

ANTI-CORRUPTION HELPDESK

PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

BEST PRACTICES FOR PREVENTIVE ANTI-CORRUPTION BODIES

QUERY

Could you please provide an overview of best practices for preventive anti-corruption bodies? We would like to have examples from the Baltic region.

CONTENT

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Date: 08 April 2015

SUMMARY

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. This is also reflected in the obligation to ensure the existence of a corruption prevention body or bodies, under Article 6 of the United Nations Convention against Corruption.

While fulfilment of this obligation may be ensured through a variety of 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.

1 PREVENTING CORRUPTION: THE ROLE OF ANTI-CORRUPTION BODIES

Corruption prevention

Preventive action has long been recognised as a key component in the fight against corruption (UNODC 1999; OECD 2006). Broadly understood, virtually all anti-corruption activities have the potential to play a preventive role. Education and awareness campaigns can sensitise the public to the cost of corruption, reduce societal tolerance toward it, and encourage citizens to report illegal activities, thereby curbing the incidence of the phenomenon. Effective investigation and prosecution of corruption-related offences do not only ensure retroactive punishment, but may also deter potential offenders from engaging in such practices in the future.

However, in a more narrow sense, activities most commonly associated with corruption prevention functions are generally regarded (for example, by UNDP 2009) as including the following:

- development of anti-corruption strategies, policies and implementation plans
- diagnostics, research and proposals for legislative reforms
- coordination, monitoring and evaluation of the implementation of anti-corruption policies
- dissemination of knowledge on corruption prevention and promotion of international cooperation.

International principles and standards

United Nations Convention against Corruption

The [United Nations Convention against Corruption](#) (UNCAC) entered into force in 2005 and has now been ratified by 175 countries. The second chapter discusses preventive mechanisms, including anti-corruption bodies (Article 6), stating that:

“1. Each state party shall...ensure the existence of a body or bodies, as appropriate, that prevent corruption by such means as: (a) Implementing the

policies referred to in Article 5 of this convention¹ and, where appropriate, overseeing and coordinating the implementation of those policies; (b) Increasing and disseminating knowledge about the prevention of corruption.

“2. Each state party shall grant the body or bodies...the necessary independence, in accordance with the fundamental principles of its legal system, to enable the body or bodies to carry out its or their functions effectively and free from any undue influence. The necessary material resources and specialised staff, as well as the training that such staff may require to carry out their functions, should be provided.”

The number of specialised anti-corruption agencies (ACAs) worldwide has grown from less than 20 in 1990 to nearly 150 in 2012 (De Jaegere 2012), reflecting a perception that such agencies represent “the ultimate institutional response to corruption” (de Sousa 2009). Nevertheless, it must be stressed that, “Article 6 is not intended to refer to the establishment of a specific agency at a specific level. What is needed is the capacity to perform the functions enumerated by the article” (UNODC 2004).

Council of Europe Criminal Law Convention against Corruption

Broadly similar obligations to the ones outlined in Article 6 of the UNCAC are also enshrined in Article 20 (“specialised authorities”) of the Council of Europe’s [Criminal Law Convention against Corruption](#). The article provides that:

“Each party shall adopt such measures as may be necessary to ensure that persons or entities are specialised in the fight against corruption. They shall have the necessary independence in accordance with the

¹ These consist of “effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability”.

fundamental principles of the legal system of the party, in order for them to be able to carry out their functions effectively and free from any undue pressure. The party shall ensure that the staff of such entities has adequate training and financial resources for their tasks.”

The article was inspired by a series of previous documents, notably Resolution (97)24 “[On the 20 Guiding Principles for the Fight against Corruption](#)”, in which the need for appropriate institutional autonomy of those involved in the fight against corruption was highlighted (principle 3). In this case too though, the drafters made clear that “the entities referred to in Article 20 can either be special bodies created for the purposes of combating corruption, or specialised entities within existing bodies” (Council of Europe 2002).

