

Federal Ministry of the Interior

Federal Government Directive Concerning the Prevention of Corruption in the Federal Administration

of 30 July 2004

The following Directive is enacted pursuant to Article 86, first sentence, of the Basic Law:

1 Scope

1.1 The Directive applies to the measures taken by all federal agencies for the prevention of corruption; the supreme federal authorities, the authorities of the direct and indirect federal administration, the federal courts and federal special funds are all considered to be federal agencies. The Directive also applies to the armed forces; the Federal Ministry of Defence is responsible for settling the details.

1.2 This Directive also applies correspondingly to legal entities under public or civil law which are wholly owned by the Federal Republic of Germany.

1.3 Any special features related to the organization or tasks of individual agencies shall be taken into account.

2 Identifying and analysing areas of activity especially vulnerable to corruption

In all federal agencies, measures to identify areas of activity which are especially vulnerable to corruption shall be carried out at regular intervals and as warranted by circumstances.

The use of risk analyses shall be considered for this purpose. The results of the risk analysis shall be used to determine any changes in organization, procedures or personnel assignments.

3 Transparency and the principle of greater scrutiny

3.1 The principle of greater scrutiny (ensuring that a number of staff members or organizational units take part in or are responsible for checking operations) shall be observed particularly in areas of activity which are especially vulnerable to corruption. If this is not possible due to legal provisions or insurmountable practical difficulties, then random checks or other measures for preventing corruption (e.g. more intensive administrative and task-related supervision) may be used instead.

3.2 Transparency of decisions and the decision-making process shall be guaranteed (e.g. via the clear delegation of responsibility, mechanisms for reporting, IT-supported oversight of operations, precise and complete documentation of proceedings).

4 Personnel

4.1 Staff members for areas of activity especially vulnerable to corruption shall be selected with particular care.

4.2 The length of staff assignments in areas especially vulnerable to corruption shall in principle be limited; as a rule, it should not exceed a period of five years. If an assignment must be extended beyond this period, the reasons shall be recorded for the file.

5 Contact person for corruption prevention

5.1 A contact person for corruption prevention shall be appointed based on the tasks and size of the agency. One contact person may be responsible for more than one agency. Contact persons may be charged with the following tasks:

- a) serving as a contact person for agency staff and management, if necessary without having to go through official channels, along with private persons;
- b) advising agency management;
- c) keeping staff members informed (e.g. by means of regularly scheduled seminars and presentations);
- d) assisting with training;
- e) monitoring and assessing any indications of corruption;
- f) helping keep the public informed about penalties under public service law and criminal law (preventive effect) while respecting the privacy rights of those concerned.

5.2 If the contact person becomes aware of facts leading to reasonable suspicion that a corruption offence has been committed, he or she shall inform the agency management and make recommendations on conducting an internal investigation, on taking measures to prevent concealment and on informing the law enforcement authorities. The agency management shall take the necessary steps to deal with the matter.

5.3 Contact persons shall not be delegated any authority to carry out disciplinary measures; they shall not lead investigations in disciplinary proceedings for corruption cases.

5.4 Agencies shall provide contact persons promptly and comprehensively with the information needed to perform their duties, particularly with regard to incidents of suspected corruption.

5.5 In carrying out their duties of corruption prevention, contact persons shall be independent of instructions. They shall have the right to report directly to the head of the agency and may not be subject to discrimination as a result of performing their duties.

5.6 Even after completing their term of office, contact persons shall not disclose any information they have gained about staff members' personal circumstances; they may however provide such information to agency management or personnel management if they have a reasonable suspicion that a corruption offence has been committed. Personal data shall be treated in accordance with the principles of personnel records management.

6 Organizational unit for corruption prevention

If the results of risk analyses or other circumstances warrant, a special temporary or permanent organizational unit shall be set up to oversee all corruption prevention measures taken in a particular agency; such units shall be independent of instructions and have the right to report directly to the head of the agency. This task may also be performed by the internal auditing department. This organizational unit shall directly inform the head of the agency and the contact person for corruption prevention in case of shortcomings in corruption prevention and shall recommend appropriate changes.

7 Staff awareness and education

7.1 When taking the oath of office or agreeing to abide by the requirements of their position, staff members shall be informed of the risk of corruption and the consequences of corrupt behaviour. When a staff member has been informed, a record shall be kept of this fact. In view of the risk of corruption, staff attention shall continue to be directed to this issue. In addition, all staff members should be given an anti-corruption code of conduct (see Annex 1), informing them of what to watch out for in situations or areas of activity which are especially vulnerable to corruption.

