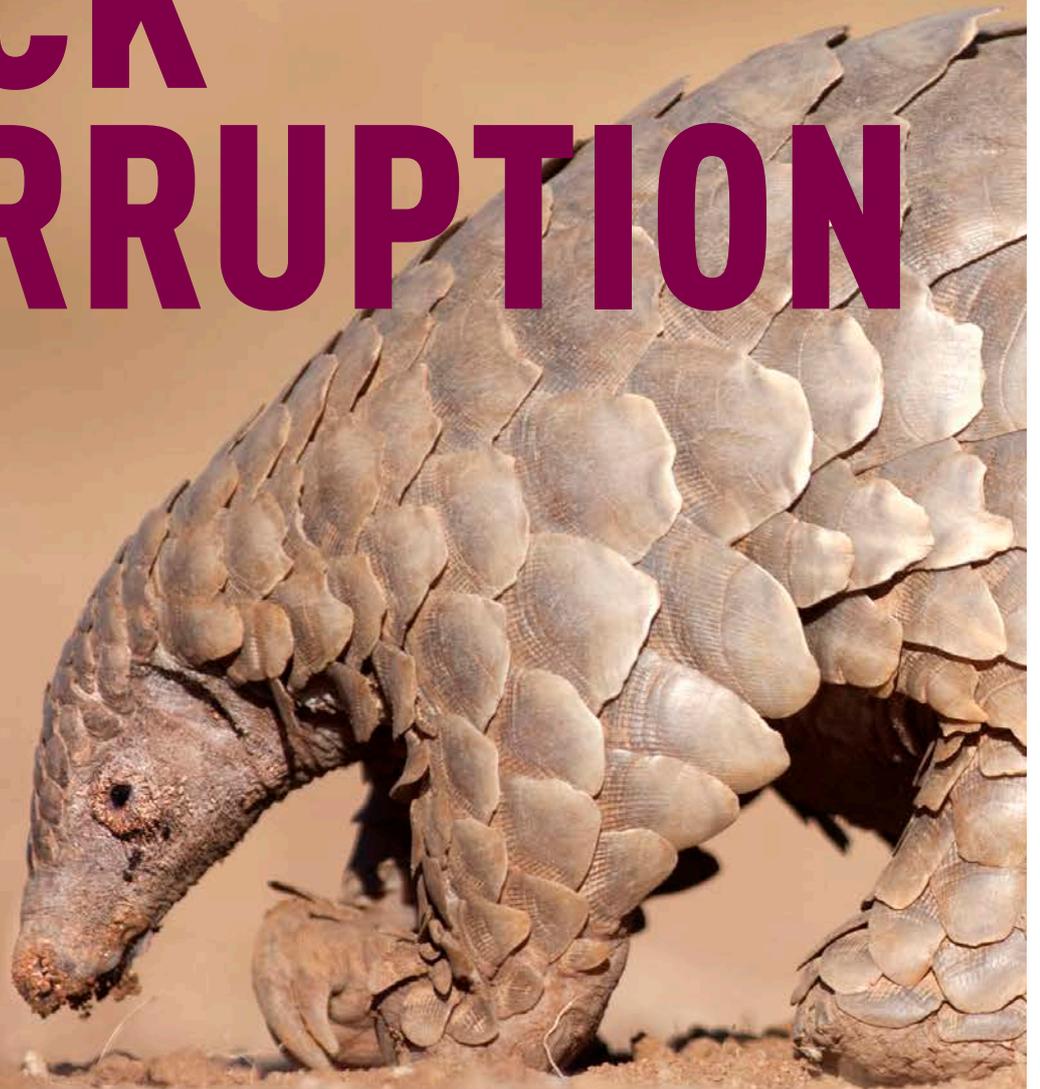




UNODC

United Nations Office on Drugs and Crime

SCALING BACK CORRUPTION



**A GUIDE ON ADDRESSING
CORRUPTION FOR WILDLIFE
MANAGEMENT AUTHORITIES**

UNITED NATIONS OFFICE ON DRUGS AND CRIME

SCALING BACK CORRUPTION

A GUIDE ON ADDRESSING
CORRUPTION FOR WILDLIFE
MANAGEMENT AUTHORITIES



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ACRONYMS AND ABBREVIATIONS

APEC	Asia-Pacific Economic Cooperation
CCPCJ	Commission on Crime Prevention and Criminal Justice
CEB	Corruption and Economic Crime Branch
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
COSO	Committee of Sponsoring Organizations of the Treadway Commission
CPC	Corruption Prevention Committee
DWNP	Botswana Department of Wildlife and National Parks
ECOSOC	United Nations Economic and Social Council
FCPA	Foreign Corrupt Practices Act (United States, 1977)
FIU	Financial Intelligence Units
GPWLFC	Global Programme for Combating Wildlife and Forest Crime
ICCWC	International Consortium on Combating Wildlife Crime
INTERPOL	International Police Organization
INTOSAI	International Organization of Supreme Audit Institutions
ISO	International Organization for Standardization
KWS	Kenya Wildlife Service
NCAA	Ngorongoro Conservation Area Authority of the United Republic of Tanzania
NGO	Non-governmental organization
OECD	Organisation for Economic Co-operation and Development
SDG	Sustainable Development Goal
UNEP	United Nations Environment Programme
UNCAC	United Nations Convention against Corruption
UNODC	United Nations Office on Drugs and Crime
UNTOC	United Nations Convention against Transnational Organized Crime
UWA	Uganda Wildlife Authority
WWF	World Wide Fund for Nature

TERMINOLOGY AND INTERNATIONAL FRAMEWORKS

TERMINOLOGY

Wildlife and wildlife crime

As the concept of “wildlife” is viewed differently in different parts of the world, this Guide leaves its precise definition to each State. However, for the purposes of this Guide, “wildlife” refers to specimens of all wild fauna, flora and marine resources.¹

For the purposes of this Guide, “wildlife crime” refers to the taking, trading (supplying, selling, trafficking or buying), importing, exporting, processing, possessing, obtaining and consumption of wild fauna and flora, including timber and other forest products, in contravention of national or international law.²

The United Nations Office on Drugs and Crime (UNODC) *Guide on Drafting Legislation to Combat Wildlife Crime* contains useful advice on different elements of wildlife crime and recognizes the importance for States to agree on clear definitions in order to outline the scope of the legislation governing wildlife and wildlife crime.³

Corruption

Another term that lacks a universal definition is “corruption”. The United Nations Convention against Corruption (UNCAC), the only universal, legally-binding anti-corruption instrument, recognizes that corruption is a continuously evolving phenomenon that is affected by various factors. Legal frameworks therefore differ in their descriptions of corruption. The Convention does, however, provide a list of universally agreed acts of corruption (see box 1), leaving each State free to go beyond the minimum standards set forth in the Convention.⁴ As with “wildlife” and “wildlife crime”, this Guide leaves the precise definition of “corruption” to individual States.

¹“Specimen” means: (i) any animal or plant, whether alive or dead; (ii) in the case of an animal: for species included in appendices I and II, any readily recognizable part or derivative thereof; and for species included in appendix III, any readily recognizable part or derivative thereof specified in appendix III in relation to the species; and (iii) in the case of a plant: for species included in appendix I, any readily recognizable part or derivative thereof; and for species included in appendices II and III, any readily recognizable part or derivative thereof specified in appendices II and III in relation to the species; (CITES, *Convention on International Trade in Endangered Species of Wild Fauna and Flora*, Art. 1 (b) (1975)).

²John E. Cooper, Margaret E. Cooper and Paul Budgen, *Wildlife Crime Scene Investigation: Techniques, Tools and Technology. Contained in Endangered Species Research*, Vol. 9: 229–238 (2009). For further explanation on illicit and illegal trade, see United Nations Environment Programme (UNEP), *Strengthening Legal Frameworks for Licit and Illicit Trade in Wildlife and Forest Products: Lessons from the Natural Resource Management, Trade Regulation and Criminal Justice Sectors* (2018, p. 2).

³United Nations Office on Drugs and Crime (UNODC), *Guide on Drafting Legislation to Combat Wildlife Crime* (2018).

⁴UNODC, *United Nations Convention against Corruption* (2004).

Box 1. Various acts of corruption

- *Active bribery* – the promise, offering or giving to a national public official, a foreign public official or an official of a public international organization, directly or indirectly, of an undue advantage, in order to act or refrain from acting in matters relevant to official duties.
- *Passive bribery* – the solicitation or acceptance by a national public official, a foreign public official or an official of a public international organization, directly or indirectly, of an undue advantage, in order to act or refrain from acting in matters relevant to official duties.
- *Embezzlement* – theft, diversion or misappropriation of property, funds, securities or any other item of value entrusted to a public official in his or her official capacity.
- *Bribery in the private sector* – active or passive bribery, directly or indirectly, to or by any person who directs or works, in any capacity, for a private sector entity, to act or refrain from acting in breach of his or her duties.
- *Embezzlement of property in the private sector* – embezzlement by any person who directs or works, in any capacity, for a private sector entity.
- *Abuse of functions* – performance of, or failure to perform an act, in violation of the law, by a public official in order to obtain an undue advantage.
- *Trading in influence* – abuse of a public official's real or supposed influence with an administration, public authority or State authority in order to gain an advantage or influence particular outcomes.
- *Illicit enrichment* – a significant increase in assets of a public official or that cannot reasonably be explained as being the result of his or her lawful income.
- *Money-laundering* – the concealment of the origins of proceeds of crime, often by means of conversion or transfers involving foreign banks or legitimate businesses.
- *Concealment* – hiding or continued retention of property, knowing that it has resulted from corruption.

Corruption risk

A distinction should be made between what constitutes “corruption” and what constitutes a “corruption risk”. While “corruption” refers to an act that has already occurred, a “corruption risk” is the potential for a corrupt act to occur. Corruption risks are weaknesses within a system that may present opportunities for corruption to occur. For example, a park ranger accepting a bribe constitutes “corruption”, whereas a situation where a park ranger works alone in a remote area with little oversight is a “corruption risk”. In this sense, a response to “corruption” is always reactive, whereas a response to a perceived “corruption risk” is proactive. This Guide concentrates on corruption risks and ways in which these risks can be identified and mitigated. It is important to keep in mind that a corruption risk assessment is not meant to consider the integrity of the wildlife management authority's personnel, but the weaknesses of the system.

Wildlife management authority

This Guide may serve as a reference tool to assist wildlife management authorities, including Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Management and Scientific Authorities, in developing their capability to tackle the corruption risks that can undermine their work, and by doing so proactively reduce the occurrence, extent and negative impact of wildlife crime.

For the purpose of this Guide, the following authorities will be referred to collectively as a “wildlife management authority” (or “authority”):

- *National wildlife management authorities*⁵ that may be responsible for conserving, protecting and managing wildlife resources and protected wildlife areas; providing security for wildlife and visitors to the protected wildlife areas; establishing and regulating quotas; issuing licences and permits; collecting revenues and charges from visitors; coordinating the country's conservation efforts; managing and regulating trophy hunting; managing wildlife stockpiles; developing mechanisms for benefit-sharing with communities living in close proximity to wildlife; coordinating compensation schemes related to human-wildlife conflicts; and advising decision makers on matters pertaining to wildlife policies, strategies and legislation, among other tasks. Some national wildlife management authorities also undertake law enforcement and prosecution functions. Law enforcement functions may include, among others, anti-poaching operations, intelligence gathering, investigations and management of forensic laboratories.
- *CITES Management Authorities*, responsible for managing trade (import, export, re-export and introduction from the sea) of specimens of species included in the appendices of CITES through the issuing of permits and certificates, for keeping records of authorized trade and for reporting annual illegal trade.⁶ In some countries, the national wildlife management authority and the CITES Management Authority are one and the same entity, while in others, these responsibilities are entrusted to separate entities.
- *CITES Scientific Authorities*, responsible for advising the CITES Management Authority on whether export of specimens would be detrimental to the survival of species in the wild and on other scientific matters.⁷

INTERNATIONAL FRAMEWORKS

This Guide builds on the existing international instruments, in particular the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES),⁸ the United Nations Convention against Corruption (UNCAC),⁹ and the United Nations Convention against Transnational Organized Crime (UNTOC).¹⁰ UNODC is the guardian of UNCAC and UNTOC. More information on these conventions can be found in annex A.

CITES, in particular, is the principal internationally agreed and legally binding instrument for the regulation of international trade in more than 36,000 species of wild fauna and flora. It distinguishes between licit and illicit trade and provides internationally agreed rules binding States that are Parties to the Convention, to ensure that trade in wildlife is legal, sustainable and traceable.

In recognition of the significant role that corruption can play in facilitating activities conducted in violation of CITES at all points of the trade chain, the seventeenth meeting of the Conference of the Parties to CITES (CoP17, Johannesburg, 2016), adopted resolution conf. 17.6 on *Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention*¹¹ and decision 17.83 which called for the development of guidelines that could "... assist Parties to mitigate the risks of

⁵ National (and subnational) institutions dealing with natural resource management may include ministries or departments or agencies of forestry, wildlife, agriculture, fisheries, interior, parks and protected areas, natural heritage, tourism, biodiversity, environment, decentralization and sustainable development, as well as related research institutions and specialized inspectors, rangers and other law enforcement officers. In addition, sanitary/phytosanitary authorities often play a role in natural resource management, especially in relation to the transport, holding/storage and trade in such resources. (UNEP, *Strengthening Legal Frameworks for Licit and Illicit Trade in Wildlife and Forest Products: Lessons from the Natural Resource Management, Trade Regulation and Criminal Justice Sectors*, p. 9 (2018)).

⁶ CITES, *Roles of CITES Authorities* (2005). See also annex A of this Guide – International Legal Framework.

⁷ CITES, *Roles of CITES Authorities* (2005).

⁸ CITES, *Convention on International Trade in Endangered Species of Wild Fauna and Flora* (1975).

⁹ United Nations, *United Nations Convention against Corruption* (2004).

¹⁰ United Nations, *United Nations Convention against Transnational Organized Crime and the Protocols Thereto* (2000).

¹¹ CITES, *Resolution Conf 17.6: Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention* (2016).

corruption in the trade chain as it relates to CITES-listed specimens”.¹² This Guide is developed as a response to that decision.

At the eighteenth Conference of the Parties to CITES (CoP18, Geneva, 2019), a decision was adopted encouraging Member States to actively pursue and promote the use of this Guide. At this meeting, the CITES Secretariat also committed to, upon request, support Parties in implementing activities and measures [needed] to address the risks and challenges posed by corruption.¹³

This Guide also supports the achievement of three Sustainable Development Goals (SDGs). In particular, Goal 14 which encourages States to “Conserve and sustainably use the oceans, seas and marine resources for sustainable development” and Goal 15 that urges States to “Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss”. Goal 15 includes Target 15.7 to “Take urgent action to end poaching and trafficking of protected species of flora and fauna and address both demand and supply of illegal wildlife products”. Further, Goal 16, which addresses many of the root causes of wildlife crime, includes Targets 16.5 to “substantially reduce corruption and bribery in all their forms” and 16.6 to “develop effective, accountable and transparent institutions at all levels”.¹⁴

UNODC has the mandate and expertise to deliver technical assistance and build the capacity of States to address both corruption and wildlife crime. To that end, UNODC has produced a number of publications and technical tools in support of countries’ efforts to address wildlife crime. These include the *World Wildlife Crime Report*,¹⁵ a guide on drafting legislation to combat wildlife crime,¹⁶ and in partnership with other members of the International Consortium on Combating Wildlife Crime (ICWC)¹⁷ an analytic toolkit¹⁸ and indicator framework for combating wildlife and forest crime.¹⁹

¹² CITES, *Decision 17.83: Enforcement matters* (2016).

¹³ CITES, *CoP 18 Doc 32, Annex 1: Draft decisions on enforcement*, Decision 18.77 and Decision 18.78 (2019).

¹⁴ A/RES/70/1 pp. 24-25, see also <https://sustainabledevelopment.un.org/sdg16>.

¹⁵ UNODC, *World Wildlife Crime Report* (2016). Available at www.unodc.org/documents/data-and-analysis/wildlife/World_Wildlife_Crime_Report_2016_final.pdf. See also UNODC, *Wildlife Crime Status Update 2017: Research Brief* (2017).

¹⁶ UNODC, *Guide on Drafting Legislation to Combat Wildlife Crime* (2018). Available at www.unodc.org/documents/organized-crime/tools_and_publications/Wildlife_Crime_ebook.pdf

¹⁷ ICWC is an alliance formed in 2010 to fight wildlife crime and is composed of five major international organizations, namely: UNODC, CITES, the International Criminal Police Organization (INTERPOL), the World Bank and the World Customs Organization (WCO). For more information on the International Consortium on Combating Wildlife Crime (ICWC), see <https://cites.org/eng/prog/icwc.php> or <https://www.unodc.org/unodc/en/wildlife-and-forest-crime/icwc.html>

¹⁸ UNODC, *Wildlife and Forest Crime Analytic Toolkit* (2012). Available at www.unodc.org/documents/Wildlife/Toolkit_e.pdf

¹⁹ ICWC, *Indicator Framework for Combating Wildlife and Forest Crime* (2016). Available at www.unodc.org/documents/Wildlife/Indicator_Framework_e.pdf

EXECUTIVE SUMMARY

There is not a country on earth that is not somehow involved in the global wildlife trade. The export, transit and import of wildlife specimens in both developing and developed economies deliver significant revenue streams for Governments and provide countless people with livelihoods. The rules and regulations that govern this trade are designed to ensure that these revenues and livelihoods are both sustainable and legal, and that they minimize the risk of injury, damage to health or cruel treatment of the living species involved.

A number of species of fauna, flora and marine resources (animals and plants) are however high-value items and therefore targeted by organized criminal groups. Further, the scale and complexity of the global wildlife trade sometimes brings with it regulatory and enforcement challenges, providing criminals with opportunities to break the law. Corruption can be described as the oil that lubricates the engine of the illegal wildlife trade, making it easier for perpetrators to commit crimes involving wildlife. To remain in illicit business, perpetrators of wildlife crime must identify ways to avoid getting caught. Therefore, there will always be a risk that corruption is used to facilitate crime, as criminals engage in corrupt activities in order to reduce the likelihood of their illegal activities being detected or punished.

In many countries, wildlife management authorities were set up to focus on conservation and tourism, leaving them ill-equipped to respond to the degree of crime and corruption that they now face. While the majority of wildlife management officials are honest and execute their duties diligently, vulnerabilities in the environment under which officials operate can create opportunities for corruption to occur, undermining the efforts of those officials who abide by the rules. This Guide aims to help wildlife management authorities identify risks in their current policies, procedures and systems, and develop mitigation measures to deter and prevent corruption and associated wildlife crime.

One of the most effective ways to address wildlife crime, and the corruption that facilitates it, is for wildlife management authorities to undertake a process of corruption risk management within their institution. This Guide provides step-by-step advice for that process, guiding the reader on how best to:

- *Assemble* a dedicated working group, ideally led by someone with appropriate authority.
- *Understand* the specific context in which the wildlife management authority operates. This could include:
 - The organizational and procedural functions of the authority
 - The key stakeholders of the authority
 - The value chain for the wildlife trade
- *Undertake* a corruption risk assessment to identify current and potential risks, and then prioritize risks to optimally allocate resources and address them.
- *Devise* a targeted risk treatment plan that includes:
 - Preventive measures to mitigate corruption risks before they occur, such as:
 - Improving transparency, access to information and accountability
 - Enhancing, policies, procedures and systems
 - Developing human capital and institutional integrity
 - Raising awareness on issues related to corruption through training of public officials, anti-corruption campaigns and involvement of civil society and local communities

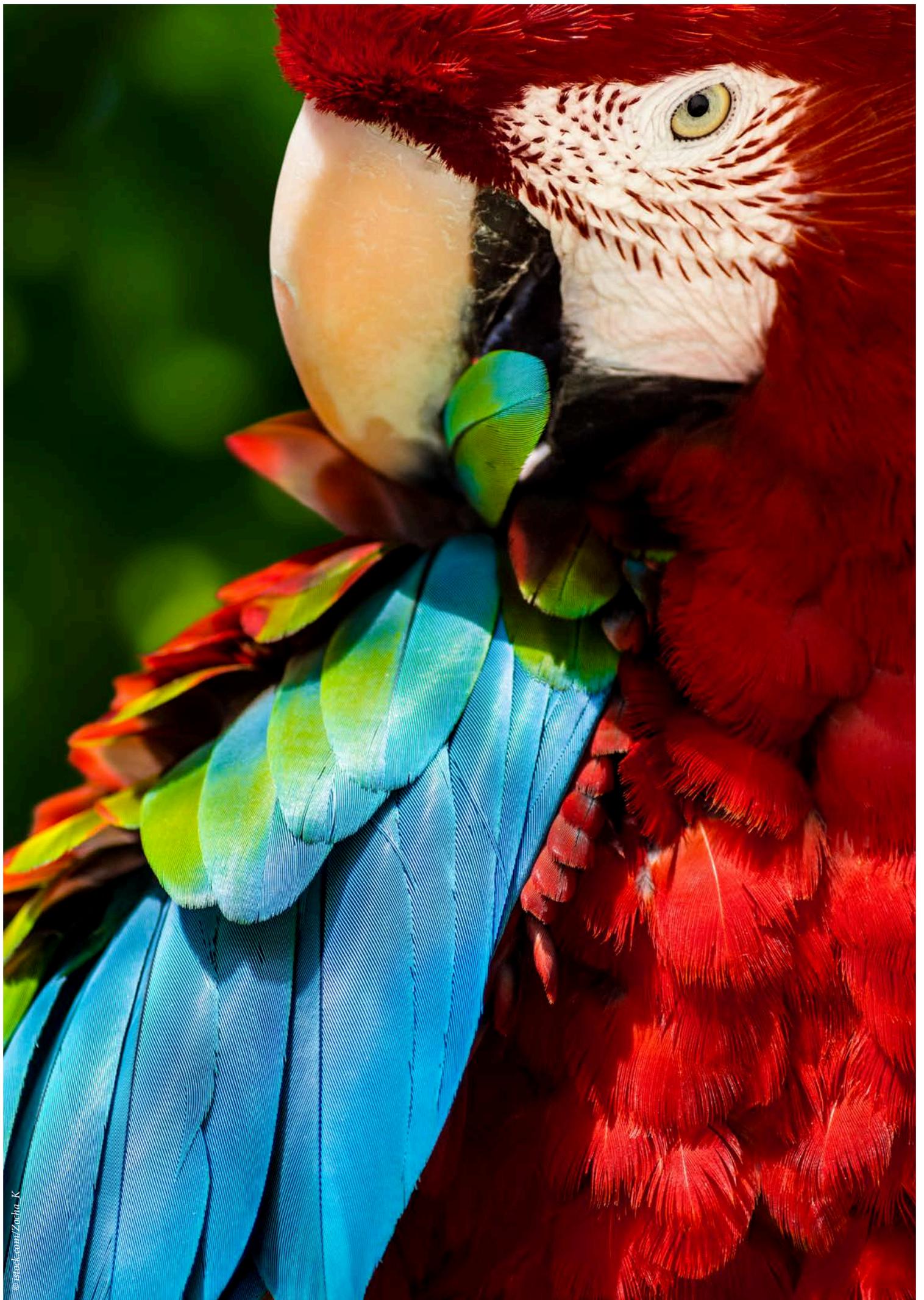
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- Law enforcement measures to form a deterrent against criminal acts, such as:
 - Monitoring the progress of corruption cases referred to the criminal justice system and publicizing the cases that are successfully prosecuted
 - Strengthening inter-agency cooperation to facilitate exchange of information and harness complementary skill sets
 - *Implement* the corruption risk treatment plan, review regularly and feed lessons learned back into the risk management process

By following the institution-wide corruption risk management process put forth in this Guide, wildlife management authorities can benefit from enhanced ability to meet their mandate to protect and sustain wildlife, and from increased integrity of individuals and systems, improved revenue collection and minimized waste of public resources. Additionally, by supporting corruption prevention measures, countries can minimize the damage that corruption inflicts on both their society and on the rule of law, and enhance the confidence that stakeholders hold in public institutions.

The risk management process put forward in this Guide focuses on the possibility of corruption occurring in the future. No matter how successful the enforcement of criminal law is, by definition it may only take place after a crime has been committed and the detrimental effects of corruption have been felt. The consequences of corruption are particularly damaging when it comes to wildlife crime. Every time a seizure of ivory, pangolin scales, shark fins or jaguar teeth is made, it is too late. The animal is already dead. It is precisely for this reason that this Guide recommends that all wildlife management authorities incorporate preventive measures into their efforts to tackle corruption.

The way forward

Wildlife across the world depends on Governments and public authorities to protect it. Additionally, the livelihoods of millions of people depend on legal wildlife trade which should be safeguarded by these entities. Corruption and wildlife crime threaten, weaken and undermine the regulatory and enforcement systems put in place to protect wildlife and the legal wildlife trade. They also impact on broader environmental issues, such as climate change. It is therefore imperative that wildlife management authorities themselves become advocates for stamping out corruption, and that Governments worldwide focus on strengthening preventive measures that will address identified corruption risks.



INTRODUCTION

Wildlife crime¹ is an increasingly pressing issue that poses a significant threat to global economic and social development, security and governance, and the environment. What was once thought of as an emerging threat has evolved into one of the most serious transnational criminal activities next to arms, drugs and human trafficking.² Furthermore, wildlife crime is a highly lucrative illicit business. While it remains challenging to reliably quantify the full scope of the problem, it has become clear that the billions of dollars generated are linked to corruption and money-laundering.³ Indeed, criminals involved in wildlife crime thrive on the existence of corruption as it enables them to commit, conceal and avoid conviction for their crimes.

The UNODC *World Wildlife Crime Report 2016*⁴ and the World Wildlife Seizures database confirm that wildlife crime is a global issue; most countries play a role as source, transit, transshipment hub or destination for contraband wildlife and wildlife products.⁵ The international community has recognized the critical role corruption can play in the facilitation of wildlife crime. For example, the General Assembly calls upon Member States to prohibit, prevent and counter any form of corruption that facilitates illicit trafficking in wildlife and wildlife products.⁶ CITES adopted a resolution⁷ at the seventeenth meeting of its Conference of the Parties aimed at prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention.⁸

In this context, it is worth noting that national wildlife management authorities have historically focused on conservation and tourism as their primary objectives. CITES Management Authorities are specifically designated to manage the CITES process, focusing on regulating the international trade of endangered species and ensuring that it is legal, sustainable and traceable. Because of this, these authorities were not originally designed to deal with organized crime, or the corruption linked to it. They might be equipped to deal with low-level crimes such as trespassing, but understandably they often lack the capacity, knowledge and, in many cases, sufficient legal mandates to address the current threats related to wildlife crime.⁹ This provides a range of opportunities that perpetrators of wildlife crime can exploit.