Institutional arrangements for preventive anti-corruption bodies

As shown in the previous section, international instruments recognise that preventive anti-corruption functions can be carried out through a variety of different institutional arrangements, which must be in accordance with the principles of each country’s legal system. Based on the literature (Heilbrun 2004; OECD 2008; Recanatini 2011) this section identifies and briefly discusses the main typologies into which such institutional arrangements can be distinguished.

Dedicated unit within a multi-purpose agency

Multi-purpose anti-corruption agencies are institutions with a mandate to provide centralised leadership for several anti-corruption activities. These typically include the development, coordination and monitoring of anti-corruption strategies and policies as well as investigations, prosecutions, education and awareness raising (Meagher 2005; Recanatini 2011). Examples of this type of structure include, for instance, Lithuania’s Special Investigation Service, or Latvia’s Corruption Prevention and Combating Bureau (see below; for more examples see OECD 2008; UNODC 2014).

According to proponents of this single, multi-

purpose agency model, its main advantage is that it brings under one institutional roof the whole range of anti-corruption activities, thereby avoiding bifurcation and conflicts between separate agencies with overlapping mandates (Heilbrun 2004; de Speville 2010).

Stand-alone corruption prevention body

Some observers have pointed out that the great diversity of activities encompassed under Article 6 of the UNCAC might actually influence against a single-agency approach (Hussman et al. 2009). The institutional requirements and technical expertise needed to effectively develop, coordinate and monitor anti-corruption policies may be very different from, for instance, those needed to investigate and prosecute corruption-related offences.

Thus, in order to avoid the risk that more publicly visible law enforcement activities are prioritised at the expense of preventive ones, a separate body for the development and monitoring of anti-corruption strategies and policies could be opted for. Examples of this model include, for instance, France’s Central Service for the Prevention of Corruption, or Slovenia’s Commission for the Prevention of Corruption (for more examples see OECD 2008; UNODC 2014).

This alternative raises its own challenges. Firstly, establishing and maintaining a stand-alone body working on corruption prevention requires new streams of funding to be created, either by increasing overall public spending or by diverting existing resources away from other areas. Secondly, the addition of one extra actor to the institutional landscape risks placing an added burden on interagency cooperation to fight corruption rather than simplify it.

Ad-hoc, inter-ministerial working groups

A third option is to avoid the establishment of a separate specialised body, and to rely instead on ad-hoc arrangements that draw on existing capacities to prevent corruption. Such arrangements may consist of inter-ministerial working groups (or boards or councils), staffed by government officials with various types of area-

specific expertise and who are directly answerable to either the executive or the legislative branch of government (UNODC 2014).

Examples of this model include Estonia's "Honest State" strategy (Johannsen and Hilmer Pedersen 2011) and Georgia's Interagency Coordinating Council for Combating Corruption (see below).

While this model may provide strong guarantees of political relevance due to its proximity to the government, it raises concerns regarding its independence and impartiality. Given this type of institutional arrangement and the risks posed, it should be necessary to consult and engage with civil society organisations in the process of developing and monitoring anti-corruption policies and strategies to ensure the public's oversight of the institution.

2 GOOD PRACTICE IN ANTI-CORRUPTION PREVENTION BODIES

It is methodologically challenging to do a comparative analysis of preventive anti-corruption bodies due to the great diversity of mandates, institutional designs and resources, (UNDP 2009; Johnsen et al. 2011). Moreover, as already mentioned, such bodies ought to fit their national context, putting into question the usefulness for constructing a single international "golden standard" for their functioning.

The following section is largely based on the [Jakarta Statement on Principles for Anti-Corruption Agencies](#), developed and agreed upon in 2012 by former heads of ACAs, anti-corruption practitioners and experts from around the world. The document expressly acknowledges "the diversity of ACAs around the world in combating corruption with some ACAs mandated to prevent corruption, others focused on investigation or prosecution, or a combination of these functions". It, therefore, also applies to the type of agencies that are the focus of this paper. Reference to other literature on the particular requirements of preventive anti-corruption bodies with policy development, coordination and monitoring functions is also provided.

