

U4 Expert Answer



Integrity management systems in global bodies: Examples from the UN, the Global Fund to Fight AIDS, Tuberculosis and Malaria and the European Union

Query

Could you please provide an overview of anti-corruption efforts and integrity management systems for global bodies such as the UN, the Global Fund and the EU development system?

Purpose

We are in the process of identifying initiatives or actions in order to improve the anti-corruption systems of global bodies, including multilateral and supranational organisations.

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Caveat

The response is a mapping of existing integrity mechanisms of global bodies. It is not a full-system assessment or comparison of integrity mechanisms across the three bodies profiled. Such an integrity assessment has not been done and could be recommendable. This answer focuses more extensively on the integrity architecture of the UN.

Summary

Having a comprehensive integrity system is seen as an important defence against corruption, whether for countries or organisations. In the area of development and aid, many organisations have come to view integrity systems as an important part of their efforts to fight corruption. For example, some bilateral donors and multilateral development banks have adopted anti-corruption systems typically rooted in a hallmark document that brings together all anti-corruption related policies. This body of institutions, processes and policies aims to provide guidance on how to prevent, detect, investigate and sanction corruption.

Global bodies engaged in development also often have similar integrity systems. A mapping of these systems was done for three organisations with global reach: the United Nations (including its separately administered funds and programmes); the Global Fund to Fight AIDS, Tuberculosis and Malaria; and the European Union (namely the European Commission and the EuropeAid Development and Co-operation Directorate-General; DG-DEVCO).

The findings show a diffuse anti-corruption policy landscape for each. Policies and programmes are

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numerous, separately administered and spread across different units, departments and agencies.

The absence of a more centralised system does not mean that anti-corruption policies are necessarily less effective. In some cases, there are legal barriers that would prevent a more overarching policy to apply to all institutions and/or members. Rather, the findings speak to the need for further research to understand how the policies are implemented. For example under such a scenario of a more piecemeal system, greater cross-departmental collaboration and information-sharing would be essential and needs to be assessed. Otherwise, there could be a potential risk of leaving certain areas uncovered and creating gaps in enforcement.

At the same time, it is important to understand what the findings point to regarding public access to information of what are essentially public bodies (supported through tax-payer resources). In conducting this mapping, information about the initiatives was often found to be fragmented, dispersed and difficult to access. Moreover, it was usually in English only.

1 Understanding integrity management systems of global bodies

Is a single framework better?

Integrity benefits the operations and programmes of organisations, whether these are bilateral (i.e. a donor agency), multilateral (i.e. a development bank), global (i.e. a sectoral fund) or supranational (i.e. a European Union-like body).

Integrity serves as a defence against corruption and mismanagement, which can have costly consequences, particularly when it comes to development. Corruption siphons off needed funding to help the poorest to improve their lives. It also creates practices that make sustainable development unattainable. Finally corruption compromises the entire aid system by turning public perception against development assistance. Increased pressures from governments to show results and “value for money” have only added to the urgency to properly address corruption in terms of development programmes (i.e. focus, design and delivery) and the internal operations

of organisations (i.e. incentives, protections, and sanctions).

Faced with such challenges, some bilateral donors and multilateral development banks have invested considerable resources to develop comprehensive anti-corruption frameworks and establish integrity management systems. These typically include both an external and an internal dimension to ensure the appropriate use of resources under the agency's management and to contribute to anti-corruption efforts in partner countries (Chene, 2010). These systems often consist of one hallmark document or strategy that brings all the institutions, processes and policies together. The system usually provides guidance on how to identify risks and to prevent and combat corrupt practices. A comprehensive anti-corruption framework typically covers four major components, namely prevention, detection, investigation and sanctions (Chene, 2010).

Yet other development organisations have constructed a more diffuse landscape of anti-corruption institutions, processes and policies. Following a mapping of the anti-corruption and integrity systems of three organisations with global reach — the United Nations (including its funds and programmes); the Global Fund to Fight AIDS, Tuberculosis and Malaria; and the European Union (specifically the European Commission and DG DEVCO) — each seems to have adopted a more piecemeal approach. Rather than an overarching strategy to shape and guide their internal and external operations, related anti-corruption activities are spread across different units and departments. Supporting policies often tend to be numerous on one topic, such as whistleblowing, and are not standardised. In some cases, there are legal obstacles to better streamlining but in others, some coherence has been promoted. Measures, when present, often address specific issues such as procurement practices, auditing and accounting, staff ethics, fraud and access to information. Unfortunately, public access to information regarding the frameworks present in these three organisations is often fragmented, dispersed and difficult to find. Moreover, contact information for staff working on the topics is often not listed.

It is important to underscore that a single anti-corruption strategy does not always equate with effective enforcement and results. As has been seen among national anti-corruption strategies, implementing any policy will depend on the policy

design, the bodies authorised to implement it (i.e. resources and powers) and how the initiative relates to other existing policies (Husmann and Hechler, 2008). Moreover, institutions like the UN and the EU are composed of legally separate units (organisations and countries), making a centralised system more challenging in light of existing measures already in place for each member.

However, recent assessments, including staff and public opinion surveys, suggest that the current anti-corruption system overseeing the global bodies that were mapped may not be functioning optimally. Below is an overview of some of the more salient findings.

The UN

In the case of the UN, an external study (United Nations, 2004) done on perceptions of integrity found that of the more than 6000 employees that responded (33 per cent of staff), the top concerns were staff accountability, setting the tone at the top, the commitment of supervisors, ethnocentrism (rules favouring certain groups) and resources dedicated to promoting integrity. Overall there was a very low level of trust among staff in the current system.

The top recommendations by staff to change the situation were grouped along four key themes:

- 1.) Improve the management system to enhance integrity.
- 2.) Supervisors and managers should be more closely supervised by senior managers.
- 3.) Management accountability should be better developed.
- 4.) Senior leaders' personal commitment to integrity and ethical conduct should be more clearly stated.

These same issues - transparency, accountability and integrity - have been signalled by others about the UN. For example, the Office of the Inspector General (OIG) of the Global Fund for AIDS, Tuberculosis and Malaria noted in its 2010 report that "*Citing privileges and special immunity, UNDP has refused to allow the OIG access to books, records and staff (...) to investigate allegations of fraud and misappropriation of funds*" (OIG, 2010)¹. Another study done by the EU Court of

Auditors of funding to the UN called for reducing its support, estimated at over one billion Euros in 2008. Its main concern was the lack of transparency of and accountability for the funds that have been provided (European Court of Auditors, 2009). Still, these findings need to be counterbalanced with other assessments that put UNDP as number one among its peers when it comes to accountability, based on ratings of transparency, participation, evaluation and complaint and response mechanisms (One World Trust, 2007).

