

Prevention: An Effective Tool to Reduce Corruption



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Prevention: An Effective Tool to Reduce Corruption */

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Abstract

This paper outlines the basis and set of tools required to advance anti-corruption reform. Economic and social progress, the rule of law under good governance, democratic values, and strong civil society are discussed as some of the basic prerequisites to building the national integrity system to sustain a fight against corruption in various forms and at various levels. The concomitant values, institutions and comprehensive, integrative, inclusive and coordinated approach within this framework are also discussed in this paper.

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I. INTRODUCTION

Anti-corruption action has produced a mountain of words and hardly a molehill of solid results in terms of positive change, or, reform, in institutional behaviour. Failure in this regard has much to do with the complexity, dynamism and pervasiveness of the corruption. Where corruption is choking development, a few with access systematically distort political and economic decisions which might be made (systematically) with conflict of interest at play. Largely unaccountable, small groups seize new opportunities—from banking schemes to drug trafficking—as swiftly as they develop. Development assistance, like reform plans, are more likely to become hostage to corruption than to provide the ‘cure’ for it. Corruption is certainly one of the greatest obstacles to development and demand for good governance is increasing world-wide.

This paper introduces an anti-corruption strategy that includes a governance program. The strategy aims at empowering individuals, communities, and governments by disseminating knowledge. In turn, results in greater government accountability and transparency—central elements in building institutional capacity and improving service delivery. It helps governments work more efficiently and helps the entire society participate in building an enabling environment for equitable and sustainable growth resulting in timely and cost effective services delivered to its public.

The anti-corruption strategy advocated in this paper rests on four pillars: (a) economic development; (b) democratic reform; (c) a strong civil society with access to information and a mandate to oversee the state; and (d) the presence of rule of law. The governance program facilitates, at the request of client Governments, a series of anti-corruption anti/integrity workshops, seminars, and surveys involving broad segments of society, and national and local government. Such instruments have served to empower civil society and improve service delivery through greater transparency and accountability. Working in partnership with governments and civil society, the program continues to help develop National Integrity Systems in Africa, Europe and Central Asia, and the Middle East and North Africa. These systems facilitate the building of awareness, prevention of corrupt practices, prosecution of corrupt officials, and reward of honest civil servants at all levels of government.

On the basis of these four broad contexts, there are four basic arenas in which action can be taken against corruption within a country:²

First, the basic institution of good governance needs to be strengthened. At the head of this list is the judiciary, which is itself the guardian of laws and integrity. But if the judiciary is itself corrupt, the problem is compounded and the public at large without rule of law.

Second, the capacity and integrity of enforcement need to be enhanced. The best law has no value if it is not enforced. The best judges and magistrates are wasted if cases are never brought to them. Good investigations are wasted effort if the judge or magistrate is corrupt.

Third, a government needs to put in place a solid set of preventive tools. Codes of Conduct and strong independent oversight bodies can help ensure that the acceptable standards of behaviour are respected in both the private and public sector. Political leaders in all branches of government, legislative and judiciary can be required to have transparency in their own financial dealings through asset disclosure for themselves and their family members.

¹ Statement of Mr. Pino Arlacchi at the Opening session of ISPAC Conference on “Responding to the Challenge of Corruption”, Milano November 19, 1999.

Fourth, the public needs to be educated on the advantages of good governance and participate in promoting it. The public itself bears a large share of responsibility for insisting on honesty and integrity in government and business. The public needs to learn: (a) not to let anybody buy their vote; (b) not to pay bribes themselves; (c) to report incidents of corruption to the authorities; and (d) to teach their children the right values; e.g. that integrity is good and corruption is bad.³

Broad-based participation is central to sustainable development. Only programs that manage to become locally owned and valued finally flourish. The broader the ownership the better. This is particularly true in many developing societies where for so long so much has been forced from the top for the benefit of a few that trust, or what is being called “social capital,” is negligible. By all logic, therefore, anti-corruption strategies should work to greatly enhance participation in the design, implementation and evaluation of programs to improve accountability. Rather than economists or procurement experts imparting their knowledge via a few high placed government clients or “champions,” the key effort should involve international task managers who develop, train and coach local stakeholders to facilitate the broadening of circles of participation. These participants, then can approach experts to devise technically competent but also locally developed, adapted and owned solutions. Systematic mechanisms to ensure access to information and checks and balances can be developed by the task managers and local owners, to suit the local needs. In such a manner, the participatory process would anchor the technical substance while working to balance the competing interests by opening access.

The wider implications of broad participation are even more promising as a means of prevention—giving teeth to citizenship, generating broader consensus and even producing a workable social contract upon which to base reform and development priorities and programs. This type of empowerment combined with other practical tools constitutes best practice in preventing corruption.

The use of common sense indicators generated by user groups among the citizens of the South and the taxpayers of the North can be utilised to clear the smoke. Through the specification of clear criteria for success publicised by stakeholders on interactive web pages, much can be accomplished to improve transparency. Once the citizens of the North, whose taxes assist those of the South, and the users in the developing world can evaluate the effectiveness of programs and approaches much will change. The debate will be animated but rather than institutional rhetoric, actions whose impact can be independently monitored will do the talking

A. The Meaning of Corruption

Corruption is defined by the World Bank and Transparency International (TI) as “the misuse of public office for private gain.”⁴ As such, it involves the improper and unlawful behaviour of public-service officials, both politicians and civil servants, whose positions create opportunities for the diversion of money and assets from government to themselves and their accomplices.

Corruption distorts resource allocation and government performance. The causes of its development are many and vary from one country to the next. Among the contributing factors are policies, programs and activities that are poorly conceived and managed, failing

Statement of Mr. Pino Arlacchi at the Opening session of ISPAC Conference on “Responding to the Challenge of Corruption”, Milano November 19, 1999.

⁴ The World Bank, *Helping Countries Combat Corruption: The Role of the World Bank, Poverty Reduction and Economic Management Network*, September 1997. See pages 19-20 on definitions of corruption.

institutions, poverty, income disparities, inadequate civil servants' remuneration, and a lack of accountability and transparency. Evidence of corruption becoming "accepted behaviour" can be found in the comments of an elderly lady from Mbale, Uganda during the National Integrity Survey conducted in 1998:

In fact, this is a common, daily and open practice, so that we think government has legalised the payment of bribes in the country.

Public servants, lacking a service mentality, become more interested in serving themselves than serving the public, as pointed out by a Kasese man:

Public servants should realize that they are there to serve the public. That can only be done when government listens and implements community decisions.

At that point a lack of political commitment and resources—institutional, human, and financial—hampers anti-corruption efforts.

For the average person, a bribe is the most obvious evidence of corruption. In many countries, applicants for driver's licenses, building permits, birth certificates, etc. have learned to expect a surcharge from civil servants in order to obtain these documents. However, the consequences of corruption are more pervasive and profound than these bribes suggest. Corruption diverts funds resulting in services of poor quality or that are simply unavailable. A man from Lira expressed this when he stated:

In both central and local government, corruption is the order of the day. Without producing cash, no one can attend to you.

It is a cause of reduced investment and even disinvestment with its many downstream effects including an increase in social polarization.

Combating corruption is instrumental to the broader goal of achieving more effective, fair, and efficient government. When there is inadequate transparency, accountability, and probity in the use of public resources, the state fails to generate credibility and authority. Systemic corruption undermines the credibility of democratic institutions and counteracts good governance. There is a high correlation between corruption and an absence of respect for human rights, and between corruption and undemocratic practices. Corruption alienates citizens from their government.

International aid institutions' decision to help its client countries attack and contain corruption is not because it is immoral, wrong, or even illegal. Rather, decision is based on the negative effect corruption has on economic development, the emergence of an enabling environment for the private sector, and its role in deepening poverty in the developing world; a situation that demands a response from the international community. There is considerable evidence that a strong negative relationship exists between the extent of corruption and economic performance.⁵ Pervasive corruption reduces the efficiency of government in general and in particular reduces the effectiveness of private investment and foreign aid.

The negative impacts of corruption have served as the impetus for international aid institutions to demand the establishment of good governance measures in recipient developing countries. These measures attempt to improve integrity, transparency, and accountability in government and private administrative transactions, to achieve sustainable growth and improved service delivery to the public⁶. Transparency, combined with the empowerment of the civil society, helps governments ensure the efficient use of resources and manage a change process that results in increased accountability and improved service delivery, two elements that assist in the creation of an enabling environment for private-sector development and economic growth.

⁵ See Mauro, 1995, 1997; Ades and di Tella, 1996; and the World Bank, 1997.

⁶ The improved service delivery should be monitored measuring the quality, timeliness, coverage and cost of service delivery.

There are several types of corruption. The distinctions can be useful in designing and developing reform programs and strategies:

- *Petty corruption*—practiced by public servants who may be basically decent and honest individuals but who are grossly underpaid and depend on small bribes from the public to feed and educate their families;⁷
- *Grand corruption*—high-level public officials and politicians make decisions involving large public contracts or projects financed by external donors. This corruption is motivated by personal greed. The money or assets from such corruption usually is transferred to individuals or political party coffers.
- *Episodic corruption*—honest behaviour is the norm, corruption the exception, and the dishonest public servant is disciplined when detected; and
- *Systemic corruption*—channels of malfeasance extend upwards from the bribe collection points, and systems depend on corruption for their survival;

Corruption can also be categorized in other ways. A distinction can be made between benefits that are paid willingly (bribery) and payments that are exacted from unwilling clients (extortion). Another way to categorize is to differentiate between bribes paid for what a client has a legal right to receive and bribes paid to receive benefits belonging to others.

B. Containing Corruption: Who is Responsible?

Ultimately, all parts of society must share the responsibility for containing corruption because all are willing or unwilling participants. Each corrupt transaction requires a “buyer” and a “seller.” The government is responsible for dealing with civil servants who engage in extortion and bribery but it is businesses and individuals who offer bribes to civil servants to obtain certain advantages.

In most countries, the demand for reform is being led by organisations of civil society and the international donor community. An active, involved and empowered citizenry is indeed essential to any anti-corruption campaign. Reformers can only achieve real gains when a society changes its expectations and understanding of its entitlement to a government that is not corrupt. For their part, government leaders—politicians and bureaucrats—must provide the political will to address all forms of corruption. Governments need to introduce appropriate legislation to reduce corruption and provide whatever means are necessary to ensure that appropriate steps are taken to build systems of integrity and rule of law.