7.2 Staff members working in or transferred to areas especially vulnerable to corruption should be given additional, job-specific instruction at regular intervals.

8 Basic and advanced training

Facilities providing basic and advanced training shall include corruption prevention in their programmes. In doing so, they shall take into account above all the training needs of supervisory staff, contact persons for corruption prevention, staff in areas especially

vulnerable to corruption, and staff in the organizational units referred to in No. 6.

9 Conscientious administrative and task-related supervision

9.1 Supervisors shall perform their duties of administrative and task-related supervision in a conscientious manner ("Guidelines for supervisors and heads of public authorities/agencies", Annex 2). This includes taking anticipatory measures for personnel management and evaluation.

9.2 Supervisors shall pay attention to any signs of corruption. They shall alert their staff to the risk of corruption regularly and as circumstances require.

10 Notification and action in case of suspected corruption

10.1 Where there is reasonable suspicion that a corruption offence has been committed, the head of the agency shall inform the public prosecutor's office and the highest service authority without delay; furthermore, an internal investigation and measures to prevent concealment shall be initiated.

10.2 The supreme federal authorities shall report annually to the Federal Ministry of the Interior – also on behalf of their subordinate agencies – on the cases of suspected corruption in which proceedings were initiated and the results of proceedings concluded during the reported year; this information is to be submitted in the required anonymous form, organized according to area, circumstances of the case, and measures taken.

11 Guidelines for awarding contracts

11.1 Competition

The principle of public invitation to tender and of open procedures is especially important for preventing corruption.

The awarding of public contracts shall be regularly monitored as part of administrative and task-related supervision to identify any prohibited influencing factors.

11.2 Fundamental separation of planning, award and accounting

According to budget and contract award regulations, when public contracts are awarded, the planning and description of requirements shall in principle be kept separate in organizational terms from both the implementation of the award process and, as far as possible, from the subsequent accounting.

11.3 Exclusion from competition

The agencies shall determine whether bidders or applicants have engaged in serious misconduct which

may compromise their reliability and result in their being ineligible to compete.

In particular, bidders or applicants are considered to have engaged in serious misconduct when they offer, promise or provide an advantage to a staff member involved in preparing or carrying out an award process, or to a third party.

12 Anti-corruption clause, obligation of contractors under the Obligations Act

12.1 When public contracts are awarded, anti-corruption clauses shall be included as appropriate.

12.2 If private businesses are involved in carrying out publicly funded projects, the individual employees of these businesses shall – as needed – agree in accordance with the Obligations Act to fulfil their obligations arising from the contract. A notice to this effect shall be included in the relevant calls for tender (including the requirement for a statement of willingness). The affected persons shall be given a copy of the Anti-Corruption Code of Conduct (see Annex 1) and a copy of the applicable regulations on accepting rewards and gifts.

13 Donations to public activities and facilities; sponsoring

Private contributions of money, material items or services made to one or more federal agencies are regulated by the general administrative regulation to promote activities by the Federal Government through contributions from the private sector (sponsoring, donations and other gifts) of 7 July 2003 (Federal Gazette p. 14906).

14 Recipients of contributions

14.1 Recipients of federal contributions in the context of institutional support shall agree, by means of special stipulations in the award notification, to apply this Directive correspondingly if the recipient is obligated by budgetary law to adhere to public procurement legislation (if the award or total amount (in case of financing from multiple sources) exceeds €100,000). An agreement to apply the Directive correspondingly shall be included in contribution contracts.

14.2 Principles on the prevention of corruption shall be contractually agreed on with foreign institutional recipients of contributions.

15 Special measures

Agencies may take additional measures as necessary.

16 Entry into force

This Directive shall enter into force on the day after its publication in the Federal Gazette, and the Directive of 17 June 1998 (Federal Gazette No. 127, p. 9665) shall cease to be in force at the same time.¹

Berlin, 30 July 2004
O 4 – 634 140-15/1

The Federal Minister of the Interior
Schily

¹ The Directive was promulgated in the Federal Gazette on 10 August 2004.