The EU institutions

In terms of EU institutions, public opinion surveys show the issue of corruption to be at the top of the agenda. A significant majority of citizens believes that the EU institutions and member states are ill-equipped to prevent corruption. For example, the European Commission's public consultation on the question "*Freedom, Security and Justice: What will be the future?*" in 2008 found that a total of 88 per cent of the respondents felt that the EU should do more about corruption. These concerns are reflected in the fact that there is no one anti-corruption strategy governing the EU's 27 members and its institutions.

In an assessment done of EU institutions and the control of conflicts of interest, it was found that most institutions did not have standardised policies in place. In the case of financial disclosure and post-employment for staff, rules were the least robust with regulations covering only two-thirds of the recommended areas that are considered as needed to effectively prevent and sanction the problem (Demke et al, 2007).

The Global Fund to Fight AIDS, Tuberculosis and Malaria

In the case of the Global Fund, its Office of the Inspector General, an independent body, has done annual reports looking at breakdowns in integrity that lead to corruption and mismanagement. It is through its report that large-scale corruption problems came to light in four African countries (see "Investigations"

This authority rests with the Secretary General. However, UNDP's Office of Auditing and Investigations can initiate this process where appropriate. A number of inter-agency agreements have been negotiated to streamline this process as much as possible.

¹ According to comments received by UNDP, the organisation does not have a delegated authority to release documents that are the subject of privileges and immunities.

under the “Global Fund” section). Additional studies have been commissioned to assess the Global Fund, including its ethical and reputational risks. This report found three areas from where risks arise: 1) its role as a financial instrument; 2) the actions and behaviours of those associated with the Global Fund (recipients spend 60 per cent of funding on procurement); and 3) the Global Fund’s overall mission and work (Dubinsky, 2008).

2 The United Nations’ integrity management system

The United Nations (UN) is composed of more than 30 affiliated organisations collectively known as the UN system. This includes offices reporting directly to the UN Secretary General (e.g. the Office of the Special Advisor on Africa), regional commissions (e.g. the Economic Commission for Latin America and the Caribbean), bodies established by the Security Council, subsidiary and expert bodies of the General Assembly, programmes and funds (i.e. UNICEF, UNDP and the UN Population Fund), other UN entities (i.e. the Office of the UN High Commissioner for Human Rights), research and training institutes and inter-agency programmes (i.e. UNAIDS). The UN bi-annual budget for the period 2010-2011 is US\$5.16 billion². The following overview primarily focuses on policies and practices in the UN, and the UN Development Programme, given it is the main UN development agency. It is important to note that UNDP, as are all the funds and programmes, is considered a separate legal entity from the UN Secretary General³.

Prevention

Effective prevention of corruption implies a credible commitment to integrity that materialises in explicit anti-corruption policies, operational guidelines supporting increased transparency, participation, disclosure and

oversight and the promotion of ethical standards throughout the organisation.

Commitment to integrity and anti-corruption across the UN

The aim to have integrity in the UN dates to its charter, which recognises integrity as a founding value for the UN. Here, a universal standard for all staff members is outlined for the “highest standards of efficiency, competence and integrity” (Article 101, paragraph 3). However, in the UN, there is no single anti-corruption policy or strategy to shape this work or unify it particularly when it comes to internal policies.

For example, each fund and programme has its own policies that oversee related integrity and anti-corruption issues (United Nations Secretariat, 2007). As a result of these separately administered organs and programmes, there is also no system-wide “zero tolerance” policy on corruption. Even individually, no UN fund or programme has such an explicit policy.

The range of anti-corruption guidelines and policies in place vary by programme. For example, while the **World Food Programme has an anti-corruption, fraud and collusion policy**, others UN programmes do not (World Food Programme, 2010). Of the bodies surveyed here, neither the UN nor UNDP has an explicit anti-corruption or integrity policy. UNDP does have a “Fraud Policy Statement”, which expresses UNDP’s commitment to prevent, identify and address fraud committed by UNDP staff and third parties as part of procurement processes. The policy is currently being updated and will be released in 2011 as a new “Anti-Fraud Policy”. The fraud policy makes up what the organisation refers to as its accountability system: an accountability framework (i.e. results and risk-based performance management) and an oversight policy (i.e. internal/external controls) (UNDP, 2008 and 2008a). It is important to note that in the case of UNDP, its policies also cover UN Volunteers (UNV)⁴ given the organisational and funding structures of the programme.

For issues such as the debarment of firms, there is no one unified policy or procedure in the UN. This is in contrast to the emerging trend, such as among the multilateral development banks, to cross-debar firms.

² Please see:

www.un.org/apps/news/story.asp?Cr=budget&Cr1=&NewsID=33429. It is important to note that UN special programmes and funds are not included in this amount as their budgets come from voluntary contributions and as such, they are separate legal entities.

³ UNDP, at the country level, is the agency that coordinates the work of the other UN agencies. At the global level, it is tasked with leading different international development initiatives including the Millennium Development Goals.

⁴ Prior to the creation of UN Women, the UN Fund for Women (UNIFEM) also was under UNDP.

Operational Guidelines

Information Disclosure

The UN has no standardised information disclosure policy which applies to the whole UN system. There is a department of public information and network of information centres around the world. However, the UN secretariat has developed its own approach to information disclosure which does not apply to specialised agencies and programmes and funds. While based on the principles of openness and transparency, the policy allows classifying information as “not for public release” under certain circumstances, depending on the nature of the information. The guidelines list different types of documents that can be deemed “confidential” or “strictly confidential”. Considerations of security or safety of individuals, member states or UN operations play an important role in this regard (United Nations Secretariat, 2007).

UNDP has adopted a different approach, with a publicly available [information disclosure policy](#), including details about how requests can be made and the process for follow-up. As it states, UNDP “recognises that there is a positive correlation between a high level of transparency through information sharing and public participation in UNDP-supported development activities.” This policy is available online in English, as well as in French and Spanish (UNDP, 2008b). There is no central place to petition information. Country-relevant information is available from the relevant regional bureau or country office websites.

Public Procurement

While each UN agency and programme has its own procurement guidelines, there is also an overarching policy that oversees the process. This includes the [UN Code of Conduct for Suppliers](#). Areas covered include labour standards, human rights, corruption and bribery, and gifts and hospitality. Moreover, the [UN Global Compact](#), a global corporate responsibility initiative which includes a principle on corruption, is seen as being a guiding framework for when the UN works with suppliers and third-party contractors.

