Transparency International Anti-Corruption Helpdesk Answer

Interagency coordination mechanisms

Improving the effectiveness of national anti-corruption efforts

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Attention to the issue of "joined up", cross-government approaches to public policy has been steadily growing in recent years. In the anti-corruption field, the problem of coordination is particularly acute, as sophisticated forms of corruption demand a combination of law enforcement, regulatory, civil and administrative responses. Unfortunately, coordination between integrity agencies is often plagued by structural and resourcing constraints, bureaucratic pathologies and political interference. There is also an underlying tension in that, while integrity systems rely on close cooperation between different agencies to function effectively, there is also a need for these same agencies to act as checks and balances on each other.

Different institutional frameworks have been proposed as more or less conducive to fostering coordination between integrity agencies, but it appears that the quality of relationships between agencies is a better proxy for the overall success of a given integrity system than the institutional model itself.

While there is no clear blueprint for effective coordination mechanisms, this Helpdesk answer studies a number of channels that can be used to encourage both formal and informal coordination between integrity agencies. Such measures range from the development of national anti-corruption strategies to the formation of policy coordination units and secondment between different bodies. It finds that coordination mechanisms can be usefully classified according to whether they are designed to promote coordination at the strategic, policy or operational level.

The paper concludes by studying coordination measures in six countries: Argentina, Mexico, South Africa, Switzerland, the United States and the United Kingdom.

Query

Please provide examples of countries that have adopted formal coordinating or cooperative mechanisms for their integrity agencies, which cover (but are not necessarily limited to) the field of anti-corruption.

Such coordination activities would include, but not be limited to, law enforcement agencies, parliamentary standards authorities, national audit office, ombudsman and so on.

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Caveat

Coordination on anti-corruption can be conceived of as taking place on four broad planes. First, coordination between integrity agencies within in a given country. Second, coordination between governmental and non-governmental actors in a given country – notably civil society and the private sector – in support of preventive and educative measures. Third, coordination between integrity agencies situated in different countries for the purpose of pursuing corruption cases involving multiple jurisdictions. Finally, participation in broader international networks and fora, such as the Open Government Partnership, the Extractive Industries Transparency Initiative, the UNCAC Coalition, the Global Forum on Transparency and Exchange of Information for Tax Purposes, the OECD Working Group on Bribery, the G20 Anti-Corruption Working Group and so on.

This answer restricts itself to a study of the first of these planes, considering solely intra-governmental coordination.

The need for coordination

Preoccupation with the need to coordinate the actions of government agencies has grown over the past three decades. Peters (2018) argues there are two key grounds for this mounting concern.

Firstly, the widespread adoption of the New Public Management paradigm and its concomitant emphasis on managing individual programmes, which has led to the establishment of a large number of fully or quasi-autonomous specialised agencies. The increasingly technical nature of much of modern governance brings with it an inherent tendency for growing specialisation. Alongside broader developments in contemporary political economies, notably the growing role of the private sector in public service provision, this has contributed to fragmentation of the public sector landscape. In response, leaders have begun to call for so-called joined-up approaches to government.

The second reason is the emergence of complex public policy problems, such as climate change, sustainable development and governance reform,

which cannot be tackled by any single public agency alone.

Across the public sector, therefore, there is an increasing recognition of the need to invest time, resources and political capital in establishing coordination mechanisms across government to reduce duplication, minimise contradictions, increase accountability and address cross-cutting problems (Peters 2018). This approach is intended to ensure that individual actions are undertaken by the agency best placed to act (Davis, Machado and Jorge 2014). A recent administrative review of interagency consultations in the United States concluded that coordination "improves the overall quality of decision making by introducing multiple perspectives and specialised knowledge, and structuring opportunities for agencies mutually to test their information and ideas" (ACUS 2012).

In the field of governance, integrity management and corruption, the problem of coordination is particularly acute. Corruption is increasingly sophisticated, often involving multiple jurisdictions, legal vehicles and a range of players. A single corrupt act may generate "separate proceedings in both criminal and civil courts, disciplinary proceedings before some sort of administrative body, a special legislative inquiry, and an audit" (Davis, Machado and Jorge 2014).

Moreover, corruption cases are often inextricable from other forms of criminality; tackling them therefore requires cooperation between multiple law enforcement agencies (Zinnbauer and Kukutschka 2017). No anti-corruption body functions in a vacuum, and none can perform all tasks relevant for the suppression and prevention of corruption (OECD 2013). To give one example, competencies for investigation and prosecution are commonly split across several independent

agencies. Coordination is therefore of the utmost importance at each stage of the law enforcement process, from monitoring and investigation to prosecution, adjudication and sanctioning (Davis, Machado and Jorge 2014). Anti-corruption agencies, internal control units, police forces, tax and customs administrations, security services and financial intelligence units all need to cooperate and actively exchange information (OECD 2013).

To complicate matters further, anti-corruption efforts are not limited to punitive and sanctioning measures alone. Prevention and education are vital components of a comprehensive anti-corruption strategy, and involve a range of regulatory, administrative, fiscal and civil instruments beyond the remit of law enforcement bodies. Taken together, these elements make up what can be referred to as an "integrity system", which is, broadly speaking, typically comprised of "a multiplicity of agencies, laws, practices and ethical codes" (Sampford, Smith and Brown 2005).

Coordination not only underpins the four vital functions of any given integrity system (investigation, prosecution, education and prevention) but is also essential to ensure coherence across these functions, which may be the responsibility of different agencies. It is no good a prosecutor offering amnesty to a firm to induce cooperation if that company is being subjected to administrative debarment by another integrity agency for the same malpractice (Davis, Machado and Jorge 2014). Recent empirical studies confirm that the effectiveness of integrity systems "largely depends on the support, cooperation and institutional coordination between and among the other supportive and complementary agencies that address the broader issues of integrity and ethics" (Aminuzzaman 2017).

Coordination mechanisms can also serve to inoculate agencies against potentially unscrupulous undue influences. By equipping and incentivising agencies to monitor each other constructively, coordination renders it more difficult for interest groups to "capture the administrative process or to play agencies [off] against each other" (ACUS 2012).

Finally, although not the focus of this Helpdesk answer, integrity agencies need to foster strong working relationships with non-governmental actors in the private sector and civil society, as well as with international partners and intergovernmental organisations. This ranges from the strategic level, whereby multiple governments agree on consistent approaches to tackling corruption, such as outlawing foreign bribery, to the operational, whereby law enforcement bodies in different jurisdictions provide mutual legal assistance on a case-by-case basis (Bosso 2015).

The need for coordination in the anti-corruption community is therefore practically axiomatic. Recognising this, Articles 5 and 6 of the United Nations Convention against Corruption oblige state parties to ensure the existence of a body to coordinate the implementation of anti-corruption measures (UNODC 2004). Article 38 further encourages state parties to foster cooperation between public authorities and bodies responsible for investigating and prosecuting criminal offences.

There is a considerable amount of literature concerning how individual integrity agencies should be structured, organised and managed, be these anti-corruption agencies (Transparency International 2017), ombudsmen (Wickberg 2013)

or supreme audit institutions (Martini 2013b). There are also a number of descriptive case studies illustrating how the absence of coordination between agencies generates inefficiencies (Jamil and Panday 2012; Ko, Su and Yu 2015; Pillay 2017).

However, there are few prescriptive models for how interagency coordination can be best operationalised and institutionalised, or explanatory studies of why coordination is (in)effective in various settings. Even integrity system theory[1] – which portrays integrity as a function of mutually supportive and reciprocally vigilant institutions – has little to say about how to improve interagency coordination. This Helpdesk answer therefore attempts to assess the coordination options available to governments. Given that experience indicates that, in many countries, cross-agency cooperation remains weak or non-existent (Chêne 2009), this is a particularly urgent issue.

After reviewing obstacles to coordination, different institutional frameworks and the issue of formal versus informal coordination, the paper surveys potential coordination mechanisms at three levels: strategic, policy and operational. It finishes by considering a number of country examples.