While the majority of wildlife management officials are dedicated and honest professionals, some officials may seek to gain undue personal benefit by engaging in corruption, thereby tarnishing the efforts and reputation of others. Perpetrators of wildlife crime can, for example, offer bribes to officials for information on the movement of wildlife or patrols, to obtain licences or permits, to allow illegal specimens to pass through checkpoints, or to ensure that illegal shipments are not inspected or seized. Wildlife crime is often highly

¹ Text on how this Guide defines “Wildlife Crime” can be found in the section on terminology and legal frameworks.

² For statistics and data relating to environmental crimes see UNODC, *World Wildlife Crime Report* (2016).

³ See, inter alia, UNODC/APEC, *Enhancing the Detection, Investigation and Disruption of Illicit Financial Flows from Wildlife Crime* (2017); WWF/Dalberg, *Fighting illicit wildlife trafficking: A consultation with government* (2012); UNODC, *Guide on Drafting Legislation to Combat Wildlife Crime*, p. 1 (2018).

⁴ UNODC, *World Wildlife Crime Report* (2016).

⁵ There are increasing efforts to gather data on poaching and illegal trade of animals and their effects on the wildlife population. See, for example, CITES, *MIKE – Monitoring Illegal Killing of Elephants* (2001), the UNODC *World Wildlife Seizures (World WISE) Database* (2016) and CITES, *COP18 Doc 36: Storage and Management of Illegal Trade Data Collected through the Parties’ Annual Illegal Trade Reports* (2019).

⁶ A/RES/69/314.

⁷ CITES, *Resolution Conf 17.6: Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention* (2016).

⁸ CITES, *Convention on International Trade in Endangered Species of Wild Fauna and Flora* (1975).

⁹ UNODC, *Addressing Corruption and Wildlife Crime – A Background Paper for the G20 Anti-Corruption Working Group* (2017).

organized, and the corruption schemes that facilitate it can involve organized criminal groups that take advantage of the vulnerabilities of a particular wildlife management authority.

To that end, criminal groups constantly assess the opportunities and relative risks of entering new markets. These groups seek to exploit organizational weaknesses, as well as weaknesses in regulatory and governance frameworks (such as a lack of transparency, insufficient enforcement of national laws or limited implementation of international conventions), or lack of adequate capacity by the wildlife management authorities. The OECD recognizes that crime convergence zones may arise in such situations, meaning that where there is wildlife crime there are often other forms of organized crime and vice versa.¹⁰ This crime convergence is also reported by TRAFFIC: The Wildlife Trade Monitoring Network.¹¹

To assist Governments in closing legislative loopholes vulnerable to exploitation, UNODC in 2018 published a guide on drafting legislation to combat wildlife crime.¹² Nevertheless, the regulatory frameworks and controls put in place to protect wildlife and govern the wildlife trade, including those related to CITES, are threatened by corruption. Corruption enables wildlife crime in multiple ways and when it occurs, can result in significant lost revenue, opportunity costs, depletion of natural assets and the permanent loss of ecosystem services and functions for the country in question.

By addressing the corruption that enables actors to contravene these regulations, countries can safeguard the integrity and efficacy of these frameworks. Without tackling corruption, these regulatory structures are left unguarded and vulnerable to manipulation. In other words, all other efforts to combat wildlife crime will fail unless corruption is tackled. This is consistent with the seven core elements of the environmental rule of law as identified by the United Nations Environment Programme's Governing Council, which recognizes that "institutions instilled with integrity and accountability are more effective at delivering enduring sustainable development."¹³

This Guide supports wildlife management authorities, including CITES Management and Scientific Authorities, by providing practical solutions to corruption-related issues, in order to improve integrity and transparency, and thereby reduce or prevent corruption. It does this by guiding the user through a structured assessment of corruption risks, detailing useful analytical tools and providing examples of effective preventive and enforcement-focused anti-corruption measures that have been successfully implemented in other contexts.

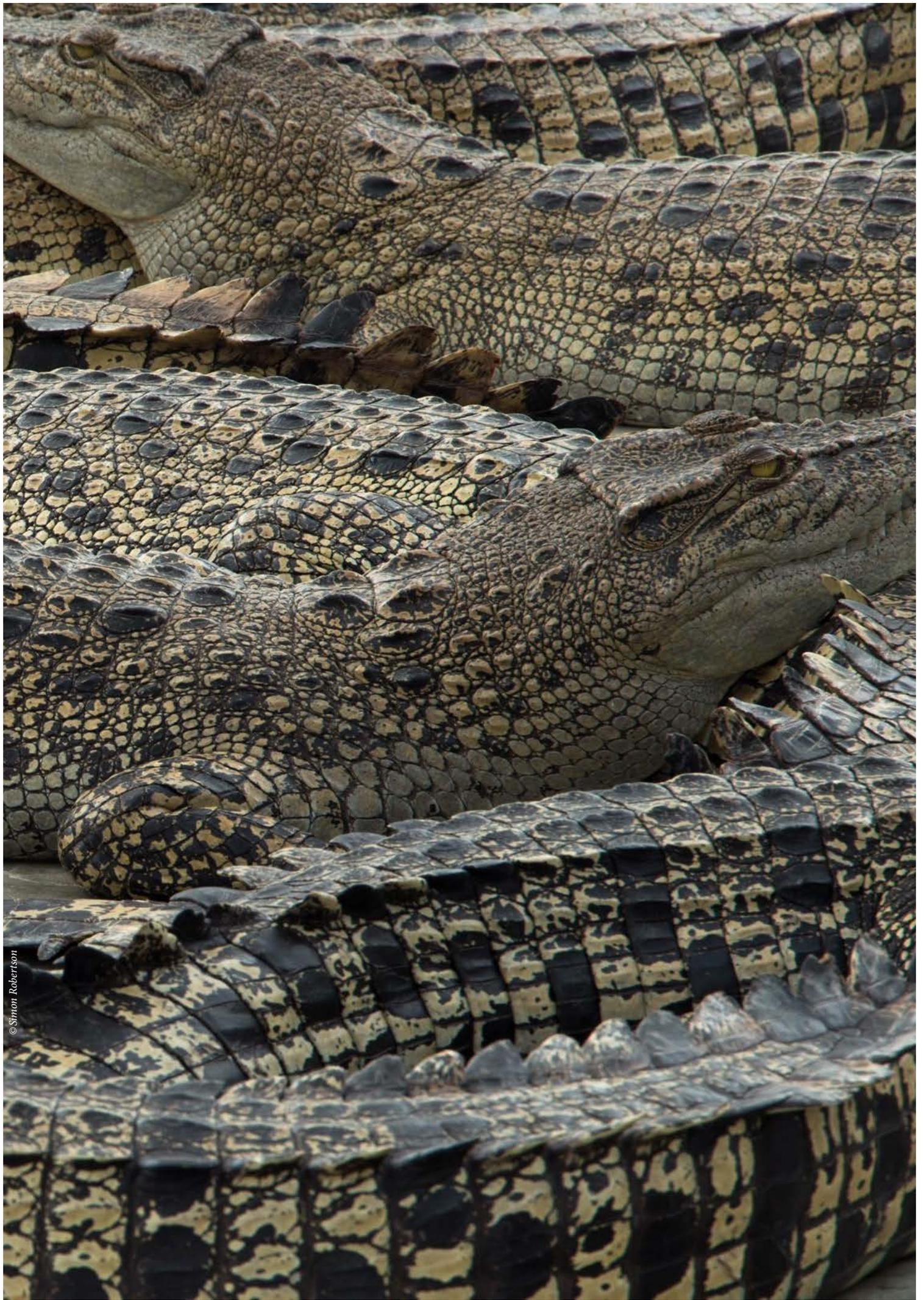
Importantly, this Guide advocates incorporating a "preventive approach" to combating corruption, alongside the more traditional "enforcement approach". The best corruption treatment plans will incorporate both these approaches in a complementary manner.

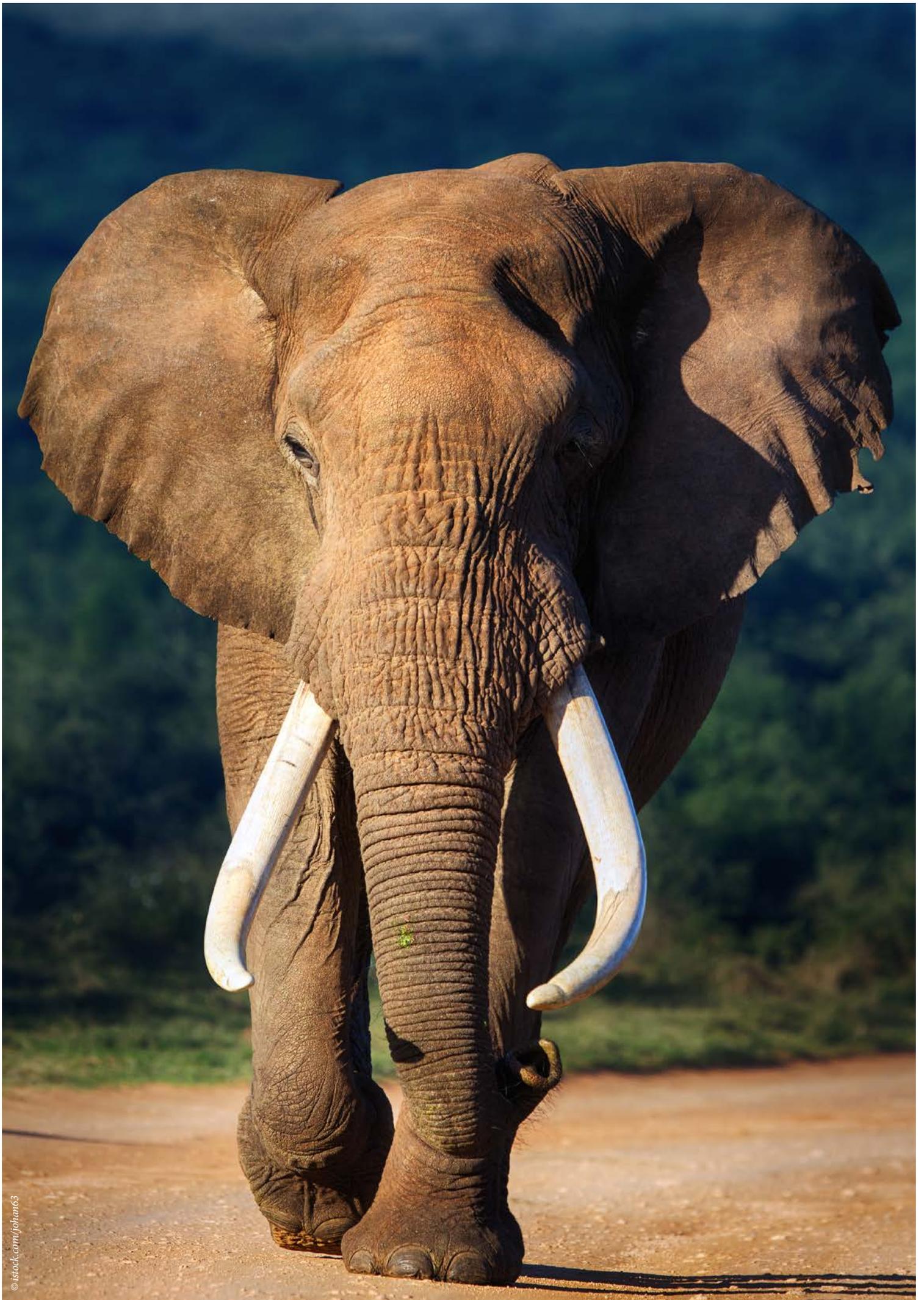
¹⁰ OECD, *Illicit trade – Converging Criminal networks* (2016).

¹¹ TRAFFIC, *Africa's Illegal Wildlife Trade - Bi-annual wildlife enforcement newsletter*, pp.6-7 (2019).

¹² UNODC, *Guide on Drafting Legislation to Combat Wildlife Crime* (2018).

¹³ UNEP, *Environmental Rule of Law: First Global Report*, p.22 (2019).





Chapter 1.

SCOPE AND CONTEXT

The anti-corruption approach proposed in this Guide is meant to complement existing approaches to wildlife crime, not to replace or duplicate them. The corruption risk management process suggested in this Guide should be undertaken in addition to any existing anti-corruption activities or ongoing preventive, detective and investigative initiatives the wildlife management authority may be conducting.

1.1 PURPOSE, AUDIENCE AND STRUCTURE

The purpose of this Guide is to help wildlife management authorities address the corruption that enables wildlife crime, threatening the survival of some wildlife, robbing communities and countries of their valuable resources and income, and undermining environmental rule of law, governance and human rights.¹⁴

It aims to enable wildlife management authorities to engage in and embed a corruption risk management process in their institutional processes. This is achieved through building capacity, instilling a culture of corruption prevention, and strengthening the transparency, accountability and integrity of wildlife management authorities.

In turn, this will also better enable countries to meet the objectives of SDG 14 (Life below water), 15 (Life on land) and 16 (Peace, justice and strong institutions).

While this Guide is focused on providing guidance specifically for wildlife management authorities, including CITES Management and Scientific Authorities,¹⁵ other organizations that are involved in the protection, management or control of wildlife (e.g., customs), or the mitigation of corruption (e.g., anti-corruption authorities, police, prosecution, judiciary and civil society watchdogs), may also find it useful.

¹⁴ For more information on “recognition of the mutually reinforcing relationship between rights and the environmental rule of law”, see UNEP, *Environmental Rule of Law: First Global Report*, p. 25 (2019).

¹⁵ When referring to “wildlife management authorities” or “authorities”, this Guide includes the CITES Management and Scientific Authorities. For further explanation of these terms, see the section on terminology and legal frameworks.

This Guide is structured in the following way: It starts by highlighting the benefits of addressing corruption linked to wildlife crime and of discussing the appointment of a working group to undertake the corruption risk management process. After this, it details a five-step corruption risk management process:

- Step 1: Establish context
- Step 2: Risk identification
- Step 3: Risk analysis
- Step 4: Risk evaluation
- Step 5: Risk treatment

The Guide then discusses the cross-cutting principles of the corruption risk management process, such as communication and consultation, monitoring and review, and recording and reporting. The importance of institutionalizing the corruption risk management process, and how this can be achieved, is also explored. The final chapter discusses risk treatment examples, including both preventive and enforcement measures.

The annexes include information on some causes of corruption risks that can be helpful for the working group, along with a toolkit that can support wildlife management authorities when documenting and institutionalizing their risk management process.

Information contained in this Guide has been derived from a variety of sources, including but not limited to consultation with experts, the ongoing work of UNODC and interactions with wildlife management authorities, academic research and reviews of materials published in the media. The findings and recommendations contained in this Guide have been validated by a group of experts.

1.2 THE BENEFITS OF ADDRESSING CORRUPTION LINKED TO WILDLIFE CRIME

Corruption is present in the environment and natural resource sectors just as it is in other sectors and can be an integral part of the devastating economic, social and environmental effects of trafficking in wildlife. Although the vast majority of officials are committed to their task and work diligently every day in the execution of their duties, corrupt activities by some officials undermine the good work being done by the majority. A number of CITES-listed species are high-value commodities targeted by organized criminal groups, and this makes the officers (responsible for protecting, managing and regulating trade in these species) vulnerable to intimidation and corruption.

Although wildlife management authorities may be aware of the role corruption plays in enabling wildlife crimes, the idea of undertaking a corruption risk assessment is relatively new. To date, only a few countries (mostly with the support of UNODC) have conducted corruption risk assessments linked to their wildlife management processes. Most countries therefore have only a patchwork understanding of which anti-corruption approaches would be most appropriate for their specific circumstances.

Tackling corruption to address wildlife crime has the benefit of protecting regulatory and legal frameworks and strengthening a State's ability to implement them. In addition, it can have a number of other material benefits for wildlife management and enforcement authorities. Some examples include:

- *Improved sustainability and reputation of the wildlife sector:* Efforts to tackle corruption and increase transparency are likely to decrease opportunities for poaching and other forms of wildlife crime. This can benefit protected wildlife, increase environmental sustainability and improve the reputation of the country's wildlife sector, which can result in increased investment in, for example, the wildlife tourism sector, and in turn generate more income and economic growth.
- *Increased transparency and efficiency of systems:* Corruption risk assessments provide wildlife management authorities with the opportunity to identify and address systematic weaknesses, to build integrity mechanisms and controls into their processes and regulatory frameworks, and to increase

the transparency of processes and decision-making. This often leads to increased organizational efficiency and accountability, enables the provision of better public services, and enhances the confidence that stakeholders have in the authority.

- *More resources:* If the integrity of wildlife management authorities is compromised, providing opportunities for corrupt practices to occur, it can result in significant loss of revenue, opportunity costs, depletion of natural assets and the permanent loss of ecosystem services and functions for the country in question. For instance, a 2019 CITES report states that illegal exports of rosewood in The Gambia account for “about half of the country’s total exports, equal to approximately 10% of GDP or twenty times the budget of the Ministry of Environment, Climate Change and Natural Resources.”¹⁶
- In many countries, wildlife management is dependent on revenue collected from park and game reserve fees, licences and permits. If these revenues are not collected in full or properly managed, it is likely that the wildlife management authorities will face additional challenges in meeting their mandates. Addressing corruption can protect against loss of revenue.
- *Less crime:* In the past 10 years, wildlife crime has become a significant and specialized area targeted by transnational organized criminals.¹⁷ It is well known that this crime is often enabled by corruption.¹⁸ If action is taken to minimize the likelihood of corrupt practices, then opportunities to engage in wildlife crime should also diminish.
- *More prosecutions and convictions:* Some facilitators of wildlife crime may primarily have done so by committing a corruption offence (rather than committing a wildlife offence as such). For example, an officer selling a licence to a person who is entitled to such a licence and embezzling the fee has committed a corruption offence rather than a wildlife offence. Linking corruption and wildlife crime, and investigating them together or in parallel, can often be the only way to hold these “supporting actors” accountable for their actions. It also allows for a wider range of entry points to prosecute illegal conduct, leading to larger numbers of cases being prosecuted.

While small-scale corruption, such as the bribery of low-level officials, may be hidden behind closed doors, many types of corruption linked to the wildlife sector leave a paper and money trail that can be reconstructed by investigators and prosecutors. This provides them with the concrete proof of criminal activity necessary for securing convictions. Stronger evidence of corruption can increase the number of prosecutions that result in convictions.

Furthermore, in many jurisdictions, the penalties for corruption are higher than those for poaching or wildlife trafficking. By prosecuting these corruption cases, tougher sanctions can be secured and in turn can act as deterrents for potential future criminal behaviour. In addition, prosecuting high-profile officials for corruption rather than lower penalty crimes can also act as a powerful deterrent to other officials.

- *Increased staff morale:* The perception that some colleagues receive personal benefit from corrupt practices may lower staff morale and shape the individual decision on whether to engage in corruption. The perception of “everybody does it, why shouldn’t I?” or observing that corrupt actors are “getting away with it” can serve as justification for corrupt behaviour. Staff morale and integrity are likely to increase where there is a perception that the organization is taking appropriate steps to prevent corruption and increase organizational transparency. Staff morale may also be influenced by leadership, meritocracy, remuneration and working conditions.
- *Minimized wasteful expenditure:* Engaging in a systematic corruption risk management process makes it more likely that resources allocated to addressing corruption risks are used effectively and will result in reduction in corruption and related crimes.

¹⁶ CITES, *CoP 18 Doc 34: Wildlife Crime Enforcement Support in West and Central Africa*, p. 13 (2019).

¹⁷ UNODC, *Guide on Drafting Legislation to Combat Wildlife Crime* (2018).

¹⁸ WWF/Dalberg, *Fighting Illicit Wildlife Trafficking: A Consultation with Governments*, p. 14 (WWF, 2012).



Chapter 2.

CORRUPTION RISK MANAGEMENT PROCESS

The corruption risk assessment and the related risk treatment plan, as laid out in this Guide, are part of a structured, systematic process designed to identify potential corruption risks, and to devise actions to minimize these risks within a wildlife management authority. It is not a sector-wide process, but rather addresses only one authority and is therefore within the span of control of the wildlife management authority that is undertaking it. The goal of the corruption risk management process is to produce a realistic list of likely corruption risks specific to the authority undertaking the process, prioritize them, and develop risk treatment measures which, when aggregated, will comprise the corruption risk treatment plan.

There are two essential components to the risk management process recommended in this Guide. First, the process should always be undertaken with a solid understanding of the mandate, operating environment and areas of influence of the wildlife management authority. Secondly, there needs to be an understanding that the corruption risk treatment plan developed will be based on a documented risk assessment and will realistically take into consideration the resources available for implementation.

This Guide takes into account the existing standards and methodologies for assessing and managing risks such as the International Standards Organization ISO 31000, Risk Management – Principles and Guidelines¹⁹ and COSO Enterprise Risk Management.²⁰

The suggested process requires commitment from the management and, if applicable, the governing body of the wildlife management authority. Figure I outlines the risk management process put forward by this Guide. The main steps of this process are described throughout chapter 2.

¹⁹ International Standards Organization, *ISO 31000:2018, Risk Management – Principles and Guidelines* (2018).

²⁰ Committee of Sponsoring Organizations of the Treadway Commission (COSO) *Enterprise Risk Management, Integrating with Strategy and Performance* (2017).

Figure I. ISO 31000 Risk Management Process



Appointment of a working group

The wildlife management authority should establish a working group and give it the responsibility and mandate for conducting the corruption risk assessment and formulating the risk treatment plan. The authority should provide the working group with sufficient powers, resources and adequate support from management and staff to ensure that it receives the information needed to conduct an effective corruption risk assessment.

Who should be involved?

A senior representative of the wildlife management authority should head the working group. The rank and influence of this individual will have a direct impact on the success of the group and its ability to devise a realistic corruption risk treatment plan and secure the active participation of group members.

The working group may also wish to engage members external to the wildlife management authority to acquire any needed skills or information that are not available within the authority. It can be beneficial to have a point of view external to the wildlife management authority that might broaden the scope of issues that are considered. Examples of external members that might be useful to invite to the group include representatives from anti-corruption authorities, financial intelligence units, audit offices, customs, police or prosecution services, among others. Where possible, some working group members should be trained in, or have experience of, corruption risk assessments and management.

The working group should be small enough to maintain efficiency and large enough to have relevant expertise available. Larger organizations will require a larger working group and need more time to assess risks and develop a risk treatment plan. The members of the team should have specialized knowledge and, if

possible, extensive experience in the different areas of operation of the wildlife management authority and where the corruption risks could take place.

During the initial stage of the working group's operation, some of the items that the group should agree on include:

- The terms of reference of the working group (e.g. composition, roles and responsibilities, meetings and reporting)
- The overall objectives of the risk assessment (e.g., that the wildlife management authority wants to minimize opportunities for corruption to take place)
- An assessment plan that outlines tasks to be undertaken with estimated timelines

Communicating the establishment of the working group

Experience shows that an organization's personnel can occasionally misunderstand the process and confuse the risk assessment phase with an investigation. Some may even fear that their unit or their job may be in jeopardy. The best way to manage such fears is through clear, regular communication to employees about the process, and by ensuring free and open discussion between the working group members and other staff.

A directive establishing the team, naming its members and briefly explaining the process should be issued at the outset by the leadership of the wildlife management authority. The directive should be informative, emphasizing that the process is not investigatory. It should also outline the rules governing recordkeeping, document storage, and other administrative matters. The directive should clearly communicate to all the authority's staff the importance of cooperating with the working group.

Where external stakeholders are to be involved, the directive should name the groups that will be consulted, or that will participate in the process. If decisions on who from outside the wildlife management authority will be involved in the process have yet to be made, the directive should note that this information will be provided at a later time.

Allocating resources for the working group

When allocating resources (which includes time, human and financial resources) for the working group to carry out its duties, a good rule of thumb is that several brainstorming sessions followed by two to three months of data collection, debriefing and validation meetings is the minimum requirement. Additionally, it is important to be realistic about the resources available to the working group. Box 2 lists the items that should be considered in a realistic budget.

Box 2. Required resource items

- *Staff time:* The amount of time staff members must spend on assessment and the level of expertise needed to perform the required tasks.
- *Outside adviser(s):* Travel and fees may be paid by the authority or by external sources (auditors, forensic accountants, fraud examiners, consultants).
- *Travel:* Will depend upon whether the authority's offices are spread out across the country or are in one location.
- *Communications:* This includes costs for Internet, postage, telephone calls, etc.
- *Printing and duplication:* These costs cover preparation of data collection instruments, reports and other documents.
- *Supplies and equipment:* This covers the costs of any required supplies and equipment (e.g. computers, packaged software) that must be purchased or rented for the assessment.

Source: OECD, *Public Sector Integrity: A Framework for Assessment* (2005).

Collection and review of documents and other data

Throughout the corruption risk assessment, the working group should collect and review documents and other data that can help determine areas vulnerable to corruption. These documents help to assess whether initially identified corruption scenarios constitute actual risks. Although the assessment does not aim to identify past incidents of corruption, documentation confirming that corruption has taken place in the past can indicate that a particular area of operation may be vulnerable to the risk of corruption occurring again in the future.

Collected documentation will assist during the process of identification, analysis and evaluation of corruption risks. Important sources of information include existing policies, past audit reports, past investigation reports, past procurement and accounting records, and analyses of procurement trends (e.g., companies that win tenders, links between these companies and government officials), among others.

2.1 STEP 1: ESTABLISH CONTEXT



Corruption is often a symptom of wider governance and organizational dynamics and is likely to thrive in conditions where accountability is weak and individuals have too much discretion or autonomy.²¹ The first step of the corruption risk management process is therefore for the working group to establish the context in which the wildlife management authority is operating. During this step, the working group should reflect on the internal and external factors that shape the behaviour of the authority and its employees, and the powers that the authority has to influence these factors.

One reason for establishing context is that the working group needs to understand who else should be engaged at each step of the risk management process. For instance, the wildlife management authority may have geographically-spread operations and so may need to involve people from a range of offices or locations. Additionally, the working group may need to include internal and external stakeholders that have significant influence over the authority's ability to carry out the risk assessment and implement effective risk treatments.

When attempting to establish the context in which the wildlife management authority is operating, the working group should seek to identify the main areas where corrupt behaviour may occur, both within the authority and outside of it. This can help identify corruption risks that the authority may be vulnerable to.