The UN has a Procurement Division which oversees all the procurement for headquarters (HQ), offices in other locations, regional offices, commissions and tribunals, and peacekeeping/political operations. The main policies on corruption are drawn from its procurement manual, which is available in English, Spanish and

French (UN, 2010). The manual covers a range of issues, including ethics, corruption and fraud. The UN Ethics Office receives procurement complaints.

For UNDP, there also is a [public procurement guide](#) that has been compiled. The guide includes a code of ethics and how to address fraud and -corrupt practices. Unfortunately, the official “Fraud Policy” for procurement (in English, French and Spanish) is not publicly accessible from the UNDP’s main website (password protected). However, some UNDP units have published it on their own websites, such as UNDP regional centre in [Bangkok](#). The policy is in the process of being updated and will be released in 2011.

Ethical Standards

Across the UN, there is a general Code of Ethics and the rights and duties of UN personnel. In addition all UN staff (including for all programmes and funds) must comply with the [Standards of Conduct for the International Civil Service](#) (International Civil Service Commission, 2002).

More specifically, there are codes regulating staff interaction with suppliers and their disclosure of assets. According to the UN Code of Conduct for Suppliers, there is a zero tolerance policy for any UN staff member to accept gifts or offers of hospitality. Also no UN staff member is allowed to accept employment from a UN supplier for a period of one-year after leaving service.

In terms of [asset declaration](#), the public disclosure of staff’s income and financial statements is not mandatory at any level (United Nations, 2007). As part of the [UN financial disclosure programme](#), staff are required to confidentially report this and can voluntarily disclose these statements.

For UNDP staff, there are additionally other codes to oversee their conduct: the UNDP Legal Framework for Addressing Non-compliance with UN Standards of Conduct and the UNDP Policy on Prevention of Workplace Harassment, Sexual Harassment and Abuse of Authority. Violations are submitted to the Office of Audit and Investigations (OAI, see section on “Detection”). Within UNDP, only the OAI is able to conduct investigations. In cases of alleged retaliation against whistleblowers, violations are to be reported to the UNDP Ethics Office, which is tasked with conducting the preliminary assessment before handing the case to the OAI for investigation.

Ethical Institutions

The UN has an Ethics Office, as do other UN programmes and funds. However, none of them have websites or a central space for materials. The **UN Ethics Office** was established in 2005 and is structured based on the approved terms of reference (United Nations, 2005). According to these, the head is appointed by the Secretary, to whom they report, and the office is “to assist the Secretary-General in ensuring that all staff members observe and perform their functions consistent with the highest standards of integrity required by the Charter of the United Nations through fostering a culture of ethics, transparency and accountability”. Unfortunately, as mentioned, there is no publicly available information on the Ethics Office (website).

Within UNDP, the organisation has its own Ethics Office, which submits an **annual report** to the Executive Board. It is here that information on its activities can be found (UNDP, 2010). The most recent figures (for 2009) show that the office received 392 requests and trained 1,400 staff through face-to-face workshops. The office also is responsible for receiving confidential advice, ensuring staff comply with financial disclosure stipulations, and addressing claims of retaliation by staff members. It can also lead an initial assessment of cases of retaliation.

Given the framework for ethics in the UN, there is a “two step system” to UNDP staff members. UNDP staff as well as those from other UN funds and programmes can appeal to the UN Ethics Committee to have their individual case reviewed by the Chair (who is the director of the UN Ethics Office) when they believe that “they have not been treated appropriately by the Ethics Officer of their own organization” (UNDP, No date).

Detection

Auditing Institutions

All UN staff and the processes that they carry out must comply with the “Financial Regulations and Rules of the United Nations”, which cover how to report and account for fraud (United Nations, 2003). Apart from this general rule, each UN fund and programme has its own auditing bodies.

The various UN organisations also are signatories to the Universal Guidelines for Investigations as part of auditing processes that were adopted in 2009 by

various international organisations (Conference on international investigators, 2009)⁵.

The principal auditing body for the UN Secretariat is the **Office of Internal Oversight Services** (OIOS). It investigates reports of mismanagement and misconduct for all activities that fall under the Secretary General’s authority, including the peacekeeping missions. It was created in 1994 and has made notable progress. There are various **oversight reports and manuals** published on the OIOS website for conducting audits and programme evaluations, conducting investigations, etc (OIOS, No date). It is important to note that all these materials are only available in English. The OIOS has reviewed over 8.000 matters since it was started. It has offices in New York, Vienna and Nairobi.

UNDP also has its own auditing (detection) and investigations body, known as the Office of Audit and Investigations (OAI). The OIA is involved in processing staff complaints, investigating allegations of violations by external parties and information disclosure requests.

Whistleblowing mechanisms

The current whistleblower protection policy in the UN dates to 2005 and establishes an independent Ethics Office, with staff responsible for receiving appeals for protection from whistleblowers. However, this soon proved to be applicable only to UN staff and not for those from special programmes and funds. This came about due to a case where the UN Ethics Office overruled a decision taken by UNDP regarding a former employee. As a result of this conflict, Secretary-General Ban Ki-moon published a memo in November 2007 that stated UNDP was exempt from the rulings of the Ethics Office. This stance in turn encouraged other funds and programmes to take the same step to develop their own internal policy and ethics offices, which they did.

Apart from the overarching UN regulations for staff, **UNDP’s whistleblowing provisions** are outlined in a

⁵ These organisations include the World Bank, the African Development Bank, the Asian Development Bank, the European Investment Bank and the International Monetary Fund, as well as European organisations such as the European Anti-Fraud Office (OLAF) and a host of United Nations specialised agencies (UNESCO, UNICEF, UNDP, WHO, etc.) and Interpol.

“Legal Framework for Addressing Non-Compliance with UN Standards of Conduct” (UNDP, 2008c). This document covers the reporting of allegations, investigation processes and disciplinary measures. Protection against retaliation for whistleblowing is covered by the UNDP Policy on Protection against Retaliation (UNDP 2010, not publicly available). The UNDP’s Office of Audit and Investigations maintains a hotline for anonymous and confidential reporting. The UNDP Ethics Office also has a confidential helpline set up for whistleblowers. UN volunteers, contractors and suppliers are not covered by either of these measures but rather the terms of their contracts. If whistleblowing involves retaliation by UNDP staff, then allegations can be looked into.