Before proceeding further, let us outline what we understand by the term coordination. In its simplest form, negative coordination occurs "when decisions made in one programme or organisation consider those made in others and attempt to avoid conflict" (Peters 2018). On the other hand, positive coordination involves going "beyond simply avoiding conflicts… to find ways to

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[1] As epitomised in Transparency International's National Integrity System assessments model (see Brown and Heinrich 2017)

cooperate on solutions that can benefit all the organisations involved" (Peters 2018).

Coordination can thus be viewed as both the extent to which agencies work together, and the extent to which they share common objectives (Davis, Machado and Jorge 2014). Meaningful coordination is about more than getting different organisations to work together smoothly, it is also about setting cross-governmental policy priorities and being able to implement these.

Indeed, we can describe a kind of hierarchy or "cascade" approach to coordination. Basic coordination simply involves different agencies working together at the operational level, such as through the use of a shared database or office space. This kind of coordination is likely to be more effective where there is coherence at the policy level, in other words where the organisations involved agree on common goals at the programme level (Serrano 2003). Finally, strategic coordination involves the design of institutional relationships and legal frameworks facilitate the broader vision of government in any given policy area, such as integrity management and anti-corruption.

The challenge of coordination

Despite widespread acknowledgement of the merits and even necessity of coordination, experience around the world indicates that the challenges of cross-agency coordination generally receive limited political attention (Chêne 2009). Perhaps this is not surprising; for most administrations, setting up a new anti-corruption body is a much more visible accomplishment than attempting to improve systemic coherence by tinkering with existing institutional arrangements.

Whichever body is ultimately given the task of coordinating a country's anti-corruption efforts, these agencies typically face an uphill struggle. In fact, coordination is judged to be "one of the most challenging aspects of anti-corruption work" (Doig, Williams and Ashour 2012). Integrity agencies may have a wide diversity of mandates, overlapping jurisdictions, competing agendas or differing levels of autonomy from political meddling, all of which contributes to a general absence of systemic clarity (Chêne 2009). In the Asia Pacific region, for instance, a recent Transparency International study found that different integrity agencies are often regulated by different legal frameworks, which has led to "gaps in the knowledge and understanding of the inherent ambiguities" (Aminuzzaman 2017).

Integrity bodies responsible for coordinating anti-corruption measures are often hastily established in the aftermath of scandals, with the result that their institutional design may be ill conceived or even partisan (Zinnbauer and Kukutschka 2017). Consequentially, they may lack the power and authority needed to compel high-profile officials to comply with their integrity obligations, such as making regular disclosures of their income and assets. Coordinating bodies may also be starved of sufficient personnel, technical capacity and resources needed to fulfil their mandate (Martini 2013a). In multiagency settings like the Philippines, where there is limited political will to tackle integrity risks, administrations are judged to have encouraged different agencies to focus on competing with each other for recognition and resources rather than joining forces to root out corruption (Transparency International 2017).

Conversely, where integrity agencies do enjoy considerable political leverage and resourcing, they may lack autonomy from the executive and be

used by those in power as a political instrument to persecute legitimate opposition.

Finally, Johnsøn (2016) points out that integrity bodies are commonly afflicted by certain bureaucratic practices and pathologies – most notably bureaucratic competition – that run contrary to notions of comparative advantage and complicate horizontal coordination. In Nigeria, for instance, observers view rivalry between different anti-corruption bodies as one of the main obstacles to President Muhammadu Buhari's anti-graft campaign (Ibukun and Mbachu 2017). In one particularly brazen example, when agents from Nigeria's financial crimes body attempted the arrest of a former intelligence chief fired by President Buhari for stashing US$43 million in cash in his wife's apartment, they were stopped by armed secret police officers. Similarly, in South Africa, robust institutional responses to corruption are reportedly "hamstrung by intra and inter-institutional manoeuvring, which deflects as well as subverts the integrity of efforts to control and regulate anti-corruption enforcement" (Naidoo 2012).

Insofar as vertical accountability frameworks lead institutions to focus on primarily internal measures, such as the establishment of bespoke codes of conduct or grievance mechanisms, Bakvis and Julliet (2004) argue that they can act as a disincentive for horizontal coordination between institutions.

Despite these serious challenges, it is worth noting that, overall, the OECD concludes that, while anti-corruption coordination in many states is frustrated by a lack of political support, meagre resourcing and institutional competition, progress against corruption is even slower in settings where no attempt is made to foster institutional collaboration (OECD 2015).

Conditions for success

The question therefore arises of how cooperation can best be nurtured. From the above discussion, we can deduce there are a number of prerequisites for effective coordination.

First among these is dedicated resourcing. Where a coordination mechanism has been established, sustaining this "common good" entails negotiating collective action problems. High profile and meaningful coordination requires the allocation of dedicated staff, as well as the commitment of a lead agency to manage the process and win over other bodies.

Second, there is a need for strong political leadership to drive cooperation across government and provide the necessary authority for decision making in existing coordination structures (Razzano 2016). Experience from South Africa suggests that political endorsement of inter-institutional coordination as an objective in itself is needed to overcome bureaucratic recalcitrance and inertia (Razzano 2016). Moreover, where government bodies consider corruption primarily in terms of the risk it poses to their operations rather than as a governance challenge to be tackled in its own right, their appetite to work with other agencies is likely to spike around corruption scandals and rapidly recede thereafter (Jenkins 2017).

Third, and related to the second point, an OECD review of international practices finds that a reasonably high commitment to coordination has to be inculcated in a critical mass of relevant stakeholders. Ideally, coordination should not be seen as the sole responsibility of a lead agency but embraced by other institutions so that "truly concerted action" can take place (OECD 2015).

This is certainly a tall order, but studies show that not all agencies need to be equal players in an integrity system. In most systems, there will be a *core* group, such as anti-corruption agencies, law enforcement bodies, prosecutors' office, and a peripheral group, which might include ombudsmen, parliamentary committees, information commissioners and so on (Smith 2005). As long as the core group are pulling in the same direction, the rest should follow. The OECD (2015) suggests that one way to incentivise key agencies to coordinate is to promote a high degree of transparency in their operations and encourage the participation of non-governmental actors, so that the media, legislators, businesses and the public can assess their commitment.

Finally, clear mandates and lines of responsibility are essential to enable interagency cooperation. This can be encouraged both formally, by setting out legal obligations to cooperate with requests for assistance or information, and informally, such as by establishing steering groups of various agencies to build the trust essential for coherent and coordinate action (Bardach 1998). Ultimately, solid working relationships are critical if different agencies are to overcome the barriers presented by specialisation, turf wars, group think, party politics and information hoarding (Peters 2018).

Institutional frameworks

While there is consensus that coordination is pivotal to anti-corruption efforts, there is no such unanimity regarding the institutional model best suited to delivering successful interagency cooperation.

Over the last 30 years, there has been a trend in low-income countries to establish new independent, multi-purpose agencies to tackle corruption and coordinate all anti-corruption measures (Olha no date). In countries with a longer history of formal integrity frameworks, notably those in the OECD, it has been more common to set up anti-corruption units within existing state institutions, resulting in anti-corruption mandates being split among a number of agencies. Within such systems, one body may be designated as the lead agency and tasked with coordinating other institutions.[2] Finally, in a third type of model, coordination may be the responsibility of more ad-hoc bodies, such as ministerial steering groups.

Centralised approach

After the successes of specialised anti-corruption agencies in Hong Kong and Singapore, until recently conventional wisdom held that nearly all anti-corruption functions should be vested in a single institution (Doig, Watt and Williams 2007; Meagher 2004). These bodies are expected to provide centralised leadership during the development of anti-corruption strategies, offer technical expertise during investigations and develop educational and awareness raising measures (Meagher 2005; Recanatini 2011). To fulfil their mandate, they are generally equipped with the authority to coordinate all other relevant players (UNDP 2009).

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[2] *Responsibility for coordination varies from the audit office in Bolivia (Chêne 2009) to the public prosecutor in Kazakhstan (OECD 2015).*

Proponents of the single, multi-purpose agency model contend that centralising intelligence and establishing vertical integration avoids bifurcation and conflicts between separate entities with overlapping mandates (Heilbrun 2004; de Speville 2010). As centralised agencies frequently form part of the executive branch and report directly to senior figures in the government, advocates of this model believe they are well placed to drive interagency cooperation. Some even argue central agencies can be viewed as a "necessary evil", providing both the political authority and setting out the tangible mechanisms for coordination as part of their programmatic function (Bardach 1998).

