

TI Source Book 2000



**Confronting Corruption:
The Elements of a National
Integrity System**

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Executive Summary

A major achievement of the past decade has been the shattering of the taboo which for a generation or more had shrouded any discussion of corruption in polite company, least of all in diplomatic circles and in intergovernmental institutions. From this debate has emerged a potentially powerful global coalition, uniting many peoples from the North and South, East and West, industrialised and developing countries and countries in transition. Opinion, expertise and resources have been mobilised. Most accept that the time for talking has past; it is time for action.

At the heart of this coalition lies the recognition that civil society's involvement is crucial in any country. Governments alone cannot hope to contain corruption. They need, and must win, the support and participation of an active but independent civil society. What else has emerged from this global debate?

Corruption is endemic and everywhere. It is not just a case of public officials abusing their positions, but of people abusing their positions wherever there is easy money to be made.

- Large private companies target public officials to win hefty export contracts.
- Officials of the International Olympic Committee have been "influenced" to choose particular venues to host the Olympic Games.
- Allegations abound in professional sport of match-fixing - soccer referees have been publicly warned against taking bribes.
- "Ghosts" have emerged in many countries, including within the French army.
- Fraudsters pose as religious leaders to conduct huge scams on their followers, particularly in the United States.
- Bogus "charities" and non-governmental organisations are established whose running costs absorb virtually all the funds raised.
- Radio show hosts take secret payments from interests keen to see their products mentioned favourably by credible personalities.¹
- Financial journalists tip the public to buy shares in companies they themselves have already invested in - and then take profits when the prices rise.
- Previously internationally-respected auction houses secretly rig their fees so as to defraud their customers, vendors and purchasers alike.
- A President's security chief is filmed making a cash pay-off to an opposition politician to buy his defection.²
- Children in Italy are blindfolded to reassure ticket-holders while they draw winning numbers for multi-million dollar lotteries, but are trained to select balls which have been rendered slightly smoother and slightly larger than the rest.³

1. The Weekend Australian, 4/5 December 1999.

2. BBC World Service, 17 September 2000 announcing that Peru's

President Fujimori was to stand down.

3. Guardian (UK), 15 January 1999.

Commonly recognised forms of corruption

The most commonly recognised forms of corruption are:

- Treason; subversion; illegal foreign transactions; smuggling
- Kleptocracy; privatisation of public funds; larceny and stealing
- Misappropriation; forgery and embezzlement; padding of accounts; skimming; misuse of funds
- Abuse of power; intimidation; torture; undeserved pardons and remissions
- Deceit and fraud; misrepresentation; cheating and swindling; blackmail
- Perversion of justice; criminal behaviour; false evidence; unlawful detention; frame-ups
- Non-performance of duties; desertion; parasitism
- Bribery and graft; extortion; illegal levies; kickbacks
- Election tampering; vote-rigging; gerrymandering
- Misuse of inside knowledge and confidential information; falsification of records
- Unauthorised sale of public offices, public property and public licences
- Manipulation of regulations, purchases and supplies, contracts and loans
- Tax evasion, excessive profiteering
- Influence peddling; favour brokering; conflicts of interest
- Acceptance of improper gifts, fees, speed money, and entertainments, junkets
- Links with organised crime; black-market operations
- Cronyism; cover-ups
- Illegal surveillance; misuse of telecommunications and mails
- Misuse of official seals, stationery, residence and perquisites

Adapted from Gerald E. Caiden, "Toward a General Theory of Official Corruption", Asian Journal of Public Administration, Vol. 10, No. 1, 1988

There seems to be no end to human ingenuity when it comes to circumventing systems designed to protect the integrity of institutions and processes.

This would be cause enough for concern, but the impact of corruption on poverty has come to the fore. By distorting development decision-making and regulatory frameworks, the poor are denied both the effectiveness of aid flows and the hope of advancement through private sector development. For rich and poor alike, the stakes are high.