Mandate

Anti-corruption bodies should have clear mandates to tackle corruption through prevention, education, awareness raising, investigation and prosecution, either through one agency or multiple coordinated agencies (see discussion above).

Collaboration

Anti-corruption bodies should not operate in isolation, but foster good working relations with state agencies, civil society, the private sector and other stakeholders. This includes international cooperation and mutual legal assistance with other government bodies and anti-corruption agencies to jointly address corruption as a global issue, launch international initiatives, exchange knowledge and experiences and collaborate on a case-by-case basis (IACC 2012).

This requirement applies to all types of preventive anti-corruption bodies, which should seek and give due consideration to the views of relevant stakeholders and partners in the process of developing, coordinating and monitoring anti-corruption policies and strategies. While single, multi-purpose agencies bring together policy-related and law enforcement activities by institutional design, stand-alone policy bodies and ad-hoc working groups face the challenge of forging appropriate collaborative arrangements with other agencies involved in the fight against corruption.

Permanence

Anti-corruption bodies shall, in accordance with the basic legal principles of their countries, be established by a proper and stable legal framework, such as the constitution or a special law to ensure continuity of the body.

As pointed out by De Jaegere (2012), executive orders or decrees are too easily annulled. This obviously raises specific issues for preventive anti-corruption bodies based on ad-hoc inter-ministerial arrangements, to which some degree of stability must be given in order to satisfy the principle of permanence.

Appointment, removal and continuity

The heads of anti-corruption bodies should be appointed through a process that ensures his or her apolitical stance, impartiality, neutrality, integrity and competence. They should have security of tenure and be removed only through a legally established procedure equivalent to the procedure for the removal of a key independent authority that is specially protected by law.

In the event of suspension, dismissal, resignation, retirement or end of tenure, all powers of the institution's head should be delegated by law to an appropriate official in the body within a reasonable period of time until the appointment of the new head. This is to ensure the body's continued functioning during a time of transition.

A number of experts consider that parliament should be involved in the recruitment of the heads of anti-corruption bodies, which should ideally represent a consensus between the political majority and the opposition. They also agree that a dismissal procedure involving only the judiciary and the executive is undesirable, and that parliament should have a say, through a two-thirds majority (IACC 2012).

This set of guarantees might, however, not be directly applicable to preventive bodies based on ad-hoc inter-ministerial arrangements, whose chair is usually a high-level member of the executive (such as the president, the prime minister, or the minister of justice). In any case, it is instrumental that the preventive anti-corruption body, irrespective of the institutional arrangement adopted, has autonomy to conduct its tasks and does not suffer any form of political interference.

Ethical conduct and accountability

Anti-corruption bodies should adopt codes of conduct requiring the highest standards of ethical conduct from their staff and a strong compliance regime. They should also develop and establish clear rules and standard operating procedures, including monitoring and disciplinary mechanisms, to minimise any misconduct and abuse of power. Finally, they should strictly adhere to the rule of law and be accountable to mechanisms established to prevent any abuse of power.

This would be particularly critical for multi-purpose agencies that, in addition to their preventive role, they also handle investigations, prosecutions and the sensitive legal issues to which they give rise (procedural justice; whistleblower protection; confidentiality of witnesses, and so on).

Nevertheless, even for a body tasked only with prevention, there is the potential for misconduct and abuse of power as they carry out functions related to policy development, coordination and monitoring.

Adequate resources and autonomy

Anti-corruption bodies should have sufficient financial resources to carry out their tasks, and particularly to secure the employment of a sufficient number of qualified staff, taking into account the country's budgetary resources, population size and land area. The budget should be provided in a timely, planned and reliable manner, and be adequate to ensure the gradual capacity development and improvement of the body's operations to fulfil its mandate. Budget management and control should be the prerogative of the body itself, without prejudice to the appropriate accounting standards and auditing requirements.