Some of the analytical tools that the working group can use either independently or collectively to establish the context include:

- Organizational functions analysis (section 2.1.1)
- Stakeholder analysis (section 2.1.2)
- Wildlife trade value chain analysis (section 2.1.3)

These tools are intended to support a systematic approach to establishing context and in turn can support the identification of corruption risks. These tools will enable the working group to establish who they are dealing with, what stages of the wildlife value chain they impact, how their organization operates, and the nature of their relationships with external parties. They are not intended to be a time-consuming exercise,

²¹ United Kingdom Department for International Development, *Why Corruption Matters: Understanding Causes, Effects and How to Address Them – Evidence Paper on Corruption* (2015).

and the working group should be able to easily produce a high-level analysis of the wildlife management authority's operating context.

2.1.1 Organizational functions analysis

Each wildlife management authority performs different activities and functions as part of their mandate. Some authorities may be responsible for the management of hundreds of thousands of visitors to their parks and game reserves, whereas another authority may be tasked with the protection of restricted reserves. One authority may have limited powers of arrest, whereas another may have full prosecutorial responsibilities.

Analysing the authority's main functions will establish the context of the organization and enable the working group to consider all the authority's functions when identifying potential vulnerabilities in its operations. The working group may first want to simply list the main functions of the authority (examples are shown in table 1 and proposed templates are provided in annex D).

Table 1. Possible organizational functions of a wildlife management authority

FUNCTIONS DIRECTLY RELATED TO THE AUTHORITY'S MANDATE	FUNCTIONS INDIRECTLY RELATED TO THE AUTHORITY'S MANDATE
<ul style="list-style-type: none"> • Security, wildlife conservation and protection • Management of parks, reserves, wildlife or ranges • Tourism and related services • Research and publications (scientific) • Veterinary services • Issuing of licences, permits, certificates, authorizations, quotas and/or CITES documentation • Community development, stakeholder engagement and relationships management • Inspections of facilities keeping wildlife • Stockpile management 	<ul style="list-style-type: none"> • Human resources management • Finance (which may include revenue management and assets management) • Procurement and supply chain • Administration of transport or logistics • Information and communications technology • Investigation and enforcement • Legal services • Communications, public relations and interagency relationships • Engineering and maintenance services • Audit • Project coordination and partner management

Next, the working group can use table 2 to detail the key aspects of each function of the assessed wildlife management authority (directly and indirectly related to the mandate of the authority). A template for table 2 can also be found in annex D of this Guide. The key aspects that this Guide suggests considering are:

- *People*, for example, who is involved and who is responsible for the function?
- *Processes*, for example, what kind of laws, policies, procedures, norms and systems are in place to govern the function?

Detailing these aspects will be important during the risk analysis stage (risk management process Step 3), as these are considered again when analysing the causes of any identified corruption risks. This analysis helps outline where corruption risks may occur, and also helps identify if there is a pattern to these risks in a certain function or across functions.

When undertaking an organizational functions analysis, the working group should review the overall legislative framework in which the wildlife management authority operates, especially regarding where the authority's mandate originates from. They may also wish to include the key aspects of any other existing laws relating to aspects of wildlife crime as well as anti-corruption laws, policies, processes, norms or systems in their analysis.

Table 2. Example of the key aspects of organizational functions

ORGANIZATIONAL FUNCTIONS	PEOPLE	PROCESSES
REVENUE COLLECTION	70 point-of-sales (PoS) staff at park gates 2 daily cash collectors	Park visitors pay cash to staff at park gates; the staff issue manual receipts and park entry permits; transactions written in ledger; cash is placed in safe with entry code; cash collection amount recorded with cash collector and PoS staff signature and date.
PROCUREMENT	1 head of procurement, 2 senior managers, 2 managers, 6 administrative staff working in procurement department Procurement focal lead in each department	Tenders announced on government eTendering web portal with automatic submission notification; sealed tenders received through electronic submission of supporting bidder documents; procurement team chooses successful bidder with input from procurement focal lead and head of relevant departments; successful bidder notified.
ISSUANCE OF CITES PERMITS AND CERTIFICATES	1 head of permits, 2 technical officers to prepare the permits/certificates	Traders apply for a CITES permit/certificate via application form, requesting authorization to trade in specimens of CITES-listed species providing the required information. Following a standard operating procedure, officials lodge the application, verify information provided and prepare permit/certificate (using appropriate template) for approval or decision to reject the application in accordance with national laws and regulations. Database with applications received and permit and certificates issued is updated. The same or another official prepares the invoice to collect the fee for the permit/certificate, if applicable, and updates accounts.

2.1.2 Stakeholder analysis

Different wildlife management authorities will have different operating structures, and therefore it is important to identify the stakeholders that influence the activities of the authority undertaking the corruption risk management process.

Stakeholder analysis can assist the working group in identifying any person, group or organization that can be positively or negatively impacted by, or have influence on, the actions of the wildlife management authority.²² Reflecting on who these stakeholders are, and how the authority works with them, can help the working group identify specific corruption risks (risk management process Step 2), and tailor corruption risk treatment measures to the relevant stakeholders, maximizing their effectiveness (Step 5).

Working groups can adapt the definition of a stakeholder above to best fit their requirements and approach. However, when assessing if a person/group/organization is a stakeholder, it is important to consider both whether that person, group or organization is affected by the activities of the wildlife management authority being assessed, and also whether they influence the activities of the authority.

Once the relevant stakeholders have been identified, the working group may decide to further analyse how these stakeholders interact with the wildlife management authority. This might include: What influence

²² Adapted from R. Edward Freeman and John McVea, *A Stakeholder Approach to Strategic Management*, University of Virginia, (2001).

does the stakeholder have? What communication exists between the stakeholder and the authority? Is there any conflict between the interests of the stakeholder and those of the wildlife management authority? A template for documenting external stakeholders is presented in table 3 and annex D.

Table 3. Examples of potential external stakeholders of a wildlife management authority

GOVERNMENT	NON-GOVERNMENT
<ul style="list-style-type: none"> • Parent ministry, ministry of finance and other related ministries • Other government agencies with mandate in areas of natural resources management and conservation e.g., forestry • Government security agencies e.g., police, military • Governmental training facilities • Customs • Immigration • Anti-corruption commissions • Legislators • Judiciary • Legal professionals (prosecutors and defenders) • Parliamentarians (ruling party) 	<ul style="list-style-type: none"> • Visitors to the parks/game reserves and tourist agents • Communities (including farmers and landowners) • Private wildlife conservancies • Civil society groups and organizations • Media • General public • Parliamentarians (non-ruling party) • Suppliers • Companies extracting wildlife legally (foresters, fishers, bird collectors, etc.) • Transport companies (land, sea and air) • Professional hunters, taxidermists, pet industry representatives, breeders, etc. • Private security companies • Private training facilities • Criminals, poachers

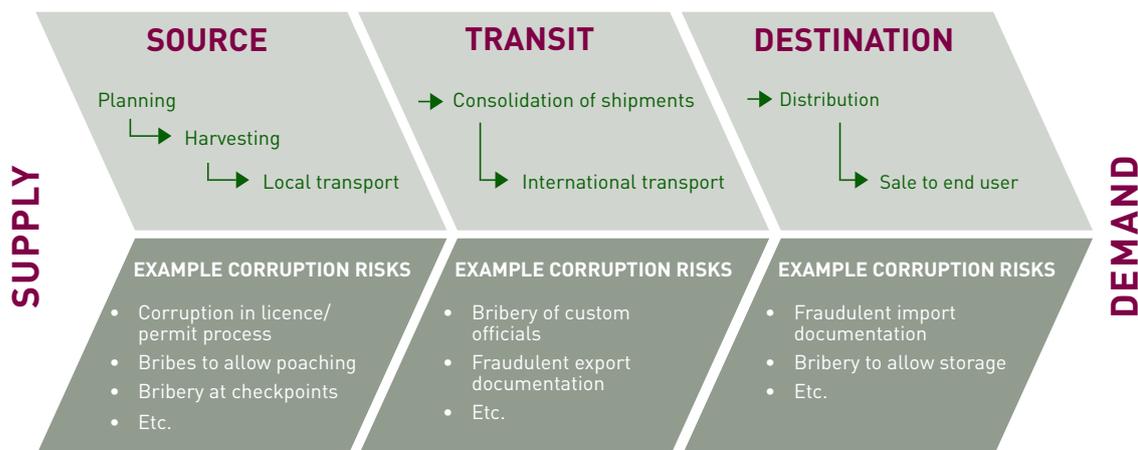
2.1.3 Value chain analysis

A value chain is a set of activities by which an operation, or set of linked operations, add value to a product. It is used to analyse legitimate businesses but is equally applicable when analysing illegal activities. Figure II below shows a generic value chain for the wildlife trade, highlighting where in the process corruption might occur. This is a useful starting point, but the working group may want to develop a more detailed value chain that is specific to their national context. Knowing where value accumulates along the chain helps wildlife management authorities identify areas that are likely to be vulnerable to corruption and where processes and controls may need to be strengthened. It is also important to note that both legal and illegal trade value chains can vary greatly, depending on the species concerned.

The value chain for the wildlife trade also highlights how all stages in the chain and the agencies that regulate those stages are interlinked. Actions taken by an agency at one stage will have consequences for other agencies working further up or down the value chain. Further details on value chains and the flow of money along these chains can be found in the UNODC publication *Rotten Fish*.²³ This can help identify which agencies or which functions should be part of the corruption risk assessment.

²³ UNODC, *Rotten Fish: A Guide on Addressing Corruption in the Fisheries Sector* (2019).

Figure II. A generic value chain for the wildlife trade



2.2 CORRUPTION RISK ASSESSMENT

After Step 1 (Establish the context) has been completed, a corruption risk assessment can take place. Corruption risk assessments are the core of the risk management process. The three steps in this process are:

- Risk identification
- Risk analysis
- Risk evaluation

These steps are detailed below and provide guidance on how the working group can recognize corruption risks, how these risks can be analysed in terms of their links to vulnerable roles and procedures, and finally, how the likelihood and impact of these risks can be evaluated to determine which risks should be addressed as a priority.

2.2.1 Step 2: Risk identification



Once the working group has analysed the context and environment in which the wildlife management agency is operating, the second step of the risk management process is risk identification.

There are many ways to obtain information that will help identify potential corruption risks, and the approach to be adopted will depend greatly on the level of sophistication and the breadth of activities in the country with regard to wildlife matters.

As mentioned in the section on terminology, a corruption risk is the potential for a corrupt act to occur and is usually a reflection of the vulnerabilities in a system. However, it can sometimes be helpful to start the risk identification step by thinking about possible corruption scenarios (e.g. a possible course of action or events that constitute(s) a corrupt act), and later link this scenario to the specific system vulnerability.

An easy starting point is for the working group to begin with a “free flow” of ideas, creating a list of possible corruption scenarios. The list should include both potential future risks of corruption as well as

types of corruption cases that are known to have occurred, as actual cases of corruption are good indicators of where and how future corruption is likely to take place. At this stage of risk identification, a wide net can be cast, but caution should be exercised to ensure that the corruption scenarios identified are within the realms of what might realistically take place. The working group should try to involve key personnel from various departments in this exercise.

Once the working group has completed its “free flow” list of potential corruption scenarios, the “establishing context” tools from Step 1 (section 2.1) can be used to help highlight risks that might not have been identified yet. Reviewing the key organizational functions (including the legislative frameworks and any existing anti-corruption policies), the stakeholder mapping and the value chain analysis will ensure that the working group has considered the core activities of, and the associated potential corruption risks to, the wildlife management authority from all perspectives.

Another approach for the identification of corruption risks is a review of existing documents combined with discussion among the working group. A third approach can be to develop a process flow charts (or reviewing existing ones) to establish the different steps within processes and identify gaps within the processes that provide an opportunity for corrupt behaviours. Some authorities may be capable of performing complex technology-based assessments with much wider scope.

The working group can use one approach or a combination of approaches in identifying corruption risks. A template for documenting the risk identification stage is presented in table 4 (and also in annex D).

Table 4. Example of corruption risk assessment documentation table – identification stage

CORRUPTION RISK ASSESSMENT			
	RISK ID NUMBER	1	2
IDENTIFICATION	IDENTIFIED CORRUPTION RISK (scenarios)	Embezzlement of gate revenue at national park	Manager is paid bribes to divert patrols
	DOCUMENTATION TO SUPPORT EXISTENCE OR SUSPICION OF RISK	Tariff books, park entry tickets/ receipts books, bank documents, bank reconciliations	Instruction to rangers regarding patrols, analysis of where poaching instances occur, possible rangers' or other management's questioning of instructions

Box 3. Mitigating revenue corruption risks within Authority W

Identification of corruption risks

UNODC supported a national wildlife management authority (Authority W) in carrying out the risk assessment exercise outlined in this Guide. Through this exercise, the Authority identified that the processes related to its two main sources of revenue were vulnerable to corruption: revenue from visitors to its parks and game reserves, and revenue from the issuing of licences, permits and sale of trophies. UNODC has since supported Authority W in identifying corruption risks specifically related to these processes using three methods.

Method 1 – Predictive modelling system: A predictive modelling system was developed for Authority W to help forecast revenue and compare those forecasts with actual revenue received from visitors in the parks and game reserves. Some of the corruption indicators established included:

- Actual revenue per visitor being less than expected entry charges per visitor
- Years where the average revenue per visitor was lower than other years
- Increase in number of visitors resulting in lower revenue per visitor
- Parks or reserves that had lower revenue compared to other similar parks
- Abnormal duration of visitors' stays
- Parks that had foreign-registered vehicles only reporting locally-registered vehicles

The predictive model also helped identify areas where Authority W was not collecting enough (or correct) data to be able to cross-check its revenue to identify leakages. The results of the predictive model were useful as they enabled the authority's management to identify the parks and reserves that were more vulnerable to potential corruption. It also allowed Authority W to identify where more detailed and accurate data collection was needed.

Method 2 – Process mapping: Process mapping of the parks and reserves revenue processes, licence and permits issuance processes, and sale of trophies processes were undertaken. This allowed the Authority to identify gaps in personnel capacity and knowledge of role, customer access to information, and pricing and processes for internal accounting and management of cash, all of which could provide opportunities for corruption if not managed well. Some of the corruption risks that were identified through this method included:

- **Parks and reserves revenue processes:**
 - Tour operators or private visitors presenting fictitious advance payment receipts
 - Officers bribed to allow visitors to access the parks or game reserves without paying
 - Visitors providing inaccurate information about their nationality and age so as to be charged lower entry fees
 - Tour operators bribing officers at the gate so that the number of visitors entering the park or game reserves are more than those paid for
 - Officers bribed to allow visitors staying in the parks or game reserves for a duration longer than they have paid for
 - Officers being bribed to allow visitors not to be charged for undertaking special activities, e.g. night game drives
 - Officers applying the wrong motor vehicle rate, resulting in underbilling, with the difference being shared between the officer and tour guide
- **Licence and permits revenue processes:**
 - Officers issuing licences or permits and not fully remitting the funds collected
 - Officers being paid a bribe to issue a licence or permit to an unqualified person
 - Officers overcharging for permits and keeping the difference (due to lack of information on the authorized fees)
 - Officers using counterfeit receipts to collect licence and permit fees from applicants
 - Officers bribed to misclassify species types for export/import permits to avoid traceability
- **Sale of trophies processes:**
 - Officers collude with a bidder to record and collect a price lower than the winning bid price
 - The winning bidder colluding with an officer to avoid a trophy from being marked, tagged or recorded so that it is not traceable

- Officers not recording a trophy sale and misappropriating the funds
- Officers being bribed to allow an individual without a trophy dealer licence to participate in a trophy auction

Method 3 – Corruption risk identification workshop: A corruption risk identification workshop was held, which allowed Authority W to identify corruption risks in addition to those identified using predictive modelling and process mapping. The workshop was attended by individuals from the reservations and licensing function of the Authority, along with key management staff. Participants came from the Authority’s headquarters, regional offices, as well as from parks and game reserves. Additional risks identified included:

- **Parks and reserves revenue processes:**
 - Manipulation of foreign exchange to underreport revenue collected in foreign currency (revenue is only reported in local currency)
 - Using visitors’ credit card details to pay for personal expenses
 - Use of outdated/previous versions of receipt/ticket books for visitors and not accounting for the funds collected in the remittance process
 - Officers using their own receipt books (current receipt books lack security features) which are used to collect and misappropriate gate fees
 - Tour operators underreporting the number of visitors in their camp sites so as to pay less in fees
- **Licence and permits revenue processes:**
 - Untrained staff intentionally posted to cash collection office thus creating a corruption opportunity
 - Officers awarding themselves “soft loans” from revenue collected (such funds are used to undertake personal business or pay for personal expenses and returned later). There are instances where these funds are misappropriated
- **Sale of trophies processes:**
 - Leaking information in relation to trophy auctions and sales. For example, officers receive a bribe to give bidders otherwise undisclosed information about the trophies and auctions

A description of the risk treatments implemented by Authority W in response to these identified corruption risks can be found in box 9.

2.2.2 Step 3: Risk analysis



Now that corruption risks have been identified, the working group must study them in more detail to better understand if these risks actually exist within the wildlife management authority, whether they have occurred in the past or may occur in future, and if and how these risks are linked to weaknesses that are within the authority’s control. This is done during the third step of the risk management process: risk analysis.

As mentioned before, the collection and review of documentation and other data is an important part of the risk assessment process and is especially relevant during the risk analysis step. During this step, the working group should thoroughly analyse the causes of, and existing controls related to, each identified corruption risk. This is important as different causes of corruption risks will require different treatment measures. For example, responding to risks arising from lack of oversight will differ from responding to risks arising from low staff morale. If there is more than one cause for each identified risk, care should be taken to treat the issues separately as the responses they require are likely to be different.

Understanding the causes of each corruption risk

The working group should, for each identified corruption risk, seek to understand the causes of corrupt behaviour that may be driving that risk within the environment of the wildlife management authority. These causes can be conditions that make the identified corrupt action more attractive or feasible for the culprit, along with anything else that might encourage particular individuals or groups to engage in corruption.

Causes of corrupt behaviour can be internal or external to the wildlife management authority and can influence the actions of both officials and perpetrators of wildlife crime. Table 5 provides examples of these causes, classified into internal and external.

This list is not exhaustive and should be used by the working group only as a starting point upon which to build a tailored list of main causes of corrupt behaviour specific to their wildlife management authority. However, familiarizing members of the working group with these examples can enable corruption risks to be identified early on.

More detailed explanations and examples of some of the causes of corrupt behaviour listed in table 5 can be found in annex B.

Table 5. Examples of causes of corrupt behaviour both internal and external to wildlife management authorities

INTERNAL	EXTERNAL
<ul style="list-style-type: none"> • Lack of oversight • Unclear mandates • Lack of a culture of integrity, transparency and accountability • Discretion, lack of standard operating procedures • Ineffective or non-existent disciplinary system, lack of sanctions • Unclear or undocumented processes • Insufficient training • Lack of segregation of duties (e.g., between collecting funds and accounting for expenditure) • Lack of transparency • Poor working conditions • Ineffective or non-existent corruption reporting system • Lack of awareness concerning applicable regulations • Pressure and intimidation by high ranking officials • Internal peer pressure • Individual greed 	<ul style="list-style-type: none"> • Weak legislative and policy frameworks • Social pressures in small rural communities • High prices for rare traded species • High demand for products • Exploitation of legal markets (e.g., introducing illegal products into legal trade channels) • Identification of similar-looking species • Culture and traditions • Individual greed

Boxes 4 and 5 contain examples of the importance of understanding the causes of corruption risks.

Box 4. Understanding the cause of a corruption risk

Money handling during the ticket-sales process can be a key corruption risk for wildlife management authorities. For example, officers can accept bribes from tour providers or tourists or can embezzle money derived from ticket sales. The working group should first seek to understand the cause of the risk and note whether the identified cause is internal or external to the authority.

During a UNODC-supported risk assessment, one authority identified that collecting ticket revenues was a corruption risk. On further analysis of this risk, the authority recognized that most rangers responsible for collecting ticket revenues had security backgrounds rather than sales backgrounds and were therefore unfamiliar with the necessary point-of-sales (PoS) accounting and record-keeping techniques. While the majority of rangers may not have been corrupt, their lack of familiarity with the procedures created a situation in which the corrupt activity of some rangers could go undetected. In this case, therefore, the main cause of the corruption risk was “staff without the requisite skillset” and was internal to the authority.

See box 8 for risk treatments related to this example.

Box 5. Demonstrating the need to understand the cause of a corruption risk

In an initiative designed to reduce revenue leakage, a large global organization provided a number of computers to a wildlife management authority in an attempt to increase its ability to track and report activities. The initiative assumed that by providing access to technology, the corruption risks faced by that authority might be reduced.

However, the initiative implemented a technological “solution” before addressing weak governance within the authority and lack of integrity in the authority’s employees which in this case were the actual causes of corruption risks. Because of this, finding that the new computers closed off previous gaps in the system that could be corruptly exploited and that they minimized the opportunity for future corruption, employees resorted to simply filling the computers with honey, rendering them useless.

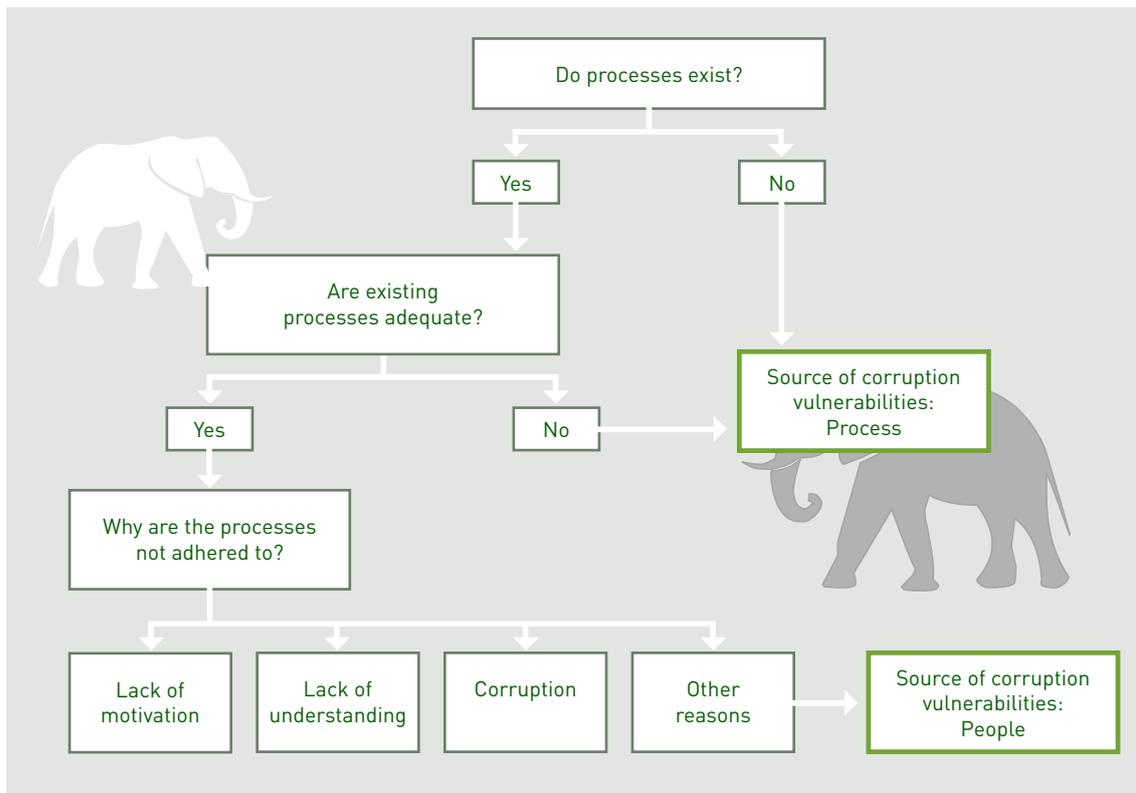
This example demonstrates that implementing a risk treatment without understanding the cause of the corruption risk makes it likely that the chosen treatment will not be as effective as it might have been, were the causes known and understood.

Reviewing existing controls

Wildlife management authorities have (or should have) processes (i.e., laws, policies, procedures, norms and systems) in place that seek to prevent fraud and corruption. Within a wildlife management authority responsible for granting licences or a CITES Management Authority responsible for granting permits, for example, this could vary from the nightly reconciliation of cash receipts to internal audits, rules for the safekeeping of unused permits, or detailed regulations related to the licensing and permit processes.

In Step 1 (Establish context), information may have been gathered on existing controls. Now the working group should analyse which processes are in place and how effective they are. Using figure III below, the working group can assess if each corruption risk arises from a vulnerability related to processes or to people (i.e., staff of the wildlife management authority). This information will be used later in Step 5 (Risk treatment).

Figure III. A flow chart for analysing corruption risks



Linking risks to processes (laws, policies, procedures, norms or systems)

No matter what analysis methodology is used, it is important to ensure that any identified risks are mapped to specific corruption scenarios that are (or may be) happening, and that those scenarios can be mapped to specific processes (i.e., laws, policies, procedures, norms or systems) within the wildlife management authority.

Very often, vulnerabilities will be associated with weak or non-existent controls. While in some cases no knowledge or record of corruption related to these weak controls may exist, it is usually only a matter of time before someone takes advantage of any vulnerability within a process. At the other end of the spectrum, over-complex or highly burdensome processes may lead to a high risk of corruption as officers and key stakeholders seek ways of avoiding, or develop alternative ways of bypassing, the overly complex bureaucracy.

Linking risks to people

When it comes to risks related to the wildlife management authority’s officers, the working group should consider whether certain roles and/or functions (rather than individual employees) are more vulnerable to corruption than others. These vulnerable roles (i.e., roles in which there are greater risks of, or potential exposure to, corruption) may become more obvious when reviewing the organizational functions analysis (section 2.1.1).

Table 6 below shows an example of categorizing roles according to their perceived vulnerability to corruption. However, the vulnerability of a role depends on the context and may vary from authority to authority.

Table 6. Example of low and high vulnerability roles within wildlife management authorities of a national park

HIGH VULNERABILITY	LOW VULNERABILITY
<ul style="list-style-type: none"> • Park entry and exit • Procurement • Warden located in areas with highly poached animals (e.g., rhinos and elephants) • Inspection of facilities that keep animals • Trophy stockpile management • Human resources • Paper-based records management 	<ul style="list-style-type: none"> • Electronic records management • Audit • Legal

Once vulnerable roles are identified, the working group should assess whether these roles have adequate safeguards in place. It is important to keep in mind that a corruption risk assessment is not meant to consider the integrity of the wildlife management authority's personnel, but the weaknesses of the system.

In addition to vulnerable roles, when it is established that people are the source of corruption risks, the working group should consider the underlying causes for these risks. For example, are the staff sufficiently trained? Do staff members' skillsets correspond with their functions? Are staff members' mandates clear? Are there issues with staff morale or motivation? By identifying the right causes for the corruption risks, the working group can design effective risk treatment measures that address the actual causes. Table 7 demonstrates how the working group could record their risk analysis findings.

