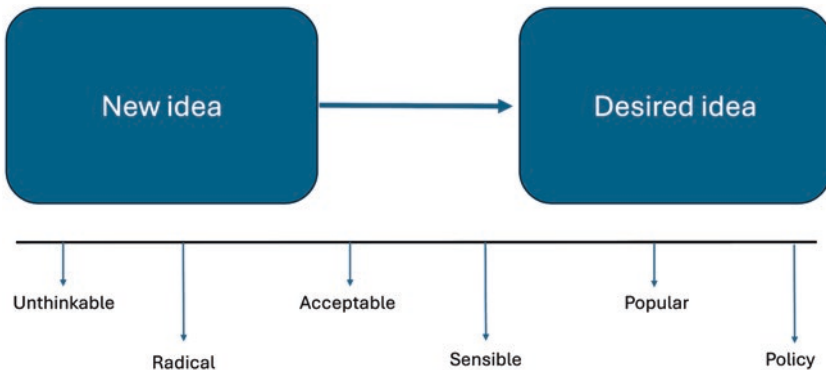


Fig. 8.4 The Overton window (image by authors)

anti-corruption interventions has the added benefit of allowing for homing in on specific parts of the implementation process, helping explore what was successful and why. Process tracing strategies allow for more granular assessments and provide a more nuanced evaluation of whether and how policies have worked.

We suggest you work through the options looking at their pros and cons according to a different range of timescales.

SKILL AND MOTIVATION LENS

Besides convincing people to support your reforms because of common purpose and because the ideas are right, you are also seeking to achieve your reforms through judicious influencing and political skill. For example, in the reform of the ‘Sin tax’ in the Philippines, cited in Chap. 6, a sophisticated coalition was put together involving parliamentarians and companies and the ministry and civil society. The core strength of the coalition came from established advocacy groups alongside experienced activists. These groups and activists used highly labour-intensive, specialised and complex forms of mobilisation. Thus, this campaign was able to attract people who were almost ‘professionals’ at building such coalitions.

You may have these skills yourself or are planning to bring on board people with such skills. Scrutinise the options from the perspective of criticality and availability of the skills that each one requires.

Leveraging Emotional Motivation

Whilst some problems and some options involve large-scale change, many others are more about persuading particular individuals, or groups of individuals, to support the changes and/or to stop active opposition.

The experience of one of the authors (Pyman) in the military sector was that officers were much readier to work ‘with the grain’ of the reforms than was expected. People within and outside of individual military forces anticipated wholesale rejection of corruption reform plans by military officers, but this often proved not to be the case. In general, the reason was simple. Officers around the world have similar professional training as cadets—like at the Royal Military Academy Sandhurst in the UK. A core part of the training is that you must have, and show, integrity if you are to be credible as a leader of soldiers. Most officers have deeply internalised this training, and they recognise the conflict if the military culture they are

in obliges them to participate in corrupt practices. It therefore takes less persuasion than you would expect to get them to assist in the reforms, even if the benefits will only be felt by the next generation of officers. Their caveat, in cooperating, is that the reforms should not be aimed at personal charges against them (see Pyman 2017).

Examine Whether the Strength of Family Ties Is an Important Motivation-Shaping Factor

Some reform approaches are founded on the presence of strong links between individuals in communities. An example would be the oversight impact of parent committees in schools. Conversely, where the community links are weaker, other measures—such as central oversight agencies—may have better chances of success. The strength of such ties varies widely from country to country and region to region and is illustrated in the schematic of Alesina and Giuliano (2010) in Fig. 8.5. In some countries, family ties form only a modest part of the social context, such as in