What counts as an "adequate" level of resources naturally depends on the extent and type of the agency's responsibilities. While purely preventive bodies tend to require a relatively smaller budget, it is important to ensure that they can attract appropriately specialised and experienced staff. In the case of multi-purpose agencies with policy development, coordination and monitoring tasks, a stream of the funding might be specifically earmarked for these activities.

Public reporting, communication and engagement

Anti-corruption bodies should formally report at least annually on their activities to the public. They should communicate and engage with the public regularly in order to ensure public confidence in their independence, fairness and effectiveness.

An important element of this requirement is engagement with anti-corruption civil society organisations (CSOs), which can be ensured through a number of different arrangements. Most anti-corruption bodies are required to consult with CSOs in the process of developing high-level anti-corruption strategies and proposals for legislative reform. In some cases, this relationship can also be given a stronger institutional foothold by directly involving representatives of relevant CSOs as full members of the body's boards. What remains crucial, to ensure both public trust and effective performance, is that the appointment process for such positions is conducted in a transparent manner and is that any appointments be based on experience and competencies (OECD 2013a).

3 COUNTRY EXAMPLES

This section provides country examples from two regional contexts: Central Asia and the Baltic region.

In Central Asia, preventive anti-corruption bodies in the form of high-level consultative councils with representatives of the different agencies, branches, and levels of government are the most common approach. The country examples provided below are those of Azerbaijan and Georgia, which have recently been identified as having the most effective arrangements in place among countries in the region (OECD 2013b).

On the other hand, the two Baltic countries reviewed – Latvia and Lithuania – have both opted for entrusting corruption prevention to multi-purpose anti-corruption agencies with additional law enforcement powers, with generally positive results. Estonia, which is not included in this study, it has instead opted for a government-wide “Honest State” programme involving collaboration between different agencies of the state (for more details, see Johannsen and Hilmer Pedersen 2011).

Azerbaijan's Commission on Combating Corruption

Legal basis and mandate

The [Commission on Combating Corruption](#) (hereafter the commission) was established in

2004 on the basis of the “Anti-Corruption Act”. According to its website, the main tasks of the commission are to:

- Participate in the formation of the state policy on corruption and coordinate the activity of public institutions in this area.
- Supervise the implementation of the state programme against corruption.
- Collect, analyse and summarise information regarding corruption-related law violations and make proposals to the appropriate public institutions.

Independence, accountability and resources

The commission is composed of and operated by 15 members – including ministers and high-level state officials, members of the legislature, representatives of Azerbaijan's high courts and the public prosecutor – who elect their chairman by simple majority. The president of the republic, parliament (the Milli Majlis) and the Constitutional Court each appoint five members of the commission to ensure appropriate checks and balances between the three branches of government.

The commission also has a secretariat that provides organisational support, background information and clerical support, and whose members are public civil servants appointed by the chairman of the commission. In addition, there are ad-hoc working groups with representation from state institutions, civil society organisations, international organisations, independent experts and the media.

Noting that the commission is composed mainly of high-ranking public official and politicians there are no criteria for appointing and dismissing members of the commission. Within this framework, a recent OECD (2013c) report expressed concerns about its independence from possible political influence, outside pressure and general impartiality when it comes to the evaluation of anti-corruption measures or possible allegations of corruption in their spheres of responsibilities.

Resource scarcity was identified as another critical issue, as the commission's secretariat only has

four staff to carry out the wide scope of tasks entrusted to it (OECD 2013c).

Achievements

The OECD (2013b) monitoring group reported that the commission had failed to achieve visible results in many areas under its responsibility, including in measuring and conducting surveys on corruption, assessing corruption risks and integrity of public institutions, and organising effective awareness raising work, among others.