Left alone and not contained, corruption is likely to increase - it has been likened to a cancer, and rightly so. Just one example is the country which sacked its Auditor-General when he reported corruption in the Cabinet, and later witnessed the spectacle of a Cabinet Minister being shot and two of his colleagues being sentenced to death for having arranged his murder.⁴

Corruption can take place where there is a combination of opportunity and inclination. It can be initiated from either side of the transaction: a bribe being offered to an official, or the official requesting (or even extorting) an illicit payment. Those offering bribes may do so either because they want something they are not entitled to, and bribe the official to bend the rules, or because they believe that the official will not give them their entitlements without some inducements being offered. Poverty may feed inclination, but realistic strategies can and have been devised which limit opportunities.

The strategies to contain corruption, therefore, should address both elements. Opportunities can be minimised through systematic reform, and inclination reduced through reversing a "high profit, low risk" scenario into a "low profit, high risk" one, through effective prevention, enforcement and deterrent, accountability mechanisms. Both the bribe "giver" and the bribe "taker" must be addressed.

More than this, to be successful a strategy needs to address not only enforcement and prosecution, but also prevention and community education.

Accountability mechanisms, when designed as part of a national effort to reduce corruption, comprise an "integrity system". This and the concept of "horizontal accountability", a way of describing modern systems of government, are discussed in chapter 4 of this Source Book. This system of checks and balances is designed to achieve accountability between the various arms and agencies of government, manage conflicts of interest in the public sector, effectively disperse power, and limit situations conducive to corrupt behaviour.

However, combating corruption is not an end in itself; it is not a blinkered crusade to right all the wrongs of the world. Rather, the struggle against malfeasance is part of the broader goal of creating more effective, fair and efficient government. Reformers are not just concerned with countering corruption per se, but with reversing its negative impact on development and society as a whole. In this way the reforms help to raise standards of living for the poor and greater respect for the human rights of all.

The wise reformer knows that corruption can never be entirely eliminated. Under many real-

4. Western Samoa.

istic conditions, it will simply be too expensive to do so. A single-minded focus on corruption prevention can also have a negative impact on personal freedoms and fundamental human rights. Corrupt programmes and services may be difficult to eliminate entirely; bureaucratic discretion (which often opens the door to corrupt decision-making) may continue to be necessary for effective administration; and stronger enforcement and deterrence is anything but cheap. Thus, the aim is not to achieve complete rectitude, but to realise a fundamental increase in honesty - and so the efficiency and fairness - of government.

So where should anti-corruption efforts begin? The obvious point of entry is to gain an understanding of the underlying causes, loopholes and incentives which feed corrupt practices at any level. If not informed by understanding, any reforms are unlikely to succeed.

Any understanding of corruption begins by dispelling the myth that corruption is a matter of "culture". In most cultural contexts, public gifts are made openly and transparently; the Swiss numbered bank account is not a part of any country's traditional culture; the people who live in societies where corruption is supposedly a "part of the way of life" generally bitterly resent the practice; and, bribes and payoffs are almost invariably illegal and criminal under the laws of the "cultures" involved. No-one has yet identified a sustainable social order in which a society believed that its leaders should prefer to promote their own private interests at the expense of the group. In those countries where popular belief has been that this is the case, the degree of public outrage that has accompanied the fall of such leaders surely indicates their outright rejection of such conduct.

The next step is to ask the question - what are the main types of corruption occurring within the public domain?

The first type is "petty" or "survival" corruption practised by public servants who may be grossly underpaid and depend on small rents from the public to feed their families and pay school fees. There are some who would argue that this type of corruption helps both companies and individuals circumvent government requirements - reducing delays and avoiding burdensome regulations and taxes. This view sees payoffs as nothing more than the "grease" needed to operate in a difficult environment, although surveys are now suggesting that those who identify themselves as "cash cows" waiting to be "milked" may in fact find that the system operates even more slowly, as gate-keeper after gate-keeper exacts his or her dues. Such small-scale corruption may be illusory, and in fact be indicative of much more damaging forms - with lowly-paid civil servants (who may even have purchased their jobs) obliged to generate returns for their supervisors, or to produce revenue for a ruling party. The impact of small bribes, too, can be radically disproportionate, as in the case of the customs officer who, for a few dollars, waves through containers of high-cost dutiable goods.

