ANTI-CORRUPTION HELPDESK
PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

HELPDESK ANSWERS 2015

The Helpdesk is a knowledge base that offers the TI network and selected stakeholders on-demand research on corruption within a guaranteed timeframe. Answers typically consist of a four to eight page brief synthesising the state of knowledge on a particular topic. The Helpdesk is a key component of TI's Anti-Corruption Solutions and Knowledge Programme (ASK).

All answers listed below can be accessed on request at: tihelpdesk@transparency.org.

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CONTENT

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ANTI-CORRUPTION LAWS

Sanctioning regime for bribery
Question submitted by Transparency International Tunisia, January 2015

Sanctions for fighting corruption differ significantly between countries and reflect different circumstances, legal traditions, national priorities and policies. While there is a broad consensus that sanctions should be linked to the gravity of the offence, there is little guidance on what constitutes effective, proportionate and dissuasive sanctions for corruption crimes. Most countries stipulate a mix of criminal and non-criminal penalties against individuals and companies found guilty of corruption, typically including financial sanctions, imprisonment, and confiscation of the bribe and the proceeds of bribery. International instruments also encourage state parties to complement such criminal sanctions with additional administrative and civil sanctions, including disciplinary action such as suspensions or reassignment, or bans on holding public office or participating in public tenders.

Cooling-off periods: regulating the revolving door
Question submitted by Transparency International Germany, June 2015

The movement of individuals between the public and private sectors – known as the revolving door – may lead to conflict of interest situations, increasing the risks of corruption. Governments should thus ensure that appropriate measures are in place to avoid former public officials misusing the information and power they hold to the benefit of their private interests. Cooling-off periods, that is, the introduction of a minimum time interval restricting former public officials from accepting employment in the private sector, is the most common measure to prevent conflicts of interest. Countries in Europe have set different cooling-off periods and requirements for former members of the government wishing to join the private sector. They usually vary from one to two years and are linked to specific types of activities in the private sector.

Best practice for electoral campaigns
Question submitted by Transparency International Chile, August 2015

It is important for a country to have a robust and comprehensive legal system that directly and clearly counters the potential for corruption to discredit the election process. Major corruption risks to electoral campaigns come in the form of ballot stuffing, vote-buying and voter register manipulation, as well as via the abuse of state resources, to swing the election campaign in the favour of one party or candidates – usually the incumbent. The legal framework must include robust election mechanisms, the opportunity for free and meaningful oversight from both national and international observers and sanctions that are dissuasive yet proportionate to the offences committed. Moreover, countries can benefit from a code of conduct that is either enshrined in electoral law or which has been created by a country's political parties.

Mutual legal assistance and corruption
Question submitted by the U4, September 2015

Mutual legal assistance (MLA) is an indispensable tool for law enforcement judiciary authorities handling corruption cases with international aspects (foreign bribery and money laundering cases are typical examples). In order to facilitate international cooperation, countries have tried to regulate mutual legal assistance through their domestic legislation and international instruments. Despite those efforts, some countries still refuse to provide MLA on legal grounds such as the absence of dual criminality, immunity, bank secrecy or for procedural reasons. In addition to those legal barriers, practical challenges at the institutional and operational level hinder the timely and effective provision of MLA (insufficient resources and expertise, limited available information, lack of coordination, etc.).

Regulating nepotism: approaches and best practices
Question submitted by Transparency International Venezuela, October 2015

There are several examples of anti-nepotism regulations worldwide. These range from broad constitutional articles (Nicaragua) to specific anti-nepotism legislation (Brazil) to organisation codes within public bodies. While it is assumed that anti-nepotism regulations act as a corruption deterrent, thus promoting merit-based recruitment, we found little empirical evidence to corroborate that assumption. Enforcement is critical, and it is clear from the case law that some jurisdictions have been more vigilant than others at enforcing existing anti-nepotism rules and at investigating breaches. When regulating nepotism, a number of general considerations must be taken into account. These include whether to opt for an outright ban on nepotism or to focus on ensuring the use of merit-based appointment systems for all applicants regardless of their connections.