While all those who are part of the problem must be part of the solution, it would be unrealistic and cost-prohibitive to attempt to eliminate corruption completely. Such a strategy would be likely to create new inefficiencies in government. Draconian anti-corruption programs, moreover, can have a negative effect on personal freedoms and fundamental human rights if regulations translate into excuses for public officials to become increasingly abusive toward the citizenry. Additionally, bureaucratic discretion is necessary for effective administration. The aim, therefore, is not to achieve complete rectitude but rather a fundamental increase in the honesty, efficiency, and fairness of government.

The responsibility of containing corruption must not ignore the participation of international firms, foreign governments and others engaged in corrupt practices either actively or passively. A number of instruments are available to curb cross-border corruption. The new “no bribery pledge” initiated by OECD is one. Among stronger measures are the

⁷ This activity could also be called distortion as most of the time the bribe is demanded by the service provider rather than offered by the public. In a recent survey (Aug 1998) of 18412 households in Uganda, 63% of the public reported to have paid bribes to the police, 55% to the judiciary and 39% to local administration

criminalization of bribery, including the prosecution of companies and governments in the North, and tax deductibility of bribes paid by Northern companies in the South.

C. Is There a Global Typology?

Corruption does have some common characteristics. For instance, it occurs in all countries regardless of the level of social and economic development. For corruption—extortion or bribery—to take place, there must be a public official with discretionary power followed by a misuse of that power. In the case of bribery, there is also collusion between the dishonest official and one or more public or private officials, and a benefit, in money or in kind, to all parties involved. Corruption most likely will occur in the interaction between the public and private sectors. And it is generally practiced by public officials who have direct responsibility to deliver services to the public, apply or enforce specific regulations, or levy fees or taxes. Despite these common characteristics, corruption takes on very different features from one place to another. Corruption flourishes in different places in different forms including: land rezoning, customs duties, income tax collection, non-merit based appointments, promotions, and many more. The actors amenable to leading or supporting reform also vary significantly from country to country. Still, it is unlikely that a detailed attempt to achieve a global or even regional typology would serve a useful purpose because of the number of variables involved. Corruption has a freer rein in some countries than in others. For example, in some countries, the failure to pay a living wage lies, at least in part, at the root of the problem. In other countries, public servants still engage in corrupt behaviour despite adequate pay. Some developing countries enjoy the rule of law and benefit from an independent judiciary that conscientiously reviews the legality of official actions; elsewhere the judiciary is suborned, acquiescent, or neutralized. Some governments have incentives that encourage law enforcement officers to be willing partners in anti-corruption activities. Others have politicians who create legislation that seems designed to render corrupters free from prosecution, even if they are caught. In some countries, the private sector and other elements of civil society are well-organised and poised to assume an assertive role; in others, they are weak and unaccustomed to having a ‘voice’ or speak authoritatively to their government. All of these factors dictate the importance of carefully choosing the strategy and entry points for anti-corruption measures.

D. The Donors’ Interest in Tackling Corruption

The topic of anti-corruption has recently generated substantial academic interest as well as support from the highest levels of the World Bank, IMF and the international community in general.

The new approach presented in this paper is founded upon the premise that corruption is a major hindrance to economic development. More and more development experts have come to the conclusion that it is impossible to alleviate poverty without first curbing corruption.⁸ Most donors are concerned “not with the exercise of state powers in the broad sense but specifically with the appropriate management of the public sector and the creation of an enabling environment for the private sector. Some multilateral donors’ mandate dictates that they can only become legitimately involved when corruption is treated as an economic phenomenon and its actions or reactions to corruption must have economic development at their core.

⁸ This is especially the case in countries like Nigeria where 10% of GNP is diverted or Indonesia where the leakage on donor programs is estimated between 25%-30%

More specifically, corruption can be addressed by World Bank and IMF staff as an economic concern within the framework approved by the Board for governance issues. This framework allows for activities in which the Bank and IMF can advise countries on economic policy reform and strengthening institutional capacity. However, the Bretton Wood organisations' mandate do not extend to the political aspects of controlling corruption, and though civil society is crucial to sustaining reform, there are limits on the extent to which the Bank, as a lender to governments, can directly support civil society's efforts.

As an example of a framework for addressing corruption "at home" the World Bank works at four levels:

- Preventing fraud and corruption within Bank-financed projects;
- Helping countries that request support in their efforts to reduce corruption;
- Greater consideration of corruption in country-assistance strategies, country-lending considerations, policy dialogue, analytical work, and in the choice and design of projects; and
- Adding its voice and support to international efforts to reduce corruption.

The ultimate goal of most donor's strategies on corruption is to help countries move from systemic corruption to an environment in which a well-performing government minimizes corruption's negative effects on development. The strategy is based on action coming from three directions: (a) economic policy reform, (b) institutional strengthening and (c) international action. The model assumes that corruption is a function of weak institutions and of policies that create economic rents. The majority of donors believe that tackling corruption is less a matter of new instruments than of reducing corruption through existing ones.

E. Prevention. An Important Tool in Fighting Corruption

The approach presented in this paper is essentially holistic. Corruption is viewed as a systemic issue requiring the donors to work on several fronts and to collaborate with all branches of government and many parts of society. The approach to promote good governance through among other things, prevention, is to help client countries curb corruption and build integrity, and therefore, improve their public services and create an enabling environment for the private sector. The Governance and Anti-Corruption program comprises three principal activity areas: (a) improving public sector service delivery by focusing on public sector accountability and legal reform in order to re-introduce rule of law; (b) building integrity by promoting governmental accountability and transparency; and (c) building an prevention and anti-corruption capacity of the public sector—including parliament, watchdog and enforcement agencies, and the judiciary—and of civil society, particularly by strengthening non-governmental organisations (NGOs) and the media. The program dovetails with other reforms such as:

Public Sector Management program, which focuses on prevention through civil-service reform and public-expenditure planning and management, as well as, on supporting governance activities, research and dissemination of findings.

Legislative reforms to strengthen parliament role in overseeing the executive but also the passing of new anti-corruption legislation

Legal reforms; that strengthen the rule of law

Building "integrity", which means "using public powers for the public good," is the flip side of fighting corruption. Experience gained from work with client countries demonstrates that it is preferable to focus on prevention through the building of integrity, which suggests a positive, pro-active preventive approach. It is often easier to get various stakeholder groups to

support preventive measures through the creation of a system of national integrity rather than specific measures designed to fight corruption.

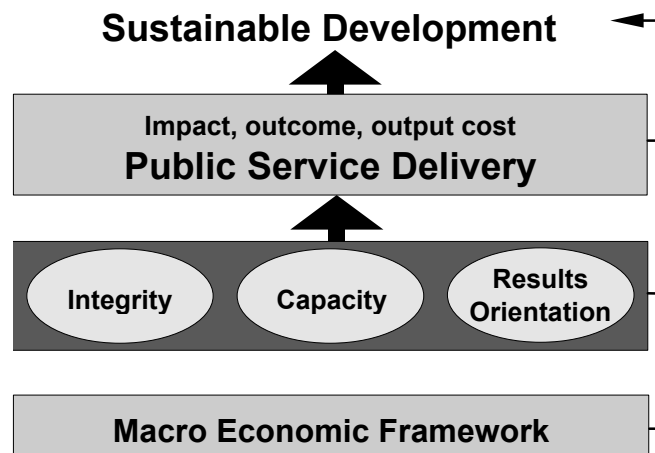


Figure 1: Key Focus Areas for Institutional Reform

The new approach links integrity to other key variables for sustainable development. As shown in Figure 1, against the background of an appropriate macroeconomic framework, three areas of focus combine to promote better delivery of public services. A first element is to build systemic integrity within the society as a whole and establish the rule of law. A second and related element, is to strengthen the institutional capacity of select public-sector and civil society organisations so that systemic integrity and better public-sector performance become possible. A third is to reorient government in order to improve performance or results.⁹ It is often necessary to explain to partners that what is sought is not merely the curbing of corruption or the improvement of integrity. The real impact these programs seeks is improved delivery of public services, established rule of law and creation of an enabling environment for the private sector.

⁹ In the terminology of results-oriented management, a distinction is made between different levels of results. This is to emphasize not only WHAT is produced by an activity, project or program but also WHY. The various activities (such as a review of corrupt practices among civil servants) will produce "outputs" which are usually immediate and tangible (such as a Code of Conduct and penalties for improper behaviour). They reason why resources are committed to activities and outputs is because they may create one or more desired "outcomes" (such as a reduction of incidents of corrupt behaviour or, more generally, civil-service reform). The combined "outcomes" or intermediate results should have some sustainable long-term influence or "impacts" on development priorities such as the improved delivery of public services.

II. UNDERLYING PRINCIPLES OF THIS NEW GOVERNANCE STRATEGY

A. New Paradigms

In the old paradigm, donor agencies preferred to work almost entirely with government agencies. Governments and donors alike gave little recognition to the private sector, the general public or civil society organisations as important agents for change. Most capacity building focused on “tools and skills” for the executive branch of government with little emphasis on the capacities of the legislative and judicial branches of government or of civil society and the private sector. More attention was given to budgets and activities than to the economic outcomes and impacts that would be achieved by these activities. Results were seldom the focus. And government accountability and transparency were not seen as particularly important.

Underlying this new approach is the belief that elected politicians and public sector employees should focus on generating sustainable development results by meeting the needs of the general public and other clients. Politicians and employees should be held accountable individually and collectively for fulfilling government’s responsibilities and commitments. This new strategy can be expressed in the new paradigms shown in Box 1.

- | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• Accountability through transparency (access to information)• Focus on prevention rather than enforcement• Raise awareness and expectations of civil society• Focus on results-oriented service to the public• Develop the capacity of “Pillars of Integrity” to fight corruption |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Box 1: New Paradigms of a Governance Strategy

B. Prevention through Increased Accountability

Lack of accountability by national and international politicians and civil servants is probably one of the most important reasons why sustainable development has not occurred in most of the world’s poorest countries. How can transparency and accountability be generated?

The approach presented in this paper is to help clients change the mind set of public-sector employees. Through its work with client countries, tools have been developed that can help client ministries and municipalities increase government accountability and performance. In recent years, it has helped clients organise integrity workshops and administer informal surveys involving public sector officials to raise their awareness of the causes and consequences of corruption.

To institute accountability and transparency in government, both internal and external pressure is needed. Accountability must be generated by a combination of political will from the top and public pressure from the base. Even if leaders are successful in changing attitudes within the government bureaucracy, more will need to be done because less than two percent of the population in most developing countries works for the government. The new governance approach is based on the assumption that increased public sector accountability can only be achieved through the education, involvement and empowerment of the remaining 98 percent of the population, including the private sector, media and civil society.