Table 7. Example of corruption risk assessment documentation table – analysis stage

CORRUPTION RISK ASSESSMENT			
	RISK ID NUMBER	1	2
IDENTIFICATION	IDENTIFIED CORRUPTION RISK (scenarios)	Embezzlement of gate revenue at national park	Manager is paid bribes to revert patrols
	DOCUMENTATION TO SUPPORT EXISTENCE OR SUSPICION OF RISK	Tariff books, receipts, bank documents, bank reconciliations	Instruction to rangers regarding patrols, analysis of where poaching instances occur, possible rangers' or other management's questioning of instructions
ANALYSIS	ORGANIZATIONAL FUNCTION	Revenue collection (reservations/tourism)	Enforcement
	SOURCE OF RISK (i.e., process or people)	People	Process and people
	VULNERABLE STAFF ROLES	Point-of-sales officers	Rangers and enforcement managers
	RELATED STAKEHOLDERS	Tourists, tourist agents	Criminal groups
	MAIN CAUSES OF CORRUPTION RISK	Lack of oversight, insufficient training	Lack of oversight, geographical dispersion, weak instructions and SOPs, insufficient training

During Step 5 (Risk treatment), the working group will review this risk analysis and decide if additional processes are required. A hypothetical example of reviewing processes is provided in box 6.

Box 6. A hypothetical example of reviewing processes

At a number of gates of a national park, very little revenue was being collected. To review the processes related to this, the system for selling admission tickets and collecting revenue should first have been documented in section 2.2.2 (see table 7: *Example of a corruption risk assessment documentation table*). Once documented, the process should be analysed to check whether it is complete and clear. Some key questions to ask are:

- Are the tariffs and charges clear and public?
- Is there room for misinterpretation?
- Is there adequate staffing and segregation of duties in place?
- Are the processes for recording takings clear and standardized?
- Is it clear who is responsible for receipts and the receipt book?
- Is it clear who handles the cash?
- Are reconciliation processes adequate and documented?
- Are there ways of raising concerns when revenue from a particular gate is not as expected?
- Are personnel at gates adequately recruited, trained, evaluated and incentivized?

Box 7 discusses possible risk treatments that might be useful if the answer to any of these questions is no.

2.2.3 Step 4: Risk evaluation



Once the working group has analysed the risks to better understand how they relate to the wildlife management authority's vulnerabilities, the fourth step of the risk management process is risk evaluation which involves: risk categorization, risk rating and risk prioritization.

During this step, corruption risks are prioritized based on their likelihood and impact. Risk evaluation and prioritization is very important when a large number of risks have been identified, or when resources are scarce.

No organization is likely to be able to address all potential corruption risks that it faces, nor would it be effective to do so. It is therefore essential to prioritize risks so that when the working group is developing the risk treatment plan, it knows which corruption risks to address first.

Risk categories

The risks can be grouped into generic categories, usually "financial risks", "reputational risks" and "mandate risks". Financial risks are those that may result in the authority losing revenue, assets or incurring unwarranted expenses. Reputational risks are those that have a negative impact on the image of the authority. Mandate risks are

those that may result in the authority not being able to deliver on its mandate.

An individual corruption risk may fall into multiple categories, and this should be reflected when evaluating the risks. For instance, if there is a risk that rangers will be bribed to turn a blind eye to forged licences, two potential risk categories are relevant: the financial risk and mandate risk. The impacts of these risks are, respectively, the loss of revenue and the authority being unable to meet its mandate to protect and sustain

wildlife. If this scheme is taking place on a grand scale and becomes publicly known, it may also fall into a third category of reputational risk where the wildlife management authority is perceived to be corrupt due to collusion between its officials and wildlife criminals. Categorizing can help the working group assess the impact of risks as well as make sure they have not overlooked an important risk.

Risk likelihood and impact ratings

Both the likelihood and impact severity of corruption risks can be rated in simple terms. For instance, likelihood can be rated as unlikely, likely and highly likely while impact severity can be rated as low, medium and high. The working group should define these ratings in order to provide clear guidance on how to rate the likelihood and impact severity of a corruption risk occurring. Tables 8 and 9 provide examples of how a working group might define likelihood and impact ratings.

Table 8. Example of criteria for defining likelihood ratings of corruption risk

LIKELIHOOD CRITERIA		
UNLIKELY	LIKELY	HIGHLY LIKELY
<ul style="list-style-type: none"> • Occurred 19 months ago or beyond, or • May occur in the next 19 months or beyond 	<ul style="list-style-type: none"> • Occurred in the last 7-18 months, or • May occur in the next 7-18 months 	<ul style="list-style-type: none"> • Occurred in the last 6 months, or • May occur in the next 6 months

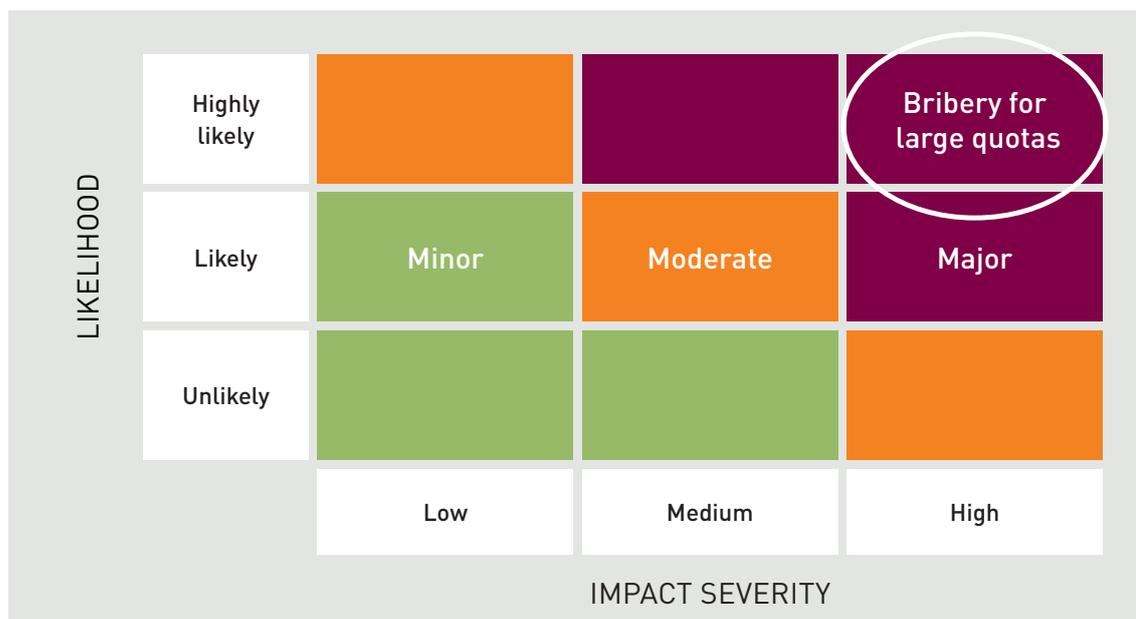
Table 9. Example of criteria for defining corruption risk impact ratings

RISK CATEGORY	IMPACT CRITERIA		
	LOW	MEDIUM	HIGH
FINANCIAL	Park entry revenue lost for a few visitors.	CITES officials regularly overcharge for a permit and keep the excess.	Tour providers regularly underreport the number of visitors at multiple gates.
REPUTATIONAL	Rangers are perceived as corrupt because of an incident in which a ranger was seen taking a bribe from small-scale bushmeat hunter.	Supervisors are perceived as corrupt due to unfair allocation of duties.	Board and senior management are perceived as corrupt due to collusion with wildlife traffickers.
MANDATE	Unauthorized researcher allowed into a park.	Grassland in protected areas degraded if cattle ranchers pay bribes to encroach in protected areas.	Mandate to protect endemic species not met because senior managers take bribes to divert patrols from areas rich in high value species.

Risk prioritization

After establishing the likelihood and impact of the corruption risk, the next task is to grade the risk. Grading risks as either minor, moderate or major enables the working group to prioritize each risk. Gradings are arrived at by combining the likelihood rating with the impact rating, as shown in the risk prioritization matrix in figure IV.

Figure IV. Risk prioritization matrix



For example, if an identified risk was “Bribery for large quotas”, the working group would consider the likelihood of such a case, and the harm it could cause if it happened. If the group judged the likelihood to be “highly likely” and the impact to be “high”, the risk would be graded as “major”. It is important to note that a corruption event that has a low individual impact but happens every day may have a higher grading, and thus be a greater priority, than an event which, if it happened, would be catastrophic but which is very unlikely to happen.

Table 10 describes how grading risks can guide the working group in evaluating which corruption risks to address first and which ones to deprioritize. This is especially helpful when deciding how to allocate limited resources.

Table 10. Risk prioritization gradings based on likelihood and impact combinations

LIKELIHOOD/IMPACT COMBINATIONS	RISK PRIORITIZATION GRADING	DESCRIPTION OF GRADING	PRIORITY
Highly likely + high impact Highly likely + medium impact Likely + high impact	Major	Catastrophic or significant	These risks are of highest priority and should be addressed first.
Unlikely + high impact Likely + medium impact Highly likely + low impact	Moderate	Moderate	These risks are of modest priority and should be addressed after high priority risks are addressed.
Likely + low impact Unlikely + medium impact Unlikely + low impact	Minor	Insignificant	These risks are of lowest priority and should be addressed last or considered for no further action. However, a mechanism should be put in place for monitoring any changes in the likelihood and/or impact.

The working group may wish to record its risk evaluation step using a similar template to the one shown in table 11 (and annex D).

Table 11. Example of corruption risk assessment documentation table – evaluation stage

CORRUPTION RISK ASSESSMENT			
	RISK ID NUMBER	1	2
IDENTIFICATION	IDENTIFIED CORRUPTION RISK (scenarios)	Embezzlement of gate revenue at national park	Manager is paid bribes to revert patrols
	DOCUMENTATION TO SUPPORT EXISTENCE OR SUSPICION OF RISK	Tariff books, park entry tickets/receipts books, bank documents, bank reconciliations	Instruction to rangers regarding patrols, analysis of where poaching instances occur, possible rangers' or other management's questioning of instructions
ANALYSIS	ORGANIZATIONAL FUNCTION	Revenue collection (reservations/tourism)	Enforcement
	SOURCE OF RISK (i.e. process or people)	People	Process or people
	VULNERABLE STAFF ROLES	Point-of-sales officers	Rangers, enforcement managers
	RELATED STAKEHOLDERS	Tourists, tourist agents	Criminal groups
	MAIN CAUSES OF CORRUPTION RISK	Lack of oversight, insufficient training	Lack of oversight, geographical dispersion, weak instructions and SOPs, insufficient training
EVALUATION	RISK CATEGORIES	Financial (and potentially reputational)	Reputational, mandate
	RISK LIKELIHOOD RATING AND JUSTIFICATION	Highly likely – may occur in the next 6 months	Likely – occurred in the last 7-18 months
	RISK IMPACT RATING AND JUSTIFICATION	High – officers embezzle large amounts of money	High – the authority is perceived as corrupt and untrustworthy. It is not able to meet its mandate to protect endangered species
	RISK PRIORITIZATION GRADING	Major	Major

2.3 STEP 5: RISK TREATMENT



Now that the working group has evaluated which corruption risks are prioritized as major, medium and minor, the group can consider how best to respond to these risks and develop a risk treatment plan. This is done during the fifth step of the risk management process, risk treatment.

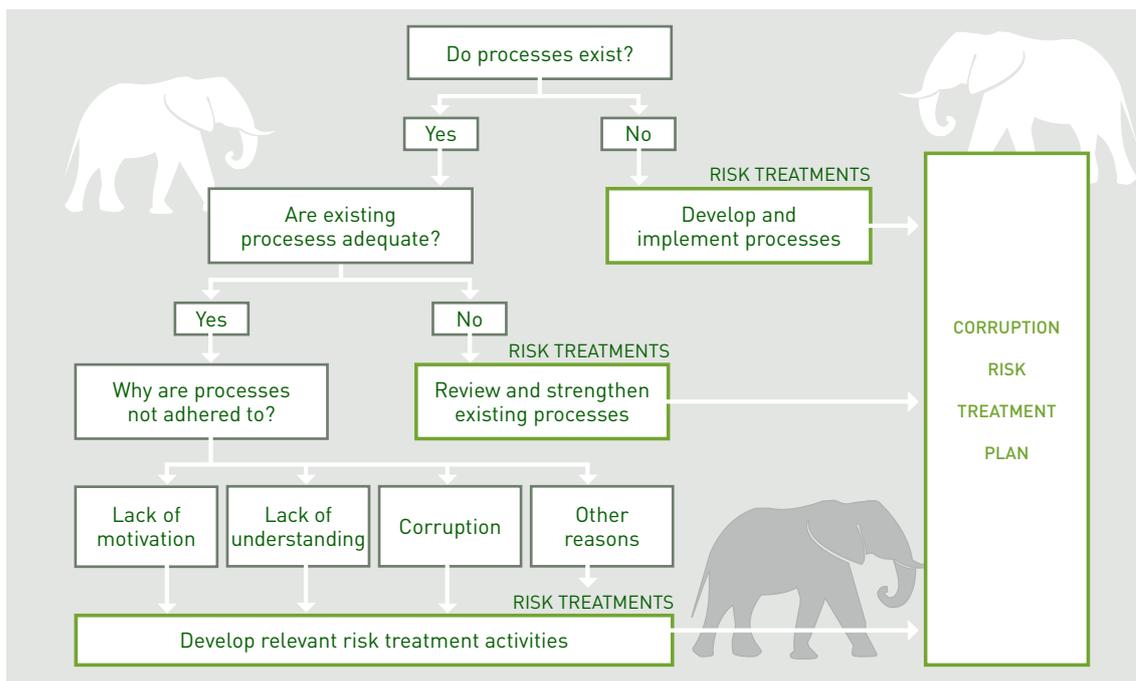
A “risk treatment” is an action taken to manage or respond to a risk. For the purposes of this Guide, risk treatments refer to activities that: reduce the likelihood of a particular corruption risk occurring; reduce the impact that particular corruption risk would have if it occurred; or reduce both the likelihood and impact of the corruption risk.

When suggesting, assessing and planning actions as part of the corruption risk treatment plan, the working group should first address the “major” risks, then the “moderate” and finally the “minor” risks, in line with the prioritization gradings in Step 4 (Risk evaluation).

Taking one prioritized risk at a time, the working group should now suggest actions that could be implemented to treat the corruption risk (i.e., lessen the risk’s likelihood or impact). When it comes to the design of risk treatments, it is important that the causes of the corruption risk are considered (causes will have been identified for each risk during Step 3 – Risk analysis), as different causes are likely to need different treatments. Building on the risk analysis undertaken in Step 3 regarding the existence and effectiveness of processes, the working group may wish to either suggest new controls or ways to strengthen existing ones.

It is recommended that the working group follows the flow chart below in figure V for each identified risk. The flow chart follows on from the risk analysis in figure III and highlights what kind of risk treatment may be required. Rigorously following this simple approach will prevent oversights when developing the risk treatments that will eventually form the corruption risk treatment plan.

Figure V. Risk assessment controls considerations flowchart



The working group can document potential risk treatments in a simple list, such as the example in table 12.

Table 12. Example of simple list style documentation of potential risk treatments

RISK ID	1	2
CORRUPTION RISK	Embezzlement of gate revenue at national park	Manager is paid bribes to divert patrols
CAUSE OF CORRUPTION RISK	Lack of oversight, insufficient training	Lack of oversight, geographical dispersion, weak instructions or SOPs, insufficient training
POTENTIAL RISK TREATMENTS	<p>Introduce posters for tourists clearly displaying park fees and that receipts should be received.</p> <p>Introduce weekly checks of park gates by other officers to count the number of visitors on a certain day. Then use this estimate to compare with actual fees received that week.</p> <p>Develop and deliver a mandatory training module for point-of-sale staff.</p> <p>Develop standard operating procedures (SOPs) for the revenue process.</p> <p>Use of technology such as the installation of a video camera at the gates or the scanning of tickets to access the premises, in order to count the number of visitors.</p>	<p>Develop SOPs for patrolling/instructions to rangers regarding patrols.</p> <p>Develop an improved oversight mechanism, including spot checks.</p> <p>Develop a better mapping system to record where poaching occurs.</p> <p>Improve vehicle tracking.</p> <p>Develop instructions for questioning rangers or management.</p>

Risk treatment plan checklist

During this risk treatment planning stage, the working group may wish to consider some of the following questions, listed in table 13, which have been designed to highlight any potential corruption risks or risk treatments that might have been missed during the process.

Table 13. A checklist of considerations when devising a corruption risk treatment plan

CORRUPTION RISK TREATMENT PLAN CHECKLIST		YES	NO
1.	Is there an efficient coordination mechanism between relevant institutions? Is there a clear division of labour between them? Is there a law or norm that prevents coordination between relevant institutions?		
2.	Do preventive policies exist? Is there a need for another policy? Does the authority have an integrity and anti-corruption policy?		
3.	Are the rules and regulations related to wildlife efficient, transparent and objective? (e.g., licensing process; import/export permits; cross-border specimen trade).		
4.	Are efficient, transparent and objective rules and regulations (e.g., clear selection criteria; adequate procedures; adequate remuneration; equitable pay scales; performance reviews) in place for the recruitment, hiring, retention, promotion and retirement of public officials that have a role in wildlife management?		

Table 13. A checklist of considerations when devising a corruption risk treatment plan (cont.)

5.	Do the officials that have a role in wildlife management receive sufficient training to understand the concepts of integrity and anti-corruption, and what is expected of them?		
6.	Are codes of conduct in place that apply to public officials that have a role in wildlife management?		
	Are these codes of conduct available to the public?		
7.	Is the wildlife management budget transparent?		
	Is it publicly reported on?		
8.	Do the agencies involved in wildlife management have reporting obligations?		
	To whom? (_____)		
	Are those reports public?		
9.	Does the public have easy access to information related to wildlife management?		
10.	Is there sufficient awareness among the public on the issues related to wildlife management?		
11.	Is there a reporting mechanism in place for suspected corruption?		
12.	Is there a whistle-blower protection mechanism in place?		
13.	Does the legislation include liability of legal persons (recognize non-human legal entities, such as business entities)?		
14.	Are the trade regulations clear and simple?		
15.	Is it clear who is responsible for investigating corruption linked to wildlife crime?		
16.	Is there a mechanism to identify wildlife crime cases where there should also be a parallel financial/corruption investigation?		
17.	Does a coordination mechanism exist linking those responsible for investigating/prosecuting wildlife crime to those responsible for investigating/prosecuting corruption linked to wildlife crime?		
18.	Is there any system to monitor the flow of wildlife crime cases from complaint to adjudication?		

2.3.1 Assess the feasibility of potential risk treatments

After the working group has listed potential risk treatments, the next step is to consider the feasibility of implementing the treatments. Assessing the feasibility of a risk treatment will include looking at the related costs, available resources, and how much control the wildlife management authority has on generating the desired change (see table 14 for examples). For instance, moving to an electronic revenue management system could be beneficial, but may also be prohibitively costly. The working group could also conclude that additional segregation of duties is not feasible due to the limited number of staff.

The working group should be encouraged to think carefully about what is within the ability of the wildlife management authority to change, and what is not. For example, if the wildlife management authority is a public sector organization, human resources may be a centralized function serving the public service as a whole, limiting the possibility of the authority to control some human resource decisions.

The working group could also consider other opportunities such as whether civil society, media or the private sector could be involved in complementing the wildlife management authority's anti-corruption work. Civil society and media could, for example, support awareness-raising efforts, or the private sector could strengthen their internal ethics and anti-corruption compliance programmes, thereby increasing the awareness of their employees of the consequences of bribing a public sector employee. This work should be done in coordination with the Government.

As noted previously, risk treatments must be based on a robust analysis of what the causes of each corruption risk are, and the effectiveness of the related existing controls. Table 14 below provides an example of how the working group may wish to document the feasibility of potential risk treatments. In order to highlight the range of risks the working group may encounter, different corruption risks have been used in this table compared to previous tables in this Guide.

Table 14. Example of a simple risk treatment feasibility assessment

RISK ID	1	2
RISK	<ul style="list-style-type: none"> • Court officials take bribes to "lose" wildlife case dockets 	<ul style="list-style-type: none"> • Managers' misuse of wildlife management authority aircraft
RISK CAUSE	<ul style="list-style-type: none"> • Manual case management system • Insufficient oversight 	<ul style="list-style-type: none"> • Lack of understanding of the aircraft usage allocation process and insufficient segregation of duties
RISK TREATMENT	<ul style="list-style-type: none"> • Automate case management system to enable case tracking • Oversight: <ul style="list-style-type: none"> – Close collaboration between the authority's legal officer/liaison person and the police/investigator, prosecutor and court officials in charge of the case on the case progress^a – Identify and engage third parties to monitor cases (civil society) 	<ul style="list-style-type: none"> • Strengthen control system by creating standard operating procedures • Increase segregation of duties linked to allocation and monitoring of aircraft usage
COST	<ul style="list-style-type: none"> • Excel system- \$5,000 for sensitization on use of the system • \$ 2,000 to organize coordination meetings • None – already resourced by third parties 	<ul style="list-style-type: none"> • \$2,000 for short consultancy

Table 14. Example of a simple risk treatment feasibility assessment (*cont.*)

RISK ID	1	2
RESOURCES AVAILABLE	\$4,000 and management time and external trainer \$2,000 and availability of other government agency officers Staff from civil society organizations	\$2,000 Managerial staff time allocation to approve and document segregation of duties
OTHER OPPORTUNITIES (Complementing resources)	Donor funding to support automation of case management	N/A
ADDITIONAL BENEFITS	Can also monitor the penalties and, if applicable, consider how conviction rates can be improved and stronger penalties achieved	Aircraft can be better used for anti-poaching operations

^a Provides a deterrent as the case is being monitored.

Once risk treatments have been assessed for feasibility (ideally beginning with the major risks), the working group should prioritize treatments that can realistically be implemented, i.e., treatments that can be delivered within the resources available and where the wildlife management authority has the ability or control to implement the required changes. Realistic solutions that can be easily and relatively cheaply implemented will improve motivation within the working group and the wildlife management authority. It is recommended to start with simple treatments and move on to more complex treatments over time.

While some risks are likely to be specific to the mandates of the wildlife management authority, and therefore need specific treatments, other risks may be similar to corruption risks faced by any public sector institution. Chapter 3 contains some general anti-corruption measures that could be useful for the working group to consider as it develops risk treatment plans.

Box 7. A hypothetical example of reviewing controls leading to risk treatments (continued from box 6)

Box 6 presented an example of a national park in which unusually low revenues were being reported from a number of gates. A range of questions were listed that would allow a review of existing controls to take place.

If the answer to any of the process-based questions posed in box 6 was no, then part of the corruption risk treatment plan would include rectifying the process-based problem. For instance:

- If there is no way of knowing who issued a specific receipt, a risk treatment might be to introduce rules and systems to make individual staff responsible and accountable for specific receipts.
- If there is no reconciliation process from receipts issued to revenue collected, a risk treatment might be to develop and introduce a reconciliation process, and so on.

If the answer was, however, that all the systems were in place, but staff were not adhering to them, it is important to understand why. It is also important to note that while corruption may be one reason for a lack of adherence to process, there can be many others. For instance, staff may have not been trained in the use of a particular process or find it overly complicated. If a problem is that staff are not adhering to a process, then the corruption risk treatment plan should include an activity to further investigate and understand why they are not adhering, and the results of this investigation should inform the subsequent risk treatment.

Box 8. Risk treatment for an identified corruption risk*(continued from box 4)*

Box 4 described a situation in which staff with security backgrounds were unfamiliar with the point-of-sale (PoS) system used by a wildlife management authority, which created a corruption risk during the ticket sale process. While the majority of rangers may not be corrupt, their lack of familiarity with the required income-reporting procedures can create a situation in which the corrupt activity of some rangers might go undetected. One treatment for reducing this risk is by linking all ticketing PoS through a computer network. However, this is not always possible.

Instead, by introducing PoS-competent staff as the risk treatment, the authority was able to lessen this corruption risk by increasing the likelihood that reporting procedures were followed, and that revenue could be checked against visitor numbers and ticket receipts, reducing the discrepancy between ticket sales and reported income.

2.3.2 Preparing a corruption risk treatment plan

At this stage, the working group will know which risks it should address first (as they will have been prioritized as major risks) and which risk treatments can be delivered with the resources available. Next, the group should prepare the corruption risk treatment plan, which will outline the activities required to implement the risk treatments for each prioritized corruption risk.

The aim is to develop a detailed plan that sets out allocated responsibilities and target dates for each risk treatment activity, and an illustrative example of this can be found in table 15. When preparing a corruption risk treatment plan, it is critical that the responsibility for overseeing the implementation of the entire plan is clearly allocated.

For most countries, the Implementation Review Mechanism of the United Nations Convention against Corruption²⁴ has identified existing gaps in controls and legislation relating to corruption offences. It also provides recommendations on how to strengthen the criminal justice framework in order to address corruption more effectively.