While centralising core capacity, expertise, responsibility and resources has its merits, experience shows that the success of specialised anti-corruption agencies nonetheless greatly depends on the cooperation and effectiveness of other state institutions (Chêne 2009). Despite this, coordination is not always an explicitly stated function in central agencies' mandate (Transparency International 2017). Moreover, in practice the new centralised bodies have frequently been established in parallel to existing institutions that retain jurisdiction on various aspects of corruption. The result of insufficient thought given to roles, responsibilities and reporting lines is generally a "crowded and inefficient policy and operational environment" (Chêne 2009; Evans 2012). Other problems of this approach include suspicions that central agencies are more prone to political influence and have trouble securing sufficient human and financial resources to fulfil their mandate (Doig, Watt and Williams 2007; Meagher 2004).

Modular approach

In recent years, a new paradigm has begun to question the virtues of the centralised approach. Critics point out that adding another integrity agency can further complicate the institutional landscape and make interagency cooperation even more challenging (Chêne 2009). An alternative strategy to tackle coordination challenges common in OECD states relies on developing the anti-corruption capacity of existing institutions rather than setting up new specialised bodies.

Observers have pointed out that the sheer diversity of activities described in Article 6 of the UNCAC implies that multiple agencies would be better able to deliver on state parties' commitments (Hussman et al. 2009). For instance, the institutional requirements and technical expertise needed to effectively develop, coordinate and monitor anti-corruption policies may be very different from those needed to investigate and prosecute corruption-related offences (Bosso 2015). In France and Slovenia, for instance, preventive functions, such as the development and monitoring of anti-corruption strategies, have been split from enforcement activities and assigned to dedicated bodies (Bosso 2015).

On the other hand, some authors have called into question the whole premise of eliminating duplication, asking whether a division of labour is even advisable, or whether it might actually be an advantage to having multiple integrity agencies performing the same function. Studying anti-corruption efforts in Guatemala and El Salvador, Ibarra (2017) speculates that "whether these institutions compete, compensate, collaborate, and/or cooperate with each other, this multiplicity of institutions represents an additional path to

exercise control over, investigate and/or sanction of a corrupt offense".

Less radical members of this school of thought advocate what they call "modular design", in other words the division of responsibility among "multiple, functionally interchangeable institutions … that are able, but not required, to coordinate their activities" (Davis, Machado and Jorge 2014). The authors acknowledge that a system based on overlapping institutions – each with a large degree of autonomy – requires greater emphasis on coordination. However, they contend that the higher costs of coordination are outweighed by the twin benefits of inducing healthy competition and spreading the risk that unscrupulous officials are able to capture the system.

In practice, however, it appears that competition is frequently unhealthy and leads to conflict and confusion. In Taiwan, the establishment of the new Agency Against Corruption led to a "sibling rivalry" with the Ministry of Justice's Investigation Bureau (Ko, Su and Yu 2015). Likewise, in the case of New South Wales, Smith (2005) found that "the existence of multiple integrity agencies" rendered the integrity system "relatively complex" and generally undermined effectiveness.

The idea that multiagency settings are more resistant to exploitation by interest groups has also been questioned by those who contend that the risk that various agencies are played off against each other needs to be mitigated by close cooperation between them (ACUS 2012).

Ultimately, despite the advantages offered by multiagency institutional models in the form of mutual horizontal accountability, a 2012 review by the Administrative Conference of the United States found that such systems are in practice likely to

"produce redundancy, inefficiency, and gaps, […and] create underappreciated coordination challenges". Where multiple integrity agencies are operationally independent, the "web of accountability" approach thus requires integrity agencies to prioritise coordination to ensure they are able to combine forces to "pursue specific enforcement actions as well as to formulate and implement broader enforcement strategies" (Davis, Machado and Jorge 2014).

Ad-hoc arrangements

A third type of institutional setting involves reliance on ad-hoc arrangements that draw on existing capacities to prevent corruption. This can take the form of inter-ministerial working groups, 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). A regular forum of high-level representatives of different agencies, branches and levels of government can provide clear indication of political buy-in. However, due to its proximity to the government, it can also raise concerns around independence and impartiality (Bosso 2015).

Context specificity

As indicated above, the debate on the relative merits of multiple versus single anti-corruption agency models rages on (Heilbrunn 2004; Meagher 2005; OECD 2007; Naidoo 2012). There are those who point out that the distinction is somewhat of a false dichotomy, as the presence of a centralised anti-corruption agency within an integrity system does not by itself hinder the ability of other state institutions to play their part in anti-corruption efforts. Moreover, in practice, many countries operate hybrid systems, with one agency

responsible for some but not all of the core anti-corruption functions prescribed in UNCAC Article 6.

To be able coordinate the fight against corruption effectively, the institutional setup needs to reflect a careful study of a given system's "historical foundations … [and] social, economic, technological, cultural and institutional context" (Pillay 2017). Moreover, institutional arrangements should be flexible enough to permit "varying degrees of coordination" depending on need (Prado and Carson 2014). Where the costs of coordination are prohibitive, vertical accountability is weak and anti-corruption measures are characterised by fundamental disagreements about objectives, integrity agencies will be required to exercise greater independence and discretion. Conversely, in settings where resources are scarce and there is an urgent corruption issue, such as a crucial investigation, interagency autonomy or discord is likely to be highly counterproductive (Davis, Machado and Jorge 2014).

Ultimately, institutional design appears to less important than de facto collaboration. While the institutional configuration of a given integrity system clearly influences the forms of collaboration needed for the system to function, the quality of relationships between agencies is a better proxy for success than the institutional model itself (Smith 2005). Understanding the effectiveness of an anti-corruption chain necessitates viewing it holistically as a network of agencies whose interactions represent more than

the sum of their parts (Sampford, Smith and Brown 2005; Six and Lawton).

Types of coordination mechanism

Having provided an overview of the need for and challenges of coordination, as well as the various institutional settings in which anti-corruption coordination takes place, it is time to consider the types of coordination mechanism in greater detail.

There have been several studies considering how to structure bilateral coordination between specific integrity bodies, such as between internal control units and external auditors (INTOSAI 2010). Moreover, as noted above, one can deduce some broad background conditions likely to be conducive to successful coordination, based on descriptive case studies of why coordination fails. However, there is little indication in the literature of the specific kinds of coordination mechanisms that are most likely to be effective at the system level. The OECD notes that interagency coordination mechanisms vary enormously by country, and that indicators of the effectiveness of existing coordination arrangements are "hardly ever available" (OECD 2015).[3] Another recent study found that there is no standardised method for approaching coordination issues, and that the success or failure of efforts to coordinate agencies is highly context-dependent (Peters 2018).

Before proceeding, let us be clear that, following Davis, Machado and Jorge (2014), coordination mechanisms are understood to "include all sorts of

patterns of communication and methods conducive to the achievement of a common goal" (Davis, Machado and Jorge 2014). Coordination mechanisms therefore encompass both formal and informal channels, and while some are imposed top-down, others can occur as a result of "individual interactions and bargaining among the actors involved" (Peters 2018).

Formal coordination mechanisms

The typical policy response to calls for better coordination of public bodies is to create institutional structures specifically intended to facilitate dialogue and joint action (Razzano 2016). These are generally imposed hierarchically by central government, and tend to be as much about politics as they are about public administration (Peters 2018). As identified by the OECD in its study of anti-corruption institutions in Eastern Europe and Central Asia, formal coordination structures come in a variety of guises at three main levels: strategic, policy and operational (OECD 2015).

First, at the strategic level, national anti-corruption strategies and action plans with clear commitments can serve as coordination tools. Here, the decision might be made to convene a dedicated inter-ministerial group or cabinet committee to lay down a cross-governmental strategy and set political priorities.