C. Raising Public Awareness

Educating and involving the public in building integrity is the key to preventing corruption and thereby the key challenge and the keystone of this holistic integrated strategy and can take different forms:

- Public education and awareness campaigns (radio, news papers, TV);
- Conduct annual broad based national/municipal integrity workshops where all stakeholders are invited to discuss problems and suggest changes;
- Inform citizens about their rights (Citizens' Charter); and empower the citizens to monitor the government through periodic service delivery surveys;
- production and dissemination of a national integrity strategy and an annual corruption survey at national, municipal and sub-county level;
- production of integrity surveys at the municipal or sub-national level;
- investigative journalism and information by the media; and
- dissemination of the *TI Source Book* and experiences of other countries in combating corruption

The rationale for these tasks can be explained by the case of Mali, where an SDS was conducted in 1995. Mali has some of the worst social indicators in the world, but the majority of villagers said the quality, timeliness, and cost of services delivered to them were “no problem.” It is possible that after so many years of misery, they had minimal expectations of government service provision. This experience confirmed the need to increase public awareness on a broader scale. The strategies listed above, that are organised and implemented with government clients of the World Bank, will be described below.

Beyond government, members of the media play a critical role in raising public awareness. A free and independent media with professional investigative capabilities can be a “nation builder.” By drawing attention to corruption, journalists can turn corruption from a seemingly low risk, high profit activity for those involved to one that is high risk and low profit. It can be a key player in fostering democratic elections by educating the public as to each political candidate's philosophies, values and goals.

Recognising the critical role of the media, Uganda began training of its investigative journalists with donors help in 1995. Several one-week seminars have been held using case studies and international investigative journalists as trainers. Since 1995, more than 70 percent of all print journalists and editors of both Uganda and Tanzania have attended the sessions. A preliminary assessment, which will be validated by content analysis shows that training and awareness raising among the journalists have had a positive effect on the frequency and quality of reporting on corruption. Participants are encouraged to adopt mindsets relating to integrity, results-orientation, and serving the public.

The lessons learned from the investigative journalism workshops in Uganda have been transferred to Tanzania, Mauritius, Benin, Malawi, Ethiopia, Ukraine, and Nicaragua through regional workshops, study tours, and exchanges. The next step for Uganda is to confront two challenges in strengthening the media. One is to persuade owners and editors to allow the media to operate freely and independently from business/advertising and politics so that the media can fulfil its role as a “nation builder,” focusing on public education and investigative journalism. A second is the training of broadcast journalists. In Uganda, for example, radios transmissions reach more than 80 percent of the population—while the print media is estimated to reach only 10 percent¹⁰.

¹⁰ Uganda has, with the help of donors, trained over 200 journalists in investigative journalism, most of whom work in print media. However, Uganda's eight FM radio stations and the two Radio Uganda stations reach 80 percent of Uganda's population, according to the

D. Broad Based Capacity Building to Strengthen all Pillars of Integrity

Capacity building has traditionally focused on expanding government facilities and skills. Typically, such projects financed infrastructure, equipment and technical skills training. These activities are important, but without a leadership confident in introducing accountability, transparency and a focus on objectives and results, the sustainable effect of these initiatives is questionable. The new approach to capacity building, encouraged and pioneered by the Economic Development Institute (EDI) of the World Bank in close collaboration with TI, involves two major shifts from traditional approaches.

The new approach emphasises the importance of leadership and an integrity mind set among public servants. “Mind set” refers to the outlook and state of mind that policy-makers and civil servants bring to their jobs. Donors work as facilitators with clients to establish standards and ground rules for leaders in the public service through the introduction of leadership codes, codes of conduct, and declarations and monitoring of assets. Integrity is critical when appointments of key executive or civil service positions are made and is equally important among politicians.

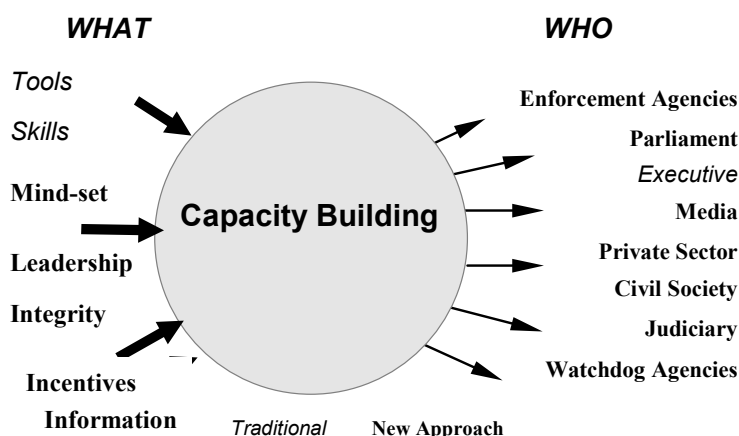


Figure 2: Capacity Building — A New Definition

The second change is that the audience for the capacity building be broadened to include all parts of society interested in creating and maintaining national integrity. Traditionally, the focus of donor attention has been on the Executive branch of government, particularly the programs and activities relating to government ministries. However, capacity building focused almost entirely on strengthening the capacity of ministries to deliver public services is insufficient. A more systemic approach to building integrity and sustainable development requires institutional strengthening of other “pillars” that is, domestic stakeholders both inside and outside government. Donors have in some of the more advanced countries been invited in to help initiate awareness raising and skill building efforts with parliaments, law enforcement agencies, judiciaries, public account committees, NGOs and private-sector organisations. The pillars are the “who” in Figure 2 and are a central part of a new definition of capacity building.

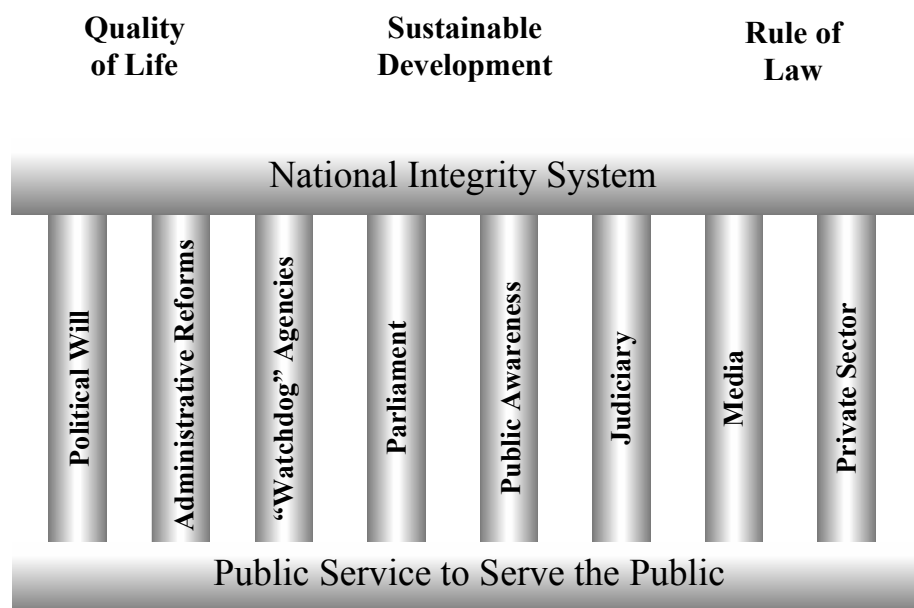


Figure 3: Pillars of Integrity¹¹

To ensure that there is an enabling environment that is supportive of private- and public-sector contributions to sustainable development, a National Integrity System needs to be built with mutually supportive pillars. The “pillars of integrity” in a society include actors outside the executive and outside government itself. The collection of stakeholder groups is referred to as “pillars of integrity” because it is incumbent on them to support and uphold practices that promote public integrity. A National Integrity System is based on eight pillars of integrity: (1) executive, (2) parliament, (3) judiciary, (4) watchdog agencies, (5) media, (6) private sector (Chambers of Commerce, etc.), (7) civil society and (8) law enforcement agencies.

The pillars are interdependent, a weakening of one pillar results in an increased load being shifted on the others. Where several pillars weaken, the system can no longer support sustainable development and effectively collapses. Figure 3 illustrates the interaction of the different stakeholders in combating corruption. Examining a National Integrity System requires identifying gaps and opportunities for corruption within each of the pillars and then co-ordinating the work of the government, civil society, and donors into a coherent framework of institutional strengthening.

The reasons for building an integrity system may differ from country to country. In Figure 3, three broad, almost generic, objectives are identified: rule of law, sustainable development, and quality of life. In the fifteen countries that have embraced the reform effort, inadequate rule of law could turn out to be *the* critical bottleneck for progress. This is particularly the case in much of Latin America and Africa where it is estimated that many countries need ten to fifteen years of intensive work before effective rule of law can be established.

¹¹ The integrity pillars were first presented by TI’s Ibrahim Seushi in Tanzania and later adapted by Jeremy Pope and Petter Langseth in building the framework for a National Integrity System in Tanzania.

E. The Role of the National Integrity Unit in Integrating Reforms

The primary objective of a National Integrity Unit (NIU), as established in Bolivia, Nicaragua and Ukraine, is to strengthen the governmental office to which it is attached and other government agencies in addressing integrity and economic reform issues. The unit functions as a secretariat to the NISC and to working groups where integrity and economic reform issues are closely interrelated. These may include groups working for public administration reform, deregulation, privatisation, budget, taxation, and banking, among other.

Specifically, the NIU may be asked to:

- develop a systemic approach to building integrity by ensuring the inclusion of integrity issues in the economic reform agenda;
- provide central co-ordination for expert assistance on integrity-related issues;
- provide a direct link between government and institutions of civil society for research, information, and public awareness-raising — requesting, providing, and using information in partnership with the media, NGOs, and citizens;
- facilitate integrity-building activities as part of the implementation of the government’s economic and public-sector reform programs; and
- conduct SDSs, public-education and awareness-raising activities, integrity-building workshops, and other events.

The National Integrity Strategy should result in a wide range of reforms that are interrelated and integrated in order to create systemic change. The focus of the strategy is on achieving specific outcomes, such as those found in Figure 4, in the expectation that these will, in turn, contribute significantly to such impacts as improved public-service delivery and the creation of an enabling environment for private-sector development through the establishment of the rule of law.