A study by the **Government Accountability Project**, an independent civil society organisation, questions the effectiveness and impartiality of dividing up the responsibilities on whistleblowing between agencies. It provides a comparison of UN system whistleblower policies in different UN programmes and funds: UNDP, UNICEF, UNFPA and WFP, noting where the shortfalls are when it comes to good practice (Government Accountability Project, No date).

Investigations

Investigative bodies in the UN are set up to both detect and follow up on detected problems (such as those reported through whistleblowing). These “sections” are set up across the UN system. Some bodies pertain to the whole system. In other instances, investigation units may exist for only a particular agency, fund or programme.

It is important too that since the UN is an international organisation, it does not fall within the remit of national laws, courts and investigative bodies. This limits oversight and legal recourse by third parties outside of this system when investigations are not taken up within the UN.

The UN Joint Inspection Unit

There is a UN-wide inspection body that can act on financial and/or administrative matters known as the **UN Joint Inspections Unit (JIU)**, which is based in Geneva. Each year, the JIU issues an annual report of its activities to the General Assembly Annual reports (Joint Inspection Unit, No date). In 2009, 10 reports were issued, which included five organisational reviews (one of which was done on the management and administration of the World Food Programme).

However, the unit has no sanctioning authority and does not recommend disciplinary action.

The UN Ethics Committee

There is also an overarching **UN Ethics Committee** which works system-wide. The committee brings together the different ethics offices and reviews their work, as well as provides for advice on complex cases. In 2009, it was convened nine times.

The Office of Internal Oversight Services (OIOS)

As already mentioned, the Office of Internal Oversight Services (OIOS) leads the internal investigations of the UN Secretariat (each programme and fund have their processes). The OIOS has an Investigations Division (OIOS/ID), which is also the unit responsible for the investigation of misconduct and whistleblower cases. As a result of unit-led investigations, the value of recovered losses is estimated at more than US\$ 19 million for the period between 1 July 2009 and 30 June 2010 (UN, 2010).

According to the most recent **OIOS statistics**, there are 216 cases opened at the UN Secretariat. This case load only covers the UN offices and regional commissions, including the Department of Peace Keeping Operations (DPKO) which accounts for 64 per cent of the case load. However, there is a consensus that the effectiveness of the OIOS has been undermined by a lack of independence, resources and skilled staff (Government Accountability Project, No date). The former Under-Secretary-General of OIOS, Inga-Britt Ahlenius, criticised the UN Secretary General Ban Ki-moon for trying to undercut the office’s independence, oversight and transparency standards (Ahlenius, 2010).

There also have been outside critiques. One review, written by Erling Grimstad, a former Norwegian prosecutor, noted that this situation “*is detrimental to the Organization’s ability to manage and detect corruption, fraud and other serious offenses, which has in recent years damaged the reputation of the Organization and has engendered a sense of mistrust.*” (Grimstad, 2007). This report and another by Michel Girodo, a Canadian management consultant, were extremely critical of a former top investigator in the unit and the agency’s deputy director (Lynch, 2008).

OIOS/ID has been without a permanent director for more than three years. The Government Accountability

Project (GAP) claims that the failure to have a permanent director “who is protected from pressure and retaliation deprives the organisation of a needed resource and deterrent to corruption” (Government Accountability Project, No date). The current acting chief, Michael Dudley, is under investigation for wrongdoing against two whistleblowers from his unit, the Office of Ethics (Associated Press, 2011).

UNDP's investigative bodies

In UNDP, the authority that conducts investigations is the **Office of Audit and Investigations** (OAI), which has its own [guidelines](#). However, the Ethics Office can initiate a preliminary assessment to determine whether an investigation is merited.

The **Ethics Office** processes cases of retaliation against whistleblowers by conducting initial assessment work to determine if the case is to be investigated by OAI. It is seen as an “anti-corruption policy” rather than a means for addressing staff grievances. Protection from retaliation, as a result, can only be granted if the retaliation results from the reporting of wrongdoing (or if the staff member has cooperated with a duly authorised audit or investigation into wrong doing). In 2009, there were eight cases of reported retaliation against whistleblowers that the Ethics Office received.

If a prima facie case is established, the case is then transferred to the **OAI** to investigate. In 2009, four of the cases were sent to OAI for further investigation. In the interim, the director of the Ethics Office has the authority to make a recommendation, including restitution, to the head of UNDP (who is known as the Administrator) until the investigation is completed by OAI.

After a final determination has been made, the complainant may seek a review by the chair of the United Nations Ethics Committee.

Sanctions

A standard list of sanctions or actions does not seem to exist within the UN.

UN

The results of all investigations, including recommendations and sanctions, are transmitted to the Secretary General to guide him on the disciplinary action to be taken (OIOS, No date). It is up to the

secretary general to determine the sanctions that are applied. There is no public listing of the cases that have been sanctioned apart from what is in the annual report. There is also no publicly accessible list of disciplinary actions standardised for certain infractions.

Moreover, since cases under investigation cannot be made public, there is no recourse for claimants to voice concerns publicly about the process. At the same time, given the UN investigation process, cases can be in the system for years before being resolved.

UNDP

Of the information found, the only materials that discuss set sanctions are those for when fraud is found in public procurement. In consultations with UNDP, it was noted that the organisation does inform its members about all disciplinary actions taken. However, this information is not publicly available.

The “UNDP Fraud Policy” (not available on the UNDP main website) states that investigations and disciplinary measures shall “be carried out in accordance with the UNDP Investigative Guidelines and the UNDP prescriptive content”. As mentioned, this policy has been revised and will be released shortly.

Where it is found that fraud has occurred, investigators will issue a report to the director of the Legal Support Office (LSO). The legal framework explains the process and lists the possible disciplinary actions for staff members. The recommendation is then reviewed, including any recommended disciplinary actions, and the director will initiate the following:

- summary dismissal of the person found in violation;
- referral to the Disciplinary Committee;
- recovery of UNDP funds and/or property in the national courts, from third parties and recovery of losses to UNDP from the staff member/personnel pursuant to United Nations Staff Rule 112.3;
- referral to the national authorities for criminal prosecution.

There is no publicly available policy on what happens to firms or contractors found in violation of the UNDP procurement guidelines and whether a debarment process would be triggered. However, in consultations with UNDP, it was noted that the organisation is formalising its vendor debarment policy and is working

to come up with a data-sharing policy across the UN system for debarred vendors.