²⁴ For more information on the Implementation Review Mechanism, see www.unodc.org/unodc/en/corruption/implementation-review-mechanism.html

Table 15. Example of corruption risk treatment plan

CORRUPTION RISK		Multiple incompatible paper-based systems for allocation of licences and permits.	
RISK TREATMENT	SPECIFIC ACTIONS	RESPONSIBILITY	TIMELINE
MERGE THE DIFFERENT SYSTEMS FOR ALLOCATION OF LICENCES AND PERMITS INTO A SINGLE NATIONAL SYSTEM	<ol style="list-style-type: none"> 1. Appoint consultant to draft a unified system 2. Convene stakeholder meetings to discuss and refine the proposed system 3. Support the minister to promulgate regulations on the quota system 	Director, Department of Legal Affairs, Wildlife Management Authority	30 November XXXX 1 January XXXY to 30 June XXXY 31 August XXXY
EDUCATE STAKEHOLDERS ON THE NEW LICENCE AND PERMIT SYSTEM	<ol style="list-style-type: none"> 1. Develop a manual and computerized training courses 2. Develop and agree a communications strategy so that stakeholders can obtain information on how to access training materials 3. Establish a helpdesk to support stakeholders during first year of application of the new system 	Director, Department of Customer/ External Relations, Wildlife Management Authority	31 August XXXY 31 August XXXY 1 November XXXY to 31 October XXXZ
COMPUTERIZE THE SYSTEM FROM APPLICATION TO AWARD OF LICENCES AND QUOTAS	<ol style="list-style-type: none"> 1. Agree on scope of the system 2. Determine whether a bespoke system is required or an existing system can be used 3. Develop and test the system 	Director, Information Technology, Wildlife Management Authority	31 August XXXY 30 September XXXY 30 November XXXY
EMBED A RED FLAG SYSTEM TO IDENTIFY POTENTIAL ANOMALIES IN THE APPLICATION AND AWARD OF LICENCES AND QUOTAS	<ol style="list-style-type: none"> 1. Develop and agree on criteria that will indicate potential abuse of the system 2. Agree on a system whereby internal control receives system-generated red flag reports 	Deputy Director General, Corporate Services, Wildlife Management Authority	31 August XXXY 30 November XXXY

**Box 9. Mitigating revenue corruption risks within Authority W:
Development of corruption risk treatment plans**
(continued from box 3)

Following the three corruption risk identification processes described in box 3, UNODC is supporting the licensing and reservations offices of Authority W in developing corruption risk treatment plans and activities that fall within the control of the authority. Some of the short to medium-term actions include:

CORRUPTION RISK	TREATMENT
<ul style="list-style-type: none"> • Tour operators or private visitors presenting fictitious payment receipts/entry tickets 	<ul style="list-style-type: none"> • Improving proof of payment so that officers at the parks have information in advance from the reservation's office of expected visitors, rather than relying exclusively on the visitor's receipt to authorize entry
<ul style="list-style-type: none"> • Officers bribed to: <ul style="list-style-type: none"> – Allow visitors to access to the parks or game reserves without paying – Allow visitors to stay longer than they had paid for – Allow visitors to not be charged for special activities undertaken – Issue permits to unqualified persons • Officers applying the wrong motor vehicle rate • Officers overcharging for permits and keeping the difference 	<ul style="list-style-type: none"> • Updating guidelines and standard operating procedures to: <ul style="list-style-type: none"> – Enhance supervision of revenue collection staff and officers at the park or game reserve entry – Ensure adequate segregation of duties among officers who receive and confirm bookings, receive and receipt payments, deposit monies at the bank, and who verify payments of visitors • Developing and printing employee handbooks and posters with easy-to-follow flow charts • Developing, printing and disseminating posters for customers and tour operators to be placed at the park or game reserve entrances (and on the authority's website and social media platforms) indicating: <ul style="list-style-type: none"> – The process for paying for entry – Up-to-date park entry fees – That all visitors should be issued with a valid ticket and that random checks will be conducted to ensure possession of a valid ticket – That corruption at the park is prohibited
<ul style="list-style-type: none"> • Visitors providing inaccurate information about their nationality and age so as to be charged lower entry fees 	<ul style="list-style-type: none"> • Visitors need to produce identification to verify age and citizenship match with the booking
<ul style="list-style-type: none"> • Officers issuing entry tickets and licences or permits and not fully remitting the funds collected • Officers using counterfeit receipts to collect park or game reserve entry, licence, or permits fees from applicants 	<ul style="list-style-type: none"> • Automation of entry ticket system • Increasing data analysis and reconciliation between: <ul style="list-style-type: none"> – Booking confirmations and payments received – Entry tickets, permits and licences issued, and applications received – Funds receipts and deposits. – In-coming register, bookings and payment received – Visitors who have paid but did not show up
<ul style="list-style-type: none"> • Officers awarding themselves "soft loans" from revenue collected 	<ul style="list-style-type: none"> • Increasing frequency of bank deposits so cash is not accumulated in the office

2.3.3 Implement the corruption risk treatment plan

Finally, once the corruption risk treatment plan has been developed, implementation of the plan can start. Examples of risk treatment measures, related to both prevention and enforcement, are provided in sections 3.1. and 3.2.

Box 10. Mitigating revenue corruption risks in Authority W: Implementation and ongoing monitoring *(continued from boxes 3 and 9)*

(Refer to box 3 for “Identification of Corruption Risks” and box 9 for “Development of Corruption Risk Mitigation Plans” in Authority W.)

Most mitigation activities are due to be implemented within one year of finalizing the risk treatment plan. Once recommendations are implemented, activities will be continuously monitored and adjusted where necessary for operational efficiency. It will also be important to consider changes in policies and how these changes affect workflow, for example if a hunting ban is lifted and the licensing department has to issue more hunting and export licences.

2.4 CROSS-CUTTING RISK MANAGEMENT PRINCIPLES

As demonstrated in figure I in the beginning of chapter 2, the following activities should take place throughout the risk management process:²⁵

- *Communication and consultation:* To ensure buy-in and support from relevant stakeholders, it is important for the working group to communicate regularly and keep everyone appropriately informed on the progress and findings of the risk assessment. The working group and the risk assessment process rely on incoming information from individuals and organizations obtained through the process of consultation.
- *Monitoring and review:* The working group should undertake regular monitoring and review, on a monthly or at least quarterly basis, to track the quality and effectiveness of the risk treatment plan and its implementation, as well as to determine if any adjustments are required. Details on how to develop metrics to measure the effectiveness of corruption risk treatments are provided below. Frequent monitoring will also encourage transparency in the implementation of the risk treatment measures.
- *Recording and reporting:* It is important for the working group to communicate risk treatment activities and their outcomes across the wildlife management authority. This information will assist decision-making, improve future risk treatment activities, improve transparency and provide valuable information on potential corruption risks to management and the governing body. The working group should agree with management on the format, recipients, publication and frequency of reports, and the data that should be incorporated in future performance management, measurement and reporting activities.

Developing metrics to measure the effectiveness of corruption risk treatments

It is important for the working group to be able to measure the effect of each risk treatment, and to be able to identify where the corruption risk treatment plan actually yields a reduction in the likelihood of a particular corruption risk occurring, and where further work is needed to address the risk. One way to measure this is to develop metrics in order to make informed assessments as to whether risk treatments are yielding the desired results.

²⁵ Institute of Risk Management, *A Risk Practitioners Guide to ISO 31000: 2018* (2018).

The purpose of the corruption risk treatment plan is to reduce the risk of corruption taking place in the future. During Step 4 (Risk evaluation), a rating for the likelihood and impact of each risk was chosen, and this rating is, as far as possible, based on the documentary evidence available to the working group. Risk treatments (developed during Step 5) are then meant to reduce the likelihood or impact of the risk by addressing the cause (identified in Step 3). To monitor and evaluate the effectiveness of the implemented risk treatments, metrics can be used to assess if the likelihood or impact of the risk has been reduced as a result of the risk treatment.

Each identified corruption risk treatment will require a metric to measure how the circumstances giving rise to the corruption risk have been addressed, and report why this risk is now less likely to materialize in the future. What should be clearly demonstrated is the initial risk likelihood, and the subsequent reduction (if any) of the likelihood of that risk occurring. This reduction in future risk is what the authority is seeking to achieve through the implementation of its chosen corruption risk treatments.

For each risk treatment, this Guide proposes two metrics that should be defined:

- *The output metric:* reflect what has been produced or provided
- *The outcome metric:* the specific data that is collected to assess the extent to which expected outcomes have been achieved

The complexity of measurement will depend on the risk to be addressed. For instance, an identified risk may be embezzlement of gate fees, and the cause of the risk is identified as a lack of reconciliation of (a) tickets issued against cash collected, and (b) cash collected against cash banked. In this case, the output metric might be the adequacy of the account reconciliations, while the outcome metric might be the increase in cash collected.

In the example above, if, after a reconciliation has been implemented, the amount of money deposited increased dramatically, then it may be that an efficiency gain has been realized or a crime has been stopped. In such a case, there would need to be a specific investigation to determine what has actually happened. Similarly, if a reconciliation is implemented but embezzlement of gate fees is ongoing, this may be an indicator that the wrong cause has been identified, and further work needs to be done on identifying the main cause of this corrupt behaviour, and the resulting risk treatment.

While it is tempting to attribute positive “impacts” to the implementation of the risk treatment, it is important to remember that the purpose of the work is to reduce the risk of future revenues being lost to corruption, which is achieved by addressing the vulnerabilities in the system.

Box 11. Examples of metrics to measure the effectiveness of risk treatments

Risk: Staff being bribed to pass sensitive information to wildlife criminals

Risk cause: Staff do not have a clear understanding as to what constitutes confidential information, or what constitutes a bribe (for instance, a “gift” of cellular telephone airtime may not be perceived as a bribe)

Treatment 1: Staff sensitization training to identify confidential information and what constitutes a bribe

Output metrics: Change in the percentage of staff that could accurately identify confidential information and understand what constitutes a bribe

Treatment 2: The introduction of a reporting system through which staff can make reports of suspected criminal approaches

Output metrics: Staff accessibility to the reporting system and actual number of reports received

Outcome metrics: Here, the outcome can be measured in three phases: firstly, intelligence developed on suspected criminals’ interactions with staff; secondly, increase in prosecutions/ convictions for wildlife crime; and thirdly, (in the long term) reduction in wildlife crime

Observations not to be used as metrics: Number of staff taking bribes from wildlife criminals

2.5 EMBEDDING THE CORRUPTION RISK MANAGEMENT PROCESS

Corruption risk management is not a one-off process, but requires focused, consistent efforts over time. It is a cyclical process, in that the outcomes of the previous risk treatment plan should feed into the initial working group discussions for the next corruption risk assessment. The process should be repeated periodically, with the authority building an internal review mechanism to allow for ongoing feedback and updates to the corruption risk assessment and resulting risk treatment plan. Reviewing the effectiveness of older risk treatment measures is especially important when it comes to highly vulnerable areas, for example, revenue collection.

Ideally, the corruption risk management process should become “business as usual”. Institutional structures should be established to gradually strengthen corruption risk management processes, and these structures will, with time and use, become increasingly nimble in addressing new potential corruption schemes as they are identified. “Institutionalizing” the corruption prevention work in this way will help it continue in the longer term.

There are a number of ways to “institutionalize” the corruption risk management process and embed it into the regular way of working within a wildlife management authority. For instance, this can be done in a manner that mirrors the corporate world by including the risk management process and the working group in any future strategy development, funding cycles or multi-year plans. It might also be achieved by creating a set of baseline measurements and key indicators (see developing metrics in section 2.4) that can be absorbed into existing departmental plans and reporting requirements. The establishment of a corruption prevention committee within the authority to oversee the development and implementation of the risk treatment plan often supports the institutionalization of the corruption risk management process.

In addition, if the process has been undertaken by the wildlife management authority in a centralized manner, one recommendation that the working group might suggest may be that the process also be undertaken by specific parks or departments within the authority (for instance because they were identified during the risk assessment process as being particularly vulnerable to corruption).

Annex C provides an example of the risk assessment and management process in action.





Chapter 3.

EXAMPLES OF CORRUPTION RISK TREATMENTS

Understanding how corrupt activities are conducted is vital to dismantling the criminal gangs driving corruption and illegal trade, and in making wildlife crime less profitable. This understanding can be used to support both enforcement and preventive approaches to combating corruption.

Traditionally, countries tend to take an “enforcement approach” to combating corruption. This means that their focus is on detecting corruption that has already happened rather than focusing on preventing corruption from taking place in the future, which would be considered a “preventive approach”.

It is critical to put in place internal controls that will minimize corruption risks that have a negative impact on wildlife conservation, management and protection.²⁶

This section provides suggestions and examples of risk treatments that are focused on mitigating corruption risks, i.e., lowering the risk. Both prevention and enforcement-based risk treatments are explored. Both corruption risk treatment approaches have benefits; however, the fact that the enforcement approach happens after the corruption has taken place and the damaging effects have been felt highlights the importance of the preventive approach. Table 16 highlights the main features and variations in these two approaches.

²⁶ UNODC, *Addressing Corruption and Wildlife Crime - A Background Paper for the G20* (2017).

Table 16. Main features of the enforcement and preventive approaches to combating corruption²⁷

FEATURES	ENFORCEMENT APPROACH	PREVENTIVE APPROACH
TARGET	Corruption that has already taken place	Corruption risks
GOAL	The detection, punishment and deterrent of corruption	The prevention of corruption
LEVEL	National level	Organizational level
MAIN ACTORS	Authorities	Management of the organization
MEANS	Legislation, punishment	Prevention controls
RESULTS	Cases of corruption are detected, punished and deterred	The integrity/efficiency of the organization is strengthened

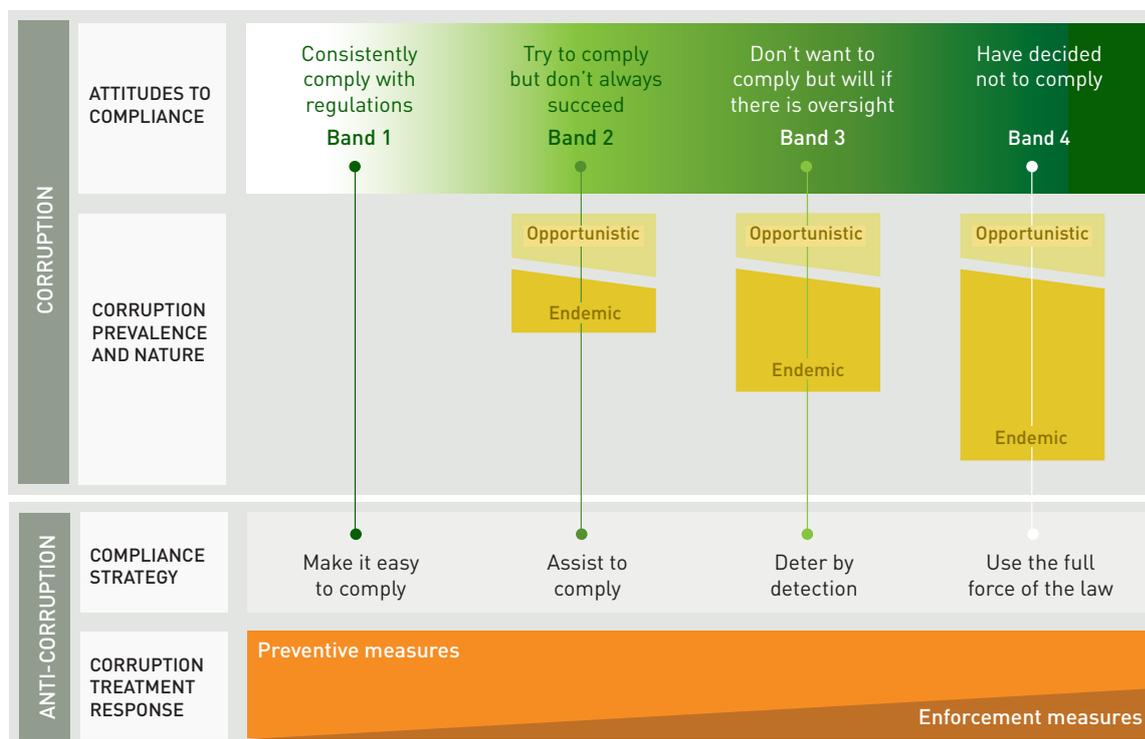
Corrupt acts that start in an opportunistic way can, if left unaddressed, quickly and easily develop into more organized, endemic corruption and become the norm rather than the exception. In extreme cases, endemic corruption can significantly influence the wildlife management authority's decision-making processes to the benefit of private interests. Both opportunist and endemic corruption can be addressed by taking a preventive approach.

However, when corruption is endemic, enforcement measures will be an essential element of the anti-corruption response. By implementing corruption prevention measures and bringing about a behavioural shift, authorities gain the added benefit of stopping the operations of criminals they may not even have been aware of.

Figure VI demonstrates the importance of addressing corruption in parallel to wildlife crimes, by highlighting the different types of attitudes to compliance by officials of wildlife management authorities, among others, and what kind of internal controls are needed to respond to those attitudes. It illustrates that the attitudes of individuals within wildlife management authorities fall across a spectrum: at one end are those who are committed to consistently complying with laws, regulations, policies, procedures and standards (Band 1), and at the other end are those that have decided not to comply with any regulations (Band 4). Officials in Band 4 may be part of organized criminal groups.

²⁷ Table taken from Supreme Audit Institution of Hungary, adapted for this Guide.

Figure VI. The relationship between attitudes to compliance, corruption prevalence and recommended corruption treatment responses



When corruption becomes endemic, the attitudes of individuals within wildlife management authorities (and the required corruption treatment approach) are likely to be pushed towards the least desirable end of the spectrum (Band 4 shown in figure VI). It is highly unlikely that any country or authority can improve adherence to laws and regulations without taking sufficient action to prevent corruption and address the behaviours that enable it.

3.1 PREVENTIVE MEASURES FOR THE TREATMENT OF CORRUPTION RISKS

Common wisdom is that prevention is better than cure, and this is particularly true for the prevention of corruption when public trust, the effectiveness of institutions, and economic development are all at stake. Even the most successful enforcement of criminal law takes place after the crime has been committed and the detrimental consequences of corruption have transpired. This is especially true in respect of wildlife crime, given that once an animal is killed, it is impossible to reverse that action. This Guide therefore recommends that all corruption risk treatment plans incorporate preventive measures. As mentioned above, it would of course be optimal if an authority could ensure both a preventive and enforcement approach.

The specific corruption risks within each authority or within each country may differ, but the basic principles by which they should be identified and addressed are the same. In undertaking this work, the intention is to:

- Make it more difficult for criminal groups or persons to influence the operations of wildlife management authorities
- Eliminate opportunities for embezzlement and misuse of funds intended for wildlife conservation, management and protection
- Embed long-term skills within wildlife management authorities that enable them to develop and put in place risk treatment plans and internal controls, creating strong and robust institutions able to respond to and overcome the risks and challenges posed by corruption

As mentioned above, corruption risks and the causes behind those risks will vary and will require a range of individualized preventive mitigation measures. These could range from legislative or policy reforms to the adoption of codes of conduct, improved public reporting, or procedures to address corruption in the recruitment and management process of wildlife management officials, to name but a few.

Increased transparency and accountability mechanisms are likely to be part of the solution to treat corruption risks in most countries. Promoting transparency and accountability can serve as an important method for preventing corruption and ensuring integrity and sustainability in wildlife management. Transparency not only reduces the opportunities for corruption within wildlife management authorities, but also allows for open discussion, participation and cooperation regarding the corruption risks that do arise.

The formula is simple. The more information that is available to more people, the more likely it is that the processes and decision-making practices will be more transparent. Similarly, the more mechanisms there are in place to hold officials accountable, the more dissuasive the environment for corrupt officials to operate.

This section provides some standard and some innovative ideas designed to improve transparency and accountability in order to mitigate corruption risks. A non-exhaustive list of corruption prevention treatments is explored in detail in sections 3.1.1 and 3.1.2 (and listed in table 17 for reference). These treatment measures have been divided into the two key organizational aspects explored earlier in this Guide: process and people.

Table 17. A non-exhaustive list of preventive corruption risk treatment measures

RISK TREATMENTS	
PROCESS-BASED MEASURES	PEOPLE-BASED MEASURES
<ul style="list-style-type: none"> • Improve access to information • Publicize fees clearly • Increase transparency related to quotas and licensing • Increase transparency in the CITES permit process • Strengthen the CITES Scientific Authorities' review process • Publicly report on activities • Increase the use of technology and databases • Clearly communicate roles, responsibilities and policies • Simplify processes • Increase budget transparency • Carry out financial management reviews • Introduce random spot-checks • Undertake regular audits • Use public expenditure tracking surveys (PETS) • Strengthen the public procurement system • Safeguard whistle-blower protection • Support labelling and marking systems • Develop a protocol of response to threats by criminal organized groups • Learn from actual corruption cases involving wildlife 	<ul style="list-style-type: none"> • Produce and publicize codes of conduct • Carry out corruption experience surveys • Strengthen human resource management • Conduct objective performance evaluations • Introduce processes to prevent conflict of interests • Where appropriate, introduce financial disclosure procedures • Ensure segregation of duties • Train public officials • Conduct awareness campaigns and educate stakeholders • Collaborate with the private sector

3.1.1 Process-based risk treatment measures

Some process-based preventative anti-corruption measures include:

- *Improving access to information.* When citizens can access key information and understand decisions made by government agencies, Governments become more accountable and it is more difficult to hide abuses of power and other illegal activities. Access to information legislation gives members of the public a right of access to government information, enabling oversight of government business and providing a deterrent for corrupt practices.²⁸

In addition to legislation, low-cost yet significant improvements that increase the ability of the public to access information can be made. This even applies to paper-based systems. For instance, authorities might consider posting rules and regulations to a wall or ledger, authorizing that the public can view records in situ, or training staff on access to information procedures (and testing staff regularly to identify if training is actually being delivered effectively).

- *Publicizing fees clearly.* Relatively simple ways to increase transparency include implementing systems to clearly communicate fees for park or game reserve entry, and/or fees for licences, permits and other services offered by the wildlife authority. This can include clear signs, notably at points of sale, detailing the relevant fees and requesting that all visitors or licence applicants ensure they are given a receipt for any payments made. An up-to-date list of fees should also be made available on the wildlife management authority's website and other online platforms or included in the relevant legislation (e.g., as an annex to a regulation).
- *Increasing transparency related to quotas and licensing.* Publicizing eligibility criteria for quotas and licences can be particularly useful for preventing corruption. If the public has a clear understanding of eligibility criteria for certain types of quotas or licences, it will also be better able to understand or identify instances where someone who should not have been issued a licence has received one. By increasing transparency and visibility of the licensing process, the probability of being caught offering or soliciting a bribe, for instance, increases, and the opportunities for corruption decreases.

If the fees that are paid for licences or permits are not duly being received by the authority that issues them, then the format of the licence or permit as well as any systems and procedures linked to the receipt of fees should be reviewed. Accountability can be increased by, for instance, clearly communicating that specific officials are responsible for pre-sequenced permit numbers. Depending on the value of the permit, care should be taken to ensure that the document, and the text in the document, are difficult to falsify or otherwise replicate. Additionally, there should be registers of licences or permits issued, and these registers should be frequently reconciled to determine how many permits have been issued and by whom, and to ensure that any money collected has been received by the organization.

- *Increasing transparency in the CITES permit process.* For Governments to know how their trading partners are implementing their obligations under CITES, for citizens to hold Governments accountable, and for firms to navigate global wildlife markets, they need to know which rules apply, who is responsible for applying them, and receive sufficient information on the role of the CITES Management Authorities. This is important for increased transparency and can be addressed through the publication of the national laws and regulations related to CITES processes. Information on the domestic authorities that administer the process (CITES Management and Scientific Authorities) and how they can be contacted, public notifications of any new or changed national measures in this regard, and regular reporting of the work of the Management and Scientific Authorities is also important to increase transparency in the CITES permit process. Analysis of the CITES transparency framework has been conducted by OECD in relation to trade in CITES-listed tree species.²⁹

²⁸ For examples of such laws see, for instance, Australia, Government Information (Public Access) Act 2009, No. 52 and United Kingdom, Freedom of Information Act 2000.

²⁹ R. Wolfe et al, *Regulatory Transparency in Multilateral Agreements Controlling Exports of Tropical Timber, E-Waste and Conflict Diamonds* (OECD Trade Policy Papers, No. 141, 2012).

- *Strengthening the CITES Scientific Authorities review process.* In addition to the CITES Management Authorities, transparency is important also for the CITES Scientific Authorities. Because Scientific Authorities are in a position to advise on any possible detrimental effect the import or export of a wildlife specimen may have on a species, and because they can take into account multiple factors requiring specialist knowledge, they have a high degree of discretion. Therefore, it is important to make sure that there is a sufficiently robust transparency mechanism and accountability in place. Periodic reviews of decisions, or a double-blind decision-making process³⁰ could facilitate an increase in integrity and transparency within the Scientific Authorities. Scientific Authorities might also have greater transparency if decisions are required to be made on the basis of pre-established guidelines.³¹
- *Publicly reporting on activities.* For increased transparency, wildlife management authorities should publish regular information on their work, including information regarding the quotas issued, eligibility criteria for each permit, and fees collected. These reports should also include information on any anti-corruption and integrity efforts that have taken place. This measure will help the public to better understand and monitor the work of these authorities.

Regarding CITES, Parties to the Convention are required to report annually on the trade authorized in the past year. The data in such reports is included in the publicly accessible CITES Trade Database.³² This ensures transparency regarding the imports, exports and re-exports authorized by a country. The CITES Implementation Report is also a useful way for an authority to publicly report on anti-corruption initiatives related to wildlife crime.³³

- *Increasing the use of technology and databases* to help make information available consistently. This can serve as a key tool in promoting transparency and preventing corruption. Examples include a fully electronic CITES e-permitting process, or an electronic payment system that can assist authorities in tracking payments. These systems can make processes more efficient and reduce the opportunities for corruption to take place.

It is clear that the more people there are with access to information such as registers of licences and permits, the lower the opportunity for corruption. As more and more electronic databases become available, corruption risks can be increasingly mitigated by cross-referencing these databases. For example, automation of CITES processes (for instance the eCITES system)³⁴ may help enforce regulations, increase transparency and reduce opportunities for corruption and the use of fraudulent documents.³⁵

Automation of revenue management systems can reduce corruption risks related to the misappropriation of park or game reserve revenues. These risks include officers issuing counterfeit revenue receipts to park visitors, not issuing receipts at all, or not accounting for funds received by recording them according to the designated process. Automation of processes can also support the segregation of duties, as the approving officer does not necessarily need to be in the same location as the officer processing the transaction. This can reduce the risks of corruption inherent in processes that lack segregation of duties (in which one officer has responsibility for initiating, processing, approving and recording transactions).

³⁰ A double-blind decision-making process is one in which all parties directly involved are not given crucial information in order to avoid biasing results. In practice this could mean that decision makers will not know the identity of those reviewing their decisions, and reviewers will not know the identity of the decision makers.

³¹ CITES, *Resolution Conf 16.7 (Rev. CoP17): Non-detriment findings* (2016). See also International Union for Conservation of Nature (IUCN), *Guidance for CITES Scientific Authorities: Checklist to Assist in Making Non-Detriment Findings for Appendix II Exports* (2002).

³² CITES, CITES Trade Database. Available at <https://trade.cites.org/>

³³ For information regarding the CITES Implementation Report see www.cites.org/eng/resources/reports/Implementation_report

³⁴ For more information on this system, visit <https://cites.org/eng/prog/eCITES>

³⁵ CITES, *Automation of CITES permit procedures and electronic information exchange for improved control of international trade in endangered species* (eCITES) (2017).

- *Clearly communicating roles, responsibilities and policies.* Many officers may not have access to relevant policies or standard operating procedure (SOP) documents and may not have been trained in their application or use. In some cases, SOPs do not exist in the first place. As a result, officers may not have a clear idea of how to perform their duties. Where a wildlife management authority's personnel are not trained on (or aware of) the correct operating procedures, opportunities for corruption are created. For example, an officer may allocate rights to hunt or trade in a species that is prohibited under CITES based on a fraudulent application, as the officer was not trained in how to identify fraudulent applications.