The report linked these shortcomings to limited capacity and weak institutional autonomy, and consequently called on the government of Azerbaijan to review the area of anti-corruption policy coordination. The capacity of the commission to engage stakeholders was also said to require further evaluation and eventually reform. Areas of concern include identifying, motivating and mobilising stakeholders; creating partnerships and networks; promoting engagement of civil society and the private sector; and managing large group processes and open dialogue.

Georgia's Interagency Coordinating Council for Combating Corruption

Legal basis and mandate

Georgia's Interagency Coordinating Council for Combating Corruption was established in 2008 on the basis of the Georgian president's decree No. 622 "On Approving Composition and Charter of Interagency Coordinating Council for Combating Corruption".

The main objectives of the council are the elaboration of the anti-corruption strategy and action plan, and the coordination of their implementation. According to its charter, the council also prepares a report on the implementation of recommendations by different international organisations. The council does not have traditional law enforcement or investigative powers (OECD 2010).

Independence, accountability and resources

Members of the Council are high-ranking officials of various ministries of the executive, as well as

representatives of civil society organisations. In particular, four NGOs participate in the council: Transparency International Georgia, the Georgian Young Lawyers' Association, Open Society Georgia Foundation and the American Bar Association. The council is chaired by the minister of justice, while the president of Georgia appoints the members of the council and has the authority to recall them, without need for parliamentary approval.

A number of aspects related to the council's institutional design have been criticised for failing to ensure the necessary impartiality. Firstly, having been established by a presidential decree, the permanence of the council is not guaranteed and it therefore remains vulnerable to dissolution. Secondly, the power of the president to recall members at any time raises concerns about the lack of security of tenure.

Lack of appropriate resources, both human and financial, has also been identified as a critical weakness. In fact, the council's executive body (known as its secretariat) is staffed by nine officials from the Ministry of Justice's Analytical Department, who also retain their previous functions. Moreover, the council currently operates thanks to donor support through the GEPAC project², and continues to lack continuous funding arrangements. Finally, the absence of any reporting obligations diminishes the council's transparency and ability to inform the public about its activities (Open Society Georgia Foundation 2013; OECD 2013b).

Achievements

While no comprehensive assessment is available to date, observers perceive the council as inactive. In 2012, the council was reported to have met only sporadically, and it failed to meet a number of its declared objectives for the year, including updating the anti-corruption action plan and producing the annual report on the implementation of the existing plan. This was said to be due in part to the fact that the incumbent government – and the officials assigned to the council's secretariat – were

² See related website at: http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/projects/GEPAC/gepac_en.asp

focused on preparing for the October parliamentary elections (Open Society Foundation Georgia 2013; OECD 2013b).

Latvia's Corruption Prevention and Combating Bureau

Legal basis and mandate

Latvia's [Corruption Prevention and Combating Bureau](#) (KNAB) was established in October 2002 through the [Law on Corruption Prevention and Combating Bureau](#).

The prevention of corruption is one of KNAB's main areas of activity, entrusted to a special deputy director for corruption prevention matters. Corruption prevention activities carried out by KNAB include the development and coordination of the implementation of the national anti-corruption programme; development of legal initiatives; and monitoring of legislation concerning public officials' conflicts of interest and political party financing.

In addition, KNAB is tasked with investigating corruption-related offences, as well as with educating public officials and the wider public regarding corruption. KNAB is therefore a typical example of multi-purpose anti-corruption agency with preventive functions.

Independence, accountability and resources

KNAB is supervised by the Cabinet of Ministers, whose primary lever of control is the capacity to appoint, and, upon legal cause, remove the head of KNAB, with parliamentary confirmation. KNAB is also required by law to report semi-annually about its affairs to the Cabinet of Ministers and to parliament, as well as to submit annual budget requests to parliament.