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INSTITUTIONS

Best practice for preventive anti-corruption bodies
Question submitted by EU, March 2015

Prevention, including the development, coordination, monitoring and evaluation of anti-corruption policies and strategies, is widely recognised as a key component in the fight against corruption. While there are different institutional designs suitable to the specific legislative context of each country, a series of principles and standards for these types of bodies has gradually been developed to ensure their impartiality and effectiveness. Several countries in Central Asia, such as Azerbaijan and Georgia, have opted for establishing high-level consultative councils with representatives of the different agencies, branches, and levels of government. In the Baltic region, Latvia and Lithuania have chosen a different model, where corruption prevention has been tasked to multi-purpose anti-corruption agencies.

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UNDERSTANDING CORRUPTION

Corruption and anti-corruption in human resource management in the public sector
Question submitted by U4, March 2015

In many developing countries, weak HR management processes have resulted in oversized and under-qualified civil services, with distorted incentive structures and poor work ethics that ultimately undermine the goal of building a strong, efficient and accountable public sector. Corruption can affect all human resource management processes, including the management of recruitments and promotions, compensation, conditions of services and personal records. In particular, favouritism and nepotism and abuse of authority in areas of recruitment, training, promotion and transfer have been identified as major risk areas. Preventing corruption in HR management involves merit-based human resource and recruitment policies, transparent pay packages and internal controls, as well as the management of effective integrity management systems, including the implementation of codes of ethics, ethical training and whistle-blowing mechanisms.

Literature review: Linkages between accountability and corruption
Question submitted by TI Kenya, April 2015

This Helpdesk answer provides an overview of the literature linking various forms of accountability to the control of corruption.

Literature review: Corruption and One-Party Dominance
Question submitted by EU Tanzania, April 2015

This answer provides a review of the main studies related to one-party dominance and corruption. Different conceptual and theoretical schools have studied the relationship between democracy, political competition and corruption, leading to rather diverse findings. A selection of key studies is presented below in an effort to provide a snapshot of the different strands of relevant research relating to this issue.

Measuring the value of bribes
Question submitted by Transparency International Vietnam, September 2015

A few measurement tools relating to experience of petty corruption include in their methodology an assessment of the average amount paid in bribes. There are three main approaches that can be undertaken to assess the value of bribes, including corruption surveys, exit surveys and online reporting. Corruption surveys interview citizens, public officials and/or private firms regarding their experiences with petty corruption during a certain period of time. Exit surveys ask citizens about their experience of corruption shortly after they have accessed a public service at one of the government agencies. Finally, online reporting provide citizens with an online platform, where they can report their experiences of petty corruption almost immediately after they occur.

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ANTI-CORRUPTION TOOLS AND APPROACHES

Anti-corruption coalitions: Examples of success and capacity building
Question submitted by EU, January 2015

Coalitions are considered to be an effective mechanism to achieve results in the fight against corruption. Existing studies show that their effectiveness and usefulness depend on a series of factors, such as the capacity of individual members, the capacity of the coalition per se, including its technical and managerial skills, and the

outcomes/impact of the coalition's work. Several Eastern European countries have operating anti-corruption coalitions, but for the great majority of them, there is insufficient evidence of their work and impact.

The impact of anti-corruption initiatives: Examples from the TI movement
Question submitted by TI UK, April 2015

This answer provides examples of anti-corruption initiatives undertaken by Transparency International (TI) chapters that had a positive impact on corruption and helped improving the life of citizens. TI chapters are involved in a wide variety of activities aimed at enhancing transparency and accountability and ultimately reduce corruption. While measuring the impact of such activities faces several methodological challenges, examples show that many of them have been successful in bringing about positive legislative change, strengthening public institutions and oversight, raise awareness and empower citizens, as well as increased punishment for perpetrators of corruption and redress for victims.