Small-scale it may be, but if not vigorously attacked, small-scale, facilitating bribes can feed on themselves to produce a corrupt spiral. Frequently too, petty corruption is simply a downwards projection of much more damaging forms of corruption at higher levels. The "grand" corruption of high public officials often involves large, international bribes and "hidden" overseas bank accounts. It is frequently fostered by exporters from countries (in particular, the industrialised countries) which may (knowingly or unknowingly) offer tax breaks for the bribes paid and refuse to regard the trans-border corruption of public officials as being criminal behaviour.

This is not to say that corruption is limited to situations where the rules are either inefficiently restrictive or overly lax. Incentives to make and ask for payoffs occur whenever a government

official has economic power over a private firm or individual. It does not matter whether the power is justified or unjustified. Once a pattern of successful payoffs is institutionalised, corrupt officials have an incentive to raise the size of bribes demanded and to search for alternative ways to extract payments.

Officials may refuse to serve clients unless a bribe is paid. They may design a major procurement project on too large a scale and with too much specialised equipment as a way of generating large bribes and keeping them hidden. They may prefer expensive new infrastructure projects, which can carry large bribes, to lower-priced, labour-intensive projects which do not. They may accept payments to reveal secret information on privatisation projects and to favour insiders. And once paid, a bribe may have to be recouped by a contractor, if not in over-pricing, then in providing lesser value. None of these examples represents the efficient use of pricing mechanisms in the public sector. All of them involve poor public and private choices and risk imposing large costs on society - costs which are often shouldered by those who can least afford to bear the burden.

As such, governments and private citizens should not respond with tolerance. Instead, they must move vigorously to strengthen their national integrity systems. The policy response to combating corruption has several elements common to every society: the reform of substantive programmes; changes in the structure of government and its methods of assuring accountability; changes in moral and ethical attitudes; and, perhaps most importantly, the involvement and support of government, the private business sector, and civil society. The challenge cannot be met simply through institutional and legal responses. Everyone must be involved. The alternative - of doing nothing - is simply not an option. Left uncontained, corruption can only fester and grow. Ultimately it has the capacity to terminally undermine the legitimacy of a government, and ultimately of a state.

This Source Book emphasises accountability measures and attitudinal change over the reform of substantive programmes to reduce corrupt incentives. Why? Because an integral part of the holistic approach to combating corruption is the concept of service delivery - bringing the public service closer to the "customer" (the public) and enhancing its cost-effectiveness through mechanisms of transparency and increased accountability. Accountability measures can often be put into effect relatively quickly and can help create a situation where corruption is no longer tolerated by most officials and citizens. Secondly, the techniques for introducing greater accountability are relatively well-understood and appear to be transferable between nations.

By contrast, substantive policy reform, involving such tasks as reform of the regulatory and tax systems and the elimination of unjustified bribe-generating programmes, is likely to be a more difficult and time consuming task. It is not a "quick win" situation upon which a series of reforms can be built. It is also an undertaking that must be geared to the particular needs and problems of each individual nation state - an undertaking which cannot be fully addressed within the confines of a single generic book.

Successful anti-corruption reform efforts have been all too rare, and the failures numerous. This should not be viewed as discouraging, but rather as a learning process.

Some of the main lessons learned within the pages of this Source Book are that anti-corruption efforts can be derailed by:

- the limits of power at the top (an incoming administration may wish to tackle cor-

ruption effectively but inherits a corrupt bureaucracy that impedes efforts for change);

- an absence of commitment at the top;
- overly ambitious promises leading to unrealistic and unachievable expectations and a loss of public confidence (short-term achievable goals or “quick wins” are often necessary to buoy public support);
- reforms that are “piecemeal” and uncoordinated, so that no-one “owns” them and no-one is committed to see that the reforms are implemented and kept up to date;
- reforms that rely too much upon the law or too much on enforcement (leading to repression, abuses of enforcement power and the emergence of further corruption);
- reforms that “overlook” those at the top and focus only on the “small fry” (if the law is applied unfairly and unevenly, it soon ceases to have any legitimacy or deterrent effect);
- the failure to establish institutional mechanisms that will outlive the leaders of the reforms; and,
- the failure of government to draw civil society and the private sector into the reform process.