Corrupt officers may also cite a lack of policies or training as justification for their behaviour. For example, when an officer is found misusing an authority's assets, they may claim that they are not aware of any policy that defines how the authority's assets should be used. Making this information openly available reduces room for misunderstanding or "interpretation" of policies, roles and responsibilities.

Additionally, explicitly highlighting the various levels of sign-off required for each process can help improve accountability within that process.

- *Simplifying processes* so that policies, procedures and rules are clear and simple, and the number of steps required for rendering services is minimized. Complex processes and procedures for simple services or applications can make it easier for officials to use their positions to demand bribes from persons seeking services from the authority so as to quicken the process. Officials may also circumvent complex processes as they try to accomplish their tasks. Often, this can result in them circumventing good controls put in place to prevent corruption.
- *Increasing budget transparency* to ensure resources are equitably allocated within the functions of an authority, depending on the capacity and workload of each function. Lack of transparency in budgeting and allocation of resources may result in funds being allocated inefficiently and therefore denied to those areas that could benefit most from the additional funding. This may also result in key agencies or personnel that are responsible for wildlife protection and management being underfunded, leading to these functions not having adequate capacity (i.e., human capital, machinery or operational funds) to effectively combat wildlife crime within their jurisdiction.

It is vital to increase budget transparency when promoting integrity and accountability, attempting to increase public trust in the authority, or when strengthening anti-corruption policies. The OECD Toolkit on Budget Transparency³⁶ provides useful guidance for this task as it brings together standards and guidelines on budget transparency as developed by a broad range of international bodies and networks.

- *Carrying out financial management reviews* in order to assess whether expected results or outputs are being achieved. To detect and prevent corruption risks related to park or game reserve entry fees, or licence and permit fees management, staff may undertake reconciliations such as comparing licences, permits and gate tickets issued with payments received, or comparing funds deposited in the bank with revenue collected. Management might also compare revenue collected across different parks and different periods to identify anomalies. For example, a decrease in revenue from a particular park during high season would be a cause for further review, as would an increase in costs or expenditure in a particular function without subsequent increase in activities, or unexplained increases in repair costs for new machinery.

Similarly, carrying out financial management reviews (including microprojects or subprojects, the creation of fixed assets, services or anything else rendered using public funds) can determine whether expenditures are genuine and whether the goods and services were actually provided as described in the payment terms or contract.

³⁶ This interactive toolkit is available at www.oecd.org/governance/budget-transparency-toolkit/

- *Introducing random spot-checks* to strengthen supervision. An example of a random spot-check process might be where visitors are, on a random basis, requested to produce entry tickets and payment receipts. For licence and permit holders, officers might wish to conduct random visits to their places of operation and request them to produce their licences, permits and evidence of payment, which can then be verified against licence and permit records held by the authority.

A notice should be placed prominently within the authority's premises (such as reserve entrances or licence issuing offices) and on its website and other online platforms that informs visitors, licence and permit applicants and other stakeholders that there might be friendly checks to ensure they have received payment receipts. Such measures, while relatively simple, can reduce the risk of officials overcharging visitors (or licence or permit applicants), or of officials collecting cash but not issuing visitors with a receipt, or issuing a counterfeit receipt, and misappropriating the funds collected.

- *Undertaking regular audits* to identify whether policies, procedures and systems are operating as expected and, where they are not, assessing if corruption may have occurred which would require further investigation or forensic audit. In addition to detecting any vulnerabilities that may be exploited by corrupt actors, regular and visible audits act as an effective corruption deterrence mechanism, as officers may be hesitant to engage in corrupt behaviour if there is a high chance that it may be detected during an audit.
- *Using public expenditure tracking surveys (PETS)* to hold both Governments and service providers accountable for payments and delivery of services. PETS can be effective in identifying areas where there might be financial leakages, inefficiencies or delays, and can highlight areas where corruption might be taking place. For more information, see the World Bank documents *Tools and Practices: Public Expenditure Tracking Surveys*³⁷ and *Using Public Expenditure Tracking Surveys to Monitor Projects and Small-Scale Programs: A Guidebook*.³⁸
- *Strengthening the public procurement system*, as a procurement system that lacks transparency and competition is likely to be vulnerable to exploitation by corrupt actors. By ensuring that the procurement system used is transparent, competitive and objective, an authority may be able to reduce procurement corruption, which may take the form of tenders being directed to particular bidders, officers influencing how tenders are graded or assessed, payments being authorized for under-delivery or non-delivery of services, or contracts being awarded to unqualified bidders, to name but a few examples.

More advice on this can be found in the UNODC documents *Guidebook on Anti-Corruption in Public Procurement and the Management of Public Finances*³⁹ and *Procurement and Corruption in Small Island Developing States: Challenges and Emerging Practices*⁴⁰ as well as the *G20 Principles for Promoting Integrity in Public Procurement*.⁴¹

- *Safeguarding whistle-blower protection*, as this is essential for the identification of corruption risks and the reporting of corrupt officials. Even though officials might witness or suspect corruption, most incidents of corruption go unreported and undetected. People who observe corrupt acts taking place may have the impression that authorities will not take their report seriously, or that nothing will be done.

Other reasons for the reluctance to report suspected corruption include the lack of awareness of available reporting mechanisms and the fear of retaliation. It is therefore important that authorities

³⁷ World Bank, *Tools and Practices Survey 18 – Public Expenditure Tracking Surveys* (2002).

³⁸ M. Koziol and C. Tolmie, *Using Public Expenditure Tracking Surveys to Monitor Projects and Small-Scale Programs: A Guidebook* (The World Bank, 2010).

³⁹ UNODC, *Guidebook on Anti-Corruption in Public Procurement and the Management of Public Finances: Good Practices in Ensuring Compliance with article 9 of the United Nations Convention against Corruption* (2013).

⁴⁰ UNODC, *Procurement and Corruption in Small Island Developing States: Challenges and Emerging Practices* (2016).

⁴¹ G20, *Principles for Promoting Integrity in Public Procurement* (2015).

improve transparency by establishing measures and systems to facilitate the reporting of suspected corruption to the appropriate authorities, and to protect the reporting persons. Authorities should provide their staff with information about the different reporting channels available to them, both internally and to relevant external authorities (i.e., regulators and law-enforcement bodies).

Reports from the public can also be useful in detecting illegal acts or corruption risks. Many countries have established hot lines and other reporting mechanisms for citizens to report suspected corruption, some of which can be done anonymously. Among other sources, the UNODC *Resource Guide on Good Practices in the Protection of Reporting Persons* provides further guidance for countries.⁴²

- *Establishing a third-party monitoring mechanism* to enhance accountability and transparency. This could include empowered civil society organizations and youth groups, among others. For example, these groups could be engaged to monitor that regulations and tariffs are properly displayed and published.
- *Supporting labelling and marking systems* for wildlife specimens and products, as these can be highly effective for transparency, implementation and enforcement of regulations. Such schemes, which already exist at the national and international levels, can help consumers identify and purchase products from sustainably managed sources.
- *Developing a protocol of response to threats by criminal organized groups.* Wildlife management authority staff are particularly vulnerable to attempts at corruption by organized criminal groups. The profits generated by illegal businesses are frequently invested in attempts to undermine institutions and the rule of law through bribery. Often, criminal groups will pair bribes offered to public officials with threats to their lives, their families or their personal property, as a way to ensure the continuity of their illicit operations.

A wildlife management authority can develop a protocol for staff on how to handle threats caused by organized criminal groups. Such protocols may include appropriate reactions to the threat, a list of departments that should be alerted, anonymity and confidentiality measures that are in place and available assistance, protection mechanisms to be deployed, as well as a description of the steps that the authority will take in response. The wildlife management authority is strongly encouraged to formulate this protocol in collaboration with local law enforcement agencies in order to join efforts toward an effective and coordinated institutional response to ensure the protection of personnel, while disrupting organized crime operations.

- *Learning from actual corruption cases involving wildlife* in order to build a better understanding of how corruption linked to the wildlife sector is being perpetrated, who is committing the crime, and what vulnerabilities in the system are being taken advantage of. This information should be fed back into the risk management process as discussed in chapter 2.

3.1.2 People-based risk treatment measures

Some people-based preventative anti-corruption measures include:

- *Producing and publicizing codes of conduct* to formalize the professional standards expected of every employee, as well as the values that all employees should endeavour to embody in their work. Codes of conduct are important integrity instruments that inform officials that corrupt behaviour will not

⁴² UNODC, *Resource Guide on Good Practices in the Protection of Reporting Persons* (2015), and also resolution adopted by the United Nations Economic and Social Council on 2 July 2018, paragraph 27 of the Report of the Committee of Experts on Public Administration on its seventeenth session (available at www.un.org/ga/search/view_doc.asp?symbol=E/RES/2018/12). The differences between whistle-blowers and witnesses can be further explored in the United Nations conference room paper (CRP) on Whistle-blower protection and the implementation of article 33 of the United Nations Convention against Corruption on the protection of reporting persons. <http://workspace.unpan.org/sites/Internet/Documents/CRP%20on%20whistle-blower%20protection%20-%20Von%20Soehnen%20UNODC.docx.pdf>

be tolerated in the wildlife management authority. Officials should be introduced to the codes of conduct during recruitment, orientation and on a regular basis thereafter, as a reminder of the behaviours expected from them. Some wildlife management authorities require their officials to declare their commitment to abide by the codes of conduct. Codes of conduct help build trust with the authority's stakeholders and enhance citizens' trust in their Government.

- *Carrying out corruption experience surveys* to help understand and measure corruption within a specific context. The participants in these surveys can be internal, external or a combination of both. The surveys can be used, among other things, to gather information on whether stakeholders have experienced corruption when interacting with the wildlife management authority. Such surveys may enable management to establish factors such as: areas of high corruption risk; roles that are particularly vulnerable to corruption; types of corrupt behaviours that might occur or are occurring; effectiveness of reporting channels; effectiveness of investigations; and effectiveness of corruption prevention strategies.

The surveys can be used to analyse trends and, by comparing results with previous surveys, can suggest if corruption is increasing or decreasing. The authority can also compare the results of the survey with other government agencies in their country, or with wildlife management authorities in other jurisdictions. The UNODC *Manual on Corruption Surveys – Methodological guidelines on the measurement of bribery and other forms of corruption through sample surveys* has sought to address this issue and provide guidance.⁴³

- *Strengthening human resource (HR) management* for all stages of the employment process, from recruitment to retirement, ensuring that HR systems are transparent, efficient and based on objective criteria such as merit, equity and aptitude.⁴⁴ Corruption risks that may arise within the HR process include favouritism and nepotism, which can result in recruitment, promotions, postings and training opportunities not being undertaken or assigned based on merit.

There might also be instances of abuses of office, such as the denial of promotions and training, or the threat of transfers or posting to hardship areas that may be used by supervisors to intimidate staff. To mitigate against nepotism, favouritism and abuse of office in the HR process, authorities might consider introducing measures to improve the integrity of the HR systems. This could include ensuring that the committee or panel responsible for recruitment, promotion, posting and training is objectively constituted. Some wildlife management authorities now include an integrity officer as part of their recruitment panel, whose main role is to check if any corrupt behaviours are exhibited by panel members. Periodically, the authority could embed an undercover investigator as a member of the panel or send an undercover investigator through the recruitment process.

A wildlife management authority may also introduce randomized identity and attendance checks to find “ghost workers”, individuals that appear on the authority's payroll but who do not actually work for the authority, or employees whose records appear more than once on the payroll.

Authorities should endeavour to improve the processes around the selection and training of people in roles that are especially vulnerable to corruption. This may include enhancing vetting procedures such as background and security checks (which can help identify whether people have a criminal record or may be particularly vulnerable to blackmail or bribery) or the introduction of additional guidance materials and specialized role-based training regarding the corruption risks that an employee is most likely to encounter in that role.

- *Conducting objective performance evaluations* to regularly appraise the output of individuals. Subjectivity, or a perceived lack of fairness, during performance evaluations can be a cause for corrupt behaviour whereby employees who are unfairly evaluated may misappropriate resources, justifying that the extra resources they are personally gaining are to compensate for the pay increase or

⁴³ UNODC, *Manual on Corruption Surveys: Methodological guidelines on the measurement of bribery and other forms of corruption through sample surveys* (2018).

⁴⁴ See article 7 of the United Nations Convention Against Corruption.

promotion they missed. Conversely, subjectivity during the performance evaluation process can also be due to corrupt behaviour on the part of the evaluator. Supervisors may use evaluations as a weapon to pressure those being evaluated to submit to their demands, which may include a demand for them to engage in corrupt acts.

When establishing performance evaluation systems, authorities should adopt good practices, including performance targets that are jointly set and agreed between employee and supervisor at the beginning of the financial year, with performance evaluations based on the agreed targets. Additionally, an individual's performance targets should be aligned with their department targets, which again should be aligned to the authority's overall goals. Areas in which staff are not achieving their targets should be objectively identified and agreed upon with the employee, and relevant training made available for the staff member. Establishing a complaint reporting system for employees who feel that their evaluation is not objective is also an example of a good practice.

- *Training public officials.* In the public sector, the majority of public servants are conscientious, diligent and honest; however, there will always be individuals who break rules and engage in corrupt practices. Some honest public officials, involved at different stages of the value chain for the illegal wildlife trade, may unintentionally allow corruption risks to flourish. For instance, they may be unable to identify corruption risks, or be unaware of the policies or procedures in place to prevent them, such as how to submit a report if they suspect their managers or colleagues are engaged in corrupt practices, or the protections available to them if they submit a report. It may also be that staff do not recognize certain behaviours as corrupt, or that they view corruption as something that is not their problem. Worse, it may be that they view corruption as simply part of the organization's way of doing business.

There are many ways to educate and raise awareness among public officials. During the risk assessment stage, gaps in knowledge and any worrisome attitudes should be assessed to decide how to best address them. Anti-corruption induction training and regular refresher courses, either in-person or online, could be provided to all employees, while more in-depth specialized training could be delivered to those who hold positions that are more vulnerable to corruption (any officials responsible for granting licences or permits, procurement officials, or rangers, for example).

These training sessions should include information on the types, risks and effects of corruption in general and in the wildlife sector in particular. Information on codes of conduct or other laws, policies, regulations or practices that are aimed at promoting integrity, honesty and responsibility in that country and authority should also be shared. Training should increase the capacity of officials to recognize corruption and act on it with confidence. It may include information on what the consequences of engaging in corrupt acts are, and what officials should do if they witness or suspect corrupt practices.

Many wildlife management authorities also have oaths of office or other forms of assurance upon induction, that seek to reiterate the values of integrity, honesty and responsibility. Authorities might also raise awareness among employees through the use of positive incentives such as annual integrity awards, or by publicizing the support of high-level officials for anti-corruption measures (the "tone from the top"). Whatever the education or awareness-raising method, the message should be clear that *corruption is not tolerated in our organization and there will be consequences for anyone found to be engaging in corrupt acts.*

- *Introducing processes to prevent conflict of interests* that may impede an employee's ability to maintain impartiality within their role. This might be implemented through the creation of an asset and interest declaration registry in which employees are required to declare any potential conflicts of interest. This can increase the level of transparency within the authority and reduce corruption risks. Periodic wealth assessments of key staff, spot checks to determine whether their lifestyle is consistent with reported household income,⁴⁵ asset and interest disclosure requirements, or a gift registry are

⁴⁵ For more information on illicit enrichment, see Lindy Muzila and others, *On the Take: Criminalizing Illicit Enrichment to Fight Corruption*, Stolen Asset Recovery (StAR) Series (World Bank, 2012).

examples of corruption mitigation measures that, if introduced, can deter staff from corrupt behaviour by increasing the threat of being caught with unexplained wealth.

- *Ensuring segregation of duties.* This is a fundamental element of internal control and a proven anti-corruption tool. However, wildlife reserves and national parks are often in remote locations that lack good infrastructure and social amenities, and as a result suffer from a lack of available staff. Therefore, it may be the case that duties are not segregated in parks, reserves and stations that are in remote areas. In such locations, one officer may be in charge of a number of linked processes.

For example, in one authority, all finance and procurement processes in several remote sites were overseen by one member of staff. This kind of situation creates an opportunity for corrupt behaviour. If one employee is responsible for awarding contracts, paying suppliers, and reviewing the quality and quantity of work completed, with minimal oversight, they may seek bribes from vendors for awarding them lucrative contracts, or be paid to sign off work that has been completed to an inferior standard.

In another authority, one officer was responsible for custody of trophies, issuing licences for trophy dealers, auctioning the trophies and reporting on trophy transactions. This created many opportunities for corrupt behaviour to take place. For instance, missing or unaccounted-for trophies were later traded by the officer, and trophy licences were issued to unqualified persons. Trophy sales were not accounted for, and trophies held in custody as evidence for a criminal case disappeared.

The basic idea underlying segregation of duties is that no employee or group of employees should be in a position of having two or more of these roles: (a) custody of assets; (b) authorization or approval of related transactions affecting those assets; and (c) recording or reporting of related transactions. Management should review processes regularly to ensure there is segregation of duties across these three roles.

- *Raising awareness among decision makers and policymakers* at the highest levels to ensure their awareness of the serious threat posed by wildlife crime and the need for strong action to be taken against it and the corruption that enables it, as well as for strict deterrent penalties (in particular where corruption is involved).

Conducting awareness campaigns and educating stakeholders. Informing various stakeholders of the risks and effects of corruption on the wildlife sector, and what they could do to help prevent it, can foster attitudes that are intolerant to corruption and develop skills that allow individuals to resist social and cultural pressures when faced with corrupt practices. These stakeholders can include wildlife management authorities, CITES Management and Scientific Authorities, park rangers, the general public, civil society and the private sector, among others.

Awareness-raising efforts can further help gather support for any required anti-corruption reforms. Communities, tour operators and other stakeholders are often wrongfully left out of the response to wildlife crime. The stakeholder analysis in section 2.1.4 can help identify which other external groups that could potentially play a role in supporting efforts to prevent corruption. Here, it is important to ensure that all possible groups, not only the most obvious ones, are considered.

One important way to promote the participation of the public and civil society in anti-corruption efforts is to ensure that they have effective and transparent access to information. However, for the public to seek information or meaningfully contribute to these preventive efforts, they must first be made aware of the effects of corruption.

Public information initiatives can take different forms, from formal education to civic education or community-based awareness initiatives. The specific context of a given country should be considered at the risk assessment stage and should guide authorities on which public information initiatives will work best for them. For instance, including ethics and anti-corruption in formal education could, given time, change attitudes and instil a culture of integrity, but it may be more important to

address immediate awareness gaps and undertake a more targeted approach specifically related to corruption in the wildlife sector. An example of a successful awareness-raising initiative is the global anti-plastic movement that gained attention worldwide and has facilitated a shift in public attitudes.

Increased public awareness can have many benefits. Understanding that the Government and its officials have a responsibility to be corruption-free, and that there are national laws to enforce this, can make the public more likely to demand integrity from their officials. If they understand the cost of wildlife corruption for their country and communities, they are more likely to engage with government, and refuse to participate in activities that are not legal and transparent. Awareness initiatives should also include information on how to access and use reporting mechanisms when corruption is suspected or observed.

Awareness-raising efforts should be carefully designed to address identified corruption risks. Points to consider are:

- *The audience.* The value chain analysis and the risk assessment process should give guidance on who the primary audience should be, as awareness efforts will vary depending on the intended audience. For instance, initiatives targeting the local community or rangers will take a different approach to those targeting private sector entities or foreign companies involved in the wildlife trade.
- *The message.* The message of the awareness initiative should be tailored to match the intended goal. A campaign to raise awareness of licence regulations, in order to help local community members identify potential wrongdoing, will have a very different message to a campaign that educates the public on how to report suspected corruption in the wildlife sector through a new corruption hotline.
- *The resources.* All awareness-raising campaigns require financial and human resources. These resources depend largely on the channels and scale at which the campaigns are to be carried out. It is also important to identify which channels the campaign should use. Passive channels include circulation of information through websites, social media platforms, flyers, handouts, posters or media, and are useful for simple messages, such as the launch of a new corruption reporting hotline. Active channels could include educational sessions where information is presented directly to the target audience and are better suited when the goal is to impart a deeper understanding of a topic.

Awareness efforts are most effective when they are part of an ongoing programme. Rather than one-off media campaigns or events, awareness-raising efforts should be a continuous and evolving effort. Additionally, engaging with strategic partners, for example national anti-corruption commissions, civil society organizations, community members or private entities interested in (or already involved in) the wildlife sector, can enable authorities to build a list of people or entities willing to collaborate on future awareness-raising efforts.

3.2 ENFORCEMENT MEASURES TO ADDRESS CORRUPTION RISKS

There is a complementary relationship between preventive and law enforcement approaches to addressing corruption linked to wildlife crime. A central assumption underlying this Guide is that if there are robust corruption prevention systems in place, criminal activities are both less likely to occur and more likely to be identified. At the same time, in order to support a strong corruption prevention system, a deterrent to criminal behaviour must be presented by the threat of effective law enforcement. An effective law enforcement approach therefore will provide both the deterrent threat of law enforcement (in the background) as well as the actual enforcement (arrests, prosecutions and sentences).

Box 12. Transparency initiatives in the Kenya Wildlife Service

The Kenya Wildlife Service (KWS), in partnership with UNODC, has implemented a risk-based approach to identify and address corruption risks. Delivered by a corruption prevention committee (CPC) appointed from various departments, the achievements include the following in support of increased transparency:

- Recommendations were made for the formation of a budget committee. This was to ensure that the KWS budgeting process remained transparent and that funds were at all times allocated prudently and without favour to particular departments.
- KWS implemented a gift register at the Director General's office for the declaration of gifts made to staff, in order to increase transparency and accountability.
- Members of the CPC are invited to be present at interviews and shortlisting exercises in order to ensure that the recruitment process is transparent and objective.
- KWS is strengthening its procurement system through the appointment of a UNODC expert tasked with identifying gaps in the current procurement procedures that could allow corruption to occur.
- KWS has reviewed its aircraft maintenance, assets management and human capital policies with a view to ensuring proper management of its resources, including fairness and equitable distribution of assets.
- KWS has undertaken a review of the Wildlife and Conservation Management Act and has submitted relevant proposals that are inclusive of offences related to marine parks.
- KWS has undertaken training of its champions with the Ethics and Anticorruption Commission of Kenya with the support of UNODC.
- KWS has carried out a service-wide survey on perception and experiences of corruption.

In addition, the CPC will build capacity to:

- Train regional CPCs on the risk mitigation approach with the aim of carrying out regional risk assessments
- Conduct regional workshops to inform and sensitize staff on the Corruption Prevention Policy and Code of Conduct
- Assist with the implementation of regional complaints management mechanisms

This KWS case study highlights how some of the preventive risk treatment measures listed in section 3.1.1 can be implemented to mitigate corruption risks in a real-world setting.

Source: Kenya Wildlife Service (2019). For more information, see also annex C.

Case synopses included in this Guide provide an overview of some of the known types of corruption linked to the wildlife sector. However, these proven cases are only the tip of the iceberg, and although the majority of wildlife officials are honest and conduct themselves with integrity, the unanimous opinion among the wide range of experts consulted in the preparation of this Guide was that corruption linked to the value chain for the illegal wildlife trade was far more common than these few decided cases would suggest.

In addition to the mandate of conserving and managing wildlife, some wildlife management authorities have investigative and prosecutorial powers, while others do not. In both cases the wildlife management authorities will collaborate with the national police, anti-corruption authorities and public prosecutors to investigate and prosecute cases of wildlife crime and corruption.

This section provides examples of enforcement measures that wildlife management authorities can take in order to address corruption risks. These measures have been divided into those that are fully within the power of the authority (internal) and those that rely on the collaboration of other agencies (external).

3.2.1 Internal enforcement measures

Some internal enforcement measures include:

- *Ensuring the existence of policies and procedures* within the authority that dictate how to process information which suggests that corruption has taken place. Procedures should be clearly articulated in an internal anti-corruption policy and in disciplinary codes. If the authority needs to create these policies and codes, it is recommended that this is done through a consultative process. If these already exist, then there should be a procedure in place to identify the level to which staff members are familiar with them.
- *Instituting internal disciplinary procedures* where appropriate, against any staff member involved in wildlife crime or corruption.
- *Developing effective internal corruption investigation and resolution processes*, as these are crucial in deterring, reporting and resolving corruption cases, as well as for creating an environment in which employees and stakeholders are confident that their reports of corrupt behaviour will be investigated. When corruption is reported but nothing is done to tackle the reported issue, employees and stakeholders might eventually stop reporting similar issues. Ineffective internal corruption investigation or resolution mechanisms can even encourage corrupt behaviour, as employees and stakeholders realize that even if someone is caught committing a corrupt act, the repercussions are minimal (if any). Management should also ensure that all internal investigations are carried out in a transparent, objective manner. There is a risk that if internal investigations are not objective, officers may use them as a tool to intimidate others, for instance by creating fictitious cases that would require other employees to be investigated.

In establishing an internal investigation function within the authority, management should ensure that a comprehensive internal investigation policy is developed, and that all staff are trained in the policy, and how it impacts their roles, responsibilities and rights. Management should also ensure that competent personnel are hired and continuously trained, and that a mechanism for approving the commencement of individual investigations is in place. A system for communicating the results of the internal investigation and the action taken by management should be developed and publicized, and linkages with other anti-corruption strategies within the authority (e.g., human resource policy, disciplinary mechanisms, whistle-blower systems, codes of conduct, corruption prevention policies, etc.) should be strengthened and embedded.

An effective internal investigation process identifies the perpetrators of corrupt acts and recommends the action to be taken against them. It is also a preventive tool as it will identify vulnerabilities that were exploited in order to engage in corrupt acts and suggest how processes can be enhanced. Its value as a deterrent is also that employees and stakeholders will be more hesitant to engage in corrupt behaviour if they know that appropriate disciplinary or legal charges will be made against them if caught.

- *Monitor-referred corruption and wildlife crime cases.* Another measure that wildlife management authorities can introduce is to monitor the progress of corruption and wildlife crime cases that they refer to the criminal justice system. This helps to both highlight any patterns in how these cases are handled, and also where these cases fail to progress through the system. In turn, this information can feed back into the wildlife management authority's corruption risk management process and inform future risk treatments.

Many aspects of proceedings can be monitored; however, the working group should be cautious to avoid this exercise becoming resource intensive. A simple approach to monitoring referred cases could look like table 18 (template provided in annex D).