Successful anti-corruption reforms
Question submitted by EU, April 2015

While evidence of impact is relatively thin, several evidence mapping exercise suggest that public finance management reforms, strengthening horizontal accountability mechanisms and transparency tools such as freedom of information, transparent budgeting, asset declarations can have an impact on controlling corruption. Lessons drawn from successful approaches indicate that there is no silver bullet against corruption, and that contextual factors linked to the local political economy as well as the legal and institutional framework are key to the success of anti-corruption interventions. The effectiveness of anti-corruption approaches is usually maximised by a combination of complementary (top-down and bottom-up) approaches and success driven by the interaction of a number of reforms introduced simultaneously.

Anti-Corruption programmes for young people in conflict and post-conflict countries
Question submitted by U4, April 2015

Young people can play an important role in anti-corruption programmes through their potential as future leaders and voters, and due to their creativity and innovative approaches. Projects in conflict and post-conflict countries have either been started by young people themselves, or by organisations wishing to engage with young people. Efforts have been helped by the growing use of ICT's, social media, and crowd-sourcing platforms which allow for quick, cheap, and easy access to large number of people. This query categorises projects into four groups (i) building capacity of young people, (ii) educating young people, (iii) youth movements and groups, and (iv) community monitoring.

Fighting grand corruption: Challenges and successes
Question submitted by EU, May 2015

Fighting grand corruption requires a set of measures at the domestic level, where corruption takes place, and abroad, where stolen assets are often located, including the adoption of mechanisms and reforms to support prevention and detection of corruption, such as transparent public financial management systems and strong anti-money laundering rules, to the enforcement of laws and punishment of public officials, companies and senior executives involved. It also requires measures to find and recover stolen assets. Measures that have been partially successful include the establishment of specialised anti-corruption units, the use of alternative legal instruments to recover assets and seek damages, and public interest litigations, among others.

Anti-corruption compliance mechanisms of State Owned Enterprises
Question submitted by TI Brazil, June 2015

State-owned enterprises (SOEs) are exposed to the same governance challenges as those faced by private firms and should be held to the same high standards of governance as private companies. In addition, due to their close relationship with policy makers and regulators, SOEs may face additional challenges that are more specific, such

as undue political influence, conflict of interest for board members appointed by the state, and a lack of knowledge and expertise within the board and management to carry out their functions. Some of the critical issues related to anti-corruption compliance in SOEs include the smart management of the state's role as the owner and regulator of the enterprises, selection and appointment of the SOE boards, establishing internal controls and strong auditing procedures, transparency and disclosure of financial and non-financial information, and adopting and integrating ethics, code of conduct and anti-corruption compliance across the entire organisation.

Corruption and anti-corruption in social security systems
Question submitted by Transparency International Italy, November 2015

Social protection programmes channel a large amount of public resources, providing opportunities and incentives for corrupt and fraudulent practices. Integrity challenges in social security systems involve corruption in defining eligibility and enrolling beneficiaries, collusion, political patronage and clientelism, conflicts of interest, corruption in pension investment funds and fraud. In OECD countries, countries tend to focus their efforts on preventing, detecting and deterring fraud. The International Social Security Association (ISSA) has developed good governance guidelines that provide a broad framework for anti-corruption activities, framed around principles of accountability, transparency, predictability, participation and dynamism. Other tools have also been implemented such as hotlines and portals to report abuse, random sample spot checks, information campaigns and training, and data matching.

Standards of public participation with a focus on the mining sector
Question submitted by Transparency International Chile, August 2015

The participation of the public in the decision-making processes of public affairs is a right that is enshrined in many international conventions. A number of countries and international organisations have defined standards of public participation, mainly focusing on consultation times, accessibility to information and processes and the responsiveness of officials as well as the principles of trust, accountability, transparency and independence which are at the core of effective public participation. Similar principles apply in the mining sector. Mining companies have increasingly come to understand the importance of public participation in the creation of their projects, and some countries have even enshrined these principles in their laws and regulations.