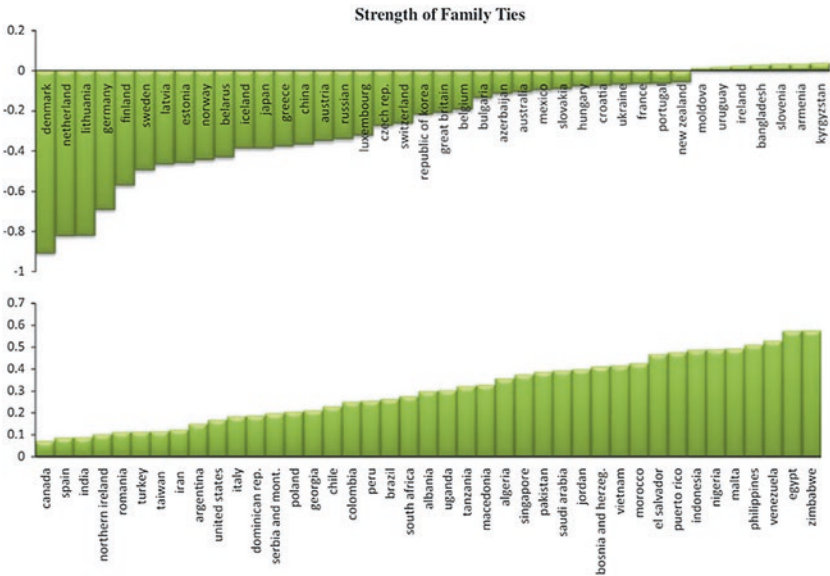


Fig. 8.5 The strength of family ties. (From Alesina and Giuliano [2010])

Denmark, Japan and China. At the other end of the spectrum, family ties are extraordinarily strong in countries such as Zimbabwe, Egypt and Venezuela.

Test the Options for Appeal to Diverse Groups, Especially Women and Youth

Always test your initiatives and options with one or more groups of youngsters, who can have perspectives and motivations that are wonderfully free of professional stuff. Different groups can have radically different motivations; often ones that can help you in your reforms in ways that you had not anticipated. Be sure to discuss the choices internally and externally with diverse groups, preferably segmented.

PLAN AND PROGRAMME LENS

A statement of the blindingly obvious, but none of the reform options can be considered ready for decision unless an outline plan has been developed to show how the individual elements are going to be put into place. Sadly, this vital step is ignored in many strategies. A false notion has become increasingly prevalent that an anti-corruption strategy is somehow too broad/grand/conceptual to require basic planning and testing on how it can be implemented (Heywood and Pyman 2020).

Compare Each Option for Flexibility

Military generals are eloquent on the limits of planning. Almost two hundred years ago, the German war thinker Carl von Clausewitz (1874) said, in words that could equally apply to anti-corruption: ‘War is the realm of uncertainty: three quarters of the factors on which actions in war are based are wrapped in a fog of uncertainty. A sensitive and discriminating judgement is called for, a skilled intelligence to accent out the truth.’

Improvisation is part of strategy, not a denial of it. A formal and overly rigid strategic plan can be a threat because it reduces the chance of learning and adapting when key assumptions are no longer working. There is good theory behind these statements. Plans can be specified to the point of bound-to-fail rigidity.

This does not mean anarchy; it simply means that success can be more likely if the amount of order is deliberately under-specified. For example, a clear statement of purpose in a commercial organisation is a powerful symbol that may give sufficient sense of direction to all the senior executives in the organisation. The same can be true of anti-corruption strategies: a single very strong sense of direction, such as happened in the land registry in Georgia. This line of thinking about strategy has become more common in the last few decades and is sometimes called ‘Emergent strategy’ (Weick 2001: 350ff; Freedman 2013: 555ff.).

Challenge Whether Complex Options Are Going to Be Well-Run

If you speak to any experienced project manager, he or she will tell you that most large projects fail. An average failure rate of 70% has been the widely accepted norm since the landmark study by Hammer and Champy (1993): of every three large projects, two will fail to deliver. This is a shocking statistic, albeit one that has been challenged (Hughes, 2011; Barends et al. 2014). Whatever the actual failure rate, it is high and that is equally true in the developed world as in the developing world. The safest way to avoid this risk is to make sure that your work programme is built up of many smaller pieces of work rather than a few large ones. Ask of each option: can this option be managed as a proper programme?