Table 18. Example of corruption case monitoring template for wildlife management

INDICATOR	INSTRUCTIONS
CASE NUMBER	<i>Record the case number. Be aware that in some cases there may be an internal and external case number.</i>
NAME OF ACCUSED	<i>Record names (including name variants) of all accused.</i>
SUMMARY OF CASE	<i>This should include the allegation and the potential charges.</i>
COURT APPEARANCES	<i>List all dates of appearance with the purpose of the court appearance and the reason given for any delay.</i>
IS THE CASE CLOSED WITHOUT REACHING FINAL ADJUDICATION?	<i>Record the reasons for this.</i>
WHAT IS THE SENTENCE?	<i>List all sanctions issued by the court.</i>

This Guide recommends, as an absolute minimum, that the wildlife management authorities maintain statistics on the progress and outcome of any corruption cases they refer to the criminal justice system. If there is any suspicion that referred cases are not being diligently investigated, prosecuted and adjudicated, the most senior official in the authority should approach the head of the responsible institution to obtain explanations, or highlight concerns to an alternative appropriate authority.

Encouraging third parties to monitor the progress of cases can be a cost-effective way to implement this risk treatment measure (see example in box 13).

Box 13. Wildlife court case monitoring by civil society organizations

Often, court proceedings are carried out behind closed doors, creating the opportunity for corruption to take place. Eyes in the Courtroom, a public-private partnership in Kenya, monitors, tracks and analyses the outcomes of wildlife crime trials in all 121 courts in Kenya, providing a performance measure by which the legal system (related to wildlife crime) can be evaluated.

By analysing the investigation, prosecution and sentencing of wildlife crime cases, the initiative allows Kenyan policymakers to increase the focus and efficacy of their policy and institutional reforms. They can do this by using the data to identify areas of priority, or areas requiring further attention, across the wildlife crime justice chain.

Similarly, the Oxpeckers Center for Investigative Environmental Journalism follows a similar approach by tracking court cases relating to rhinos and publishing the information on its interactive court case monitoring map.

Source: More information on the Eyes in the Courtroom project and published monitoring reports can be accessed at <https://wildlifedirect.org/eyes-in-the-courtroom/>. The Oxpeckers Center for Investigative Environmental Journalism Rhino Court Cases database can be accessed at <https://oxpeckers.org/rhinocourtcasesmap/>.

- *Publicize the results of cases successfully prosecuted* to raise awareness and enable them to become a deterrent for others. Where appropriate, wildlife management authorities should also recognize or reward the officers involved in exposing corruption.
- *Where appropriate, provide support to law-enforcement authorities.* Once cases are reported to the competent agency, wildlife management authorities should provide any support as may be appropriate or is requested and monitor the progress of referred cases.

3.2.2 External enforcement measures

Some external enforcement measures include:

- *Assessing interaction with the criminal justice system.* Once information has been passed on to law enforcement, and as part of their overall anti-corruption strategy, wildlife management authorities may wish to consider how to increase the probability of criminal cases referred by the authority leading to convictions, in particular convictions of more senior members of criminal groups.

A risk that is frequently identified by wildlife management authorities, and which can render ineffective the threat of law enforcement sanctioning, is corruption within the criminal justice process. This means that either cases never reach the point of adjudication, or at the point of adjudication the verdict has already been bought.

If the wildlife management authority conducting the risk assessment and management process has law enforcement or legal powers, then their relationships with the criminal justice system are likely to have already been reviewed using the context analysis tools recommended in section 2.1 (particularly through the organizational functions mapping and stakeholder analysis tools).

However, for wildlife management authorities without these powers, developing a detailed understanding of how wildlife crimes are processed will enable them to identify and treat certain corruption risks that may occur. Table 19 below provides a format for analysing the links between a wildlife management authority and a typical law enforcement system (this template can be found in annex D). It is important to bear in mind that wildlife management authorities can play a supporting role in bringing about convictions for corruption linked to wildlife crime.

Table 19. Example of how wildlife management authorities can analyse their interactions with other agencies in the criminal justice system

INTERACTIONS BETWEEN WILDLIFE MANAGEMENT AUTHORITY AND OTHER AGENCIES IN THE CRIMINAL JUSTICE SYSTEM				
	CUSTOMS	POLICE	PROSECUTION	JUDICIARY
WHO	Port (sea and airport) officers and border officers	Investigators, wildlife crime unit	Attorney General's office, environment/wildlife prosecutor	Court
WHEN	Wildlife products are seized	From the time a potential case is handed to the police until the file is either closed or passed to prosecution	From the time that the case is handed to the prosecution until its conclusion	From the time that the decision to prosecute is taken until final adjudication of the case
WHY	To monitor responses to seizures	To reduce the risk of the case not progressing and to provide timely support to the police	To reduce the risk of the case not progressing	To reduce the risk of the case not progressing
HOW	Establishing communication channels with customs enforcement	Regular meetings with the relevant police units	Attending and monitoring court proceedings or participating as a court appointed expert	Attending and monitoring court proceedings

- *Strengthen inter-agency cooperation* to facilitate the investigation and prosecution of corruption linked to wildlife crime.

As mentioned earlier, responsibility for the investigation and prosecution of corruption cases involving wildlife is unlikely to be part of a wildlife management authority’s mandate. However, where considered appropriate, multi-agency teams in which wildlife management authorities are represented can be established to address corruption related to wildlife.

A challenge that many countries are likely to encounter is how to structure coordination between different agencies, such as those tasked with addressing the various aspects of wildlife crime and those tasked with investigating and prosecuting corruption.

Inter-agency coordination mechanisms can be achieved by reaching out to and establishing working relationships with those national agencies responsible for the investigation and prosecution of incidents of corruption. Experience from enforcement responses to other crime types shows that there are different models that can be used to improve coordination between the authorities and to ensure that the acts of corruption and economic crimes are investigated and prosecuted alongside other types of crime. These models include:

- The establishment of an inter-agency coordination mechanism to, among other objectives, facilitate the sharing of intelligence and technical expertise, and the referral of cases between investigative agencies
- The creation of ad-hoc, multi-agency task teams to investigate and prosecute specific cases
- The formation of a permanent multi-agency task force mandated to focus on corruption and economic crime linked to the wildlife sector

Several high-level resolutions and declarations encourage the formation of multi-agency task forces or teams, including those of the General Assembly, the Commission on Crime Prevention and Criminal Justice, and the Economic and Social Council. This Guide recommends that member agencies should include anti-corruption agencies and Financial Intelligence Units (FIUs) as standard.⁴⁶

These entities should be sensitized to the serious nature of wildlife crime and requested to thoroughly investigate any credible allegations of corruption associated with wildlife crime. Wildlife management authorities can also support prosecutors by working with them to jointly develop rapid reference guides that include all relevant legislation as well as the requirements for strong case management to ensure the smooth progress of any such case through the justice system. It is important to establish the required communication channels with these agencies to facilitate swift reporting of any corrupt activities or suspected corrupt activities for further investigation.

Whichever inter-agency cooperation model is adopted, it will need a “champion” to act as coordinator and ensure that the model is fit for its intended purpose. Prerequisites for this champion to succeed include high-level political support and being able to allocate sufficient time and priority during the working day. There will also be a need for the allocation of financial resources to underpin the work of the champion and the inter-agency coordination structure. Box 14 demonstrates the impressive conviction rates of a permanent inter-agency task force.

⁴⁶ See, inter alia, Economic and Social Council resolution E/RES/2013/40, para. 7 (2013); General Assembly resolution A/RES/69/314, para. 6 (2015); General Assembly resolution A/71/L.88, para. 9; General Assembly resolution A/71/326, para. 9; CITES resolution 11.3 (Rev CoP17) *Compliance and Enforcement - Annex 3: Guidance for Specialised Wildlife Law Enforcement Units* (2016) and; Commission on Crime Prevention and Criminal Justice resolution 28/3, para. 10.

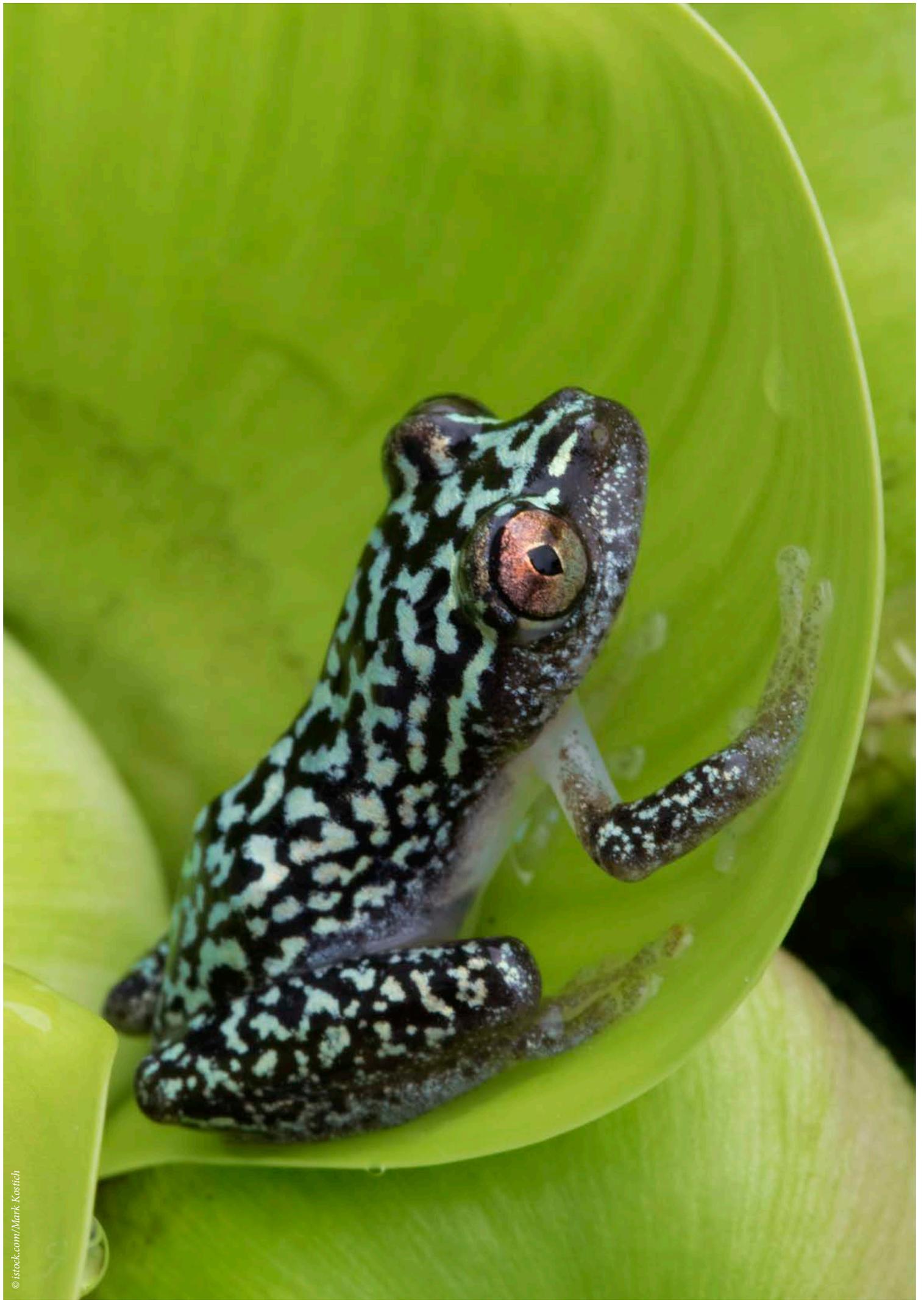
Box 14. United Republic of Tanzania establishes successful Inter-Agency Task Force

The Tanzania National Task Force for Anti-Poaching, comprised of the National and Transnational Serious Crimes Investigation Unit (NTSCIU) and the Wildlife and Forestry Crime Task Force, under the guidance of the Ministry of Natural Resources and Tourism, is an example of effective and successful cooperation between national agencies.

In 2014, the NTSCIU was responsible for the arrest of a number of major ivory traffickers, including Yang Feng Glan, the so-called “Ivory Queen”, who was sentenced to 15 years imprisonment. In the referred case, financial investigations conducted by the task force revealed that once the ivory was weighed, cash distributions and mobile money were used to pay the various parties involved in obtaining, transporting and storing the product. Moreover, several properties owned by Yang Feng Glan were identified and linked to criminal activities, leading the court to conclude that the assets were used to launder proceeds of crime. In addition, one of the defendants, Salvius Matembo, allegedly offered to pay a bribe in cash to an arresting officer to disrupt the investigation.

Since 2012, the task force has led to the arrest of over 2,000 poachers, and related cases have a conviction rate of 80 per cent. The CITES National Ivory Action Plan Progress Report for the United Republic of Tanzania noted that between January and July 2018, 1,239.5kg of ivory were seized by coordinating groups and task forces.

Sources: See, inter alia, United Republic of Tanzania Ministry of Natural Resources and Tourism, SC70 Doc 27.4 Annex 23: *CITES National Ivory Action Plan Progress Report* (2018); Taverner, L., *Tanzania task force tightens noose on international traffickers*, (Africa Geographic, 30 June 2017); Tremblay, S., *Leading elephant conservationist shot dead in Tanzania*, (The Guardian, 17 August 2017). Court documents of the “Ivory Queen” case in the United Republic of Tanzania.



Chapter 4.

CONCLUDING REMARKS

Wildlife crime threatens the survival of many species of flora, fauna and marine resources, robs States of revenues, and deprives communities of valuable resources. It is well recognized that wildlife crime is one of the most serious transnational criminal activities next to arms, drugs and human trafficking.

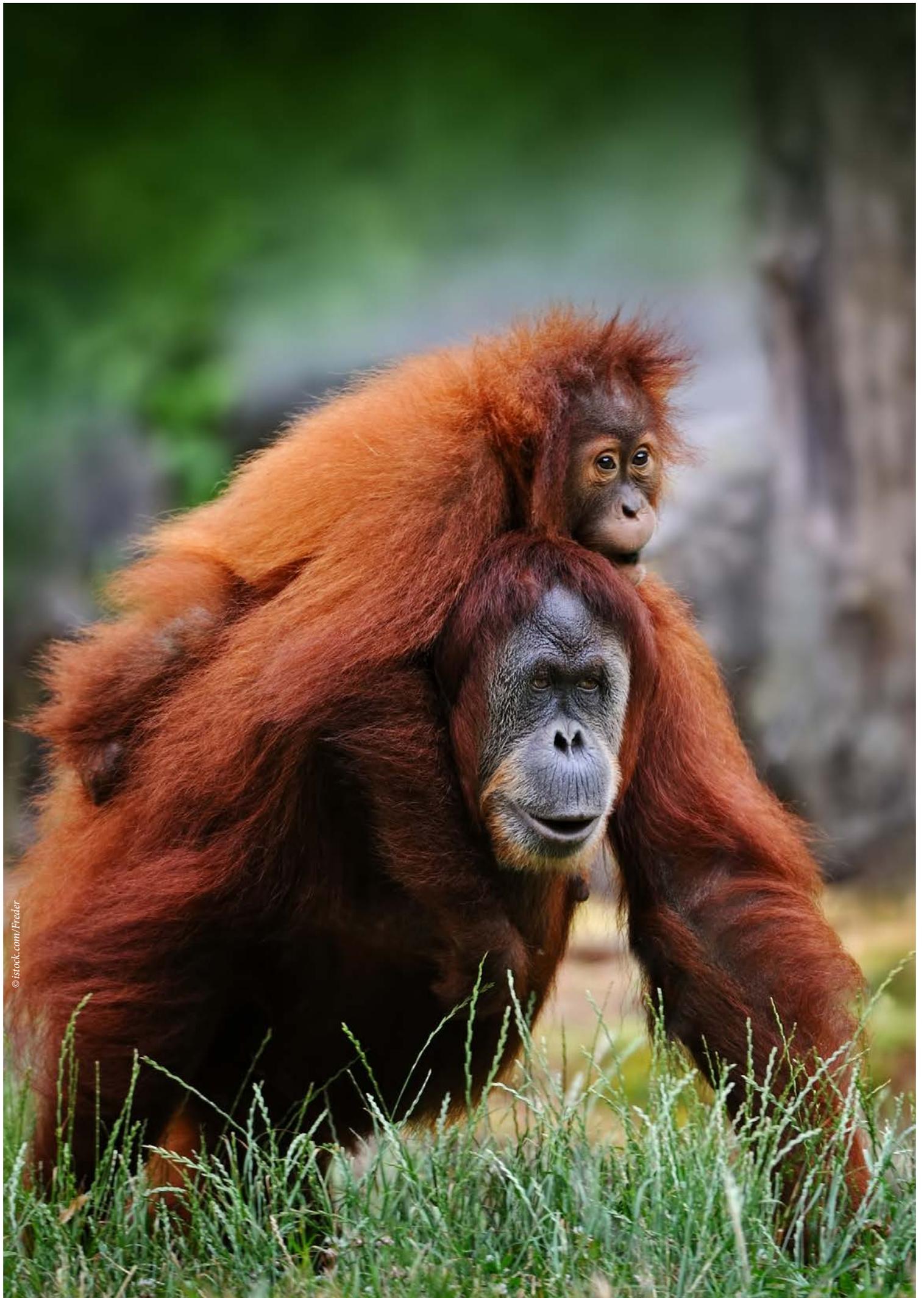
This Guide urges wildlife management authorities to take a leading role in addressing corruption by undertaking a comprehensive corruption risk management process. It seeks to support wildlife management authorities in identifying vulnerabilities within their operations that present opportunities for corruption to occur, and to put measures in place to minimize these risks. The structured self-assessment approach to managing corruption risks proposed by this Guide can be adopted by all wildlife management authorities, regardless of the availability of budget or resources.

The process put forth in this Guide relies on the authority establishing a firm understanding of the internal and external context in which it operates. This understanding supports the subsequent corruption risk assessment, in which corruption risks are identified, analysed and evaluated. During the evaluation step, risks are prioritized through an impact x likelihood matrix to ascertain which risks should be addressed first. Finally, mitigating risk treatments are devised and the feasibility of these measures is assessed to ensure that the resulting risk treatment plan is within the control and means of the authority.

This Guide provides numerous examples of corruption risk treatments and encourages wildlife management authorities to implement preventive measures that increase transparency and accountability, raise awareness and educate stakeholders. Additionally, in order to provide a deterrent to criminal behaviour, authorities could consider law enforcement measures such as strengthening inter-agency cooperation and supporting the criminal justice system (e.g., through the monitoring of referred cases).

Corruption risk management is a cyclical process. As risks can diminish or increase over time or be impacted by the treatments designed to address them, it is recommended that this process be repeated at regular intervals. As a result, the risk treatment plan will be dynamic, responding to the findings of each review cycle.

Through developing and embedding a culture of corruption risk management, wildlife management authorities can strengthen integrity and build their capacity to respond to the corruption that facilitates wildlife crime, and which gradually undermines public faith in Governments. Member States are encouraged to actively promote the use of this Guide among their relevant national agencies.



ANNEXES

A. INTERNATIONAL LEGAL FRAMEWORKS

As reflected in a number of recent resolutions and decisions, the international community has recognized the severity of the problem of wildlife crime, global biodiversity loss and degradation of ecosystems. For example, in 2017, the General Assembly unanimously adopted a resolution on “Tackling Illicit Trafficking in Wildlife”, which sets a powerful framework for collective action.⁴⁷

UNODC works closely with various international organizations and agencies with mandates in law enforcement and criminal justice capacity-building to address wildlife crime, including the nexus between anti-corruption and wildlife crime. In 2010, representatives from UNODC, the Secretariat to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the International Criminal Police Organization (INTERPOL), the World Bank and the World Customs Organization (WCO) decided to form the International Consortium on Combating Wildlife Crime (ICCWC) to jointly move forward in a coordinated manner.

ICCWC works to bring coordinated support to the national wildlife law enforcement agencies and to the subregional and regional networks that, on a daily basis, act in defence of natural resources. Tackling corruption is a core part of the work of ICCWC, and partners aim to leverage their expertise to jointly tackle what is recognized as a key facilitator of wildlife crime.

International conventions

There is an extensive international legal framework to combat corruption linked to wildlife crime. Three globally accepted legal instruments are of crucial importance, listed in table A1. These instruments complement and support each other and provide States with a robust foundation for their efforts to address the nexus between corruption and wildlife crime.

⁴⁷ A/RES/71/326

Table A1. International legal framework

CONVENTION	OVERVIEW	RELEVANCE TO WILDLIFE MANAGEMENT AUTHORITIES
THE CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)	A trade convention, regulating the trade in around 36,000 species of plants and animals to ensure that international trade does not threaten their survival.	A legally binding framework focused on ensuring the legal global wildlife trade does not threaten the survival of any traded species.
THE UNITED NATIONS CONVENTION AGAINST CORRUPTION (UNCAC)	Embodies innovative anti-corruption standards and provides a comprehensive approach both to corruption prevention and enforcement.	As most countries have committed to this Convention, authorities can use UNCAC as a basis for both preventive and law enforcement approaches to corruption risk management.
THE UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME (UNTOC)	Provisions address transnational organized crime and must also be deployed in serious cases involving the trafficking in natural resources.	Many wildlife crimes are committed by organized criminal groups operating on a global scale. UNTOC assists wildlife management authorities with many of the tools necessary to defend against organized criminals.

Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

CITES⁴⁸ provides the fundamental legal framework for ensuring that international trade in specimens of wild animals and plants does not threaten their survival. CITES regulates international trade in over 36,000 species of plants and animals to safeguard CITES listed species from over-exploitation. This is done by listing animals and plants in one of three appendices (see box A1).

Species listed in the three appendices require various degrees of regulation to ensure their sustainability, ranging from a general prohibition on commercial trade to allowing international trade via a system of

Box A1. CITES Appendices – Defining licit and illicit wildlife trade

Appendix I includes species threatened with extinction. Trade is permitted only in exceptional circumstances. An export permit can only be issued after verifying that the specimen will not be used for commercial purposes; the trade will not be detrimental to the survival of the species. The import of any of these listed species requires the prior granting and presentation of an import permit.

Appendix II includes the majority of traded and commercially important species, that are not necessarily threatened with extinction, but may become so if trade is not controlled, essentially by ensuring that any specific trade will not be detrimental to the survival of the species in the wild. Export permits are required, but the import of any of these listed species requires only the presentation of an export or re-export permit.

Appendix III species are protected in at least one country, which has asked other CITES Parties for assistance in controlling the trade. For any State that has included a certain species under appendix III, export permits are required for the trade in that species. In the case of export from any other State, a certificate of origin must be issued.

Sources: CITES, *Convention on International Trade in Endangered Species of Wild Fauna and Flora*, (1975), appendices I, II and III.

⁴⁸ In August 2019, there were 183 States parties to CITES.

permits and certificates, which are issued only when certain conditions are met, and which must be presented when the specimen concerned leaves and enters a country. CITES Parties issue over 850,000 permits a year. The Convention provides a legal framework requiring all CITES Parties to penalize trade that contravenes the Convention.

The national agency responsible for implementing CITES in each country is called the CITES Management Authority. Countries also designate a CITES Scientific Authority to advise the Management Authority on whether trade in specimens would be detrimental to the survival of species in the wild, along with any other scientific matters.⁴⁹

Only the Management Authority that issued a permit or certificate is authorized to write on or otherwise alter the permit, and any permit that has been altered after the issuance without the re-authentication of the issuing authority is void.

The Conference of the Parties to CITES, in recognition of the high degree of involvement of organized criminal groups and networks in wildlife crime, and their frequent use of corrupt practices to facilitate these crimes and frustrate efforts to enforce laws, adopted resolution 17.6 on Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention.⁵⁰

UNCAC and UNTOC support the purpose and efforts of CITES by criminalizing acts of corruption and organized crime and by providing a range of preventative measures.

United Nations Convention against Corruption (UNCAC)

UNCAC⁵¹ is the only legally binding universal anti-corruption instrument. It embodies innovative and globally accepted anti-corruption standards and provides a comprehensive approach both to corruption prevention and enforcement. It promotes integrity, accountability and proper management of public affairs and public property. UNCAC also addresses the cross-border nature of corruption with provisions on international cooperation and asset recovery. UNODC is the guardian of UNCAC and multiple resolutions from the Conference of State Parties to UNCAC call upon UNODC to support States' efforts to implement the Convention.

The Convention recognizes that corruption is a continuously evolving phenomenon that is affected by various factors, such as political environment, institutional and organizational structures, economic and structural policies and social and cultural settings. Different legal frameworks therefore have different descriptions of corruption.

The outcome of the UNCAC Implementation Review Mechanism can be utilized by States parties to identify gaps and challenges in the implementation of Convention requirements. It consists of States parties reviewing the progress of their peers in the implementation of the provisions of the Convention. It is also a tool for countries to identify technical assistance needs.

United Nations Convention against Transnational Organized Crime (UNTOC)

UNTOC⁵² is the primary global Convention against Transnational Organized Crime, binding together 190 States parties to collectively address issues related to cross-border organized crime. Adopted in 2000, the Convention is particularly relevant to the illegal trade in wildlife products, as the majority of the illegal trade is carried out by organized criminal groups with networks spanning across international borders. Articles 8 and 9 of UNTOC call for measures to prevent, criminalize, detect and punish corruption, in particular the bribing of public officials as well as the solicitation of bribes by public officials, both of which are drivers and enablers of wildlife crime.

⁴⁹ CITES, *Resolution Conf 10.3: Designation and role of the Scientific Authorities* (2010).

⁵⁰ CITES, *Resolution Conf 17.6: Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention* (2016).

⁵¹ In November 2019, there were 186 States parties to UNCAC.

⁵² In November 2019, there were 190 States parties to UNTOC.

Other relevant regulatory frameworks

There are several other regulatory frameworks that can support the anti-corruption work of wildlife management authorities. A non-exhaustive list of these regional frameworks is provided below; however, the working group may wish to research others during Step 1 (Establish context) of the corruption risk management process detailed in this Guide.

- The African Union Convention on Preventing and Combating Corruption (AUCC)
- The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
- The Financial Action Taskforce (FATF)
- The United States Foreign Corrupt Practices Act (FCPA)
- The Council of Europe's Group of States against Corruption (GRECO)
- Inter-American Convention against Corruption (OAS)

B. CAUSES OF CORRUPT BEHAVIOUR

Causes of corrupt behaviour internal to wildlife management authorities

1. *Lack of oversight*

An environment where there is little oversight or accountability, for example poor financial and personnel management systems, can lead to situations that facilitate corruption. When individuals perceive that they are unlikely to be caught or punished, corruption becomes more attractive and can even escalate to the point where it is considered an accepted norm.