Corruption risk assessment and management approaches in the public sector
Question submitted by the EU, September 2015

There is no one-size-fits-all methodology to corruption risk assessment and management. Many different approaches exist with various elements. Some good practices emerge in terms of who should participate in the process: the institution assessed, of course, but also relevant stakeholders such as the institution's users, the national institution or entity responsible for ensuring public sector integrity (court of audit, anti-corruption agency or ombudsman), civil society organisations, and other external experts. It is also considered good practice to use various data sources to ensure a certain level of quality and reliability of the findings. Several corruption risk assessment and management tools as well as country methodology examples are presented in this document.

Overview of Transparency and Openness Literature
Question submitted by Transparency International Slovenia, October 2015

Transparency and openness are concepts that have been around for many years, but it has been only in the past 20 years that they have gained momentum in the policy agenda. As a result, a series of academic and non-academic publications have delved into the issue of the importance, effectiveness, ways of measurement and of promoting increased transparency and openness in the public sector. This answer provides a collection of some of the most relevant literature and studies on transparency and openness; its importance, effects measurement and advancing reforms.

Unexplained wealth orders as an anti-corruption tool
Question submitted by TI Mauritius, November 2015

Unexplained wealth orders (UWOs) are part of non-conviction based asset confiscation, but contain some specificities: they do not require criminal convictions; they shift the burden of proof to the property owner who must prove a legitimate source for his wealth; and the forfeiture proceeding is instituted against a person rather than against the property. Provided that the law establishing UWOs provides for enough guarantees to avoid the mechanism to be abused and to ensure constitutional guarantees, such as due process and presumption of innocence, are respected, they can be considered an effective anti-corruption tool in the recovery of stolen assets. Their success also depends to a great extent on the existence of an independent body tasked to investigate and request such orders.

The interaction between the public and private sectors: preventing conflict of interest
Question submitted by TI Chile, November 2015

Conflict of interest situations, if not properly identified and managed, may can distort decision-making processes and generate inappropriate outcomes, thereby undermining the functioning of public institutions and markets. Preventing conflicts of interests is therefore essential to closing opportunities for corruption and preventing for instance abuse of power and influence peddling. In the public sector, rules should be established clearly defining what situations could generate a conflict of interest and how they should be managed. The private sector also plays a role in ensuring that when interacting with the public sector it abides to the principles of honesty and integrity and that personal relationships or financial advantages are not used to influence public decision-making.

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SECTOR SPECIFIC INFORMATION

National strategies for engaging with the private sector
Question submitted by TI Malaysia, March 2015

This answer provides an overview of the main issues related to the design of anti-corruption plans by civil society organisations aimed at engaging the private sector in the fight against corruption and improving the business environment. It also provides an overview of the main components of such programmes with examples of activities conducted by Transparency International chapters, including training and advisory services, corporate supporters forums, integrity pacts, advocacy and awareness raising activities, among others.

Public procurement law and corruption
Question submitted by TI Guatemala, June 2015

The existence of an adequate legal framework is the very first step to limit corruption opportunities in public procurement. While procurement laws should be designed in accordance with the country's context and legal tradition, there are some general issues that should be covered by all procurement regulations. They include, for instance: clear and objective rules regarding the available procurement methods and the grounds under which each of them should be used; transparent rules on the bidding process, including time limits, tender documents and contractor qualifications; and the evaluation criteria of bids and bidders. Moreover, procurement laws should regulate complaint and redress mechanisms, sanctions for non-compliance, and provide for the effective monitoring of awarded contracts through, for instance, proactive disclosure rules and the participation of civil society as a watchdog.