The elements of a serious and concerted reform effort must therefore include:

1. a clear commitment by political leaders to combat corruption wherever it occurs and to submit themselves to scrutiny (revisiting the need for immunities and privileges which may shield some from legal process);
2. primary emphasis on prevention of future corruption and on changing systems (rather than indulging in witch-hunts);
3. the adoption of comprehensive anti-corruption legislation implemented by agencies of manifest integrity (including investigators, prosecutors, and adjudicators);
4. the identification of those government activities most prone to corruption and a review of both substantive law and administrative procedures;
5. a programme to ensure that salaries of civil servants and political leaders adequately reflect the responsibilities of their posts and are as comparable as possible with those in the private sector;
6. a study of legal and administrative remedies to be sure that they provide adequate deterrence;
7. the creation of a partnership between government and civil society (including the private sector, professions, religious organisations);
8. making corruption a “high risk” and “low profit” undertaking (i.e. increasing both the risk of being detected and the likelihood of appropriate punishment thereafter);
9. developing a “change management scenario” which minimises the risks to those who may have been involved in “petty” corruption and which wins the support of key political players (whose participation may be crucial) yet which is seen by the public as fair and reasonable in all the circumstances (blanket amnesties can trigger riots in the streets; equally, a blanket imposition of legal penalties can lead into the quicksands of political oblivion).

Bearing all of these points in mind, the development of a coherent, comprehensive strategy must involve an attack on several fronts. Most countries, however, will not be able to do everything at once. Dedicated reformers need to decide where the greatest problems lie and what kinds of policies will be most effective. They also need to recognise the interconnections between different strategies: removing controls on the freedom of the press will have little impact if reporters do not have adequate access to government data, as will anti-corruption laws if law enforcement is weak and corrupt.

This Source Book flags six main areas of reform which can help implement an overall anti-corruption strategy:

- leadership;
- public programmes;
- government reorganisation;
- law enforcement;
- public awareness; and,
- the creation of institutions to prevent corruption.

Important though enforcement undoubtedly is, a strategy that focuses only on enforcement is almost certain to fail and is unlikely to yield a sustained ethical environment that is alien to corruption. Carrots are needed as well as sticks.

The discretionary power of public officials, and the corresponding opportunities for abuse of power, can be reduced through a broad set of reforms targeting the reorganisation and reform of public programmes. These changes will not simply diminish the incentive to pay bribes but also streamline business transactions of all sorts and improve people's access to public services generally. Reforms may include eliminating corrupt programmes which do not enjoy a strong public policy justification - some programmes may have little to recommend their continuance beyond their ability to produce personal benefits for officials! Another option is to simplify programmes and procedures to make them more efficient. Eliminating, for example, "gatekeepers" who are in a position to collect illegal tolls from users, or streamlining the steps required to gain government approvals, serves to reduce the opportunities for delay and discretion - the breeding ground of corrupt practice.

What are the other options for the reform of specific programmes? When payments by the public would actually help to improve efficiency and would not violate distributive justice norms - one can consider legalising the sale of government services, either on a "user pays" basis or to the highest qualified bidders. Likewise, areas of bureaucratic discretion can be minimised. When discretion must be retained, officials should be given clear, written guidelines on the exercise of their duties. Privatisation of state enterprises can also reduce corrupt opportunities within government (but the process itself must be transparent to avoid becoming ensnared in corruption and any resulting private monopolies well-regulated to prevent abuse). The "monopoly power" of bureaucrats can be reduced by providing rival sources of supply - let people apply for a driver's licence at any motor vehicle office, or let businesses obtain operating licences from any of several officials or offices. Conversely, police forces can be given overlapping jurisdictions so that no official can guarantee a lawbreaker that he or she will not be arrested. The list of potential reforms to government programmes is a long one...