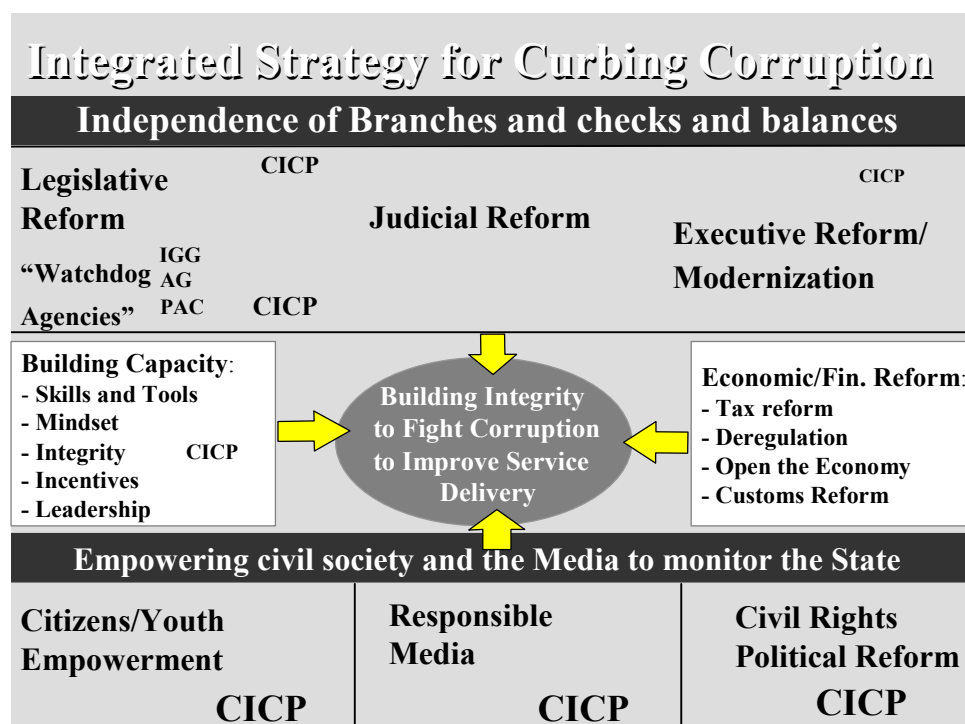


Figure 4: Elements of a National Integrity System

Each of the outcomes listed in Figure 4 represents a series of integrated activities and outputs. Following are two examples of a series of outputs that may be needed to achieve outcomes in terms of public administration and civil-service reform as an element of institutional reform, and in terms of deregulation as an element of economic/regulatory reform.

F. The Champions of Reform

A ninth “pillar” can be added to the eight organisational or institutional pillars. This pillar would be composed of those essential individuals or groups of people who provide the political leadership necessary to give vision to the reforms and the political will to see them implemented. Depending on the country, this group could be derived from municipalities or youth. Such groups increasingly have the power and influence needed to protect the institutions undergoing reform from the enemies of reform. Ideally, a country’s Executive would be the chief champion of reform and this is the case in most of the countries where donors facilitates governance work. However, in other situations, the nation’s chief executive may be the formal client for governance work while the real champion is another senior government official. In this instance, the champion may be the Inspector General of Government as in Uganda, the Minister of Justice as in Mauritius, the Vice President as in Bolivia, and the Controller General as in Nicaragua.

III. STRATEGY FOR BUILDING INTEGRITY

A. Local Ownership

First among key elements in promoting a new governance strategy is local ownership. Local “ownership” must be rapidly achieved when a pilot governance program is launched. Local actors must drive the process for the very reason that they will be bringing about reform. It is naive for outsiders to believe they can solve another country’s corruption problems. Corruption takes a myriad of forms, and the internal dynamic vary subtly but distinctively from country to country. The local community is best positioned to know and understand its particular problems, the network of participants, and the best possible solutions.

The Role of Civil Society

Civil society’s involvement is a central part of a strategy to build integrity. Government efforts have failed when the confidence and support of civil society were absent, so it is essential to develop broad coalitions supporting reform. An apathetic, cynical public could undermine even a government’s best intentions, thus the stipulation that credible donors be invited into a country by government and an organisation in civil society. The potential partner in civil society must be one the government feels comfortable with to enhance creativity. This protects the donor’s objectivity on political issues and ensures that work is directed towards the entire system rather than individuals.

There are practical benefits to including an international NGO such as TI in the partnership. There are various stakeholders in the integrity system and success depends on involving as many as possible. Having an international NGO as a partner opens avenues into civil society through its contacts with leading individuals and opinion-makers in the country. Such a partnership also helps minimize risks and exposure for the donor in this admittedly sensitive area of activity.

The Role of Donors as an External Facilitators

Most donors would probably today openly accept that they have more questions than answers and must work with partners in a learning process. There are no standard solutions that any donor can impose upon or recommend to a country. The donors’ competitive advantage lies in: (a) the knowledge it acquires through its global experience and perspective; (b) its ability to help identify the questions that should be asked; and (c) its capability of contributing relevant experiences from other countries and contexts into the answer-seeking processes.

With a shared understanding of objectives among all the partners and with the process being locally owned and driven, the donors should work as facilitators, focusing on the process, rather than presenting themselves as policy experts. These facilitators should help governments determine how to manage a change process that results in increased transparency, accountability and improved service delivery. The strategy is to demonstrate an approach that can be incorporated into projects and to act as a resource for NGOs and local institutions. Ultimately, the objective is to help client countries mainstream integrity so anti-corruption practices become institutionalised and systemic.

One of the strategies is to initiate a process that will lead all the stakeholders to identify their roles and recognise that “they are either part of the problem or part of the solution.”

B. Action Research

Action research refers to learning by doing. Various instruments and tools are used, ranging from formal surveys, which provide baseline data and measure change over time, to the

establishment of integrity units within government. There are many questions to be answered, which might include:

- What is the role and impact of bribes paid by companies from the North to civil servants in the South?
- What is the role and impact of donors on corruption in a country?
- Who is paying and who is receiving the bribes?
- Where is the money going?
- Is there a link between paying a small bribe and improved service delivery?

CICP and UNICRI both emphasise the piloting of new approaches to public-sector management issues and the dissemination of lessons learned from such pilots and experiences elsewhere. The Governance Program works on a regional basis because a country is likely to be most interested in the experiences of other countries in the same region and therefore more receptive to their examples. While these efforts need to be tailored carefully to each client's situation, some approaches based upon the Team's prior experiences have married well with the circumstances of other countries.

The strategy for building integrity systems must remain flexible at all times, adapting to case law and best practice experience in order to improve the strategy's effectiveness. The sequencing of reforms is an action-research issue of particular interest to CICP's and its clients. While it is too soon to provide clear guidelines, this element is being studied in each country case.

Facilitating the building of national integrity to curb corruption in sixteen countries or more allows for sharing and learning among them. In order to make this learning process as rich as possible, countries across all five regions have been chosen, as seen in Figure 4. The objective of the action-research process is to monitor the performance of different tools and processes within these countries, learn from the results as they become available, and adapt each national strategy accordingly.

Regional Implementation of National Integrity Systems	
Africa	Benin, Nigeria, South Africa, Uganda, Zimbabwe
Asia	Indonesia
Central and Eastern Europe	Hungary, Macedonia, Tajikistan
Middle East and North Africa	Lebanon
Latin America and Caribbean	Bolivia, Colombia, Guatemala, Nicaragua

C. Action-Oriented Data Collection

Critical to the success and sustainability of the integrated approach to governance is the innovative use of information. Data from different surveys and other economic and financial data are made available to all integrity pillars, opening up government to the public. The information disseminated about the government's responsibilities and what it is actually doing empowers the public and increases the accountability of public servants.

Action Areas	Actors/Audience	Short-Term Specific Actions	Medium/Long-Term Actions	Expected Outcomes
Action-oriented Information Gathering	Ministries	SDS: Households, firms Database for procurement	Follow up to the SDS: Households, firms	Increased accountability Improved service delivery

Accountability, Transparency, Monitoring and Empowerment	Exec. Agencies	of goods and services (e.g. medical services, school lunches)	Monitoring of targets against baseline	Result-oriented management
	Municipalities			Reduce costs
	NGOs	Citizens' Charter and performance indicators increase transparency of procurement	Donor project evaluation system	Reallocate funds to social programs
	Private Sector		Database to monitor performance across municipalities	Poverty alleviation
	International community	Database for jurisprudence	Database for procurement of goods and services (e.g. medical services, school lunches)	
		Database to monitor FDI		
		Economic, financial, and project data		

Box 2: Example of Action-Oriented Information Gathering from Bolivia

Typically, surveys are conducted as part of a Rapid Assessment, or prior to a National or Municipal Integrity Workshop in order to disseminate the data first to the workshop participants. Information about people's perceptions of the actual service delivery and levels of corruption helps make the workshop more realistic. The information can include not only an identification and description of the problem, but also possible solutions suggested by householders, communities, service workers, and administrators at different levels.

IV. PREVENTION AND INTEGRITY TOOLS AND ACTIVITIES

The process of strengthening a National Integrity System begins with a national dialogue followed by national action. To promote national reform, the following prevention and integrity tools have been developed

- Surveys focusing on service delivery
- Integrity or corruption Surveys
- Municipal and Sub-national Integrity Workshops
- External oversight in tender process
- Enforce code of conduct including declaration and monitoring of assets
- National and Integrity Workshops (NIWs) (broad based action planning)
- The Integrity Pledge
- Islands of Integrity
- National Integrity Steering Committee (NISC)
- National Integrity Unit (NIU)

A. Service Delivery Surveys (SDSs)

In many countries, programs to increase the integrity, effectiveness, and efficiency of public management have had limited success. One reason for this is that programs are frequently designed with limited information about the quality of service delivery before reforms to improve delivery are implemented. The Service Delivery Survey (SDS) is an important tool used by governments to provide information about service quality, including factors constraining the delivery of public services. The SDS covers many aspects of service delivery and identifies the multiple reasons for inefficient and ineffective service delivery. Equally, if not more important, the SDS cycle employs processes which build local capacity for data collection and analysis. The NGO, CIETinternational, developed the SDS methodology and continues to administer the surveys for the government.

The SDS provides essential baseline data and periodic evaluation information to help design civil service, decentralisation, privatisation, and other reforms; monitor results; and ultimately make services more responsive to citizens' demands. By obtaining more accurate information about service delivery, including information about the cost, timeliness, coverage, and quality of each service, government clients are better equipped to decide which services should be delivered by the State, private sector, and NGOs. If the information leads a government to privatise some services or to ask NGOs to deliver them, the surveys will also give the agencies responsible for the out-sourcing excellent information to manage the contracts.