Second, at the policy level, responsibility for establishing a work plan distilling the broad strategy into tangible policies and overseeing implementation of the commitments is usually given to a lead coordinating body. This central body generally then assigns tasks to other agencies and monitors their performance. This lead body might be a centralised anti-corruption agency bestowed with sweeping powers.

Alternatively, a multiagency coordination commission or an anti-corruption tsar or champion might be assigned the task. These bodies provide a venue for representatives of various institutions to exchange information, agree commitments and coordinate their efforts to ensure policy coherence.

Third, to implement the work plan's foreseen tasks at the operational level, existing public bodies may be restructured, or multidisciplinary teams and task forces set up (OECD 2013).

Formal means of coordination can be established by special legal provisions setting out the conditions under which agencies are obliged to cooperate (Zinnbauer and Kukutschka 2017). However, formal mechanisms do not always require a legal basis, do not have to be imposed top-down and are not necessarily institutional in nature. They can, for example, include measures such as decision-making protocols and memoranda of understanding between agencies, which might be adopted on the basis of mutual agreement between two or more horizontal institutions (Davis, Machado and Jorge 2014).

Informal coordination mechanisms

It would be misguided to simply set out formal mechanisms and expect coordination to blossom. Research demonstrates that the most successful examples of interagency collaboration rely on the emergence of an "epistemic community", in other words a community of practice whose members establish a base of common knowledge, expertise and support (Bardach 1998). Where informal collaboration – based around a common understanding of the "problem" at hand – is successful, it can lead to greater coordination than the structural remedies to which governments frequently resort (Peters 2018). In fact, in the same way that the "success" of corrupt networks is often

based on interpersonal ties, the level of mutual trust between employees in different integrity agencies is a crucial factor in the effectiveness of the overall integrity system (Sampford, Smith and Brown 2005).

Informal channels, particularly the interpersonal connections and social networks between staff in different agencies, are key to meaningful collaboration. The value of day-to-day interactions, such as casual conversations, meetings and working groups, should therefore not be underestimated (ACUS 2012). In fact, informality is an implicit reflection of reality; regardless of how neatly delineated integrity agencies' respective jurisdictions are, the complexity of corruption ensures it will obfuscate even the strictest of institutional boundaries. While on one hand an ombudsman's office may be set up to monitor maladministration, and on the other an anti-corruption agency is expected to focus on cases of corruption, some incidents will likely involve both kinds of integrity failure (Sampford, Smith and Brown 2005). Moreover, establishing protocols for every conceivable scenario can be needlessly bureaucratic; where multiple agencies have robust informal relationships built on mutual trust, they are much better placed to respond to unexpected developments and emergent threats (OECD 2013).

While many studies commend the advantages of informal coordination mechanisms, most observe that such impromptu cooperation must nonetheless be linked to formal structures that are "stable, visible, and durable" in comparison to often transitory personal relationships (ACUS 2012). Where formal channels for coordination are absent, "the risk of ad hoc and potentially poor decision making about the development of integrity bodies remains high" (Sampford, Smith and Brown 2005). The OECD observes that, given the fragmentation

of anti-corruption functions across a multiplicity of institutions, even powerful centralised bodies "cannot function without institutionalised (and mandatory) channels of cooperation with other state institutions in the area of enforcement, control and policy making" (OECD 2013).

Attempts can therefore be made to institutionalise the benefits of informal exchanges in fostering cross-agency cooperation, such as through the practice of organising joint training courses or seconding staff to different agencies for a period of time (Chêne 2009).

The next section of the paper considers coordination mechanisms according to the schema introduced above: strategic, policy and operational. While acknowledging the value of informal interactions at each of these three levels, the paper largely restricts itself to a consideration of formal coordination mechanisms.

Coordination models at strategic, policy and operational levels

Coordination at the strategic level

Interagency coordination can be constrained by an underlying tension. Indeed, the effectiveness of an integrity system can be theorised in at least two conflicting ways: the extent to which the various integrity agencies coordinate their efforts and the extent to which they are able to act as checks and balances on each other. While coordination relies on interdependence and cooperation, horizontal accountability requires independence and a degree of opposition (Sampford, Smith and Brown 2005).

This tension is particularly evident at the strategic level, where institutional models and legal

frameworks set out the "constitutional" relationships integrity agencies are expected to develop with each other (Peters 2018). These relationships are often defined by the statutory independence of particular bodies, legislative provisions outlining jurisdictions, requirements for political bipartisanship in the formation and management of integrity agencies, parliamentary oversight measures and legal avenues to challenge decisions of other bodies (Sampford, Smith and Brown 2005).

To mediate these contradicting incentives, executive bodies like inter-ministerial groups or cabinet committees may be needed to compel coordination between different integrity agencies and arbitrate between parties in case of disagreement. Arguably the most effective – and increasingly common – means of mitigating this tension is to lay out a national anti-corruption strategy that provides a cross-governmental agenda with clear commitments.

While achieving harmony at the strategic level can be especially problematic, where it is successful coordination problems during implementation are likely to be less severe at the policy and operational levels since the overall direction of travel is at least clear (Peters 2018).

National anti-corruption strategies

Anti-corruption strategies are policies developed by governments to mainstream and prioritise anti-corruption measures in a given national context. These policies provide a comprehensive policy framework that cuts across different sectors and involves different government institutions (Martini 2013a). As such, successful anti-corruption strategies must go beyond simply laying out a set of substantive policy reforms and also provide channels to ensure coordinated implementation of these reforms. Indeed, the Kuala Lumpur Statement on Anti-Corruption Strategies stresses that they provide a valuable opportunity for strategic coordination between anti-corruption agencies (UNODC 2013).

As of 2015, the UNODC had counted over 70 countries that had either produced a single national anti-corruption strategy or developed a set of documents that collectively constituted a comprehensive and coordinated anti-corruption framework (UNODC 2015). Well-known case studies include Romania and Georgia (Martini 2013a) and, more recently, South Africa, the United Kingdom and Argentina. These are among the countries to commit to a comprehensive national strategy.

The UNODC's Practical Guide to the Development and Implementation of National Anticorruption Strategies points out that interagency coordination can be nurtured in two pivotal phases. During the drafting stage when the strategy is under development, regular consultations with all government agencies affected by the strategy are advisable. Participants should not only include representatives of executive branch agencies, like the ministries of justice and interior, the police, financial intelligence units, ombudsmen, anti-corruption agencies, procurement bodies and civil service commission, but also agencies outside the formal control of the executive, such as judges, legislators, audit agencies and subnational governments (UNODC 2015). In Ghana, those drafting the strategy drew input from parliamentarians and the judiciary, while in Estonia the public prosecutor and competition law agency contributed to the strategy, and in Peru there were consultations with the supreme audit institution and the ombudsman (UNODC 2015).

These discussions should improve the quality of the strategy's design by soliciting input from a variety of agencies in terms of their analysis of integrity challenges, potential solutions and the kind of operational detail crucial to smooth implementation, such as budgetary implications (UNODC 2015). Broad participation is also likely to heighten the sense of "ownership" of the strategy's success. In addition, it is probable that the frequent exchanges between different institutions involved in the process of drafting the strategy will lead to greater informal collaboration. In turn, this should improve different agencies' ability to cooperate on integrity issues during the strategy's implementation and monitoring stages (UNODC 2015).

During the implementation phase, the UNODC (2015) observes that coordination is "a major challenge" due to the number of entities involved (some of whom are mandated to operate independently of the government) and the fact that some of them might actually benefit from the corrupt status quo and attempt to sabotage the strategy's execution. Nonetheless, where a national anti-corruption strategy has been developed, this can bring extra attention and momentum to interagency coordination as a means to achieve the specified objectives. As a high-level coordination unit has an incentive to ensure the success of the strategy, this can provide a useful channel to compel different institutions to work together (UNODC 2015). In Romania, for instance, the minister of justice is responsible for coordinating the implementation of the anti-corruption strategy and organises high-level meetings with representatives of the legislative, judicial and executive branches as well as local government, the business sector and civil society at least every six months (OECD 2015).

Unfortunately, as the UNODC guide notes, few other national strategies seem to contain explicit references on how coordination mechanisms are intended to operate in practice (UNODC 2015).