Quite apart from reforming specific programmes, attention needs to be given to preventing corruption through government reorganisation. This involves changing the way the government actually does business. How can this be achieved? By paying a living wage to civil servants and politicians so that an honest career in government is a reasonable choice for qual-

ified people. By demystifying and depersonalising government - opening up information, informing citizens of their legal rights in dealing with government, publishing staff manuals which are easily accessible to department users and contractors, and minimising face-to-face contact by introducing random elements (such as staff rotation) so that users cannot predict the officials with whom they may be dealing.

The range of options for changing governments' *modi operandi* is extensive. A few suggestions include:

- developing and implementing strategies which create a firm ethical basis for public administration;
- opening up government to make most official information accessible to the public, and fostering positive and open relationships between government agencies and the press when the press asks for information and comment;
- developing internal financial management systems that ensure adequate and effective controls over the use of resources;
- establishing other types of internal oversight mechanisms to provide speedy and effective review of contentious decisions;
- assuring the adequacy of judicial review of agency actions;
- making managers at all levels responsible for the activities of their subordinates;
- increasing the effectiveness of supervision to enable superior officers to check and control the work of their staff;
- conducting surprise checks on the work of officers;
- requiring officials at management levels to certify that those they supervise comply with civil service regulations and laws;
- purging payrolls to eliminate "ghosts" and make their reappearance more difficult;
- implementing effective monitoring of the assets, incomes, and liabilities of officials with decision-making powers;
- introducing appropriate restrictions on post-public employment in the private sector;
- providing complaints channels to enable junior officials to complain about their superior's corruption;
- ensuring that the press is both itself free and free to expose corruption;
- rewarding good behaviour;
- establishing mechanisms for civil society to be involved in a continuous process of government review;
- polling the public periodically on its perceptions of government service delivery;
- establishing an open, genuinely competitive and transparent system of public procurement;
- examining present practice against "best practice" and the rules in place in the most transparent systems;
- ensuring that choices are not captive to departmental advice and interests;
- involving "outsiders" (i.e. independent individuals who are not part of "the system");
- forcing speedy decision-making in order to eliminate delay during which corruption can take place;
- encouraging professional bodies (accountants, auditors, lawyers) to declare that participation in corrupt activities (including money-laundering) is unprofessional conduct and that corrupt members will be liable to disbarment;
- requiring all gifts, hospitality etc. received by government officials and all political donations to be reported and recorded;
- reviewing and enforcing appropriate "conflict of interest" regulations (including the introduction of ethics programmes and periodic group discussions of real-life ethical dilemmas drawn from their own experiences); and,

- building coalitions of interests in support of corruption prevention, drawing on the private business sector and civil society.

No matter what the options are, reform within public programmes and procedures cannot occur in isolation. Credible legal constraints must exist to back up administrative reform. Yet, in many countries neither the prosecutors nor the judiciary are well-respected, and the underlying laws are weak and ineffective. Several types of reforms need to be considered to strengthen the enforcement of anti-corruption incentives.

Independent investigators, prosecutors, and adjudicators can be established in such a manner that they perform their professional duties in a transparently independent fashion and enforce the Rule of Law against all who breach it. Adequate powers of investigation and prosecution (consistent with international human rights norms) should also be provided for, including access to all government documentation, international mutual legal assistance arrangements with relevant countries, and a re-examination of the laws of evidence and the penalties for corruption to determine if they are appropriate to modern realities.

Transparent mechanisms which lift any immunities which high public officials enjoy by reason of their office can also be integrated into the reform of enforcement measures. So can the development of channels for effective complaint-making, whether internally with the public service or by a member of the public. Procedures for punishing those involved in corruption within the state but who are outside the jurisdiction of the state should also be seriously considered in the anti-corruption reform effort. Civil penalties, black-listing of corrupt firms, extradition arrangements, and other legal provisions which enable the profits of the corrupt to be seized and forfeited, inside or outside the country, are all powerful disincentives for the would-be corrupt.