Annex 1

Anti-Corruption Code of Conduct

This Anti-Corruption Code of Conduct is intended to inform staff of situations in which they might inadvertently become involved in corruption. It is also aimed at urging staff to fulfil their duties properly and lawfully and at alerting them to the consequences of corrupt behaviour:



For this reason:

1. **Set an example: Show, through your behaviour, that you neither tolerate nor support corruption.**
2. **Immediately refuse any attempt to involve you in corrupt activities and inform the contact person for the prevention of corruption and your supervisor without delay.**
3. **If you suspect that somebody wishes to ask you for preferential treatment contrary to your duty, consult a colleague as a witness.**
4. **Do your work in such a manner that it can pass review at any time.**
5. **Separate your job strictly from your private life. Check to see whether your private interests might conflict with your work duties.**
6. **Help your workplace in detecting and clearing up corruption. Inform your supervisor and the contact person for corruption prevention in case of specific indications of corrupt behaviour.**

7. **Support your workplace in detecting defective organizational structures that favour corruption.**
8. **Take part in basic and advanced training on preventing corruption.**
9. **And what should you do if you have already been caught up in corruption?
Free yourself from the constant fear of being found out! Get it off your chest!
If you confess on your own initiative, and your information helps clear up the facts, it may reduce the severity of punishment and consequences under public service law.**

Ad 1:

Corruption in the federal administration can be prevented better if everyone makes it his or her goal to fight corruption. This is also in line with the duties which every staff member accepts at the time of hiring.

Upon hiring, each employee agrees to abide by the Constitution of the Federal Republic of Germany and its laws and to fulfil his or her tasks conscientiously. Employees must conduct themselves as befits a public employee and must act in a way that demonstrates their support for the free and democratic fundamental order within the meaning of the Basic Law. Therefore, all employees are to perform their functions in an impartial and fair manner.

Corrupt behaviour conflicts with such duties and harms the reputation of the public service. It destroys trust in the impartiality and objectivity of the public administration and hence the basis for living together as a community.

For this reason, every employee has the task of acting in a way that sets an example for co-workers, supervisors and the public.

Ad 2:

In dealing with persons outside your agency, e.g. with bidders, contractors or in the course of regulatory activities, you must put things on the right footing from the outset and immediately avert any attempt at corruption. You must never give the impression that you would be receptive to 'small gifts'. Do not be afraid to reject or return a gift, asking the giver to understand that rules prevent you from accepting.

If you work in an administrative area involved in awarding public contracts, you have to be particularly sensitive to attempts of third parties to influence your decisions. This area is where most corrupt activities take place.

For this reason, strictly abide by the law and regulations and follow the Directives prohibiting acceptance of rewards or gifts.

If a third party asks you for a questionable favour, immediately inform your supervisor and the contact person for corruption prevention. First, this helps to avoid any suspicion of being corrupt; second, it may, under certain circumstances, also help to take legal action against the third party. If you reject such attempts but do not tell your supervisor or the contact person for corruption prevention, the same party will go to one of your co-workers and try to corrupt him or her. For this reason, also protect your co-workers by conscientiously disclosing third parties' attempts at corruption.

All staff members (supervisors and staff) have to work together so as to present a united and credible front.

Ad 3:

Sometimes you may have to meet with persons you think may try to involve you in a questionable activity which will not be easy for you to turn down. In these cases, it is often not enough to distance yourself clearly from such attempts. You should not try to deal with the situation on your own but ask a co-worker to join you. Talk over the situation ahead of time and ask your co-worker to act in such a way as to avert any attempt at corruption.

Ad 4:

Your working methods should be transparent and comprehensible to all.

As you are likely to leave your position at some point (promotion, transfer) or to be away for short periods (illness, holidays), your working methods should be transparent enough to enable a successor or substitute to familiarize him- or herself with your duties at any time. Transparency in your record-keeping also helps you protect yourself, in the course of reviews or inspections, against implicit or explicit accusations of dishonesty. You should never keep 'secondary files' so as to avoid even the slightest appearance of dishonesty. Hand files should be kept only if this is absolutely necessary for your work.

Ad 5:

Corruption attempts often start when a third party goes beyond official contacts to private ones. As you know, it is particularly difficult to deny granting a 'favour' when you are on excellent private terms with somebody and when you or your family receive advantages and benefits (concert tickets, discounts on holidays, invitations to expensive meals which you cannot reciprocate). You should make clear to your private contacts from the outset that you are obliged to keep your job strictly separate from your private life so as not to be suspected of accepting advantages.