Public procurement planning and corruption

Questions submitted by TI Serbia, June 2015

The planning phase of the procurement is often overlooked with regard to anti-corruption, but it is also exposed to corruption that can have a lasting impact on the procurement cycle. Conflicts of interests, bribery and kickbacks, bid rigging (in the form of manipulation of procurement specifications) and a lack of resources all heighten the risk of corruption at this stage. To address corruption risks, steps should be taken to ensure that the entire planning process is transparent and open to public debate and participation. Care should be taken that conflicts of interest do not stifle open competition among bidders, or that undue influence is not exercised over the needs assessment or bidding documentation stages.

Combatting corruption in tax and customs administration in Asia-Pacific

Question submitted by U4, August 2015

Tax and customs administration is particularly prone to corruption due to the complexity and technical nature of regulations and processes, the high discretionary powers of revenue officials, and the disproportionate financial gains which can be made compared to the risk and cost of getting caught. Corruption in this area generally takes the form of evasion (by taxpayers/importers), collusion (between taxpayers/importers and officials) and extortion (by officials). Approaches to mitigating corruption risks in tax and customs administration can be divided broadly into four areas: simplifying laws and processes; strengthening risk-based management and improving employment conditions; strengthening the ethics and monitoring framework; and promoting greater transparency in operations.

Anti-corruption mechanisms in the banking sector

Question submitted by Integrity Watch Afghanistan, August 2015

Corruption in the banking sector has manifested itself in many scandals involving money laundering, rate rigging and tax evasion, all of which undermine the public's trust in financial institutions. Since the global financial crisis of 2008/2009, a number of high-level reforms have been undertaken, both at the regulatory level and at an operational level within banking institutions. Among the key anti-corruption tools to consider within the banking sector are: having strong anti-bribery rules, robust anti-money laundering rules, managing risks associated with politically exposed persons as banking clients and tools to counter banking secrecy. To effectively counter corruption and promote integrity, these rule-based approaches should be complemented with measures to engender a culture of integrity in banks and financial institutions, including codes of conduct, public oaths, building incentives for integrity in remuneration packages and careful management of conflicts of interest.

Non-competitive public procurement

Question submitted by U4, August 2015

To prevent non-competitive practices in public procurement, principles of competition and transparency must be defined in legislation and regulations. To complement a strong legal framework there needs to be oversight from independent bodies, and civil society should be empowered to hold the government and procurement bodies to account. In Ethiopia, a newly implemented procurement law has had some impact on corruption in public procurement generally, and has helped to reduce the amount of contracts that are tendered noncompetitively. However non-competitive practices are still an issue, particularly in the telecommunications sector. The country suffers from a lack of opportunity for civil society oversight, meaning that there is still the possibility for procurement laws to be abused or circumvented, as enforcement remains inconsistent.

Carbon market corruption risks and mitigation strategies
Question submitted by U4, September 2015

As a new market with a developing architecture, the carbon market has proven susceptible to corruption and other integrity risks. These risks are significant, because any attempt to undermine the carbon market jeopardises one of the major elements of our global response to climate change. This paper examines these risks and the carbon market's vulnerability in terms of both its environmental and financial integrity. It concludes each section with an overview of some of the mitigation strategies in place to reduce corruption and ensure that the carbon market functions to fulfil its ultimate aim: to reduce greenhouse gas emissions.

Corruption and anti-corruption in European football associations
Question Submitted by Transparency International Argentina, September 2015

National football associations represent football in their country and operate in a very complex system of governance. In this context, it is vital that national football associations maintain robust governance mechanisms that promote transparency and integrity. In Europe, there are a number of examples of national football associations beginning to understand that good governance is key to combatting organisational and institutional corruption in the sport. In recent years, both Northern Ireland and Wales have undertaken independent reviews of their governance structures and have implemented reforms to enhance transparency and integrity within the organisations. However, no national football association, including the European football confederation, UEFA, can be seen as representing a gold standard of anti-corruption as, in general, the governance of sports organisations is weak throughout the world.