A common factor to all anti-corruption efforts, whether these efforts involve reforming public programmes, reorganising government, or strengthening enforcement, is that they must enjoy public support. Anti-corruption campaigns cannot succeed unless the public is behind them. If ordinary people and businesses at all levels of society are used to dealing with the state through a system of “payoffs”, it will be difficult to change attitudes. Yet such changes are essential if fundamental change is to occur. People need to understand the seriousness of the corruption problem and what can be done about it - civil society groups (religious leaders, business organisations, professional associations and ad hoc groups), in partnership with government and the private sector, have an important role to play in raising public awareness of the harm done by corruption.

Several steps can be taken. One of the first should be to ascertain what the public perception is regarding existing levels of corruption and where corruption takes place in order to provide a baseline against which the progress of anti-corruption reform can be measured. Secondly, the legal and administrative environment should provide an enabling environment for a free press. The freedom of the press will be aided by several measures, such as passing Freedom of Information laws giving private citizens, including journalists, access to government information (and, it follows, ensuring that government record-keeping is efficient and effective); repealing or revising anti-defamation laws and “insult” laws to ensure that these cannot be used to threaten and fetter the press; ending press and media censorship; raising the professional standards of journalists; ending government discrimination (such as controlled access to newsprint, advertising) of certain media; and, ensuring that state-owned media employees can maintain professional standards of independence and responsibility

In addition, the environment in which civil society operates should be appropriate to a free and democratic society. Nongovernmental organisations and other civil society institutions should be easy to establish, (subject to concerns for the fraudulent use of the non-profit format) and registration provisions should be simple and inexpensive. Registration of a civil society group should be a right, not a privilege.

A nation that is serious about fighting corruption may also need to establish new institutions or strengthen existing ones to specifically carry out some functions in the anti-corruption mandate. Although a number of different models exist, each must ensure that the institution is adequately staffed and funded. Otherwise, the long list of ineffective anti-corruption show-pieces common throughout the world will only get longer. The options include establishing an Independent Commission Against Corruption, such as the one that exists in Hong Kong, with broad investigative and prosecutorial powers and a public education mandate. Such a Commission must be genuinely independent of the country's rulers but subject to the Rule of Law or it risks becoming a force for repression in its own right. These agencies have, however, been largely failures, usually because of a lack of independence has prevented them from investigating major corrupt figures and they have been starved of resources, either through ignorance of their need for adequate capacity or to trim their sails. It is axiomatic that a law enforcement approach is likely to work only where there is already a functioning and independent judicial system.

Another option is to strengthen the Office of the Auditor-General and the Office of the Ombudsman (and if necessary, to create the Office of Ombudsman - an institution which is uniquely placed to improve the performance of officials whilst at the same time providing a quick and cheap remedy to members of the public). The office-holders must be appointed in a way that ensures the independence and professionalism of the office and reports stemming from these Offices must be given widespread publicity, and the government must act to implement recommendations. Ombudsman offices are being established in many countries and they afford an opportunity to introduce administrative accountability while the judicial system adjusts to its new role, or reduces the inefficiencies and corruption that obstruct its performance of its duties. Establishing an Office of the Contractor General would provide independent oversight of government contracting and performance.⁵

An Elections Commission may be needed to ensure independent and impartial review that does not favour any political party or group. The Commission would require transparency in all aspects of the elections system (except, of course, the casting of individual ballots), foster public participation in the monitoring process to build confidence, and provide for training political party officials to ensure their familiarity with the system and enable them to monitor it professionally. In addition, strengthened legislative mechanisms for accountability such as a Public Accounts Committee is required to ensure public access to oversight proceedings.

In a situation of systemic corruption, more often than not the courts - and with them the Rule of Law - fall into disrepute. Their utility as part of the engine of a reform programme can be highly questionable. These institutions must be prepared to accept much more open criticism than they are accustomed to bearing, and not resort to contempt of court charges to silence their critics, however misguided these may be. The judiciary's leadership must become a key part of the coalition for change, and make the necessary changes to their own practices. Simply to deny a truth which the populace at large recognise as being true, only confirms the pub-

⁵ This has been tried in Jamaica, but although the office has performed well, the political class has shown itself to be unenthu-

siastic about taking appropriate action to stem political interference in government contracting.

lic's view that high judicial figures are reluctant to provide a lead and to frankly acknowledge the fact that they have problems. Civil society can help by building coalitions of court users to help overcome the obstacles which would-be judicial reformers face.