3 The Global Fund's integrity management system

The Global Fund is a self-described "international financing institution" that has committed US\$ 21.7 billion in 150 countries to prevent, treat and care for individuals afflicted by AIDS, tuberculosis and malaria. The fund is supported by donor governments (such as Australia and Germany) and private foundations such as the Bill & Melinda Gates Foundation and Chevron Corporation (The Global Fund, 2010). Every year, it channels an estimated US\$ 3 billion of donor funds to developing countries.

Prevention

Operational Guidelines

Information Disclosure

The Global Fund does have an information disclosure policy that covers all documents it produces (The Global Fund, 2007). All information is considered public regarding the Global Fund's operations and decisions in the absence of a "compelling reason for confidentiality". The policy also outlines the types of information disclosed and exceptions. There is also a separate policy that governs reports that are released by the independent auditing and evaluation office, the Inspector General (The Global Fund, 2009).

Procurement

There is a **manual** to govern all issues related to procurement and supply management done by the Global Fund. The guide states that "procurement procedures should be transparent, follow formal written procedures throughout the process and use explicit predefined criteria to award contracts. Annual external audits to verify procurement office accounting records are required to ensure transparency and compliance with procurement policies." The guide is available in English, French, Spanish and Russian.

However, the manual does not specifically address anti-corruption or anti-fraud measures that should be followed. Given the challenges of ensuring clean bidding processes and quality goods (particularly given the risks of doctored or false medicines), the absence

of these issues could undermine attempts by the Global Fund to effectively manage procurement.

Ethical Standards

There is an **ethics policy** that governs the actions and behaviour of Fund staff members. Individuals covered by it include board members; any member of a committee, task force, technical review body or subsidiary body and professional employees of the Global Fund's Secretariat (paragraph 2(a)). The ethics policy is only available in English.

There is also an **Ethics Committee** and Ethics officials that help to address any breaches in ethics that arise. The Committee takes decisions on staff matters and can report these to the Board at its discretion (paragraph 5(2)). It is obliged to notify the Board in instances where someone covered by the policy failed to disclose a conflict of interest (paragraph 5(6)).

In April 2008, the Inspector General presented its priorities which included a "Values and Integrity Initiative" to define core values, shape organisational culture and promote ethical conduct. The Finance and Audit Committee of the Board approved this initiative.

In addition to policies for staff, the Global Fund has a **code of conduct for suppliers** (available online only in English). It states that the code "requires all bidders, suppliers, agents, intermediaries, consultants and contractors (Suppliers), including all affiliates, officers, employees, subcontractors, agents and intermediaries of Suppliers (each a Supplier Representative), to observe the highest standard of ethics in Global Fund-funded activities" (Global Fund, 2009).

Detection

Auditing Institutions

The principal auditing institution in the Global Fund is the **Office of the Inspector General**. It both audits spending and provides for an additional means to uncover any wrong doing. The office was established in July 2005 and began work in December 2005. It acts as an independent unit of the Global Fund and reports directly to the Board.

To date, it has undertaken investigations in 33 of the 145 countries where the Global Fund administers grants. These audits have shown that the total

amount of misappropriated or unaccounted for funds is \$34 million⁶. This amount represents 0.3 per cent of the total amount of \$13 billion that the Global Fund has disbursed to date (Global Fund, 2011).

The Inspector General has the right to review all systems, processes, operations, functions and activities of the Global Fund (The Global Fund, 2009). The specific scope of work covers:

1. audits;
2. inspections and investigations;
3. countering fraud and promoting ethical conduct;
4. assurance validation; and
5. functional reviews.

As a result of the fraud uncovered in an OIG report, the Global Fund recently announced that it will restructure its auditing procedures and designate external officials to review its systems.

Whistleblowing mechanisms

The Global Fund has a list of **whistleblowing procedures and policies** for individuals raising allegations of fraud or misconduct (both at the secretariat and country level). These policies are available only in English on the website (although the site does offer content in multiple languages).

The Global Fund has a hotline and reporting system that allow individuals to report *confidentially* (in which case your identity will be known to the OIG and not divulged to third parties) or *anonymously* (in which case no one, not even the OIG, will know your identity). The hotline is open 24 hours and provides a secure line. There is also the option to fax, email or write to report an allegation. All hotline reports are to be reviewed within three days of being received and a decision should be taken whether an investigation will be pursued.

Investigations

The Inspector General is the independent body within the Global Fund that is tasked to do investigations.

In its 2010 report, the Inspector General cited grave misuse of funds in four countries: Djibouti, Mali, Mauritania and Zambia. In Mauritania, Mali and Djibouti, the principal problem was that a high proportion of grants for training and “per diem” allowances were misspent. Actions were immediately taken to recover misappropriated funds and rectify the breakdowns that allowed this to happen.

However, the German and Swedish governments have threatened to stall their disbursements due in 2011 until a full review can be done. Ireland and Norway have also stressed their concern about the findings and the Global Fund’s response. In addition to the four countries mentioned, another 23 investigations are currently underway.

Sanctions

There is no clear or established policy on mandatory sanctions and/or disciplinary action for staff violating the aforementioned codes of conduct. However, the Global Fund does provide **sanction procedures against suppliers** that violate their code of conduct (Global Fund, No date). This includes organising a sanctions panel and setting out the process for reporting and reviewing the recommendations with the supplier(s) accused of an infraction. Sanctions against suppliers can include declaring them ineligible (indefinitely or temporarily) from participating in any activity financed by the Global Fund. Sanctions, however, do not allow for cross-debarment proceedings with other development agencies.

4 The EU’s integrity management system

The European Union is composed of 27 member states. The European Commission (EC) is the executive body of the European Union. Its responsibilities include presenting proposals for European law, overseeing correct implementation and managing funds. The Commission operates as a type of cabinet government, with 27 commissioners (i.e. one per member state). It is supported by a staff of about 25,000 European civil servants who are employed within the Commission’s different departments, called Directorate-Generals (World Law Direct, 2011). The Commission consists of 36 Directorate-Generals (DGs) and specialised services. A Secretariat-General ensures the overall coherence of the Commission’s work. The **DG for EuropeAid Development and**

⁶ There are also reports that this figure was US\$ 39 million and US\$ 43 million (Financial Times, 2011).

Cooperation (DG DEVCO) is responsible for development policy and funding.

Given that the EU is a supranational organisation, there are different integrity systems in operation. Consequently, the decentralisation of the integrity system leads to a situation whereby, integrity measures such as cross-debarment (for legal reasons) and whistleblower protections (each EU institution has its own rules), are not commonly addressed across the different EU institutions. Most EU institutions have their own policy that guide staff conduct and prevent corruption and fraud. For example, the DG for EuropeAid Development and Cooperation has its own policies when it comes to monitoring and evaluation, procurement and reporting (EuropeAid, No date).