The Open Government Partnership

Since it was launched in 2011, 79 countries have signed up to the Open Government Partnership (OGP), pledging to fulfil a range of commitments to make government more open and accountable to citizens. Perhaps to an even greater degree than national anti-corruption strategies, realising the ambitions of the OGP requires a "whole-of-government" approach. Experience suggests, however, that very few countries adopt this approach (Pegus and Razzano 2016). Despite the fact that the OGP promotes the establishment of so-called permanent dialogue mechanisms (a kind of national multi-stakeholder forum) to ensure joined-up implementation, studies show that fewer than 20 per cent of countries actually operate a forum for regular dialogue (Razzano 2016).

Moreover, coordination in the OGP field is generally seen in terms of collaboration between government and civil society, and observers point out the need for better intra-government coordination in most OGP countries (Razzano 2016). In practice, governments typically appoint a lead agency to coordinate the OGP process, which delegates responsibility for specific commitments to other bodies. Evaluations show there seems to be an "over-reliance on lead agencies to drive the implementation of far-reaching commitments that are contingent on the cooperation and compliance of practically all departments" (Pegus and Razzano 2016). At the same time, there is typically limited consideration of how to practically stimulate coordination between different government agencies and departments (Razzano 2016).

Coordination at the policy level

Interagency relationships at the policy level describe interactions whereby integrity agencies collaborate to establish coherence and consistency in how integrity is managed. This can include measures to identify overlaps, tackle duplication and foster coordination in policy implementation. Regrettably, experience shows that policy coherence is frequently a short-term, one-off consideration at the moment new integrity structures are set up (Sampford, Smith and Brown 2005), whereas building the trust needed for effective coordination is a long-term project (Martini 2013b).

At the policy level, formal coordination functions are typically exercised either by centralised anti-corruption agencies or by some kind of interagency forum. As centralised anti-corruption agencies were discussed above, this section only considers the role of interagency groups.

Interagency fora

Interagency coordination fora take many different forms in different countries, from standing committees to interagency councils and multidisciplinary commissions (OECD 2013). In Latvia, even the Parliamentary Sub-Committee on Corruption Prevention enjoys a certain coordinating mandate (OECD 2015).

What these various structures have in common is the recognition that anti-corruption policies "cannot be planned and effectively implemented in isolation" (OECD 2015). These bodies enable the leaders and working level representatives of various integrity agencies to exchange information, develop joint work plans and assign responsibility for specific activities.

In Georgia, for instance, the anti-corruption council is composed of 41 representatives of government agencies, international and local organisations, as well as the business sector. It is tasked with coordinating the country's anti-corruption activities, monitoring the implementation of the national integrity strategy, providing legislative recommendations and liaising with international organisations. The council is supported by an expert level working group, which in turn is charged with overseeing the implementation of the national strategy and meets on a frequent basis (OECD 2015).

Anti-corruption champion/tsar

Finally, a relatively recent mechanism developed to promote coordination is the rise of the policy tsar. These officials are assigned personal responsibility for a cross-cutting policy domain and given a large degree of discretion on how they make it work. Generally, they report directly to the president or prime minister and, as such, enjoy considerable political authority to press for better performance and coordination between relevant bodies (Vaughn and Villalobos 2015).

In the field of integrity and anti-corruption, the UK anti-corruption champion is perhaps the best known example. The champion is responsible for driving delivery of the national anti-corruption strategy, scrutinising and challenging the performance of government agencies, representing the government on anti-corruption matters internationally and engaging with external stakeholders to ensure their concerns are taken into consideration in policymaking (TI UK 2018).

A comparable role was filled between 2009 and 2011 by the White House's Special Counsel for Ethics and Government Reform, who guided President Obama's policies on campaign finance,

lobbying, whistleblower protection and other integrity issues (Lichtblau 2010). Although these kind of positions are most visible in the US and UK, there are similar positions in a number of other political systems, including Sierra Leone (Rashid Thomas 2018) and China (Radio Free Asia 2017).

Coordination at the operational level

Relationships between integrity agencies at the operational level revolve primarily around the interactions required for day-to-day coordination. This is where coordination mechanisms become the most tangible: protocols for joint investigations, information sharing procedures, common risk assessment frameworks, mutually intelligible grievance channels and so on.

Some types of mechanism are intended to facilitate coordination among agencies performing similar functions. For instance, agencies involved in monitoring might agree which of them is expected to collect which kind of data and then agree on common data standards. In Azerbaijan, for instance, a joint order between the prosecutor general and the Ministry of Internal Affairs was used to establish the Proper Registration of Criminal Offences (OECD 2015). Alternatively, a protocol between law enforcement agencies might stipulate how a lead investigating agency is appointed for a particular case or how multiple prosecutions are to be sequenced (Davis, Machado and Jorge 2014).

Other kinds of coordination mechanisms are designed to enable coordination between agencies performing different functions. Monitoring agencies, such as audit institutions, might sign memoranda of understanding with investigative bodies outlining how information about suspected offences should be referred to lead agencies (OECD 2015).

In addition, there are a number of informal methods to encourage interagency cooperation at the operational level. Noonan, Morningstar and Erickson (2008) suggest seconding officials to partner agencies, holding joint training sessions and embedding each agency's contribution to overall coordination into performance appraisals. In fact, a study in Alberta discovered that the most effective means of encouraging horizontal coordination was explicitly linking senior officials' performance pay to an assessment of how successfully they facilitated interagency coordination (Victoria State Service Authority 2007).

All these kinds of measures are intended to lower transaction costs of coordination in the field. It is important to stress, however, that the effectiveness of coordination at operational level is in part a function of coherence at the policy and strategic levels. Without legislative amendments permitting greater information exchange and in the absence of formal coordinating units, for example, on-the-ground collaboration will be difficult (Sampford, Smith and Brown 2005).

Task forces

In law enforcement circles, multidisciplinary task forces are sometimes assembled to investigate specific cases. Task forces are believed to help pool resources, enhance coordination and concentrate specialised learning opportunities across integrity agencies (CAPI 2016a). Occasionally, task forces may be constituted to go beyond a single case and focus on common types of corruption. In Brazil, for instance, there are a few examples of longstanding task forces, including the *Força Tarefa Previdenciária*, in which the federal police, the social security ministry and public prosecutors work together on fraud cases related to pension funds (Davis, Machado and Jorge 2014).

Country examples

The following country examples were selected either on the basis of being jurisdictions reasonably comparable to Australia in their federal structures, or because they have recently adopted anti-corruption strategies.

It is worth noting that Olivieri et al. (2011) have observed that systematic coordination between government agencies is generally costlier in federal countries than unitary polities. In federal models of government, Peters (2018) argues that vertical (hierarchical) coordination is particularly important as sub-national administrations can enjoy considerable autonomy and central government therefore needs to be able to find channels to ensure overall policy coherence within the federal polity.

Argentina

In Argentina, the government is currently working on a national anti-corruption strategy, a key objective of which is to enhance coordination between integrity agencies in the executive branch when it comes to the prevention and prosecution of corruption. This would seem to exclude bodies such as the auditor general, which although functionally autonomous, belongs to the legislative branch (Davis, Machado and Jorge 2014).

As yet, however, there is no regulation that establishes cooperation mechanisms between the country's integrity agencies. A good example of this relates to anti-money laundering measures, which require several oversight agencies to collect information related to the beneficial owner of legal entities. Currently, however, Argentinian law does not specify how to share this information between law enforcement bodies, tax agencies and the

financial intelligence unit (Argentinian Ministry of Justice).

Moreover, while coordination units do exist, they have not tended to work directly on corruption issues. The national risk assessment conducted by the National Coordination to Combat Money Laundering and Terrorism Financing unit, for example, focused solely on terrorism financing rather than other integrity issues (CIPCE 2016).

Although some bodies have in practice established collaboration agreements to facilitate information exchange, the longevity of these arrangements usually relies on the personal commitment of the individuals heading those institutions.