When engineers have a large task, such as building a ship or a power station, they plan the work into many small projects, each of which is individually managed. The engineers then manage the totality of these projects as a single ‘programme’, with one master plan of how all the individual projects fit together, depend on one another and so on. Each separate project—which for our purposes is an individual reform—might be managed in quite different ways: for example a project to implement technical changes to IT systems will be managed quite differently from a project to strengthen the values of the organisation. This is ‘Programme management’. Programme management approaches are routinely used for managing organisational change programmes in government.

Managing a multitude of small projects in a coordinated way is a formal skill. There is plenty of guidance available on how to run a good programme, which we summarise briefly in the text box below.

Programme Management Good Practice

A clear definition of the purpose, value and scope of the programme. We have already described much of this in the sections above on developing the strategy. It is important! With a clear overall direction and purpose, you can better keep a wide range of people on a common path and can more easily re-centre the programme as time goes on and as unexpected things happen. In some programme management guides for public sector projects, you will see this referred to as the ‘business case’.

Full-time project personnel: Often the most important element for a successful programme is to have a full-time programme manager and a small project management unit. This is a large investment, but it is necessary: it can be very hard to run a programme with part-time inputs and coordination. This small team then monitors, coordinates and chases up all the individual actions and projects.

Programme management and control: This is the principal task of the core personnel. They should be working to a detailed project plan, updated every week and pay attention to all the mundane but vital bits like weekly task lists, cross-programme coordination, liaison with external stakeholders, project schedules, organising steering committees and so on.

Ownership: It is good practice for a ‘Senior Responsible Owner’ to be appointed who is the top-level person who can be considered to own the programme. He/she would normally be the Chair of the senior steering committee.

Engaging with stakeholders: There will be a multitude of different groups with an interest in the programme; meeting them regularly, communicating with them regularly, involving them at appropriate stages: all these are the task of the project management unit.

Tracking results and benefits. Tracking the results and benefits is obvious, essential and routinely not done. This task needs to be established from the beginning, either for the project management unit or, better, by another group that can view the results more independently. Using an NGO group is one possibility.

Two useful programme implementation guidelines are:

Programme management guidance from the UK: The UK has an agency called the Infrastructure and Projects Authority whose purpose is to provide ‘expert project delivery advice, support and assurance to government departments and works with industry to ensure projects are delivered efficiently and effectively, and to improve performance over time’ (IPA 2021). There is a formal qualification in project management, widely used across the UK public sector, called ‘PRINCE2’.

Implementation guidance from UNODC: *National Anti-Corruption Strategies: A Practical Guide for Development and Implementation*. This is a detailed report about the process of strategy-making and implementation. It covers assigning responsibility for drafting the strategy to a small, semi-autonomous group; ensuring the continued support and involvement of senior political leaders; consulting regularly with all government agencies that will be affected by the strategy; soliciting the views of the political opposition whenever possible; engaging all sectors of society in the drafting process; emphasizing communication, transparency and outreach throughout the drafting process; allocating sufficient time and resources to drafting the strategy; and taking advantage of other countries’ expertise (UNODC 2015).

Multiple Paths to Reform

Sometimes, formal planning processes are your enemy. Such formality conceals the fact that this is usually not how change happens: people will interpret and react to the changes in many ways, and it may be a better strategy to allow and indeed encourage such variation. For example, you might set just a few fixed policies at central level, then allow extensive variation and improvisation across the organisation.

This alternative approach, sometimes called a ‘complexity approach’, has been in vogue in large corporations for some time, but is also relevant in societal change. For example, allow separate teams to choose how they carry out the project in their area: or implement different reforms in different cities or provinces. On a larger scale, recent research suggests that encouraging such variation and diversity may be one of the reasons why China has been able to develop so quickly (Ang 2017).

One way to encourage variation and thereby increase political momentum is to have a strategy focused on *networks*, utilising them to create space for reform. You focus less on specific reforms and the political dynamics of effecting those reforms and instead focus on creating more flexibility and more space so that there are more possibilities that can emerge; however, the political dynamics evolve. The way that the political dynamics evolve—or are encouraged to evolve—is through networks, especially by working with those who act as the connecting nodes within networks (Andrews 2008).