As a result of this landscape, a broader mapping of all the relevant bodies and policies that promote integrity of the EU institutions is outside the scope of this paper. Rather a snapshot of few overarching policies and bodies will be undertaken, as well as an attempt to map the integrity system within DG-DEVCO. This must be seen as a work in progress given the reform process that has begun from the implementation of the EU Lisbon Treaty.

Looking ahead, actions could be taken to unite the current patchwork of policies into an overarching set of integrity measures, thereby unifying and reinforcing them.

Such change could enable synergies and complementarities with other regional and global anti-corruption mechanisms, including the anti-bribery convention of the Organisation for Economic Co-operation and Development, the UN Convention against Corruption (UNCAC)⁷ and Council of Europe initiatives on corruption.

Promoting integrity in EU Member States⁸

Besides the intra-institutional integrity management system within the different EU institutions (see below), the EU has a further role to play in promoting and

setting anti-corruption standards in the 27 EU Member States.

At the EU level, the anti-corruption policy currently in place was developed in a **2003 communication** which lays the ground for a comprehensive EU anti-corruption policy. Among other principles, this document emphasises the need to implement, monitor and strengthen existing anti-corruption instruments, to develop common integrity standards across the EU, to improve investigative tools in Member States, and redouble efforts to protect the financial interests of the European Communities from corruption. The policy has only been partly transposed into Member State legislation.

In addition, there are some legal frameworks that address corruption and related policies in the region and among Member States. The Lisbon Treaty (**Art 83 TFEU**) recognises corruption as a serious crime in the EU and the UNCAC, to which the EU is a signatory, provides an overview of anti-corruption laws and regulations that are to be adopted for the EU to be in compliance.

Finally, a number of additional mechanisms are currently being developed. The Stockholm Programme, for example, allows for the establishment of a **new EU anti-corruption reporting mechanism**. The programme outlines the implementation of initiatives in the areas of justice, freedom and security (including corruption), from 2011 to 2014 (Europa Gateway to the EU, No date).

Promoting integrity inside EU institutions

Most EU institutions have their own integrity rules. The following examples are a selection of some of the initiatives involved in preventing corruption in the different EU's institutions, organisations and bodies. All of these intra-institutional integrity initiatives, and policies, unless otherwise noted, are available in multiple languages on websites that also are in multiple languages. The policies serve to govern staff conduct as well as activities of the institutions and the third parties with which they engage. Given the numerous issues related to integrity, the list is not complete but provides insight into some of the measures in place.

⁷ The EU ratified the convention in November 2008.

⁸ Much information in this section is drawn from a U4 expert answer that has been produced in 2008 on Corruption and the European Neighbourhood Policy at <http://www.u4.no/helpdesk/helpdesk/query.cfm?id=161>

Prevention

Operational Guidelines

The EU has developed a collection of measures to prevent corruption, some of which apply to all **EU institutions** (the European Parliament, the European Commission, the Council, the Court of Justice and the Court of Auditors), its nine official bodies and its several specialised agencies. These policies include:

- The **European Code of Good Administrative Behaviour** sets clear standards for the administrative behaviour for EU civil servants
- The **EU staff regulations**.

Moreover, as part of its anti-corruption efforts, the EU has also established its own instruments to tackle fraud within the EU institutions, with two conventions on the **protection of the European Communities' financial interests** and on the **fight against corruption involving officials of the European Communities and officials of EU Member States**.

Others measures are relevant for certain EU bodies or certain staff, such as members of parliament and commissioners. For example, the European Commission has a 2004 **Code of Conduct for Commissioners** (currently under review), which requires Members of the Commission to declare information on former and current outside activities, financial interests and assets, and spouses' activities. This declaration must be completed when the Member of the Commission takes office and revised during his or her term of office if the information changes. **Commissioners' declarations of interests** are available online.

Regarding the DG-DEVCO, civil servants are covered by the overarching staff regulations for all EU employees. In relation to the conduct of suppliers and contractors, general guidelines include section 2.3.3 of the **"Practical Guide to contract procedures for EC external actions"** (EuropeAid, 2010).

Information Disclosure

The Regulation 1049/2001 of 30 May 2001 on public access to documents from the European Parliament, Council and Commission defines the principles and limits of the public right of access to documents of these three institutions. According to **the**

Commission's openness and access to documents website, the regulation grants in principle a right of access to documents to any European Union citizen and to any natural or legal person residing, or having its registered office, in a member state. The citizens' guide explains how to access information from the Commission, including published and unpublished documents.

As part of the EC, DG DEVCO falls under the current guidelines for accessing documents of the EU Commission. The DG also must **report** annually on its activities, of which this information is publicly available online. The DG uses an external cooperation **Info point** for disclosing information to the public, as per the existing regulations.

However, the existing regulations are currently undergoing review and reform. A consultation was conducted in 2007 to review the access to information policy and the Commission has published a **report on the results of the public consultation**. This report is available on the dedicated website **"Review of the rules on access to documents"**.

In February 2011, a number of non-governmental organisations (NGOs) raised concerns regarding European Commission proposals that were coming up for approval. Under the new rules, only documents that are formally transmitted would be made available upon request to the public. The new rules would reduce transparency of official procedures and limit access to documentation by enabling Member States to refuse access to their communications with EU institutions and restrict access to documents involved within disputes initiated by the commission against national capitals (EU Observer, 2011). For now, a revision of the EU's access to document rules is pending and under discussion. In March 2011, the EC requested that its existing rules (i.e. Regulation 1049/2001) be extended to **all EU institutions, bodies and organisations** in order to have a single framework for right to access documents.

EU financial regulations

EU Financial Regulations (passed in 2002 and currently under review) also include provisions aimed at increasing transparency in the spending of EU funds (see in particular articles 29 and 30 on transparency under Chapter 8 of the regulations).

A major break through to increase transparency of the spending of EU funds has been the commitment of the EU to encourage Member States to disclose the beneficiaries of all EU funds every year by the end of June. This is considered a first step, however there is no clear sanction for non-compliance, information is not systematised and user-friendly.