Many national wildlife management operations are geographically dispersed. Significant responsibility for the management of valuable resources, often with a relatively high level of discretion, is frequently delegated to junior staff living in small rural communities or where working conditions are poor. Usually, these staff receive little support, oversight or training, which can lead them to feel isolated from the broader authority. This situation can facilitate corruption as due to the lack of oversight, staff may feel a decreased likelihood of being caught, and may also appear as easy targets to those seeking to perpetrate wildlife crime.

Criminal groups can take advantage of systems that suffer from a lack of oversight by offering bribes or incentives to officials working in those environments who are less likely to be subject to controls or suspicion. Box B1 highlights how officials operating in systems with little oversight can form a vital link in illegal wildlife trafficking chains.

2. *Unclear mandates*

Perpetrators of wildlife crime seek to operate in a manner that gives them the most confidence that they will not be caught. The desired outcome for such individuals or groups is that officials ignore or intentionally overlook fraudulent paperwork or other illegal activities (as opposed to paying officials to supply genuine paperwork). Often, the risk of this type of corrupt behaviour is higher when employees do not have clear mandates or have multiple responsibilities.

For example, a customs official, who is usually the first (and often the only) level of inspection of shipments of CITES specimens, carries the responsibility of verifying that trade is in accordance with CITES provisions in order to detect fraud and illegal trade where it occurs, and inform the CITES Management Authority. However, for customs officials, CITES verification is only one of several responsibilities. Multiple responsibilities might result in officials rationalizing corrupt activity, thinking that it is “not so bad”, “not their problem”, or that they “cannot do everything”.

Box B1. Wildlife trafficking trends, techniques and modus operandi as it affects West and Central Africa – elephant ivory

In 2019, CITES commissioned UNODC to develop a threat assessment report on illegal wildlife trade in West and Central Africa. One specific finding of the report, as detailed in document CoP18 doc. 34 prepared for the eighteenth meeting of the Conference of the Parties to CITES, is particularly reflective of the extent to which corrupt behaviour can flourish when oversight is lacking or non-existent.

“The threat assessment report states that seizure and forensic data show that the West and Central Africa subregions are both a source for illegal ivory and a transit area for ivory from elephants poached in other parts of Africa. It highlights that, as in other parts of Africa, both organized and opportunistic poaching occur, and that both feed into smuggling groups that would fit the United Nations definition of an organized criminal group. The report highlights that poachers are most often local people recruited by crime syndicates. Interviews with poachers as well as enforcement officials suggest that national middle-men (brokers between the poachers and the exporters) are often successful businesspeople, military officials, or others in positions of authority, who by virtue of their position are less likely to be questioned by law enforcement. Exporters are most often Asian nationals from the destination countries, who reside in the region. The report concludes that ivory trafficking as it affects West and Central Africa is reliant on the connections between three distinct social groupings: those who make their living from the land, the wealthy or powerful who can assure unimpeded transport of the ivory from the rural areas to the ports of export (in unstable areas, these may often be people with connections to the military), and the Asian expatriates who have the connections to direct the contraband to its final destination.”

Sources: UNODC, West and Central Africa Transnational Organized Crime Threat Assessment (2018). CITES, CoP 18 Doc 34: Wildlife Crime Enforcement Support in West and Central Africa, p. 6, para. 25 (2019). See also CITES, CoP 18 Doc 34, annex 4, for the full West and Central Africa Wildlife Crime Threat Assessment report.

Box B2. How unclear mandates can create opportunities for corruption

Criminals or criminal groups can bribe customs authorities to turn a blind eye as goods pass through customs, or might bribe cargo inspectors to not inspect a shipment or to ignore incorrect or forged documentation. Permits often need to be disclosed during the customs stage of the wildlife trade value chain, and bribing a customs officer might mean that criminals can avoid interacting with the wildlife management authorities (e.g., to secure a legitimate permit). A passive act (e.g., turning a blind eye) might be easier for a customs official to justify to themselves than the active act of facilitating the crime (e.g., incorrectly certifying that forged paperwork is valid).

In some instances, wildlife management authorities may place officials in airports, ports and customs either at the point of origin, transit or destination. These officers support the airport security or customs officials in their task to detect trafficked wildlife. This can help mitigate the risk of not being able to simultaneously meet multiple mandates.

If the authority undertaking this corruption risk assessment already places officials at ports as part of its regular operations, the working group should also consider potential corruption risks at later stages of the illegal wildlife trade value chain.

This is less likely to occur with park rangers or CITES Management and Scientific Authorities, for example, due to their clearer mandates. However, much will depend on the institutional practice of the Authority, the available resources, and whether the Authority has additional or competing mandates.

3. Lack of a culture of integrity, transparency and accountability

In an environment that lacks a culture of integrity, transparency and accountability, staff morale is often low and there is a greater likelihood that officials will act on their desire to gain personal wealth and power. Corrupt officials who are very familiar with wildlife management processes can use their knowledge and access to generate illicit wealth or engage in wildlife trafficking for personal gain. These officials may even reach out to known criminals to instigate corruption, and sometimes use their position to rise within the ranks of organized criminal groups.

In such an environment, officials may be more likely to embezzle their organization's resources, engage in corrupt procurement practices or divert money that is meant for conservation into their own pockets. This usually means that there are insufficient funds remaining to adequately protect wildlife. Some examples of corruption linked to the lack of a culture of integrity, transparency and accountability include:

- Wildlife management authority officials, who often have insider knowledge and technical experience, could seek to illicitly enrich themselves through the permit issuance process. They could, for example, overcharge for a permit and keep the excess, divert permit fees prior to recording them, or intentionally request payment for permits for a look-alike species, issue the unnecessary permit, not record the issuance and keep the profit.
- Wildlife management authorities and law enforcement officials with access to confiscated wildlife could steal high-value wildlife products from government-held stockpiles and introduce them into the illegal trade.⁵³ Similarly, illegal products can be laundered through government stockpiles into the legal trade. For example, ivory that may have been stockpiled prior to an export ban may be augmented by additional illegal stocks, facilitated through corruption.
- Wildlife management authority officials can use corrupt practices in procurement processes, allowing for highly priced or defective equipment to be purchased in return for personal gains. This can be detrimental for wildlife operations, for example, when rangers' radios or vehicles are defective.

Box B3. Corrupt payments to organizations close to government

Corrupt actors will often find ways of funnelling State funds into the hands of their criminal partners. For instance, the Deputy Director of a Ministry responsible for wildlife management in country X authorized a substantial payment to a law firm for services that could have been provided for free by the Office of the State Attorney. Upon closer inspection, it was found that the head of this law firm had close ties with the country's President and had defended a number of his supporters, including prominent judges, against claims of corruption or misconduct. The contract was awarded without engaging in the required tendering process.

It was also discovered that alongside the authorization of the suspicious contract between the Ministry and the law firm, the Deputy Director who had awarded the contract (along with a number of the Ministry's managers) had allegedly stolen a large volume of high-value abalone and was being defended by the same law firm.

This case shows how corruption enables wildlife crime through the funnelling of State funds and wildlife stock into the hands of a select few, robbing the State of the funds that could have been used to protect wildlife or address corruption. In addition, this demonstrates the feedback mechanisms that are often present in corrupt activities, whereby an individual helps a corrupt government officer to engage in illegal activities and is rewarded through the gifting of government funds, either as illegal payments or the corrupt awarding of contracts.

Box B4. Leveraging official positions to move into organized crime

It is not uncommon for officials who have engaged in opportunistic corruption (i.e., accepting a bribe when it is offered) to move on to engage in endemic corruption, using their position to instigate the corruption and criminal activities.

In one case, a deputy minister with a mandate to protect the endangered African Grey Parrot not only facilitated the illegal export of over US\$ 500,000 worth of parrots by accepting bribes, but later was found, through their position of influence within the government, to have taken on a leadership role in the organized criminal group from which they had previously accepted bribes.

⁵³ UNODC, *Addressing Corruption and Wildlife Crime – A Background Paper for the G20* (2017).

Causes of corrupt behaviour external to wildlife management authorities

1. Weak legislative and policy frameworks

In some countries, wildlife crime is not regarded as a serious crime. In fact, in a 2016 United Nations Secretary General's report on illicit trafficking in wildlife, one third of respondent Member States reported that illicit trafficking in wildlife was not a serious crime under their national legislation.⁵⁴ Even in countries where the crime was considered serious, it was often not treated as a priority.

A UNEP study of 2018 confirmed that legislation governing wildlife issues was sometimes inadequate and outdated, and that there were often deficiencies in domestic criminal law, particularly in penal codes.⁵⁵ The report of the Abidjan Symposium on Strengthening Legal Frameworks to Combat Wildlife Crime in Central and West Africa noted in their participant survey that 30 per cent of respondents stated that their country did not have sentencing guidelines for cases of illegal trade in protected wildlife and forest products.⁵⁶ There is often a preference, even in serious cases, for administrative sanctions and fines rather than prison sentences. This creates a situation in which organized criminal groups are able to operate with little fear of serious repercussions and leads to wildlife crime being considered a "low risk, high reward" crime.⁵⁷

2. Social pressures in small rural communities

Many wildlife operations occur in small and often remote communities, where the hunters and those who are tasked with regulating their conduct may live in close proximity. When this situation prevails, the line between hospitality, friendship between neighbours, and corruption may become indistinct and blurry. Pressure to maintain community relationships in these circumstances can encourage corrupt behaviour.

Social pressures can encourage rangers or officials to accept bribes or tolerate illegal behaviour from members of their community for a number of reasons. Groups or individuals, usually poaching gangs or low-level transporters, may use personal relationships in order to obtain hunting permissions, quotas or licences that otherwise would not be issued, or in some cases local officials may be coerced or forced to turn a blind eye to illegal behaviour due to threats to family, life or personal property.

- Wildlife management authority staff may be persuaded to share information regarding wildlife patrols such as scheduling, locations, and which officers will be on duty or even the movement of protected animals in an attempt to remain cordial with friends, family or neighbours.
- Individuals, businesses and criminal groups have been known to fund sought-after community projects in towns where they have current or future interests. These projects can range from organizing a concert to constructing new factories or resource extraction-based activities that increase local employment. Once these projects have been delivered and the communities are favourable towards the funder, they are significantly less likely to report any illegal, suspicious or corrupt activities.
- National parks are often surrounded by agricultural areas. As wildlife moves outside the boundaries of the park and encroaches on nearby communities, it can cause damage to farms or homes, and in some cases injure humans. To deter people from killing wildlife to protect their property, many Governments have instituted compensation mechanisms to reimburse citizens for damage from wildlife or for capture of wildlife outside of parks. This creates opportunities for corruption where farmers can collude with wildlife officers to falsify or inflate damage claims and bribe officers with some of the compensation received from the Government to conceal their fraudulent claim.

⁵⁴ Report of the Secretary-General, *Tackling Illicit Trafficking in Wildlife* (A/70/951, Para. 23, 2016).

⁵⁵ UNEP, *Strengthening Legal Frameworks for Licit and Illicit Trade in Wildlife and Forest Products – Lessons from the Natural Resource Management, Trade Regulation and Criminal Justice Sectors* (2018).

⁵⁶ UNEP, *Symposium on Strengthening Legal Frameworks to Combat Wildlife Crime in Central and West Africa* (2019).

⁵⁷ OECD, *Illicit Trade: Converging Criminal Networks* (2016).

3. High prices for rare traded species

For species that are commercially traded, the rarer the species becomes due to illegal trade, the greater the commercial value of the remaining specimens. This can lead to a vicious cycle as the incentive to further poach the remaining specimens and bring illicit wildlife products to market increases with the enhanced financial prospects.⁵⁸ This can cause conditions that facilitate corruption, as the potential financial benefit to corrupt inspectors and front-line wildlife officers can increase in line with the value of the species in question.

In some countries, Governments may have stockpiles of wildlife products that have a high commercial value either within the legal or illegal trade, and wildlife management officials may be bribed to share confidential information regarding these stockpiles. For instance, individuals tasked with security for government rhino horn stores (which have been banned from legal trade but still have a high value in the illegal wildlife trade) could be bribed to share inside knowledge with potential thieves on how to gain access to the secured storage locations.⁵⁹

4. High demand for products

Demand for wildlife specimens can be driven by a variety of social, cultural, religious or economic factors. Opportunities for perpetrators of wildlife crime to meet this demand arise when quotas for commercially traded species are filled but demand remains, or where there is a demand for species that cannot be legally traded.

The UNODC World Wildlife Crime Report provides insight into the unsustainable demand for wildlife products. For example, between 2007 and 2013 the number of legally traded pangolin specimens was 1,467 whereas the number of seized illegal specimens was 107,060. This demonstrates the substantial gulf between legal supply and consumer demand.⁶⁰

Box B5. Restricted timber products imported using fraudulent paperwork

High demand in a destination market for a restricted product can lead to import officials relaxing or ignoring rules in order to meet that demand. In Country X, a ban on the export of a restricted CITES appendix-II listed timber product was implemented. This ban was communicated to Country X's trading partners in the form of a formal written notification that Country X had banned "all trade and circulation" of the particular species of timber, and requested the cooperation of country Y to "prevent trade, purchase or import" of the timber from Country X.

However, in the two years following the official request, over 8,000m³ of the restricted timber was imported into Country Y from Country X to meet local demand, in violation of the restriction on trade in that species and of the official notification to cease trade. In a written complaint to the CITES Secretariat, it was alleged by Country X that the CITES Management Authority in Country Y was knowingly accepting forged CITES permits, even after being informed by Country X's CITES Management Authority that those permits were fraudulent and therefore illegal.

5. Exploitation of legal markets

Many species of flora and fauna can be traded legally, provided the specimen has been sourced legally and sustainably. Successful legal trade depends largely on control over the issuance, inspection and acceptance of documentation. The proof of legality is provided by the paperwork, but if this paperwork is not properly managed, vulnerabilities are created.

⁵⁸ United Kingdom Department for International Development, *Why Corruption matters: understanding causes, effects and how to address them* (2015).

⁵⁹ Tom Milliken and Jo Shaw, *The South Africa – Viet Nam Rhino Horn Trade Nexus: A Deadly Combination of Institutional Lapses, Corrupt Wildlife Industry Professionals and Asian Crime Syndicates*, TRAFFIC Report Series, (2012).

⁶⁰ United Nations, *World Wildlife Crime Report – Trafficking in Protected Species* (2016).

For anyone seeking to move illegal wildlife specimens, the best possible situation is to appear as if all the required permits and licences are in place. If legitimate paperwork can be obtained through an act of corruption, it is unlikely that the illegal specimen will be intercepted or even treated with suspicion. This makes such paperwork invaluable to criminals.

Corrupt behaviour is especially likely to be present when a well-organized criminal enterprise seeks to move illegal or restricted specimens, and a weak control environment exists within the authority tasked with issuing licences or permits. Situations where an illegal specimen can be made to appear legal present a significant corruption risk as substantial bribes can be involved. For instance, a criminal group observes that 20 per cent of its goods are being seized by customs officials. If it could pay a bribe of less than 20 per cent of the value of the cargo, this would be a worthwhile risk.

Further opportunities for corruption arise if paperwork, such as CITES permits or certificates, are too easily accessed, stolen or forged by wildlife management officials. Weak controls surrounding this valuable paperwork can enable traffickers to introduce illegal goods into legitimate commercial channels and access a much broader pool of potential buyers.⁶¹ In this way, corruption can turn an illicit wildlife product into a seemingly licit product.⁶²

Box B6. Guinean wildlife director arrested for forging export permits

Legal captive breeding facilities can be particularly vulnerable to corruption. In January 2014, CITES issued a statement concerning the illegal export of great apes from Guinea to China. It noted that between 2010 and 2011, Guinea had been exporting a large number of great apes to China using permits that labelled the animals as “captive-bred” and that reportedly originated from the CITES Management Authority. However, it emerged that “no commercial captive-breeding of specimens of CITES-listed species occurred in Guinea, or had taken place in the past, contrary to what was indicated on fraudulent Guinean CITES permits for a range of species”.

In August 2015, the former wildlife director and head of the CITES Management Authority of Guinea, was arrested by the Guinean National Central Bureau of INTERPOL for his role in corrupt and fraudulent actions in the issuance of CITES export permits for great apes.

By fraudulently issuing legitimate paperwork to the criminal groups exporting the great apes, he used his position to enable wildlife crime and made it unlikely that the exports would be intercepted or appear suspicious. He has since been prosecuted and has served time in prison. In 2017 he received a presidential pardon.

Sources: CITES Secretariat, Great apes exported from Guinea to China from 2009 to 2011, (CITES, 2014) CITES Secretariat, CITES Secretariat confirms the arrest of former wildlife director in Guinea and applauds national authorities’ work, (CITES, 2015).

6. Identification of similar-looking species

A challenge often confronting officers is the correct identification of traded wildlife specimens, which is necessary to ascertain the legality of traded specimens. The responsibility for identification lies with inspectors and front-line wildlife officers, but with many different species being traded, it can be very difficult for front-line officers to distinguish different but similar-looking species from each other. These identification challenges can be abused by traders who knowingly declare specimens falsely and then bribe officials to intentionally approve such false declarations. This challenge is further exacerbated by the fact that few people have the expertise necessary to identify or correct false declarations.

⁶¹ UNODC, *World Wildlife Crime Report* (2016).

⁶² UNODC, *Addressing Corruption and Wildlife Crime – A Background Paper for the G20* (2017).

C. THE PREVENTING CORRUPTION WITHIN WILDLIFE AUTHORITIES PROJECT⁶³

UNODC identified the need to implement projects that address corruption prevention within state agencies; specifically in this context, within wildlife authorities.

In 2015, Kenya, and much of Eastern Africa, was experiencing a wildlife-poaching crisis, with numbers in flagship species decreasing by the day. In the media, corruption in the wildlife sector was indicated as the main enabler of wildlife crime, with wildlife authorities being accused of being corrupt, and of facilitating the illegal wildlife trade. Furthermore, civil society and the public at large identified corruption as a key factor enabling wildlife crime and illegal trade. In response to a request from the Government of Kenya, UNODC began working with the Kenya Wildlife Service (KWS) to strengthen its internal mechanisms and systems to better prevent future occurrences of corruption from taking place.

The KWS pilot project used a risk mitigation approach, recognizing that corruption occurs in many shapes and forms, and that there is not one specific way in which it manifests itself. It does, however, always involve people and systems.

The Preventing Corruption Within Wildlife Authorities project process

The *Preventing Corruption Within Wildlife Authorities* project uses a three-step approach, as outlined in this Guide, first bringing together a working group of senior managers to identify and prioritize areas vulnerable to risk.

The working group then develops risk mitigation strategies, which are detailed and systematized with the view of addressing the root cause of each risk area.

Finally, a corruption prevention committee (CPC) is established within the institution to ensure ownership and implementation of the risk mitigation strategies developed. Often CPCs are composed of the senior managers from various divisions who developed the risk mitigation strategies.

The Kenya Wildlife Service's Corruption Prevention Committee

Although KWS has had an established corruption prevention committee since 2015, its scope of operation and reach was enhanced through this project. At the time, most staff were not aware of the existence of the CPC, nor knew what its roles and responsibilities were. Through support to this project, the KWS CPC was empowered to implement the mitigation strategies it developed, and its capacity was enhanced in order to ensure sustainable and permanent institutional capacity is retained throughout KWS.

Preventive measures implemented

Developing policy frameworks has been a priority since the CPC became active, resulting in a KWS Code of Conduct and Corruption Prevention Policy being produced and disseminated. The Armed Wing's Service Standing Orders and Disciplinary Code, which governs an officer's roles, responsibilities, behaviour and demeanour, were outdated and had been identified as a major risk as they were no longer in line with the 2010 Constitution and other laws of Kenya. As a result, both codes were updated and are intended for timely publication.

The CPC identified procurement and supply chain management as being areas with a high risk of corruption. UNODC embedded an expert in the procurement and supply chain management department of KWS to analyse the systems in place in order to make recommendations for modernizing them.

As the CPC progressively became empowered in its institutional role, it began to be recognized as an important committee to be included in various forums. To date, the CPC has been invited to appoint its members to

⁶³ Source: Report from Lauren Friedmen, UNODC.

several ad hoc committees of KWS, including the Human Capital recruitment and shortlisting committee and also to be part of the procurement committee, bringing transparency to these closed committee processes.

CPC members have developed their individual capacity through training, including the Government of Kenya's Ethics and Anti-Corruption Commission's Integrity Assurance Officer training, as well as train-the-trainers programmes to ensure in-house transfers of knowledge, including to regional CPCs officers, on the risk mitigation process. This will ensure that knowledge is transferred to KWS officers allowing greater institutional strengthening to take place, reinforcing the ability of KWS to meet its mandate.

The above describes only a small portion of the work undertaken by the CPC during its inception stage. Implementation plans include:

- CPC members training regional CPCs on the risk mitigation approach, with the aim of conducting regional risk assessments
- Delivery of regional sensitization workshops on the developed Corruption Prevention Policy and Code of Conduct
- Assistance with complaints management mechanisms
- Mentoring the procurement unit on active procurements
- Implementing records and knowledge management systems
- Introducing policies and procedures on aquatic and marine resource management
- A review of Parks and Land Management Policy and procedures

Expansion of the project

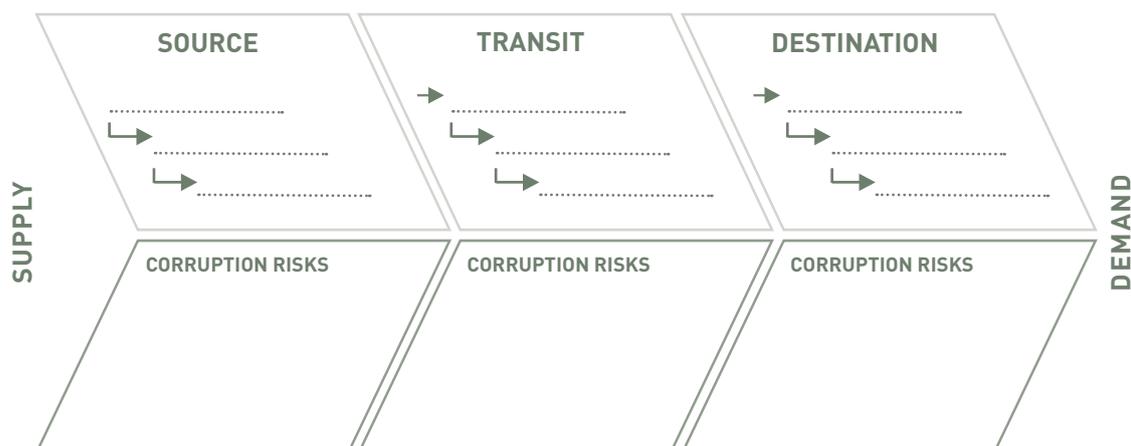
Experiencing positive results working with the KWS CPC, UNODC expanded the project in 2017 to the Ngorongoro Conservation Area Authority (NCAA) of the United Republic of Tanzania, the Botswana Department of Wildlife and National Parks (DWNP), and in 2018, the Uganda Wildlife Authority (UWA). Through the expansion, common risks to all wildlife authorities came to light, but with differing risk mitigation approaches as outlined by the respective CPCs.

D. TOOLKIT

Template 1. Causes of corrupt behaviour both internal and external to wildlife management authorities

CAUSES OF CORRUPT BEHAVIOUR	
INTERNAL	EXTERNAL

Template 2. A generic value chain for the illegal wildlife trade



Template 3. Organizational functions of a wildlife management authority

FUNCTIONS DIRECTLY RELATED TO THE AUTHORITY'S MANDATE	FUNCTIONS INDIRECTLY RELATED TO THE AUTHORITY'S MANDATE

Template 4. Key aspects of organizational functions

ORGANIZATIONAL FUNCTIONS	PEOPLE	PROCESSES

Template 5. External stakeholders of a wildlife management authority

GOVERNMENT	NON-GOVERNMENT

Template 6. Low and high vulnerability roles within wildlife management authorities

HIGH VULNERABILITY	LOW VULNERABILITY

Template 7. Criteria for defining likelihood of corruption risk

LIKELIHOOD CRITERIA		
UNLIKELY	LIKELY	HIGHLY LIKELY

Template 8. Corruption risk assessment documentation table

CORRUPTION RISK ASSESSMENT				
IDENTIFICATION	RISK ID NUMBER	1	2	
		IDENTIFIED CORRUPTION RISK (scenarios)		
		DOCUMENTATION TO SUPPORT EXISTENCE OR SUSPICION OF RISK		
ANALYSIS		ORGANIZATIONAL FUNCTION		
		SOURCE OF RISK (i.e. process or people)		
		VULNERABLE STAFF ROLES		
		RELATED STAKEHOLDERS		
		MAIN CAUSES OF CORRUPTION RISK		
EVALUATION		RISK CATEGORIES		
		RISK LIKELIHOOD RATING AND JUSTIFICATION		
		RISK IMPACT RATING AND JUSTIFICATION		
		RISK PRIORITIZATION GRADING		

Template 9. List style documentation of potential risk treatments

RISK ID	1	2
CORRUPTION RISK		
CAUSE OF CORRUPTION RISK		
POTENTIAL RISK TREATMENTS		

Template 10. Risk treatment feasibility assessment

RISK ID	1	2
RISK		
RISK CAUSE		
RISK TREATMENT		
COST		
RESOURCES AVAILABLE		
OTHER OPPORTUNITIES (Complementing resources)		
ADDITIONAL BENEFITS		

Template 11. Corruption risk treatment plan

CORRUPTION RISK			
RISK TREATMENT	SPECIFIC ACTIONS	RESPONSIBILITY	TIMELINE

Template 12. Interactions between a wildlife management authority and the criminal justice system

	INTERACTIONS BETWEEN WILDLIFE MANAGEMENT AUTHORITIES AND THE CRIMINAL JUSTICE SYSTEM			
	CUSTOMS	POLICE	PROSECUTION	JUDICIARY
WHO				
WHEN				
WHY				
HOW				

Template 13. Corruption case progress monitoring

INDICATOR	INSTRUCTIONS	REFERRED CASE
ID NUMBER OF CASE	<i>Record internal and external case ID numbers. Be aware that there may be more than one case ID.</i>	
NAME OF ACCUSED	<i>Record names (including name variants) of all accused.</i>	
SUMMARY OF CASE	<i>This should include the allegation and the potential charges.</i>	
COURT APPEARANCES	<i>List all dates of appearance with the purpose of the court appearance and the reason given for any delay.</i>	
IS THE CASE CLOSED WITHOUT REACHING FINAL ADJUDICATION?	<i>Record the reasons for this.</i>	
WHAT IS THE SENTENCE?	<i>List all sanctions issued by the court.</i>	



Artwork provided Natalie Creed, an artist and designer whose art is influenced by the world's cultures and natural wonders.





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