You must observe such strict separation between your private interests and your official duties in any case – irrespective of any risk of corruption – in all your official activities. Your agency and every citizen are entitled to your fair, appropriate, impartial

behaviour. For this reason, check every procedure for which you are also responsible to see whether your private interests or those of your relatives or of organizations to which you feel obliged could lead to a conflict with your professional obligations. Avoid any appearance of possible partiality. Make sure you do not give any appearance of being biased, not even through a general climate of influence exerted by an interested party.

If you recognize, given a specific official task, that your obligations and your private interests or the interests of third parties to whom you feel obliged might come into conflict, inform your supervisor so that he or she may respond appropriately (e.g. by releasing you from activities in a specific instance).

You must also clearly separate secondary activities you pursue or intend to pursue from your proper work. Personal relations arising from secondary activities must not influence your main professional activities. If in doubt, give up the secondary activity. Also bear in mind that you might face sanctions under public service law or labour law if you pursue a secondary activity that is subject to authorization but has not been authorized; the same applies to failures to give notice of a secondary activity.

Irrespective of this, sooner or later your reputation - and hence the reputation of the entire public service - will be damaged if you have given priority to your private interests in case of conflict. This applies all the more if you hold a position of influence. In this case, take special care that you claim only those conditions that are laid down in abstract terms for similar circumstances.

Ad 6:

Corruption can be prevented and combated only if everyone takes responsibility and all pursue the aim of a corruption-free workplace. This means that everyone must seek to ensure that third parties have no possibility of dishonestly influencing the decision-making process.

It also means that one should not cover for corrupt co-workers out of a mistaken sense of solidarity or loyalty. Everyone is obliged to assist with the investigation of criminal activities and to prevent his or her workplace from damage. One 'black sheep' hurts the entire flock. For this reason, do not participate in attempted cover-ups.

Every workplace has a contact person for the prevention of corruption. You should not be afraid of talking to this person if co-workers' behaviour gives specific and reasonable indications that they might accept bribes. The contact person will respect your desire for confidentiality and then decide if and what measures should be taken. It is however absolutely essential that you express a suspicion only if you have reasonable grounds. Co-workers' names may not be blackened without specific evidence.

Ad 7:

Often, procedures that have been followed for a long time result in 'islands' which are especially conducive to corruption. These can be procedures in which one staff member is solely responsible for granting privileges. Or they might be vague work processes which hinder or even prevent review.

In most cases, changing organizational structures can remedy the situation. That is why all staff members should provide those responsible for organization with relevant information in order to contribute to clear and transparent work processes.

Within operational units, too, work processes must be transparent enough to stop corruption before it starts.

Another effective means to deal with the danger of corruption is staff rotation. This personnel management tool should be extensively used in areas especially vulnerable to corruption. Doing so requires that staff are willing to take on different functions at regular intervals – as a rule, the period of assignment should not exceed five years - even if this usually results in more work (time needed to familiarize oneself with new tasks).

Ad 8:

If you work in an area especially vulnerable to corruption, take advantage of basic and advanced training offered by your workplace on forms of corruption, risk situations, preventive measures, and consequences of corruption under criminal, public service and labour law. You will then learn how to prevent corruption yourself and how to respond to attempts to corrupt you or when you discover corruption in your work environment. With such training, you can be sure you will be able to deal with corruption in the correct and lawful manner.

Annex 2

Guidelines for supervisors and heads of public authorities/agencies

I.

As supervisors and heads of public authorities or agencies, you are both responsible for and serve as an example to those working under your supervision.

Your conduct and attentiveness are extremely important in preventing corruption.

For this reason, you should be pro-active in your personnel management and evaluation. In particular, you should ensure that responsibilities are clearly designated, that job descriptions are transparent, and that staff performance is assessed with appropriate frequency.

Examples of weaknesses that may lead to corruption include:

1. inadequate administrative and task-related supervision;
2. blind trust in senior staff or those with specialized functions;
3. character weaknesses of staff in sensitive areas;
4. negative example set by supervisors who accept gifts;
5. lack of consequences after manipulation has been revealed, therefore no deterrent effect.

You can counteract such weaknesses with the following measures:

1. Staff awareness and education

Referring to the Anti-Corruption Code of Conduct, talk to your staff regularly about their obligations arising from the ban on accepting rewards and gifts and from regulations aimed at avoiding conflicts of interest.

2. Organizational measures (depending on your authority)

Make sure that any room for discretion in decision-making is clearly defined and limited as appropriate.

Discuss with your staff the structures for delegating authority, the limits of discretionary powers and the need for co-signatures.