The SDS process involves a number of steps. First, representatives of the public-service institutions that will be the focus of the survey and representatives from the private sector, help analyse any existing data and prepare the process. Second, the appropriate number of local supervisors and interviewers are trained to organise the surveys and analyse the results. Several survey cycles are required to build local capacity sufficiently so that future surveys may be conducted independently. Next, the survey is conducted; households and service providers are asked about their perceptions of the quality of public services, existing problems, and ways to overcome the problems. After the data is collected, the results are shared and interpreted by focus groups comprised of both the households and the service providers. Finally, workshops bringing all key stakeholders together are conducted to build consensus and find acceptable solutions to service delivery problems.

An SDS supplements existing institutional data with community-based data. The basic building block of the community-based data is the household survey. Since households have a wide range of contacts with public institutions (e.g., taxation, health, roads and police protection), the methodology is inherently inter-sectoral. A group of communities is chosen in a given region or country, which permits comparison between communities over time in order to measure the effect of reforms. The SDS uses a large enough sample to permit statistical analysis of the survey results data. The quantitative data is supplemented with qualitative data collected through focus groups, key informant interviews, and institutional reviews. The survey results provide valuable information, which enables national and sub-national public managers and policy makers to do their jobs more effectively.

All SDSs observe the same guiding principles and methods, and in all cases, capacity building is a central theme. A large number of nationals are trained to sustain the process. The SDS process provides data for sub-national levels (such as regions and districts) as a basis for rational planning at these levels. It builds skills among planners and decision makers at local levels in the process of designing surveys, collecting data, interpreting findings and planning on the basis of timely, relevant information. By emphasising analysis and communication capacities, SDSs can contribute substantively to national capacities for evidence-based planning. Thus, SDSs do not require highly developed capacities to be in place; instead, it develops from and along with national capacities.

Survey results are used in different ways by different stakeholders. The central government and a municipal government may use the data as a performance monitoring tool in part of a broader results-oriented management scheme. The public is empowered when the same data when it is disseminated by the media and other means to civil society and the private sector. These additional “pressure points” outside the civil service should increase the accountability of the public sector and may lead to improved efficiency, effectiveness, and responsiveness.

In each country, the objectives, instruments, and outcomes are different and reflect the particular country’s context, capacities, and needs. In Nicaragua, for example, the SDS was part of an effort financed by donors to reform public administration. A pilot cycle was run in ministries (urban transportation, environment, and customs services) that opted into the reform program. Survey questions dealt with specific problems that public-sector managers had identified. By contrast, in Mali, SDSs were used further up-stream in program development. Regionally, a representative sample of households were asked open-ended questions about their contact with government services, which services were most important to them, which ones had problems, and their suggestions for improvements. The information gathered was used to raise the awareness of designers of an institutional development program to improve service delivery.

With the growing realisation that an assessment of public-service delivery should consider the private sector, the SDS compares public and private services and highlights the areas where the public and private sectors interact. The surveys help identify areas of institutional weakness that prevent the optimal use of resources and allow individuals to use public power for private gain. In Tanzania, surveys were requested by the Government and were used during a Presidential Commission investigation designed to identify corruption problems and propose solutions. These surveys provided valuable data on the Tanzanian police, judiciary, revenue service, and lands authority. In Ukraine, surveys were conducted at the request of the government to help rank the quality of sixteen services. Among the information gathered were integrity ratings, time required to resolve a complaint, staff behaviour, speed of service, the percentage of households having to pay a bribe to receive a service, the average amount of a bribe, attitudes toward corruption, and solutions.

To date, SDSs have been piloted by CIETinternational in Africa (Mali, Tanzania, Uganda, and Mauritius), the Middle East (Jordan and West Bank-Gaza), Central/Eastern Europe

(Bosnia and Ukraine), South Asia (Nepal and Pakistan), and Latin America (Nicaragua and Bolivia). Over the next four years, UNICRI in close collaboration with CICP, intends to deepen and expand this product line by undertaking more survey work and capacity building, as part of a monitoring and evaluation process in other pilot countries (Hungary, Lebanon, Uganda, Nicaragua, South Africa, Nigeria, Benin, Bolivia and others).

B. Integrity Surveys

Since 1997, client countries have found it useful to complement the extensive Service Delivery Surveys, which examine many aspects of service delivery and identify multiple reasons for inefficient and ineffective delivery, with smaller surveys focused specifically on corruption. The “integrity surveys” or “corruption surveys” are used to identify those areas in the public service where corruption is a problem and to raise awareness of the extent of corruption. They can also be used as part of an anti-corruption enforcement strategy.

For most reformers and governments committed to change, enforcement remains one of their biggest challenges. New laws, rules and regulations serve little purpose without an adequately funded and staffed enforcement strategy. NGOs such as TI, with donor support, can play an important role in helping reformers to monitor the effectiveness of enforcement measures. One way of doing this is to conduct an annual bribery survey similar to the TI Index.

In addition to the formal integrity surveys, informal participant surveys are sometimes included as part of an integrity workshop or symposium to draw attention to a particular corruption issue. For example, the government of Mauritius in collaboration with TI-Mauritius and TI Tanzania, used an integrity workshop in to test a survey instrument that captured participants’ perceptions of bribery practised by their country’s trading partners. Because of the instrument’s potential it is tested in other countries in Latin America and Africa.

To date, formal integrity surveys of households and businesses have been conducted in Nicaragua, Bolivia, Uganda, West Bank Gaza, Ukraine and Mauritius. Discussions are under way to conduct others in Bangladesh, West Africa, the former Soviet Union, and Eastern Europe.

C. National Integrity Workshops (NIWs)

The completion of an SDS or an Integrity Survey generally involves a workshop where different stakeholders discuss the causes of inefficiency and corruption and seek to form a consensus about possible solutions. The objective of an NIW is to promote better public-service delivery by facilitating actions and promoting reforms that increase accountability and transparency in institutions and among stakeholder groups. The NIW assembles representatives of all the major stakeholders or integrity pillars in society: the executive branch of government, parliament, the judiciary, media, civil society, watchdog agencies, and others. These workshops, which have been conducted in Malawi, Mauritius, Tanzania, Uganda, Ukraine, Nicaragua and Venezuela and are planned to be held in Bolivia, Bulgaria and West Bank-Gaza. A series of workshops, one to be held every year or two, are envisaged for each country. As mentioned earlier, the NIW may be an activity of the National Integrity Steering Committee, drawing together representatives of the same stakeholder groups. Or it may replace the NISC as the primary national instrument for building a National Integrity System.

The workshop can start with a presentation of the SDS and Integrity Survey data, papers written by representatives of each of the “integrity pillars” describing how corruption is present in various stakeholder groups, and international experiences and best practices in

controlling corruption. External actors can facilitate the process, but the dialogue and its results must be developed and therefore owned by the local stakeholders. In small discussion groups, the participants identify and form a consensus about where and how corruption affects their society. With a contextual understanding of the problem, these small groups are then encouraged to apply lessons learned and prepare an action plan. When this was done in Tanzania, 60 percent of the proposed actions in the plan were accomplished within a year.

Follow-up activities may aim to help prevent corruption, strengthen enforcement, raise public awareness, and build (or strengthen) institutions. Examples of these activities include:

- the declaration and monitoring of assets as occurred in Tanzania;
- the establishment of Citizens' Charters; payment of adequate wages;
- the establishment of an investigative unit;
- the reinforcement of anti-corruption laws (on election financing, gifts for civil servants, etc.); and
- the strengthening of the court system and the police.

Awareness-raising activities include:

- dissemination of survey and workshop results to the media (Tanzania, Uganda, and Ukraine);
- a media campaign and public-education program about corruption (Tanzania, Uganda, and Ukraine); and
- concrete expression of political will (Tanzania and Bolivia).

Cabinet workshops aimed at raising awareness have been conducted in Bolivia and Uganda. Regional awareness-raising workshops have included "Good Governance for Private Sector Development" for fifteen Middle Eastern and North African countries in 1996, another for fourteen African countries in 1997, and two planned for South Asia and Eastern Europe in 1998.

A series of two or more NIWs is useful in building a National Integrity System. The main purpose of the initial NIW is to build a consensus for a National Integrity Action Plan involving representatives from each of the integrity pillars, including the political opposition. Another key objective of the workshop is to raise awareness about the negative effect of corruption in the country and the progress that has been made in curbing it. The workshop develops a general outline of a National Integrity System within the guidelines of the country. This is done by drawing on experience and identifying the relevant actors in the society and the roles they would assume in establishing a program where civil society can complement the efforts of government. During the initial workshop, the issues of integrity and ethics and their relation to corruption control are addressed. As part of this dialogue, the facilitators describe their experience in working with societies addressing comparable problems and actions taken internationally, especially within the OECD, to constrain transnational corruption and its impact on countries in the South.

Specifically, participants are invited to:

- discuss the needs of their country in the context of building a workable National Integrity System and in the light of evidence of corruption;
- prepare an outline drawing on best practice that can serve as a basis for informed public discussion and political debate;
- determine how the society as a whole might participate in continuing the debate on the issue of integrity and how to work with like-minded political players in a creative and constructive fashion; and

- establish ownership and commitment of the participants to the conclusions and an action plan.

The integrity workshop model marshals the ideas and resources of key stakeholders by inviting them to contribute to the proceedings as equal partners. It also emphasises the production of tangible outputs: (a) an Integrity Pledge that expresses the consensus of the workshop on the issue of corruption; (b) a National Integrity Action Plan by the end of the workshop; or (c) a review of progress made on an earlier Action Plan.

D. Municipal and Sub-national Integrity Workshops

Conscientious mayors and municipal managers are generally concerned about the quality of municipal services and how to improve municipal efficiency, effectiveness, transparency, accountability, and value for money. They want to know residents' opinions of the services provided, find out where corruption may be siphoning resources, install a Local Integrity System to improve service delivery, and enhance the image of the municipality.

Municipal and other sub-national workshops are part of a four-phase program to introduce a Municipal (or sub-national) Integrity System. Phase I is intended to help build a coalition in support of reform by focusing on discussions with local stakeholders and deciding on the modalities for a program. This is done through a Municipal Integrity Workshop. The specific objectives of this first workshop are to: (a) determine the views of the workshop participants regarding the provision of municipal services by conducting an informal opinion poll; (b) seek agreement on the importance of an improved service delivery system to increase the efficiency and effectiveness of delivery; and (c) introduce the idea of a Local Integrity System to enhance accountability and transparency.