For instance, while the national anti-corruption office does not appear to have a specific mandate to coordinate other integrity agencies, it does make use of some coordination mechanisms on a bilateral basis (Davis, Machado and Jorge 2014). For instance, to fulfil its mandate to monitor officials' asset declarations, it has agreed upon joint monitoring criteria with the financial intelligence unit, which is supposed to monitor suspicious financial transactions. The anti-corruption office conducts enhanced monitoring of politically exposed persons, a criteria that is defined by the financial intelligence unit's regulatory power. In addition, both have strengthened their monitoring capacity by granting each other access to their databases and registries (Davis, Machado and Jorge 2014).

Finally, in the area of law enforcement, the general prosecutor has been known to create task forces to prosecute specific cases relating to corruption and tax fraud. A relatively recently formed agency, called PROCELAC, specialises in serious economic crime and money laundering (Thomas Reuters

2018). PROCELAC uses multidisciplinary teams and, in addition to providing technical assistance in complex cases, can also act as the lead agency to investigate and prosecute suspected crimes (Davis, Machado and Jorge 2014).

Brazil

In Brazil, the lack of a single anti-corruption institution ensures the need for robust inter-institutional cooperation mechanisms (France 2019). The National Strategy for Combatting Corruption and Money Laundering (Estratégia Nacional de Combate à Corrupção e à Lavagem de Dinheiro, ENCCLA) has been, since its creation in 2003, the main forum for discussions on anti-corruption within the government (ENCCLA 2018). It gathers specialists from several public bodies from all branches of power and from the federal, state and municipal levels, though civil society participation remains limited. They decide on action plans, which may involve conducting a study, drawing legislation or monitoring implementation of a policy.

Task forces, comprised of individuals from the federal police, the prosecutor's office, the Brazilian Federal Revenue Department and others, have become a common way of investigating elaborate corruption schemes. The Carwash Task Force, for example, has received widespread attention and appraisal (France 2019). The unit facilitates immediate communication and coordination on law enforcement activities.

In addition, institutions have increasingly resorted to agreements and memorandums of understanding to promote cooperation and delineate areas of competence. Notable agreements have covered information sharing protocols and approaches to tackling foreign bribery (France 2019). Such coordination goes

beyond anti-corruption bodies to also involve institutions such as the Council on the Defence of Economic Activities (Conselho Administrativo de Defesa Econômica, CADE) in charge of competition law and the Brazilian Health Regulations Agency (Luiz Vassallo 2018; Controladoria-Geral da União 2018).

One of the bigger issues concerning the Brazilian authorities' use of leniency agreements was companies' misgivings that one entity not involved with the agreement might prosecute them regardless. The resolution of this issue through a cooperation agreement between the office of the comptroller general and the office of the attorney general in 2016 has since led to the signing of multiple leniency agreements (Controladoria-Geral da União 2016).

Inter-institutional cooperation in Brazil is not without its limitations and contradictions. Disputes between the Ministério Público Federal and the federal police on the mandate of the prosecutor's office to conduct investigations and of police detectives to make plea agreements had to be settled by the Supreme Court. International judicial cooperation remains a point of contention between the federal prosecutor's office and the Ministry of Justice (France 2019).

Mexico

A landmark anti-corruption reform package came into force in 2016, covering a range of legal and policy areas and establishing a number of new integrity agencies (Oldfield 2017). The creation of the national anti-corruption system (*Sistema Nacional Anticorrupción*) is specifically designed to provide a comprehensive and coherent approach, installing mutually comprehensible anti-corruption frameworks at federal and state level. A key plank of the reform effort is therefore to bolster
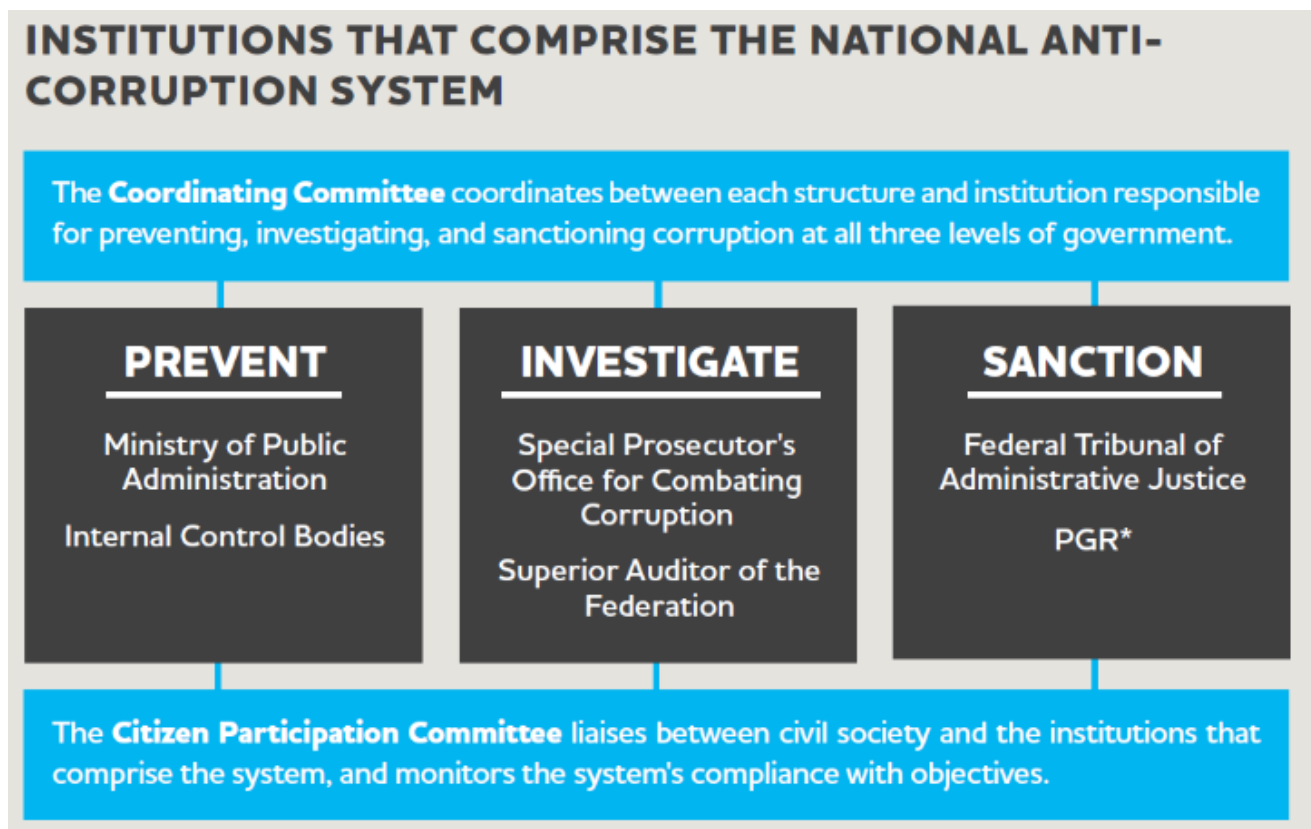
coordination between Mexico's dizzying array of 96 different entities at federal, state and municipal levels tasked with curbing corruption (Meyer and Hinojosa 2018).

Presiding over the new system is a central coordinating committee, which is tasked with defining coordination mechanisms among the constituent members of the national anti-corruption system and the design, promotion and evaluation of anti-corruption policies (Secretaría Ejecutiva del Sistema Nacional Anticorrupción 2018). Of particular interest is its stated objective of ensuring the supply, exchange and systematic update of information about corruption at all levels of government and hosting this on the National Digital Platform.

The coordinating committee comprises representatives from seven agencies:

- Superior Auditor of the Federation (*Auditoría Superior de la Federación*)
- Special Prosecutor's Office for Combating Corruption (*Fiscalía Especializada en Combate a la Corrupción*)
- Ministry of Public Administration (*Secretaría de la Función Pública*)
- Federal Tribunal of Administrative Justice (*Tribunal Federal de Justicia Administrativa*)
- National Institute for Transparency, Access to Information, and Personal Data Protection (*Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales*)
- Federal Judicial Council (*Consejo de la Juridicatura Federal*)
- Citizen Participation Committee (*Comité de Participación Ciudadana*)

Below is an overview of the system (Meyer and Hinojosa 2018).