Corruption risk assessment and management approaches in the public sector
Question submitted by EU, September 2015

There is no one-size-fits-all methodology to corruption risk assessment and management. Many different approaches exist with various elements. Some good practices emerge in terms of who should participate in the process: the institution assessed, of course, but also relevant stakeholders such as the institution's users, the national institution or entity responsible for ensuring public sector integrity (court of audit, anti-corruption agency or ombudsman), civil society organisations, and other external experts. It is also considered good practice to use various data sources to ensure a certain level of quality and reliability of the findings. Several corruption risk assessment and management tools as well as country methodology examples are presented in this document.

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COUNTRY-SPECIFIC INFORMATION

Zimbabwe: overview of corruption and anti-corruption
Question submitted by U4, January 2015

Zimbabwe was effectively a one-party state, ruled by Robert Mugabe's Zanu-PF, until the main opposition party, the Movement for Democratic Change (MDC) outpolled ZANU-PF in the violence-affected elections of 2008. A fragile and acrimonious power-sharing deal reached after the polls started to resolve the country's economic and political crisis, and brought relative calm and economic stability to Zimbabwe. In spite of recent constitutional reforms, the country continues to face major governance challenges, manifested through various forms of corruption, ranging from petty, bureaucratic and political corruption to grand forms of corruption involving high level officials. Corruption is also characterised by the deeply entrenched system of political patronage, the tight grip of the ruling party over the security forces, and the history of political violence, repression and manipulation.

Timor-Leste: overview of corruption and anti-corruption
Question submitted by EU, February 2015

In little more than a decade since achieving independence, Timor-Leste has made significant progress in the fight against corruption, establishing part of the required legislative framework and a number of institutions dedicated to combating the issue. Despite these successes, the process of state building is still on-going, and most state agencies and independent watchdog bodies continue to lack the necessary human resources and capacity to tackle corruption effectively. This problem is particularly acute in the public financial management sector, with mounting concerns about the country´s over-dependence on the massive financial inflows from the oil extraction sector. Indeed, while the growth in oil revenues has allowed the government to invest in much needed infrastructure and human development initiatives, it has also created new opportunities for corruption and administrative malpractice, as reflected in the increasing number of high-level corruption cases being brought before the courts.

Bangladesh: overview of corruption and anti-corruption with a focus on the health sector
Question submitted by U4, March 2015

Despite a relatively strong legal framework, anti-corruption efforts in Bangladesh are undermined by weak implementation and political interference. A culture of confrontational politics between the country's two main parties has weakened the rule of law and led to the politicisation of state institutions including the judiciary and bureaucracy. As a result, corruption is an endemic problem in Bangladesh at all levels of society. Although bribery rates are reported to have declined over the past five years, the amount of unauthorised money paid for receiving public services is in fact estimated to have increased. In the health sector, as well as bribery and unauthorised payments, irregularities include politically influenced recruitment, transfers and promotions of healthcare professionals, irregularities in the procurement of drugs and equipment, unregistered and unqualified doctors operating in private healthcare facilities, and absenteeism.

Bangladesh: Corruption Risks in the Public Financial Management System
Question submitted by EU Dhaka, March 2015

A is central for the achievement of a government's policy outcomes and goals. Like many of government activities and processes, a PFM system can also be susceptible to corruption risks. There are important corruption risks in Bangladesh's public financial management (PFM) system identified by different institutions, scholars and civil society organisations. These risks include bribery and collusion in the tax administration; bribery in the allocation of development funds; embezzlement in the expenditure of public funds; collusion in public procurement tenders and extortion in the performance of external audits. This answer considers corruption risk in the PFM system of Bangladesh, focusing on Bangladesh's tax administration, budget process, public procurement process, and external audit and parliamentary oversight.