GOVERNMENT ALIGNMENT LENS

One of the lessons learnt about tackling corruption is that to do corruption reforms ‘on their own’ can be a recipe for failure. They usually benefit from being incorporated into an organisation’s overall change programmes and/or included in larger cross-organisation alignments.

If your organisation is a part of government, you would normally expect to have a greater chance of success and more sustainability if your efforts are aligned to wider government efforts, especially if the government has a broader anti-corruption plan running and is pursuing progress on it across multiple sectors. A good example is the sector-specific reforms that form part of the UK Government’s National Anti-Corruption Strategy and how they are dovetailed into the overall coordination (UK Government 2017, 2020).

A comprehensive organisation-wide anti-corruption strategy would embrace national, sub-national and sector strategies. Ideally, your sector strategy would fit cleanly into an overall structure along these lines. Where the government’s anti-corruption efforts are not well aligned, you could consider setting up an informal coordinating forum across ministries.

When the Government’s strategy does have authority, this can be useful in building more support: official plans and strategies act as a common point of reference across all the different ministries, agencies and related organisations. You may be able to use this authority in persuading other parts of a ministry and other parts of government to support your proposals.

*Decide Whether Cross-Government Alignment Is
a Worthwhile Effort*

Nevertheless, there is a prior decision to consider: you may not want to align with the efforts across government but to operate solely within your organisation and independent of any larger grouping, whether public sector or private. This might be the best way to proceed, if, for example, your organisation is doing much more than others. It is also possible that the rest of your organisation does not yet have a strategy or is taking its time. In this case, you may well choose to go ahead regardless. There is also the risk that working together with the rest of a larger organisation will mean ceding some control of the programme to the central unit, with consequent dilution of your efforts.

*Take Advantage of Any Central Cross-Organisation
Coordination Unit*

Large organisations are always limited in personnel, and they often look to set up anti-corruption strategies without any champion and without any coordinating or monitoring unit. Our belief is that this is a guarantee of failure of the strategy. If there is a champion and a full-time unit, they may or may not be effective, but at least there is a chance. If your organisation has such a unit, then do ensure that your larger team engages with them. If it is all being done without dedicated personnel, then you may be better off pressing ahead on your own.

At national level, some countries have set up active coordinating mechanisms and staff for coordinating their anti-corruption actions across government ministries and sectors, such as the UK (UK Government [2020](#)).

Strengthen Alignment with Major Government Policies

For public sector reform, there is also a policy aspect. Corruption types differ in how much they distort the policies necessary for achieving important policy goals of a ministry and a government. Policy goals such as poverty reduction, increasing tax collection or improving national reputation can be subverted by modest levels of corruption: examples include building permit corruption and nepotism in the appointment of teachers. This is a good reason for strong coordination at policy level between ministry anti-corruption initiatives and policy makers (see Khan et al. [2016](#)).

Strengthen Alignment with Other Stakeholders

Your plans may also involve close working with others, be they politicians, parliament, companies, international organisations, or with civil society and others. These all take effort to engage with, but it is a core part of building support and coalitions. This is where key helpers, with deep experience of working with such groups, may be able to support you, as discussed in the section above.

INTERNATIONAL LENS

As we first discussed in Chap. 4, you should make maximum use of international sector support and international sector goodwill. They may be sources of knowledge, ideas, support and assistance in the development of your initiative and in helping you to determine your preferred option.

Non-sector-specific organisations also have sectoral knowledge. UNODC and OECD have been joined by other international organisations (such as the World Bank, the European Commission), and more specialist groups such as the Financial Action Task Force on money laundering (FATF) and the Group of States against Corruption (GRECO) set up by the Council of Europe.

SEQUENCING LENS

Lastly, scrutinise your remedial strategies by looking at the order of your remedial measures. Whilst they may all look the same on paper, the ease of doing them may depend a lot on the order in which you do them—the sequencing. There is no prescription about this; sometimes it may be politically easier to do the hard measures first, sometimes better to do the low profile, easier ones first. More broadly, some measures may fit in well with external activities going on, or these other measures may require other changes, perhaps quite unrelated to the corruption issue in question, to be completed first. Going through the issues and asking this question about the order in which to take the actions to have the best chance of success (or, conversely, the least chance of being diverted or stalled) is a useful lens to apply.