In areas of activity that are especially vulnerable to corruption, make sure that operations are processed flexibly under numeric or alphabetical systems by

- a) critically reviewing the processing carried out according to these systems,
- b) assigning tasks randomly, or by

- c) repeatedly changing the numeric or alphabetic ranges for which individual staff members are responsible.

If possible, implement the principle of greater scrutiny in your sphere of responsibility as well. It might be advisable to set up working teams or groups. Check whether staff members need to be accompanied by a second staff member to local appointments; whether on-site checks, etc. are advisable; and whether a 'transparent' office should be set up for visitors so that outside contacts always take place under the principle of greater scrutiny. If this is not feasible owing to actual circumstances, organize controls at frequent intervals.

Make consistent use of staff management tools, in particular for activities involving technical knowledge that can be obtained quickly:

1. rotation, as a rule after a period of five years in areas especially vulnerable to corruption;
2. If in exceptional cases staff are not subject to rotation, e.g. those in positions requiring knowledge acquired over many years, the reasons for the exception must be stated in writing and supervisory staff should thoroughly review the area of activity.

If it is not unusual in your workplace for two staff members to share an office, take advantage of this practice to prevent corruption in high-risk areas e.g. by occasionally changing office assignments (even without changing staff members' assigned tasks).

3. Responsibility for others

In areas of activity which are especially vulnerable to corruption, prevention also requires extra effort in looking after your staff.

- a) Always be aware of the increased risk to individuals.
- b) Keeping communication lines open is also a way of looking after staff.
- c) Be aware of any work-related and/or private problems staff members may be facing.
- d) If you become aware that a staff member faces conflicts of interest due to his or her secondary activities or activities of a family member, provide a remedy, e.g. by releasing the staff member from certain tasks.
- e) Special vigilance is required if demands on an individual are obviously too high or too low.
- f) You must also pay special attention if you become aware of staff members' personal weaknesses (e.g. problems with addiction, an inclination to expensive hobbies which are hard to pay for) or excessive debt; staff whose personal finances are in disorder should not be in positions where they are responsible for procurement activities or

where they are particularly vulnerable to dishonest influence by third parties.

- g) Finally, if any staff member is openly dissatisfied with his or her employer, you must be particularly vigilant and take steps to deal with such dissatisfaction.

4. Supervision and leadership style

You should be aware that in case of corruption, there is no victim in the usual sense to make a complaint; therefore, preventing corruption essentially depends on your own awareness and that of your staff. It also requires your administrative and task-related supervision – your core duty as supervisor in any case. A mistaken notion of a co-operative management style or a ‘laissez-faire attitude’ can be disastrous in especially vulnerable areas. For this reason, you should try to

- a) optimize the monitoring of transactions and operations by incorporating control mechanisms (re-submission of files and records, etc.) in management procedures;
- b) prevent individual staff members from isolating themselves from co-workers and becoming too independent;
- c) keep a sharp lookout for signs of corruption;
- d) make random checks to see whether discretionary powers have been used according to the rules;
- e) assess the acceptance of administrative activities by discussions with your ‘clients’.

Take advantage of advanced training offered on preventing corruption.

II.

1. Signs of corruption, warning signals

Nevertheless, corruption cannot be ruled out.

According to a survey of experts conducted by the Federal Criminal Police Office,² corrupt activity is often associated with certain typical behaviours. However, these indicators are not 100% reliable, because some may be regarded as neutral or even positive although, in hindsight, they have turned out to be right.

None of these indicators is ‘proof’ of corruption. If however, due to comments or observations, a behaviour seems conspicuous, you should check to see whether this indicator, together with the surrounding circumstances, points to a danger of corruption.

1.1 Neutral signs

- a) Conspicuous and unexplainably high standard of living; lavish lifestyle, display of status symbols;
- b) Conspicuous private contacts between the employee and third parties (e.g. invitations, secondary activities, consulting contracts; capital investments);
- c) Unexplainable resistance to a change of tasks or transfer, especially if connected with an actual or prospective promotion or salary increase;
- d) Secondary activities without the necessary authorization or notice;
- e) Unusual, unexplainable behaviour (e.g. due to blackmail or a bad conscience); increasing reticence; sudden changes in behaviour towards co-workers and supervisors;
- f) Decreasing identification with the workplace or tasks;
- g) Social problems (alcohol or drug addiction or compulsive gambling, etc.);
- h) Craving for recognition, boasting about private or work-related contacts;
- i) Acceptance of advantages from third parties (special conditions for purchases, free restaurant meals, invitations to private or business events of ‘clients’);
- j) Great generosity on the part of businesses (e.g. sponsoring).