Phase II focuses on carrying out an SDS directed at specific areas of concern. In Phase III, the results of the SDS are presented at a second Municipal Integrity Workshop and an Action Plan is drafted. Phase IV involves implementing the action plan according to the agreed timetable, monitoring and evaluation.

Drawing on the SDS findings, the content of the second workshop includes the following topics:

- Define the nature and magnitude of corruption in the municipality
- Define the detrimental effects of corruption
- Define a Local Integrity System to fight corruption
- Raise public awareness and emphasise the role of the civil society
- Emphasise public participation and the democratic process
- Discuss anti-corruption strategies
- Discuss watchdog agencies
- Discuss the judicial process
- Discuss role of the media
- Discuss role of the private sector

Like the National Integrity Workshops, the municipal or other sub-national workshop should produce tangible outputs, including: (a) an Integrity Pledge, which expresses the consensus of the workshop about corruption, and (b) a Local Integrity Action Plan which established a time frame for specific actions to address priority areas and identifies a group (probably an NGO) that will be responsible for monitoring the achievement of the plan's goals and tasks. Being held accountable for decisions made at the workshop makes participants role models for accountability throughout the country.

Sub-national or municipal integrity workshops have been conducted in Uganda, Bolivia, Venezuela, Ukraine and Nicaragua.

Results Indicators

The results of the Local Integrity Action Plan can be measured in terms of progress made in building a Local Integrity System. Of particular importance is the extent to which the plan has been implemented. Each stakeholder should be encouraged to self-assess the outputs and outcomes achieved by the organisation. Regularly repeated SDS will provide outside confirmation of changes in public-sector performance and of the factors that are responsible for these changes. Integrity surveys can provide additional information on the extent to which the public perceives that corruption has been curbed. Other indicators of progress can be established at the Municipal Integrity Workshop (e.g. media coverage of corruption, changes in revenue collection, changes in foreign direct investment, or evidence of successful prosecutions for corrupt practices).

Measuring results may show progress in terms of “outputs” (e.g., introducing a Code of Conduct and periodic appraisals of the performance of municipal employees) and the desired “outcomes” of these changes such as a decline in requests for bribes. The sustainable “impacts” of these changes in terms of less corruption and improvements in public services overall will be influenced, however, by factors (such as wage scales and offers of bribes from the private sector) beyond the control of a particular municipality.

E. Special Integrity Workshops for Each Integrity Pillar

Special workshops have been held for peer groups, which focus on corruption as seen from their perspective and what it means for them in carrying out their public roles and responsibilities. For example, a workshop for parliamentarians includes discussion on how to prevent or curb corrupt practices among the parliamentarians themselves and seeks to strengthen Parliament as a watchdog agency. Workshops for ministers have similar objectives. Occurrences of ministerial indiscretions being vaguely defined and being defended as being “in the public interest” are all too common. To give one example, this kind of reasoning has been used by an Attorney General to justify the action taken by a Minister of Finance who exempted his own car from import duties.

The overall objective of these workshops is to create a pool of trainers in the region equipped with skills to assist local authorities in developing and setting up a Local Integrity System to fight corruption. More specifically, these workshops aim at:

- Making participants appreciate the detrimental effects of corruption;
- Fostering discussion of what will be needed to set up a Local Integrity System with all integrity pillars;
- Assisting/facilitating local authorities in setting up Local Integrity Systems; and
- Defining the roles of relevant actors (donors, NGOs, and other integrity pillars).

F. Action Plans

Translating dialogue into action is a critical step in the process of building a National Integrity System. Figure 4 shows a simple model of a framework that might be employed by an integrity workshop to develop an action plan.

The same principles apply to all action plans, whether they be a National Integrity Action Plans, municipal or other sub-national action plans:

First, to be successful, the effort must be wholly owned and driven by the subject country. In particular, the country’s political leader and his/her deputy play a central role in setting the

tone and asserting moral authority. The action plan should be endorsed or issued by an executive commission.

Second, a major effort must be made to draw civil society into the process in imaginative and constructive ways. Public opinion surveys, which proved successful in the Hong Kong reform efforts, can be used.

As a third principle, any action plan should call for major initiatives in four separate areas: awareness-raising, both top-down and bottom-up; institution building; prevention of corruption, by minimising opportunities and increasing risks of detection; and enforcement. Expectations must be managed carefully to ensure that promises are realistic, that some changes are made quickly and that they are communicated to the public to maintain their confidence in the process.

Fourth, a high level of co-ordination within the government will be needed as actors and stakeholders execute the program. Implementing the national action plan, for example, will typically involve the auditor-general's office, the ombudsman's office, prosecution agencies, the civil service, public procurement agencies, government departments, and professional associations among other groups. Donors will also need to co-ordinate their actions as the undertaking will be too all-embracing to allow for the luxury of ad hoc assistance. The process of devising a National or Local Integrity Action Plan is event-driven. A timetable with benchmarks, staggered events, and monitoring schedules is necessary but there should be some room for flexibility. Stakeholders should be help accountable for achieving results. Donors can help organisations achieve reform by providing resources, space and protection. Most action plans developed so far have had concrete action items for each of the pillars represented at the integrity workshop. See, below the example of the national plan developed for Mauritius.

At a recent district integrity workshop in Luwero district in Uganda, the IGG staff facilitating the workshop emphasised the importance of:

Agree on a focused and realistic action plan (no more than 5 items)

- Select actions where the participants have authority to change things
- Pick areas that are visible and important to the public
- Pick action items that you can afford to implement
- Agree on who is responsible for the implementation and a time frame

Mauritius National Integrity Action Plan

Civil Society

- Conduct a national public awareness campaign
- Conduct a media campaign against corruption
- Conduct a public awareness campaign in secondary schools
- Conduct further research, monitoring and evaluation (e.g. annual integrity surveys)
- Introduce Code of Conduct for teachers
- Co-ordinate the corruption campaign with the media and educational and religious organisations

Private Sector

- Strengthen Code of Ethics for managers of private-sector companies
- Increase transparency of political party financing
- Implement declaration and monitoring of assets for private-sector managers
- Increase public accountability for private-sector managers
- Increase protection of shareholders interests
- Increase control of monopolies and quasi-monopolies
- Improve monitoring of financial services, banking, and insurance

Watchdog Agencies and Ombudsman

- Review the role of the ombudsman
- Reappraise institutions assigned to combat corruption
- Strengthen anti-corruption legislation and institutions

Executive Branch

- National Transport Authority: "Clean up" vehicle fitness test through privatization and improved enforcement
- Introduce and enforce Code of Ethics in the public service
- Create a Human Resource Division and job appraisal review
- Implement declaration and monitoring of assets for top civil servants
- Introduce more realistic ceiling on funding of political parties
- Demand registration with Electoral Supervisory Commission

Judiciary

- Introduce Code of Conduct for all sectors within Judiciary
- Conduct speedy investigations into allegation of misconduct made against judicial staff according to existing regulations
- Entrust responsibility of recruitment and discipline to the judicial and legal service
- Commission for administrative staff as well
- Introduce Code of Conduct for administrative staff in the judiciary

Police and Prosecution

- Set up of an independent police complaints board with its own investigators
- Have complaints go to media, DPP, or ombudsman
- Introduce an independent group within the police force to investigate corruption within the police
- Implement a declaration and monitoring of assets for police officers
- Implement and monitor Code of Ethics for police

Box 3: Example of a National Integrity Action Program (1 of 2)

Mauritius National Integrity Action Plan

(continued)

Media

- Legislate liberalisation of broadcasting
- Legislate more access to information in ministries
- Demand more balanced reporting
- Implement Code of Conduct for journalists
- Introduce more specialised training (e.g. investigative journalism)
- Demand more balanced coverage between private-sector and public-sector on corruption issues
- Have media engage in public awareness campaign on corruption issues

Parliament

- Shorten parliamentary holidays for MPs
- Increase number of weekly sessions
- Demand annual report of Ministries to Parliament
- Introduce live broadcast of parliamentary proceedings
- Introduce more regular meetings of Public Accounts Committee (PAC)
- Improve staffing and resources of PAC
- Have the PAC's report debated in assembly, open to the media and the public
- Sanction parastatal bodies for late submission of annual report to Parliament
- Introduce more parliamentary committees to discuss corruption reforms
- Introduce regulation of political funding before the next general election
- Introduce written answers to PQs communicated in advance
- Introduce annual returns of assets for MPs published in the media
- Amend legislation to deal with corruption

Customs

- Review customs procedures
- Various legislation to strengthen compliance
- Have regular meetings with various stakeholders
- Establish Complaints Bureau (report to outsider)
- Code of Ethics for all officers
- Raise public awareness
- Increased transparency about where you get what service in customs
- Implement the declaration and monitoring of assets for customs officers

Box 4: Example of a National Integrity Action Program (2 of 2)

G. The Integrity Pledge

Another tool used is an “integrity pledge” that participants sign at the end of integrity workshops. These pledges are not legally binding, but participants commit themselves with their signatures to take certain actions against corruption. Pledges have included the following: launching a local chapter of Transparency International; committing to act honestly and openly in all aspects of their lives; putting the well-being of the people ahead of their personal and party interests; uniting to fight corruption by using all opportunities both in their place of work and in their private lives; and sensitising the public to the effects of corruption on the development of their countries. These pledges are given wide publicity at the end of the workshops by both print and broadcast media, and the names and signatures of participants are printed in newspapers in most cases. Such public commitment by participants, who include parliamentarians, journalists, educators, civil servants, ordinary citizens, non-governmental organisations, etc., puts added pressure on the participants to take the fight against corruption seriously.

H. Islands of Integrity

The “Island of Integrity” or “enclave” approach was developed by Transparency International as one way of guaranteeing a transparent process in procurement. The approach fences off an area of government activity to address corruption in a manner isolated from other influences. For example, in the area of procurement, the approach is based on pledges by bidders not to pay bribes to win government contracts. Sizeable bonds are subject to forfeiture in the event of non-compliance. Other consequences could include, disqualification from further involvement in the project or other publicly-funded projects (blacklisting) for all private-sector parties who violate the pledge and immediate dismissal of those in the public sector who are found guilty of violation. This approach as been tried in countries like Ecuador, Argentina, and Panama, sends a definitive message that private industry is no longer a party to defraud the government and the public. Key donors have been including this approach as one of the integrity tools in the fight against corruption. Although it is too early to pass judgement on its successes, the challenge of this approach is to introduce integrity into the process before any irregularity takes place and to obtain a credible commitment by all stakeholders involved, to ensure the rules are not broken.