INSTITUTIONS THAT COMPRISE THE NATIONAL ANTI-CORRUPTION SYSTEM

The **Coordinating Committee** coordinates between each structure and institution responsible for preventing, investigating, and sanctioning corruption at all three levels of government.

PREVENT
Ministry of Public Administration
Internal Control Bodies

INVESTIGATE
Special Prosecutor's Office for Combating Corruption
Superior Auditor of the Federation

SANCTION
Federal Tribunal of Administrative Justice
PGR*

The **Citizen Participation Committee** liaises between civil society and the institutions that comprise the system, and monitors the system's compliance with objectives.

South Africa

In South Africa, the National Anti-Corruption Forum, a coalition of government officials, private sector representatives and civil society players was established in 2001 to drive national anti-corruption efforts through the coordination of sectoral strategies against corruption and the exchange of information (Republic of South Africa 2016). By 2014, the forum was no longer meaningfully active, which limited cross-sectoral collaboration in the development of anti-corruption mechanisms and led to serious challenges in coordination and information sharing across government (Republic of South Africa 2016).

Partly as a result of this perceived gap, the Anti-Corruption Inter-Ministerial Committee (ACIMC) was established in 2014 with the mandate to coordinate and oversee the work of state anti-corruption institutions. The committee is composed of representatives from the ministries of planning, justice, state security, police, cooperative governance, public service, finance, home affairs and social development (Republic of South Africa 2016).

In 2015, the ACIMC began developing a comprehensive national anti-corruption strategy (Republic of South Africa 2018). A discussion document has been widely circulated for consultation, and the strategy is currently in the process of being finalised (Corruption Watch 2018).

As things stand, the proposal is that a lead agency should be identified to "support the implementation, coordination and monitoring of the National Anti-corruption Strategy, and to act as a secretariat to organisational platforms that are important for its delivery, such as the National Anti-Corruption Forum" (Republic of South Africa 2016). It is foreseen that the coordination unit be established within the presidency. The strategy's proposed institutional structure is shown below.

MINISTERIAL OVERSIGHT
With designated as political champion of the fight against corruption

Office for the promotion of integrity and fighting corruption
Permanent Office with permanent head and staff and programmic budget

Function
- Policy-making on fighting corrption
- Coordination of implementation of the National Anti-corruption Strategy
- Monitoring the efficacy of the anti-corruption system
- Monitoring the implementation of the National Anti-corruption Strategy
- Reporting (domestic and international instruments/forums)
- Evalution
- Communication, awareness and education
- Secretariat support to the inter-sectoral coordinating body

Body to coordinate anti-corruption agencies

Functions:
Operational cooperation on law enforcement and intelligence gathering

National Anti-corrption Forum or other inter-sectoral coordinating body
Chair: Minister (political champion)

Option 1: Composition, operational and funding modalities to be determined through a political consultation process, starting immediately.

Option 2: Composition, operational and funding modalities to be determined through consultation process (road map) and inter-sectoral body established at end of the process.

Proposed functions:
- Promote cohesion and common purpose in society on fighting corruption
- Align and coordinate sectoral anti-corruption programmes
- Establish, coordinate and monitor inter-sectoral working groups on thematics/specific areas
- Outcome monitoring of the National Anti-corruption Strategy

Source: Republic of South Africa 2016

Another existing coordination mechanism on the law enforcement side is the multi-agency Anti-Corruption Task Team, to which the inter-ministerial committee provides strategic direction. Formed in 2010, the task force is mandated to work on priority investigations and prosecutions, as well as to implement governmental anti-corruption programmes (Republic of South Africa 2016). It includes representatives from the National Prosecuting Authority, the Asset Forfeiture Unit, the Directorate for Priority Crime Investigation, the Special Investigating Unit, the South African Revenue Service, the Office of the Accountant-General and the Chief Procurement Officer in the National Treasury, the Financial Intelligence Centre, the National Intelligence Coordinating Committee, the State Security Agency, the presidency, the Department of Justice and Constitutional Development, the Department of Public Service and Administration, and the Government Communication and Information System (Republic of South Africa 2016).

Despite these initiatives, critics point out that, in terms of inter-institutional interaction, "overt displays of intra-party political motives … [have] thwarted efforts to both in stitutionalise robust and specialised anti-corruption capacity within the state, as well as undermine[d] the effectiveness of South Africa's existing multi-agency framework" (Naidoo 2012). An infamous case involves the political pressure exercised over the multi-agency investigation into a major armaments procurement contract and the subsequent disbandment of the Directorate of Special Operations.

Switzerland

In response to a recommendation by the Council of Europe's Group of States against Corruption, the Swiss Interdepartmental Working Group on Combating Corruption (IDGW) was established in 2008 to coordinate the efforts of the country's federal offices and authorities to counter corruption.

The IDGW's chair and secretariat are located within the Federal Department of Foreign Affairs, and the body is comprised of Swiss federal agencies involved in anti-corruption as well as the office of the attorney general. This core group includes representatives from the Federal Office of Justice, the Federal Office of Police, the Federal Office for Defence Procurement, the Federal Office of Personnel, the State Secretariat for Economic Affairs and the Federal Roads Office. This core group approves the IDGW's work plan and issues strategic guidelines.

The IDGW's primary functions include to "strengthen the flow of exchange and flow of information between the different federal offices" and to "signal abuses and risks and, where necessary, suggest changes to Switzerland's anti-corruption framework" (FDFA 2018). To this end, the working group's plenary meetings provide a forum to share experiences and information, as well as to discuss developments in the international sphere, such as the Council of Europe, the UN Convention against Corruption, the OECD Working Group on Bribery and the G20 Anti-Corruption Working Group. Finally, the working group also convenes thematic workshops to consult with independent experts as well as representatives of the cantons, cities, business and civil society (FDFA 2018).

As part of a self-evaluation exercise conducted in 2018, IDWG described itself as a "cross-departmental project organisation" and argued its main value lies in internal coordination (IDGW 2018). The appraisal noted that, as of 2018, there

had been no overall analysis of Switzerland's anti-corruption framework and no strategy for its further development. To address this, the IDWG has recently been tasked with producing a set of strategic and operational anti-corruption goals at the federal level to be submitted to the Federal Council for approval by March 2020 (FDFA 2018).

United Kingdom

In 2014, the UK government released its anti-corruption plan, which sought to establish a comprehensive overview of all UK activity against corruption for the first time. The overriding objective was to bring greater coherence to anti-corruption efforts to ensure "that future activity to tackle corruption is joined up and collaborative" (UK Government 2014). The anti-corruption plan was followed by a fully-fledged anti-corruption strategy in 2017 (UK Government 2017). The strategy specifies two main coordinating channels at the strategic level.

First, the Inter-Ministerial Group on Anti-Corruption brings together relevant ministers and heads of operational agencies to oversee the delivery of government anti-corruption commitments and set the strategic direction of the UK's anti-corruption effort (UK Government 2014; UK Government 2015). As co-chair of the group, the prime minister's anti-corruption champion assumes personal responsibility for driving delivery of the strategy and holding the government accountable for its implementation, as well as scrutinising the performance of relevant integrity agencies (UK Government 2017).

Second, the other co-chair of the inter-ministerial group is the new minister for security and economic crime, based in the Home Office. This position provides oversight of cross-departmental anti-corruption activities. Part of this work included

the establishment in January 2019 of the Ministerial Economic Crime Strategic Board, jointly chaired by the home secretary and the chancellor and involving the participation of private sector representatives such as UK Finance (UK Government 2018a). In the area of economic crime, which is understood in broader terms than just corruption, this new body is intended to oversee strategic priorities and overall performance, as well as align funding and the develop capability.

At the policy level, the Joint Anti-Corruption Unit (JACU) based at the Home Office has been tasked with ensuring policy coherence by tracking actions taken by individual government departments and agencies towards the 134 commitments outlined in the anti-corruption strategy (UK Government 2018a). JACU has the mandate to facilitate coordination of domestic and international anti-corruption efforts and promote stronger links between anti-corruption efforts and measures against other forms of economic and organised crime. To serve this purpose, it draws civil service secondees from a number of different government bodies, such as the Department for International Development and the Cabinet Office. In addition, it represents the UK at international anti-corruption fora and provides institutional support to the anti-corruption champion (UK Government 2017).