1.2 Warning signs

Apart from these rather neutral indicators, there are – according to the Federal Criminal Police Office – others which are characteristic of administrative corruption and must therefore be regarded as ‘warning signs’.

Indicators in the workplace:

- a) Circumventing or ‘overlooking’ regulations; a growing number of ‘minor irregularities’; discrepancies between actual transactions and operations and their subsequent documentation;
- b) Lack of identification with the workplace or tasks;
- c) Unusual decisions without a comprehensible rationale;
- d) Different assessments and decisions on transactions and operations with similar content but different applicants; abuse of discretionary powers;
- e) Granting of authorizations (e.g. with exemption from stipulations) while circumventing other responsible agencies;
- f) Intentionally circumventing controls; isolating areas responsible for certain tasks;
- g) Carrying out operations in secret;
- h) Conspicuously brief processing times for certain approvals;
- i) Preference for certain applicants or bidders;
- j) Trivializing the principle of thrift;

²Federal Criminal Police Office (BKA), *Korruption - hinnehmen oder handeln?* (Corruption: Tolerate it or take action?), Wiesbaden 1995, pp. 151-160.

- k) Attempts to influence decisions in areas beyond one's own responsibility and for which the interests of third parties are important;
- l) Tacit acceptance of misconduct, in particular unlawful behaviour;
- m) Inadequate or nonexistent control of operations where particularly needed; weak administrative and task-related supervision;
- n) Lack of response to suspicious circumstances or events;
- o) Too many tasks concentrated on one person.

Indicators related to outside contacts:

- a) Conspicuously deferential treatment of applicants or bidders;
- b) Preference for limited tender procedures or invitations for tenders with discretionary award of contract; also splitting contracts so as to enable discretionary awards of contract; avoiding asking for additional bids for purposes of comparison;
- c) Substantial or repeated exceeding of contract amounts;
- d) Procurement not at usual market prices; unreasonable acquisitions; conclusion of long-term contracts without transparent competition on conditions unfavourable for the agency;
- e) Conspicuously frequent 'miscalculations'; subsequent corrections to specifications of goods or services;
- f) Incoming mail in award matters without official entry stamp (received via 'personal channels');
- g) Costly additional work;
- h) Secondary activities of employees or activities of their family members for companies which are also contractors or applicants of the public administration;
- i) Overly familiar manner or conspicuous deference when negotiating with companies;
- j) Companies exploiting (supposed) positions of power;
- k) Frequent 'business trips' to certain firms (particularly conspicuous if involving unnecessary overnight stays);
- l) Companies establishing a 'permanent presence' in the workplace (with specific decision-makers or desk officers); certain company representatives visiting only when 'their' staff members are present;
- m) Absence of the usual conflicts with companies and applicants.

According to research by the Federal Criminal Police Office (BKA), the items on this list may be of particular interest if occurring outside the norm ("unexplainable", "not comprehensible", "suddenly changing" "conspicuous"). The BKA highlights as a frequent and obvious warning signal a lavish or unusually high standard of living by employees with 'outside income',

including the display of relevant status symbols. According to the BKA, understatement is less characteristic of these groups of persons.

Experts consulted by the Federal Criminal Police Office say that additional warning signs are allusions by co-workers, rumours from outside and anonymous tips (e.g. by disadvantaged companies that hence find themselves in financial difficulties). According to these experts, these signals become even clearer when they occur in large numbers and in connection with certain persons or fields of activity, although it is absolutely necessary to weigh and analyse information coming from the 'rumour mill' carefully in order to rule out abuse. On the other hand, anonymous indications have often led to investigations which ultimately revealed cases of corruption.

2. Suspicion

In case of specific and well-founded suspicion of corruption, you should immediately inform the contact person for corruption prevention and the personnel department and agency management. Depending on the circumstances, you might also have to take rapid and appropriate measures to prevent a cover-up, such as

- a) withdrawing certain ongoing or completed operations from particular staff members,
- b) prohibiting access to records,
- c) securing the office, work-related files or relevant equipment (e.g. computers and floppy disks).

The extent of measures required can only be based on the circumstances of the individual case.

Remember that corruption is not a 'trivial offence' and that concealment can also harm your reputation.

If you break the rules, you may be guilty of a disciplinary and criminal offence.