I. The National Integrity Steering Committee

A first practical step in strengthen a National Integrity System is to establish a National Integrity Steering Committee (NISC) which brings together all stakeholders. Within government this would include representatives of the nation’s executive, judiciary, cabinet, electoral governing body, and civil servants in key departments such as customs, procurement, revenue collection, and local government. Representatives from outside government would include leaders from religious groups, business, the media and special interest groups. In Africa, political leaders have accepted that participants of the annual National Integrity Symposium or Workshop (NIW), described below, act as a NISC. In Latin America, on the other hand, there is more willingness to establish a separate National Integrity Steering Committee appointed by the President.

The committee’s task is to analyse the framework, identify and prioritise areas for reform, and develop a plan that includes short-term, medium-term, and long-term goals along with a public awareness-raising program. It should assign subcommittees to follow up action and receive reports on the progress toward stated goals. The working group should publish the names of its members, its overall plan, and regular status reports. Input from the general public should be solicited from the beginning and regularly throughout the national integrity working group’s existence. The endorsement of the working group and its plan by political leaders and the public is essential and must be solicited for the duration of the committee’s existence. The group should pay particular attention to achieving several “quick wins” to build public confidence early in the process. In doing their work, the NISC members should be guided by certain key principles, summarised in Box 4.

A controversial issue that must be resolved is how to include opponents to the party in power in the NISC. It is critical that they be involved in order that corruption will be to criminalised instead of politicised. This issue arose, for example, in Mauritius, Bolivia and Nicaragua. Faced with the argument that the National Integrity System would lack credibility in the eyes of the public if the opposition were not included, Mauritius agreed to include the Leader of the Opposition at the NIW, and Nicaragua and Bolivia accepted the inclusion of the opposition within the NISC. Facilitators successfully argued that its client had to choose between “control over the process versus the credibility of the process” and that a National Integrity System without credibility probably would not be worth controlling. In order to

avoid a politicisation of the process, the steering committee should be as broad-based as possible. Despite external facilitators urging the same in Ukraine, the political leadership failed to invite leaders of the opposition to attend the NIW in Kiev in November 1997.

Key Principles

- **Local Ownership**
- **Increase accountability through increased transparency**
- **Enforce access to information to all**
- **Balancing of powers across executive, legislative and judiciary**
- **Broad-based capacity building**
- **Public empowered to monitor the state**
- **Administration based on rules**
- **Rule of law**
- **Focus on corruption initiated both from the “North and South”**
- **Overall objective is improved service delivery and high quality growth**

Box 4: Key Principles Guiding the Integrated Reform Efforts

V. MORE QUESTIONS THAN ANSWERS

Despite the work done over the past few years, its intensity and the involvement of both academics and activists, reformers and development agencies, there are still more questions than answers.

We have found very clearly that what outsiders have to offer is process: substance has to be provided by the internal actors. Outsiders can facilitate and provide information, but they cannot diagnose and they cannot prescribe. Only the local people are in a position to do either. However, together, the facilitators and the facilitated, there can be potentially powerful impact emerging from informed discussion, particularly through the creation of action plans.

We have found, too, that the concept of the single “national integrity system” is an extraordinarily useful one and one which helps put the various components into a coherent perspective. It also can throw short-comings into sharp relief, especially where discourse takes place in the setting of a national integrity workshop.

A classic example is provided by experience in Uganda. There a stakeholder innocently asked of the Inspector General of Government how it was that although many cases of corruption were unearthed by him, few if any people appeared in court. The IGG said that his was not the job to prosecute, simply investigate, and so the files were sent to the Director of Public Prosecutions for action. The DPP said that his office did not receive the files. Why not, asked the questioner, have the IGG prosecute, as this would eliminate the gap through which the files appeared to be leaking and make it plain where accountability lay? The DPP agreed to a recommendation that the constitution be amended to provide for this, and the amendment was made several weeks later. One of the morals of the story is that the DPP and the IGG might well never meet in a work environment, and so the workshop provided a unique opportunity for pillars of the integrity system to discuss their difficulties in ways that otherwise would not have eventuated.

It has also appeared very clearly that an effective anti-corruption strategy must be integrated and holistic. Ad hoc, stand alone reforms are unlikely to achieve much progress, at least in the short term. It matters little, for example, to tidy up a judicial system if the prosecution and investigation “pillars” are left to crumble.

There can be longer term advantages—the reforms in Kenya which have strengthened the office of the Auditor-General have resulted in much more transparency and greater awareness of the extent of corruption in that country, but because of an enfeebled parliament and a dominant executive, despite the media discharging its role and getting the messages out, the levels of corruption do not appear to have abated.

A clear lesson—and a widely accepted approach—is that prevention is better than prosecution. The move to clean up a system through prosecution depends on having a working judiciary and good prosecution service in place and numbers of people being charged who can be accommodated within the system, and the available resources, both human and material, to conduct the necessary investigations. It thus lends itself more for tidying up a strong integrity system which has hit a bumpy patch, rather than resolving problems of systemic corruption. Enforcement is certainly essential if the corruption equation of “Corruption = High Profit, Low Risk” is to be converted into a deterrent which says “Corruption = High Risk, Low Profit”. But it can seldom be the major tool. Enforcement is retrospective, and what matters most is to stop the leakages at once, not chase after the leakages after they have taken place.

This in turn points to the need to address “the system” rather than the individual. There is little point in indulging in indiscriminate witch-hunts (though some scalps may well assist raise public confidence in the credibility of the reform process).

Corruption generally being a secret undertaking, with benefit flowing to both giver and receiver, we are left with having to battle against perceptions of where corruption is taking place. The need for hard facts is obvious, but obtaining them may be another matter. One way is to install telephone call-in lines, guaranteeing anonymity, and inviting the public to ring in with their complaints. Another is to establish a commission of inquiry, such as the Warioba Commission in Tanzania (although this unearthed so much corruption that popular perception seemed to be that matters were getting worse, not better, pointing to other lessons, particularly to information management being essential).

More recently, in some countries we have seen municipalities start to realize that there is space for them to reform local practices, enabling local mayors and councils to clean up local government without having to rely on central government (which may itself be paralysed by corruption or otherwise be unwilling to take the issue on). Mayors are starting to develop strategies, drawing civil society watch-dogs into the frame to inform and to authenticate the processes, and there will be many interesting insights gained at the local level in the coming months.

We have also seen very starkly that what will work in one country, and work well, may be wholly ineffectual in another.

The most outstanding example of this would be the Independent Commission Against Corruption, which was introduced so successfully in Hong Kong, and copied with a high degree of success in Singapore. What was it about the Asian model that helped it succeed there, whilst failing dismally in e.g. Africa? The Hong Kong environment was an ideal one for the Commission approach. There was a head of government (a Colonial Governor) from outside the colony, with no family or business links into the local scene. He was well paid and could look forward to a comfortable, respectable and respected future as a member of the U.K. House of Lords. There was also determined to see the experiment succeed and so honored the independence of the Commission, even though this was nominally accountable to himself. Added to this there was a working judiciary and a pool of well-paid, highly-professional investigators and prosecutors to conduct enforcement work, and a robust economy (particularly over the later years) capable of delivering significant budgets to the Commission for its public awareness and prevention work. The country was undemocratic, and thus could sustain the shocks of a police strike and an enforced partial amnesty being granted for past sins which shocked the populace and might well have brought down a popularly-elected government.

Singapore took the model, and again it worked. The same ingredients were there, with the exception of an outsider as head of government. Instead there was a Prime Minister who was well-paid and ruthlessly determined to rid the country of corruption, which he had identified as the major barrier to the country succeeding. Thus, although the Commission (actually an Agency) was accountable to the Prime Minister (and formed part of his office), it knew that it had the whole-hearted support of the Prime Minister and so could and did investigate even cabinet ministers where these were suspected as having transgressed. The fact that the country was a de facto one party state also meant that the room for politicisation of anti-corruption work was kept to a minimum.

Yet when the same models were established in Africa they undoubtedly failed. The Prevention of Corruption Bureau in Tanzania was been blunt about political interference in its work. Reporting to the Office of the President, once the unquestionably “clean” Julius Nyrere stepped down as president, its reports simply disappeared into a black hole, and although they were largely free to investigate the system determined that none could touch the untouchables who developed around the office of former President Mwinyi. Zambia is another country that had a similar problems. It tried to resolve these at times by bringing in expatriates to head the office, but these departed in situations surrounded by controversy. In both countries the

resources available for the agencies were grotesquely insufficient, the rule of law was far from entrenched, courts were unpredictable to say the least, and many of those working in the public sector were poorly paid, inadequately motivated and professionally lacking. The fatal flaw was unquestionably taking the Hong Kong and Singapore models and applying them into different situations where they simply would never be able to function.

By contrast, Botswana—an African country well-run, well-resourced and where the rule of law was functioning—adopted the Hong Kong model after scandals involving ministers had been uncovered. The fact that these discoveries were triggered by police at a car accident scene finding a considerable sum of money in US treasury bills say much for the prevailing ethical environment (in many countries, north, east or south, the money would have vanished and the story would have ended then and there). Quickly, a Commission was established under the Hong Kong model and a former Deputy from the Hong Kong ICAC brought in to run it. Just as quickly a rash of prosecutions began against low level civil servants and a reform introduced to snare big fish was scooping up minnows. The development in Botswana are too recent for us to be able to judge the success of the reforms, but without doubt the presence of ethical leadership at the highest levels of government have played a significant role in the achievements to date.

This, then, highlights the problem of transition. As the Vice President of Uganda remarked to a donor mission, a government that has corruption at the highest levels lacks moral authority to act against those who are corrupt at the lower levels. “How do I explain to a family why it is their brother or their sister who has been singled out for treatment?” she fairly asked.

So if prosecution for all past transgressions is not a viable option—too many people, hugely disruptive and the state lacking moral authority to act—how does one achieve an amnesty, both to set minds at rest and to ensure that there is not a huge spate of prosecutions such as appears to have been the case in Botswana? The public (as was the case in Hong Kong) deeply resent corrupt police being given an amnesty for their illegal actions against the public. Rationally one can explain why this might be necessary, but it is easy for a political opponent to blow the case out of the water with a blast of populist oratory—“Soft on crime, soft on the causers (sic) of crime”, etc.