Bangladesh: Corruption Risks in the education sector
Question submitted by EU, March 2015

Bangladesh has been recognised internationally for progress made in achieving almost universal access to primary education and attaining gender equity at the primary and secondary education levels. However, the main forms of corruption identified in the country's education sector include more obvious forms such as bribery in admissions and in the disbursement of stipends; nepotism in the recruitment of teachers; and corruption in procurement. Less obvious forms include teacher absenteeism; misuse of private tuition by teachers; and sexual exploitation in schools and universities. Governmental efforts in the area of governance have led to improvements in the recruitment of teachers and school management. Notable non-governmental anti-corruption initiatives in the sector include TI-Bangladesh's Integrity Pledge which aims to promote people's participation in planning, budgeting, implementation and monitoring in schools.

Iraq: Overview of corruption and anti-corruption
Question submitted by U4, March 2015

Since the overthrow of Saddam Hussein's regime, Iraq has faced significant corruption challenges. The country continues to score among the worst countries on corruption and governance indicators. Corruption risks are exacerbated by the historical legacy of the previous authoritarian regime, lack of experience in the public administration, weak capacity to absorb the influx of aid money, sectarian issues and lack of political will for anti-corruption efforts. While Iraq has introduced a number of anti-corruption initiatives, these fail to provide a sufficiently strong integrity framework. Political interference, lack of political will, a weak civil society, a confusing penal code, and a lack of resources limit the effectiveness of anti-corruption measures. Corruption in the military and security services and oil smuggling has contributed to the major security challenge that the country now faces with the militant group Isis.

Kurdistan Region of Iraq: Overview of corruption and anti-corruption
Question submitted by U4, March 2015

Kurdistan Region of Iraq has faced years of war and genocide, but has developed a political system with regular elections, and an improving space for civil society and its engagement in governance. Levels of corruption in the country, while lower than in Iraq, are comparatively high compared to other countries in the region. Corruption challenges are rooted in the strong role that the two established political parties have in the political system, nepotism, a weak bureaucratic governance system and the task to ensure proper use of oil revenues. While progress has been made on delivering the government's 2009 'Good Governance and Transparency Strategy' and the 'Vision for 2020', there is a desire to see more high-profile convictions for corruption cases. A challenging media environment remains a serious constraint on effective anti-corruption reform.

Fighting illicit financial flows from Ethiopia
Question submitted by U4, March 2015

Recent studies show that Ethiopia is among the top ten African countries by cumulative illicit financial flows related to trade mispricing. This amount may be much higher if funds from corruption and other criminal activities are considered. In any case, corruption plays a key role in facilitating the flow of illicit funds, and measures to fight corruption are instrumental for preventing and combating the movement of illicit funds. Ethiopia has been making progress in improving its legal and institutional framework to combat corruption, but the government needs to ensure that reforms and new rules are now implemented and enforced effectively. A few areas, such as business regulations, taxation, the media and civil society, could still benefit from further legal improvements in order to contribute to corruption prevention and detection and ultimately end illicit financial flows.

Overview of corruption and anti-corruption in Egypt
Question submitted by EU, April 2015

Egypt has entered the fourth year of a period of political instability unheard of since its independence, after massive demonstrations denounced the deep-rooted system of corruption plaguing the country and finally ousted former president Mubarak. It is challenging to assess whether the level of corruption has increased or declined in the country due to the rapidly changing context, but it is generally admitted that political corruption remains a major problem in Egypt with clientelistic networks playing a central role both in politics and in the economy. Corruption in the country's law enforcement agencies severely undermines the rule of law, and some recent abusive trials give the impression that the judiciary has become politicised. Egypt has a relatively strong legal and institutional framework to prevent and stifle corruption, despite the notable lack of a comprehensive anti-corruption law, freedom of information law and whistleblower protection. The most important problem lies in the implementation of existing legislation.

Transparency and accountability in Lebanon's emerging petroleum sector
Question submitted by U4, April 2015

Following the discovery of petroleum and gas in Lebanon, the country has taken several steps to establish an adequate institutional and legal framework that would allow for effective exploration and management of resources. Fighting corruption and ensuring that the emerging petroleum sector is governed in a transparent and accountable manner remain one of the main challenges. Important decisions regarding petroleum exploration and management of funds are expected to be made in the coming years, including the licensing of oil blocs and the establishment of a sovereign fund. It is thus essential that the adequate mechanisms are in place to enhance transparency, accountability and prevent corruption. In particular, increased participation in the decision of policies and regulations regarding petroleum exploration, the enactment of clear rules governing the negotiations between the government and oil companies during the licensing process, and stronger oversight by the government and civil society are key.