The financial disclosure stipulation has been put forth as part of the [European Transparency Initiative \(ETI\)](#), which calls for:

- Transparency of interest representatives seeking to influence EU decision making, and upholding minimum standards of consultation;
- Transparency about the use of EU funds;
- Ethical rules and standards for public officials; and
- Public access to documents

The ETI reflects the growing demand from all stakeholders for better accountability and increased transparency of EU funds. The Commission adopted in 2006 the Green paper on the European Transparency Initiative, based on the desire to increase the openness and accessibility of EU institutions, raise awareness over the use of the EU budget and make the Union's institutions more accountable to the public. The simplification of rules across the EC is intended to foster greater transparency and accountability as well as increase the effectiveness of spending (Europa Press release, 2007).

Apart from increasing transparency, other tools have been put in place to prevent fraud and corruption within specific institutions, like the European Commission. These include the Early Warning System (EWS) and the Central Exclusion Database (CED). Set up by the Commission in 1997, at the request of the European Parliament, the EWS is an internal information tool used to manage financial and other risks related to the beneficiaries of EU money such as grants and contracts. All EU institutions and bodies may block or suspend contracts or payments to entities listed in certain EWS warning categories. The CED is used to monitor EU funds managed in partnership with the EU Member States, or funds delegated to international organisations. It contains information on entities condemned for fraud or corruption in the Member States and third countries involved in the implementation of EU programmes.

The DG-DEVCO as a department of the European Commission comes under these frameworks – the policies as well the tools. For example, it publishes all the [beneficiaries of funds](#) (grants and contracts) in line with the requirements of Article 30 of the aforementioned [EU Financial Regulations](#), whether this work is financed under the [general budget of the EU](#) or the [European Development Fund](#).

Public Procurement

In considering the existing policies in place, it is important to note that an estimated 80 per cent of EU funds are spent by EU Member States (national public contracting) and only 20 per cent are spent directly by the EU. This would highlight the need for strong integrity systems among member states when it comes to procurement given the bulk of funding that they control. There is currently a [consultation](#) on Green Paper to modernise the EU-wide procurement policy for a European procurement market.

Overall, the EU has introduced legislative provisions to modernise and facilitate the procurement process, seeking to increase transparency and the fairness of contract awards. Tools such as the Tenders Electronic Daily (TED) database, the single classification system (evidenced by the common vocabulary for public contracts) and the System of Information on Public Procurement (SIMAP) are examples of the attempt to make the process more transparent and reflect the principles of the ETI. The EU has also signed the multilateral Agreement on Government Procurement (AGP) and negotiated an international award procedure within the World Trade Organisation (Gateway to the EU, no date). Detailed rules and regulations on procurement can be accessed on the [EU website on procurement](#).

Finally, the EU has developed a set of rules and regulations for contracting authorities that are compiled on its [procurement page](#). These measures also relate to the conduct of suppliers and contractors and when firms can be disbarred. As mentioned, the EU is currently revising existing policy on public contracting, looking into the expansion of e-procurement among other things to help prevent corruption and fraud. For example, there are some gaps, such as regarding the current debarment rules. These are not standardised or a separate policy but rather are embedded as part of the EU's Financial Regulations (Article 94).

In terms of procurement process of DG-DEVCO, contracting rules would fall under the same guidelines across the EU. There is also a [specific site](#) managed by the DG that provides open information by listing all procurements and grants as well as a [practical guide](#) for contracting procedures for development (termed “external actions”). The procurement guide, revised in 2010, outlines specific policies related to public contracting, including the need for fair and transparent competition and ethics clauses (including conflicts of interest). Debarment proceedings are not included as these would be regulated by the [EU Financial Regulations](#) (as already mentioned). The guide is currently available only in English and French.

Ethical Standards

There is currently no one set of ethical standards for EU institutions or a stand-alone code of conduct. There are provisions that cover ethical conduct by civil servant staff which are embedded in the [EU Staff Regulations](#). There are also ethics correspondents that are to be appointed in every DG (following a decision by the Commission in March 2008). While there is no centralised policy, the current guidelines for staff seem to be sufficient according to the EU. The audit of ethics in six DGs already mentioned (2009) found that Commission’s ethics framework covered most areas, although it was recommended that greater clarity was needed on reporting gifts, hospitality and conflicts of interest (European Commission, 2009).

Still, the European Ombudsman has indicated that the public would benefit from a statement of the public service principles for EU public servants, referring to a code of ethics. In light of the scandal regarding Members of the European Parliament in March 2011, it would seem that such an advance is needed. A consultation on such a code has been launched, which uses the term “public service principles”, rather than “ethical principles”. The [draft document](#) is currently open for comments from citizens, interest groups, and other organisations.

In terms of DG-DEVCO, such a new code would apply to them, as well as the current stipulations included for all EU staff. However, the organisation does not have a code of conduct, presumably for the reasons signalled above.

Improved ethical standards are also being promoted for third parties engaging with EU institutions. According to the Commission’s transparency website, the European

Commission and European Parliament are also currently working together towards the establishment of a joint register and code of conduct for lobbyists. The joint working group has drawn up a draft agreement between the European Parliament and the European Commission on the establishment of a Transparency Register for the registration and monitoring of the organisations and individuals engaged in EU policy making and policy implementation. This draft will now be submitted to the two EU institutions involved.

For DG DEVCO, it also has ethic standards in place for its suppliers and contractors through its guidelines on procurement.

Detection and Investigation

The following section provides a snapshot of some of the key bodies involved in detecting and investigating acts of corruption among EU-level institutions. These would not have authority over member state affairs. As opposed to the mapping done of the other global organisations, this section has grouped together the actors and policies used to detect and investigate corruption as these activities are often included within one body.

In looking at detection mechanisms, it is important to point out that [fraud allegations](#) related to the protection of the EU Funds are to go through one reporting channel: the European Anti-Fraud Office. More general citizen complaints about maladministration in EU institutions and bodies are to be filed with the [EU Ombudsman](#). In spite of these centralised functions, there is not a similar EU-wide policy on protections for individuals who report allegations of wrongdoing by EU institutions.

In terms of the development body of the EU, DG DEVCO would come under the broader framework set up for the European institutions. In comparison with similar development agencies, it does not have a clear mechanism or channel for reporting alleged fraud in its operations or publicly available information that addresses such concerns. This would be done through OLAF, although the DG DEVCO site does not provide a link to this site or information for lodging complaints.

The EU Anti-Fraud Office (OLAF)⁹

Given the need to prevent fraud and to protect the financial interests of the Union, the Commission created the **European Anti-Fraud Office** (OLAF) in 1999. The office deals with a variety of issues affecting EC budget. To date it has carried out around 4500 investigations.