Responsibility for the coordination of UK commitments to the OGP was recently moved from Cabinet Office to the Department of Culture, Media and Sport, which is currently finalising the country's fourth open government action plan (UK Open Government Network 2018).

At the operational level, there have also been some recent developments. Foremost among these is the creation of the National Economic

Crime Centre (NECC), based in the National Crime Agency (NCA). As the national authority for the UK's law enforcement response to economic crime, the NECC draws staff from across government and the private sector (UK Government 2018b). Its primary objectives are improving intelligence around economic crime, coordinating the overall law enforcement response, and enhancing the UK's ability to investigate and prosecute sophisticated economic crime (UK Government 2018a).

The NECC acts a kind of clearing house for cases related to economic crime, receiving complex cases referred by other agencies like the Serious Fraud Office (SFO) or NCA where these are believed to require a multiagency response. The NECC then evaluates the case to determine the most appropriate type of investigation (criminal, civil or regulatory), before identifying a lead agency and appointing supporting agencies to assist with specific aspects of the case. While not directly running the investigation itself, it maintains a monitoring role as cases develop to ensure smooth interagency cooperation and effective information exchange. It is expected to promote the use of new powers like Unexplained Wealth Orders and Account Freezing Orders to tackle illicit finance (NCA 2018).

The NECC relies heavily on secondments from other agencies, including the NCA, HM Revenue and Customs, the City of London Police, the Serious Fraud Office, the Financial Conduct Authority, the Crown Prosecution Service and the Home Office (NCA 2018). While operating as an independent body, its activities are overseen by the Economic Crime Strategic Board. It is worth noting that the NECC has only recently been set up, and as of January 2019 had no officially appointed director.

Other coordination mechanisms include close working arrangements between the Serious Fraud Office and the Crown Prosecution Service, who have agreed a joint approach to prosecutions under the UK Bribery Act 2010 and developed common guidelines to prosecute corporate entities, as well as publishing a joint code of practice on the use of deferred prosecution agreements (Serious Fraud Office 2014). While the SFO leads on serious or complex and overseas cases of bribery and corruption, the Crown Prosecution Service advises on investigations and conducts all relevant prosecutions other than those brought by the SFO.

Finally, it is worth mentioning the UK government's Business Integrity Initiative, which seeks to bring a cross-departmental approach to the provision of integrity support to UK firms operating in difficult overseas markets. As a first step, the UK government harmonised its advice to companies across various government websites (DFID, DIT, FCO, UKEF and SFO). In addition, a new Business Integrity Hub was created in November 2018 to support interagency coordination and supply practical guidance on compliance, prevention and collective action strategies to UK companies. Country pilots are currently underway in Kenya, Pakistan and Mexico and are intended to systematise the business integrity support provided by UK missions in those countries (UK Government 2018a).

United States

Federal level

The Centre for the Advancement of Public Integrity observes that the United States maintains a uniquely decentralised system of anti-corruption oversight. At the federal level, there exists a profusion of institutions with an integrity mandate.

These include the Government Accountability Office in the legislative branch and the Office of Government Ethics in the executive branch, as well as more than 70 inspectors general tasked with overseeing a specific department or government programme (CAPI 2016b).

The Office of Government Ethics (OGE) was established in the aftermath of the Watergate scandal. It provides overall leadership and oversight of the executive branch ethics infrastructure designed to prevent and resolve conflicts of interest (US Department of State 2018a). In addition, it has the mandate to develop the executive branch's ethics programme, provide guidance and interpretation on the programme, evaluate 130 executive agencies' compliance with the ethics infrastructure, and run educational activities for executive officials and staff (US Office of Government Ethics, no date). Notably, it is only a preventive body, and neither handles complaints of misconduct nor has investigative or prosecutorial authority. Part of its responsibility is to provide technical assistance to foreign governments on measures to prevent corruption in the executive branch through its International Assistance and Outreach Team.

On the law enforcement side, a number of bureaus sited in the State Department play a role in anti-corruption efforts. The Bureau of International Narcotics and Law Enforcement Affairs coordinates special visa authorities that can bar entry of the corrupt and their families to the United States, and works with the Department of Justice to help recover stolen assets (US Department of State 2018b). It is also responsible for coordinating US participation in multilateral anti-corruption fora.

The Bureau of Economic and Business Affairs leads a number of anti-corruption initiatives,

including promoting adherence to the Anti-Bribery Convention, fiscal transparency and responsible business conduct, as well as undertaking measures to curb corruption in public procurement. It is also charged with developing the congressionally mandated Fiscal Transparency Report. The Bureau of Democracy, Human Rights, and Labor is responsible for coordinating US government engagement in the Open Government Partnership. Finally, The Bureau of Energy Resources coordinates the US government's commitments to the Extractives Industries Transparency Initiative.

The Federal Bureau of Investigation plays a central role in investigating violations of federal law by public officials at the federal, state and local levels of government, and overseeing the nationwide investigation of allegations of fraud related to federal government procurement, contracts and federally funded programmes. It notes that its effectiveness depends "largely to the cooperation and coordination from a number of federal, state, local, and tribal law enforcement agencies" including the Department of Justice, Agency Offices of Inspector General, law enforcement agencies' internal affairs divisions, federal, state and local law enforcement and regulatory investigative agencies, and state and county prosecutor's offices (FBI 2018).

Multiple units at the Department of Justice are also involved in anti-corruption activities, such as the Public Integrity Section, which oversees the federal effort to counter corruption through the prosecution of elected and appointed public officials at all levels of government. The Department of State consults the Public Integrity Section in relation to domestic corruption laws and prosecution experience (US Department of State 2018a).

Other relevant integrity agencies include the Department of the Treasury, which plays a role in identifying corrupt schemes and sharing this information with relevant financial institutions and the Securities and Exchange Commission, which is responsible for civil enforcement of the Foreign Corrupt Practices Act involving US issuers.

State level

Integrity frameworks at state level have emerged largely in isolation from each other in response to local pressures, with the result that integrity systems are even more variegated than at the national level. A recent study of anti-corruption oversight across US states by the Center for the Advancement of Public Integrity (CAPI 2016b) found there have been "few efforts at harmonisation or coordination due to America's strong traditions of federalism". Indeed, some states have multiple bodies while others lack any form of integrity agency. In a few states, watchdogs enjoy ample resourcing and comprehensive investigative powers, while in others, oversight agencies take the form of volunteer boards that meet rarely and lack means of enforcement (CAPI 2016b).

There appear to be two main types of state level oversight agency: inspectors general and ethics commissions. Inspectors general are typically gubernatorial appointments and are responsible for investigating cases of fraud, waste and corruption. They commonly enjoy law enforcement powers, such as the ability to conduct audits and investigations, subpoena evidence and witnesses, collect sworn testimony, and hold public hearings. Like agents of federal level inspector generals, they may be entitled to execute search warrants, seize evidence and carry firearms (CAPI 2016b).

Forty-two states have ethics commissions, with a broader mandate to oversee ethics rules, investigate ethics violations, issue administrative sanctions, such as fines or injunctions, refer criminal matters to law enforcement authorities, issue advisory opinions, and conduct training and public awareness programmes. While they may be entitled to subpoena evidence and collect sworn testimony, they lack audit powers and generally have limited investigative powers. In many cases, they are also responsible for electoral oversight, lobbyist registration and public access to information (CAPI 2016b).

Finally, there are other integrity bodies, including judicial ethics commissions, legislative ethics committees, audit bodies (sometimes with investigative units), prosecutorial offices with dedicated integrity units, anti-corruption units in the state police and executive offices in the secretary of state or governor's office designed to promote transparency (CAPI 2016b).

Crucially, the CAPI study found that in a number of states "an overabundance of watchdogs may hamper coordination". To enable state-by-state comparison of oversight agencies, CAPI has put together an online map listing relevant bodies, their powers, jurisdiction, budget, and leadership appointment and removal processes.

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