Zimbabwe: overview of corruption in the health sector, the education sector and local governments
Question submitted by U4, April 2015

There are few studies specifically focussing on corruption in the health and education sectors in Zimbabwe, as most studies discuss the daunting challenges faced by these sectors in the past decade, which although not directly related to corruption maybe a consequence of high levels of corruption permeating the country. Both sectors have been severely hit by the hyperinflationary economic crisis that the country has experienced since the beginning of the 2000s that has resulted in massive cuts in budgets allocated to health and education, brain drain and shortage of skilled staff, obsolete equipment and infrastructure. Local governments are also plagued by lack of resources and skilled staff, inadequate financial management systems, providing incentive and opportunities for corruption. Major forms of corruption affecting the health and education sectors as well as local governments in developing countries such as bribery, nepotism, embezzlement, theft, mismanagement absenteeism are present in Zimbabwe.

Singapore: Resources on corruption and anti-corruption
Question submitted by TI India, May 2015

Control of corruption in Singapore has always been high on the agenda of the ruling party. Over the past 60 years, the country has built a strong public administration, reducing significantly the opportunities for corruption. The government has also adopted strict anti-corruption laws and invested heavily on investigation and prosecution services. On the other hand, issues related to transparency are still considered a concern. There is very limited space for civil society and the media to monitor government activities or even speak up against corruption and other human right issues. The ruling party exercises a great deal of influence over government institutions, including the judiciary. Moreover, there is evidence that Singapore is increasingly being used by foreign officials to hide the proceeds of corruption or evade taxes, making use of the high levels of secrecy found in financial services in the country.

Overview of corruption and anti-corruption: Uzbekistan
Question submitted by U4, September 2015

Reports from various sources consulted for this expert answer describe Uzbekistan as an oligarch-authoritarian state where public resources are misused to sustain power to the benefit of those in or close to the ruling elite. While there is limited information regarding the extent and forms of corruption in the country, available evidence suggests that corruption is widespread and affects the daily lives of citizens. Corruption allows the elite to illegally appropriate the country`s natural resources and acts as a facilitator of human rights violations in cotton plantations. The government's response to widespread and systemic corruption has been weak, with extensive emphasis given to anti-corruption training. Legal and institutional reform is needed to ensure meaningful separation of powers and

adequate public accountability of government bodies.

Tackling judicial corruption in Afghanistan
Question submitted by U4, October 2015

Known to be slow and ineffective, the Afghan judiciary is criticised for failing to provide even basic services, such as fair and open trials. Out of frustration a large share of the population turns to either vigilantism or the informal justice system or justice provided by the Taliban. A corrupt judiciary further breeds a culture of impunity, letting the most corrupt individuals slip through the system. While the Afghan judiciary has taken various steps to tackle corruption within itself, there are further measures to be taken.

Whistleblowing protection in Romania and Hungary
Question submitted by TI France, October 2015

Good practices in whistleblowing protection include a broad definition of a whistle-blower that protects both public and private sector employees against all forms of retaliation and discrimination, clearly communicated internal and external disclosure channels, including anonymous reporting, the right to confidentiality, to receive advice on their rights and to receive appropriate compensation from damages resulting from retaliation. Romania is considered to have a strong whistleblowing protection legal framework that only applies to the public sector. While Hungary's new 2014 legislation extends whistleblowing protection in both the private and the public sector, its regime is considered weaker, none the least because it requires corporate compliance officers to inform targets of whistle-blower disclosures that they are the subject of a complaint, undermining the credibility of subsequent investigations.