An alternative approach—or a supplemental one—can be the introduction of systems whereby senior decision makers declare their assets, whether publicly or privately. This is now widely seen as the key to unlocking the anti-corruption chest. Indeed, it might be. But for the monitoring of assets to work there must be several thresholds met—the declarations must be true and correct (and so able to serve as a benchmark against which future assets can be measured), the procedure must be such as to deter people from making false declarations (e.g. they must be subject to random audit if they are made in confidence; or they must be accessible to the press and the public to enable civil society to do its own monitoring), the assets covered must include all the areas that lend themselves to be used to store looted public funds (an excellent example of how to ensure that legislation is wholly ineffectual is provided by the law in Tanzania, which requires that all assets be declared but then goes on to exempt just about everything imaginable), and the immediate family of the official must also be covered in appropriate ways (the debates in legislatures are wonderfully instructive, with legislators notorious for their male chauvinism suddenly becoming advocates of the rights of wives to earn and hold wealth separate and apart from, and unknown by, their spouse).

It has to be said that the authors are not aware of a serious recent attempt to get on top of the problem through this route. There are many legislatures who have been going through motions of one sort or another, but the jury is still out as to whether ways will be found to cut through a classic conflict of interest: the legislators/executive are being asked to provide firm rules to keep themselves honest.

There are very real problems. If a person has survived for some time in a systematically corrupt environment and risen to a position of prominence, the chances are that he will have (perhaps have been forced by economic circumstances to have) augmented his income in irregular ways, whether through unnecessary foreign travel, “ghost” up-country trips or simply servicing his private car in the public service garage. One way or another he or she will have acquired assets and a style of life that is out of line with their official income—particularly where this has not constituted a “living wage”. This means that anyone filling out a declaration of assets will in effect be declaring that they possess illicit wealth. And if they do not complete the forms correctly, the whole exercise is valueless.

The same questions overhang another simple reform. Hong Kong introduced the offence of a civil servant “living beyond known means”. It was not necessary to show a corrupt act. It was enough for a person in a position to prosper illicitly as being in possession with wealth or leading a life style wholly out of line with official income, unless and until he or she can produce an affirmative defence and show that the wealth came from licit sources.

This has proved powerful in Hong Kong, Singapore and Malaysia to name three. But again, in Africa the provision has been enacted but there have been no prosecutions. Why not? Again, an EDI/TI team was told that the provision was “a bit harsh “ and that “we do not like it very much”.

Part of the answer lies in the participation of civil society and the active involvement of the professions and the private sector in cleaning out their own houses as well as helping the government with prevention strategies. A large part of the answer lies in non-legal approaches: In dismissing public servants “in the public interest” and not risking an endless succession of hazardous and time-consuming trials through an incompetent and perhaps corrupt legal system. In building accountability between officials and the public they are meant to be serving, both by the use of surveys and, even more potently, by organizing meetings in which officials explain to people at the grass roots just where the money has gone.

An excellent model for this latter approach is provided by activities in India. The Indian village of Surajpura is a long way from Washington D.C., yet access to information—which forced President Nixon from office in the USA after the Watergate Tapes become public—proved no less potent there. The Government of Rajasthan recently recognised the people’s right to access to official documents at the local level, landmark legislation itself the culmination of a 53-day hunger strike. Now an NGO, the Mazdoor Kisan Shakti Sangathan (MKSS) is taking that information to the people. A public hearing, attended by village leaders, on 19 January 1998 in Surajpura village began with a puppet show dealing with the abuse of development funds by politicians and government functionaries. A crowd soon gathered and most stayed for the next six hours. Some had been involved in development works as labourers or masons and followed with interest as the accounts for 23 development projects were publicly examined. Schools, drainage and sewage schemes and other projects were looked at and as confidence among the crowd grew, more and more started to ask questions and to identify a wide range of frauds. The accounts listed some as being paid who had not been. Some showed inflated bills. Others suggested that payments had been made for materials that were never used. The crowd roared with mirth when the name of a person long dead was listed as a paid labourer.

Throughout, the meeting was surprisingly constructive and orderly, made possible through skilful facilitation by MKSS and its success in persuading officials that they really had no alternative but to take part. At its end, about 20 percent of the funds were found to have been misappropriated and leaders involved had agreed to co-operate with a follow-up process to recover the funds, some even agreeing on the spot to return money where personal liability had been established. Unpaid workers and suppliers were promised payment.

These may seem small victories, but across rural India small development projects have been undertaken in the name of the poor only to have the funds looted for private gain by contractors and officials. The looted money then helps pay for the buying of votes and so distorts democracy as well as development. Aside from being a creative exercise in government for the people by the people, these meetings are small but significant steps towards a transition from representative to participatory democracy. This points to access to information being a powerful tool if creatively used by civil society and suggests that more work needs to be done in this area, if necessary at the expense of some of the work that has been going on in more traditional governance research areas.

Overall, there is a Gordian knot that needs to be cut if it cannot be untangled. We know where we are. We know where we want to be. Just how do we get there? The answers are coming, but not just yet.

VI. CHALLENGES AHEAD

If there are many unanswered questions, there are also as many challenges. First, the question of the sequencing of reforms. This will differ from country to country, but actually working out precisely where to start in the process is an important one as it will dictate much of the path ahead. It is in this context that the “national integrity system workshop” can be most effective, providing as it does an opportunity for all stakeholders to participate in a process that otherwise tends to be dominated, for no good or compelling reason, by lawyers.

A particular challenge for the outsider is to identify the appropriate (and clean) partners in a given country. There may be many who offer themselves, but the outsider must be able to determine what hidden agendas there may be and what individual motivations are as well as gain a reading on where the people concerned stand in their community. This dictates a special role for civil society in a country from the very outset so as to ensure that the reform process is fostered with the right “champions”. The road blocks, too, need to be identified from the outset, and the base line of acceptable (or perhaps better described as tolerable) conduct which the people are prepared to live with, defined.

The credibility of enforcement and watchdog agencies is crucial to the building of public trust and confidence. Credible agencies will attract public co-operation, both as complainants and as witnesses. An institution lacking in trust will not. And at the heart of credible institutions lies their manifest and popularly-accepted integrity. Their leaders must role model conduct of the highest kind.

The donor community also has a significant role to play in developing countries, both as part of the problem and as part of the solution. They are part of the problem because in many quarters they are viewed as having turned a blind eye to corruption in the projects they have been funding, and to tolerate the misappropriation of public funds to suit their own ends. However unfair some may think this to be, it is a perception that is very real. And in many instances there is substance to the complaint. So donor organisations must re-examine their own practices, something which many have been doing. And as part of the solution there are activities which donors can, should and do fund, but it is essential that these be locally owned and driven. The traditional form of expert aid—a foreigner flying in for a short period, doing a job and going—has been conspicuous by its failure to achieve sustainable development. Whatever may have been the position in the past, most countries now have the human resources to tackle their own problems, but they may need access to information, the tools they need to undertake the job and, at times, a word of encouragement. Thus the donor’s role is to be low key, supportive and facilitative. The more conspicuous the role of the donor (dominating small group discussions etc.) the less likely the efforts are to bear fruit. The donor community can; in particular, back up the data collection processes needed to empower civil society to hold the civil service accountable—to turn public servants into servants for the public. And they can help stress a focus on the bribe giver, and not just the bribe receiver.

This is particularly the case in so-called “grand corruption”, where for a generation or more exporters from the industrialised countries have been accustomed to bribing officials in developing countries to win business or to create what in many cases became “white elephant” projects. Frank acknowledgement of the role of the rich countries in contributing to the present decline, and with it an equally frank admission that no country can claim any sort of moral supremacy when it comes to corrupt practices, goes a long way towards cementing a meaningful partnership. The “hand that gives” must also be addressed at the national level, but concerted action against the “grand corrupters” from abroad (and the OECD treaty signed in December 1998 offers a way forward for the industrialised world) creates a climate of change and the moral ground necessary to address forms of corruption at lower levels.

There are many lessons to learn, and the final one is information sharing. The task countries confront is daunting and everyone needs access to as much experience and information as possible. This is not an area in which “experts” should develop stand-alone and discreet information bases. This is why TI are joining with the Vienna-based UN Crime Prevention Programme and the Commonwealth Secretariat in London to build a web site which will contain as much best practice as possible. This will be added to, and pruned from, as experience grows. And we would conclude with an invitation to others to join in this project as being one from which all can benefit through sharing.

VII. CONCLUSION

The process of building national integrity systems is as important as the content. The following are six final thoughts about the process.

1. Successful reform requires a country to integrate and harmonise all reforms in to a National Reform Program, including: sector reforms, financial reforms, economic reforms, constitutional reforms, civil-service reform, decentralisation, army demobilisation, privatisation, and legal reforms.
2. Reform is a long-term process where attitudes and conduct must be examined and re-evaluated for effectiveness at all levels.
3. Successful reformers will have to manage both expectations and change while introducing realistic incentive structures and sanctions.
4. Initially, reform should only tackle areas: (a) that can show credible impact on issues important to key stakeholders; (b) where the return on investment is greatest; (c) that are discrete and where reformers can control implementation, (d) that are within the budget; and (e) that can have some short-term positive impact.
5. Reform is a process of instituting building blocks that must be put in place over a number of years.
6. The process of and commitment to reform must be visibly supported from the top.

Essential to curbing corruption is undertaking and maintaining the public's confidence in the State as an institution. It is dependent upon the people's loyalty to its philosophy and policies regarding the development of the society's social, economic, and political welfare. At the heart of successful reform is the State's

These ten country examples are important since they act as regional examples, which are often more relevant and easier to sell to other countries in the same region. All CICIP country-based activities should be compatible with the other donors' general strategy and an overall larger framework of country reform (CDF) Collaboration between all active donors to put the anti-corruption into an effective overall strategy can only facilitate these efforts. Some models based upon the governance group's prior experiences have been effective, but the strategy must remain adaptable. The model should change as "case law" or best practice experience increases with the final objective being improved effectiveness. Surveys help establish a baseline on which to judge progress.

The growing realisation that the private and public sectors should be examined supports efforts to develop effective, action-oriented information-gathering procedures. They play an important role in measuring the places where the private sector interacts with the public, such as the case of the TI survey. It is significant to note that surveys used for pure awareness raising and problem identification are going to be less involved and smaller than surveys used for problem description or in the development of a broader reform program. The so-called Service Delivery Surveys (SDSs), done in partnership with CIET International, are in the latter category and are consequently expensive. However, to ensure effectiveness, much of the governance work should be done at the sub-national level. As decentralization becomes a growing priority, more analyses are needed to assess the relative advantages of decentralisation and the process for the efficient delivery of public services.

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