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CHAPTER 9

Last Words

Abstract This chapter provides brief final thoughts, emphasising the role of leadership and the importance of building integrity into the DNA of an organisation.

Keywords Leadership, Integrity, Organisation

In the introduction to this book we quoted Karl Weick, the renowned organisational theorist, who was responsible for introducing ‘sense-making’ as a way of understanding how each organisation constructs its own particular reality. As we come to the end of the book, here he is once again on the benefits of breaking down big problems into smaller ones as a means to help manage them:

*To recast larger problems into smaller, less arousing ones, people can identify a series of controllable opportunities of modest size that produce visible results and can be gathered into synoptic solutions. This strategy of small wins addresses social problems by **working directly on their construction and indirectly on their resolution**. Problems are constructed to stabilise arousal at moderate intensities where its contribution to performance of complex tasks is most beneficial. (Weick 1984: 40)*

He could so easily have been talking about corruption: we redefine the problem twice over, first into a set of smaller problems, and then we reframe the smaller problems into ones that we can solve (see Weick 2001: 426–7).

The example of ships' captains no longer paying bribes in ports, from shipping giant Maersk that we discussed earlier in the book, was of this nature. It certainly wasn't a simple problem, but nor was it framed in massive terms like 'tackling corruption in African ports'. By redefining it as a mid-sized problem in three pieces—requiring behaviour change by the captains, a collective action endeavour with the port authorities and a technological requirement for easy global reporting and monitoring of bribes given—the problem was redefined in a way that made it easier to reach a solution. The point here is that Maersk's management reconstructed this problem into a form that they could move forward with. This was good 'sense-making' by the responsible team in the organisation.

We hope, fervently, that the machinery we have outlined in this book is sufficient to enable you and your organisation similarly to make sense of corruption issues that impact your organisation. That is, by staying away from the 'big' problem of corruption writ large and reformulating it in ways that allow you and your colleagues to address, avoid or prevent individual corruption issues that are affecting your organisation's performance.

We hope too that the issue of corruption will now be more 'discussable' in your organisation than it was before and no longer only recognised at the margins, if at all. In order to bring recognition of corruption as a cause of performance issues into the mainstream, you could ask yourself and your colleagues questions like the following:

- Is there an annual requirement in your organisation to catalogue corruption constraints? Past ones, current ones, potential ones. Organisations are better these days at structured, regular risk assessments; do corruption risks form a normal part of that?
- Are corruption constraints (or integrity issues) recognised within the operations of your organisation? Are they raised at daily, weekly or monthly operations meetings, in the same way that safety worries or environmental risks are?
- Does your organisation train staff on corruption: how to recognise problems, how to assess them, how to reconstruct them in ways that could be addressed?

- Have the technical and managerial professionals in your organisation had at least one module of training during their professional certification on addressing corruption risks? Are they required to commit to having such knowledge and keeping it up to date as part of their periodic recertification?

We finish on the importance of leadership: building anti-corruption awareness and competence thoroughly into an organisation is a critical leadership role. In Chap. 3, we quoted the senior NATO civilian leading the organisation's initiatives aimed at seeding thinking about corruption and integrity into NATO forces and Defence Ministries. We repeat below the apt phrase that she used everywhere across NATO:

We need to get to the point where building integrity and reducing the risk of corruption are embedded into NATO processes—planning cycles, staff assessments, policy reviews, operational planning, procurement—so that it becomes part of the organisation's DNA.

This is a big thought, worth repetition: a good organisation that can cope robustly with corruption constraints is one where building integrity/countering corruption is built directly into the organisation's core processes.

This leadership role is essential in both public and private sector organisations, although the written works to date on this topic tend to be more focused on the public sector (see, e.g. Ceva and Ferretti 2021). We hope this book starts to redress that balance.

We wish you every success in countering corruption issues within your organisation and that the SFRA approach is helpful to you in doing so.

Additional material on the approach described in this book can be found online at CurbingCorruption.com.

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