Nor can the public interest in containing private sector corruption be ignored. It is, of course, relevant in the context of the private sector's interface with government as a provider of goods and services. But today the private sector is much more than this. Increasingly, public assets are being privatised and strategic public interests placed under private ownership and control. The public therefore have a greater interest than ever in the achievement of good ethical standards. More than this, in many developing countries the private sector is looked upon as the principle engine for development. Government-led efforts have largely failed, and the theory is that the private sector, through the market-place, may be able to achieve that which governments have not. However, if that market-place is marred by corruption; if it is a market in sleaze and not in the arms-length pricing of goods and services, then that market-place will be unlikely to produce what it should for the benefit of the wider community.

This Source Book is only a stepping stone towards containing corruption - it examines programme reform, government reorganisation, enforcement, institution building and more. What is one to do with all of this information? When a group of individuals in a country seeks to put the reduction of corruption on the policy agenda, how should they actually proceed?

The sources of political power and policy influence will differ from system to system, but there are some suggestions which may be applicable to many differing scenarios.

One way to begin is by establishing a "national integrity working group" which draws together all the stakeholders within government (executive office, public service, investigation, prosecution, judiciary, education, information and key vulnerable departments such as customs, procurement, revenue collection, local government) together with coalition partners from outside government (civil society, religious leaders, private sector, relevant professional bodies - law, auditing, accounting, health and education - and groups representing consumer interests). This group could:

- Gain agreement that corruption is too important an issue to be dealt with on a party political basis, and win the support of all major political groupings to work to a commonly-agreed objective. Then, analyse the existing framework and identify areas for reform in order to develop an overall plan which includes short-term, medium term and long-term goals (including a public awareness-raising programme), and assign responsibilities for follow-up action and reporting back to the working group.
- Publicise the establishment of the working group and its overall plan and solicit inputs from the wider public. Continue by seeking endorsement of the plan by the political leadership.
- Hold regular meetings of the working group and give appropriate publicity to its work, paying particular attention to achieving some "quick wins" to build public confidence.
- Post the "national action plan" on a web site and generate local media interest in covering the progress made, and the success stories, without simply wallowing in corruption scandals.

- As reform programmes involve various ministries and a variety of actors, have the government appoint an influential Minister as “Minister for Governance” so that there is a political figure who is clearly responsible and who is well placed to keep an eye on the variety of balls that are in the air.
- Work to generate both “top down” and “bottom up” pressures on corrupt elements within and outside the public sector.
- Ensure that all involved appreciate that the task is long-term; and that while there may be some “quick wins” to be had, in countries where the problem is at its greatest, the time-frame cannot be shortened. Many anti-corruption strategies have foundered on a lack of understanding of this simple fact.

But such a scenario presupposes both a readiness and an ability to act on the part of a political leadership. In many countries there is an absence of will, and an attachment to a comfortable - and corrupt - status quo. In such an environment is it naïve to think in terms of starting an anti-corruption movement? This Source Book argues that it is not. Even in such unpromising territory there is likely to be space in which to start informed discussions among opinion-leaders as to how a society wishes to be governed; to identify potential “champions” of reform within the administration and to assure him or her of support; and to develop “islands of integrity”, be it in a single act of procurement, a single privatisation or a single government agency. There are few, if any, administrations that are wholly corrupt, and the elements that are not, or are unwilling to be, can be the bricks and mortar with which to fashion sustainable change.

In the drive to implement anti-corruption reform - with all its processes and procedures, choices and options - it is important to remember that it is a long-term process. It is one which must be openly supported from the top and one in which ethical attitudes and conduct must be nurtured and reinforced at all levels. Initially reform should only tackle issues where it can be most effective or where there is the most added value, bearing in mind the importance of timing and sequencing, and of building the public’s confidence in the transparency and accountability of the State. The anti-corruption campaign must be made the business of all.