As soon as the Commission identifies potential cases of fraud relating to EU funds, these are immediately submitted to OLAF for further assessment and investigation. Once OLAF investigations come to an end and the conclusions are communicated to the respective Commission services, appropriate measures are taken according to OLAF recommendations which can correspond to a range of different actions, mainly depending on the entity found guilty of misconduct and on the gravity of the actions. However, OLAF doesn't have prosecution powers and relies on individual states to prosecute wrongdoers (M. Chêne., 2008).

In March 2011, the European Commission adopted a proposal to reform OLAF (see [press release](#)). The aim is to improve the efficiency, effectiveness and accountability of OLAF, while safeguarding its investigative independence.

Budget Directorate-General

The Budget Directorate-General plays a more general role in preventing corruption as well as one in detecting wrongdoing.

The Budget Directorate-General prepares the rules governing the European Union's finances and, by offering advice and training, promotes sound financial management within Commission departments.

The DG also helps to detect problems through its accounting activities. The DG reports on the implementation of the budget and progress towards the granting of a positive Declaration of Assurance (DAS) by the EU Court of Auditors (see DG Budget [website](#)).

⁹ Much information in this section has also drawn from a U4 expert answer that has been produced in 2008 on Corruption and the European Neighbourhood Policy at <http://www.u4.no/helpdesk/helpdesk/query.cfm?id=161>

The EU Court of Auditors

The European Court of Auditors (ECA) also has a role to play in detecting and investigating corruption given its function to independently audit revenues and spending of EU funds. It is also tasked with assessing errors in EU accounts. It examines whether financial operations have been properly recorded and disclosed, legally and regularly executed and managed so as to ensure economy, efficiency and effectiveness.

A small proportion of substantive errors uncovered by the ECA are reported by the court to OLAF, which would then be tasked with investigating the claims.

Internal Audit Service (IAS)

The **Internal Audit Service** (IAS) of the European Commission plays a role in detecting irregularities within the DGs. The IAS, created in 2001, aims to provide independent and objective assurance and consulting services.

The IAS monitors the management of finance and resources in the Commission, decentralised and executive agencies and other EU bodies receiving contributions from the EU budget. Apart from the service, there are also internal auditing bodies created within each DG that work with the IAS to coordinate risk analysis and audit planning through a network called Auditnet.

In completing its duties, the IAS cooperates with the European Court of Auditors (the external Auditor of the European Institutions), the European Parliament Budgetary Committees, the European Anti-Fraud Office as well as with Internal Auditors within others international institutions.

The IAS' independence is guaranteed in its Mission Charter, which forbids any other authority to interfere in the conduct of its audits or ask the IAS to make any alteration to the contents of our audits. Staff are under the code of ethics established by the Institute of Internal Auditors.

The body produces an annual report on its activities although it does not provide in-depth detail of its findings.

The EU Parliamentary Committees

The **Budget Control Committee** of the European Parliament plays a role in detecting and investigating corruption at the institutional and member level through its monitoring of EU funds. The European Parliament committee is charged with controlling the EU budget and producing reports (e.g. for the EU budget discharge) relating to the European Union's Budget.

There are additional parliamentary committees which act as watchdogs over the integrity in EU institutions as well as the integrity of member. These include the **Constitutional Affairs** committee and the **Legal Affairs** committee. One of responsibilities of the Constitutional Affairs Committee, for example, is the determination of the existence of a serious and persistent breach by a member state.

The EU Ombudsman

The **Ombudsman** was established in 1992 and acts as an intermediary between citizens and the EU authorities. The Ombudsperson is elected by the European Parliament for a renewable term of five years, which corresponds to Parliament's legislative term. The person holding this position is entitled to receive and investigate complaints from EU citizens, businesses and organisations, and from anyone residing or having their registered office in an EU country. Complaints are to be in relation to the poor or improper administration of duties by EU institutions and bodies. The remit does not extend to member states. However, the EU Ombudsman is able to work with the European Network of European Ombudsmen to transfer the case to the correct national counterpoint.

The Ombudsman also has the power to launch its own investigations. However, the Ombudsman can only make recommendations for action and not issue direct sanctions if they are not accepted by both parties. If the institution that is found to be at fault disagrees with the recommendation, the Ombudsman can file a special report with the European Parliament.

Sanctions

At the EU level, institutions and bodies do not have a common set of sanctions that are uniformly applied when corruption or wrongdoing are found. At the level of the EU institutions, OLAF has the power to act when it comes to fraud (under the purview of its mandate revisions). Enforcement of the sanctions would reside

with the specific institutions involved, such as the European Parliament or the European Commission.

However, OLAF does not have the legal authority to prosecute acts committed by Member States – this would rest with the respective government authorities of the country. Such a guiding framework for an EU-wide sanctioning mechanism might be drawn from the UNCAC, but the current EU laws have not been revised to be in compliance with all of the convention's articles.

Sanctions are also referred to in the EU's procurement policies and contractor guidelines for infractions, although these are not specific in terms of actions but rather provide a common standard. For example, there is a "**Remedies Directive**" that was passed in 1989 and **amended** in 2007. It is applicable to all EU countries when bidders consider that contracts have been unfairly awarded. However, it is up to the member countries to apply these and any EU Commission directives in cases of infringements of EU laws.

Conclusions

The current anti-corruption and integrity measures in place in the three global bodies covered in the expert answer suggest that more could be done to standardise and streamline anti-corruption measures as well as access to information about existing policies. These policies tend to focus on internal issues (i.e. staff conduct, ethics and whistleblower protections) as well as external actions (procurement and debarment, the design of anti-corruption and integrity programmes, etc.), both of which would be of public interest.

It is important to note that this study was a mapping rather than an assessment or comparison of integrity systems. The expert response aims to provide a landscape of existing policies and bodies within these three global bodies that could serve as an integrity framework against corruption. Given each of their roles in development, preventing corruption is particularly important to ensure that money is not wasted, misspent or stolen.

What the findings of the mapping show is that the current integrity frameworks of these three global bodies differ from those in place in multilateral and donor organisations. These development actors tend to prefer a single, organisational-wide framework and a clear anti-corruption strategy. In conducting this

mapping, such statements or unified strategies were not found.

A unified organisational policy on fighting corruption could help development agencies to address a series of different issues in their work and to properly cover the individuals (staff, volunteers, suppliers, and others) who carry out their activities. Moreover, unified policies could help to lower costs in terms of their implementation, due to overlap and inconsistencies, as well as offer a broader coverage of corruption risks across the different institutions.

In conducting the mapping, however, it becomes clear that the diffuseness of policies and information requires further assessment to determine whether this piecemeal approach is leaving gaps in policy and enforcement.

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