According to its website, KNAB is flanked by a public advisory council which is tasked with ensuring participation of public representatives in the formation and implementation of corruption prevention policy through regular meetings. Its membership is approved by KNAB, taking into consideration a given NGO's experience and expertise in the field of anti-corruption, or in fields covered by the specific anti-corruption policy in question.

Particularly in the initial years of its existence, KNAB faced a number of attempts to limit its operational autonomy. In 2007, for instance, an attempt by the prime minister to dismiss the head of KNAB on dubious grounds generated massive popular protests, which ultimately led to the prime minister's resignation (Kuris 2012).

Internal conflicts between staff and various directors have been frequent, generating public controversy and raising questions about the long-term sustainability of KNAB's independence. No KNAB director has concluded a full term of office (European Commission 2014a).

In its Second Compliance Report, GRECO (2012) identified several institutional issues regarding KNAB's independence: (1) KNAB is under the direct supervision of the prime minister; (2) the director is appointed and dismissed by parliament on the government's recommendation; (3) the budget is proposed and decided by parliament whose members KNAB might potentially investigate. The latest report by GRECO (2014) concluded that recommendations to address these issues and ensure the impartiality of KNAB remain only partially implemented.

Amid budget and salary cuts, nearly 20 per cent of KNAB's 142 employees had left by the end of 2010 (European Commission 2014a). In 2014, the agency had a budget of €4.7m and 132 staff members, 25 of which had investigative functions³.

Achievements

KNAB has been credited with spurring a series of important reforms aimed at curbing corruption more effectively in Latvia (Kuris 2012). New legislation – much of it based on drafts developed by KNAB's legal experts – has been introduced in the areas of public financing for political parties' electoral campaigns and the criminalisation of campaign finance violations; judicial reforms to expedite trials; whistleblower protection and assets declaration requirements; and the lifting of parliamentary immunity for administrative offences (see also KNAB 2013).

³ <http://www.acauthorities.org/country/lv>

Lithuania's Special Investigation Service

Legal basis and mandate

Lithuania's [Special Investigation Service](#) (STT) was created in 1997 by Government Resolution No. 5 "On the Establishment of the Special Investigation Service under the Ministry of the Interior". While STT originally had a narrow law enforcement focus, with the adoption of the 2002 Law on Corruption Prevention, its scope was expanded to include education, awareness and analysis. Consequently, STT currently carries out a number of anti-corruption policy-related activities, including:

- corruption risk analysis of the activities of state or municipal institutions and recommendations concerning corruption prevention measures to be adopted
- anti-corruption assessment of legal acts and drafts, as requested by government or on its own independent initiative
- provision of support to relevant authorities in developing, coordinating and monitoring national, sectorial and institutional anti-corruption programmes.

Independence, accountability and resources

The Lithuanian STT was originally established within the Ministry of the Interior. In 2000, it became independently accountable to the president and parliament, who respectively nominate and approve the appointment of its director. STT is thus currently separated from the executive branch of government in the Lithuanian semi-presidential system.

In the past, there have been attempts to exert political influence on the STT, which led one of its directors to resign in protest in 2004. More recently, the fight against corruption has become a key issue in the agenda of the leading political parties, and the operational independence of the agency seems accordingly to have commanded more respect.

Concerns have been voiced regarding the impact of budget cuts on the effectiveness of the agency (in 2012, the budget was €5.2 million, down from

€7.2 million in 2008; European Commission 2014b). In 2014, the agency had 231 staff members, 135 of whom had investigative functions⁴.

Achievements

STT appears to take an active stance in providing input for the development of government legislation on anti-corruption issues. In 2013, it put forward seven draft legal acts to improve the existing legislative framework. It also performed anti-corruption assessments of 118 laws and draft laws, as well as 62 regulations and draft regulations (STT 2013). In certain cases, concerns expressed by STT have led to the president vetoing legislation brought forward by the executive, which subsequently had to be amended to be brought in line with anti-corruption best practices (European Commission 2014b).

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