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Analysis of public accountability mechanisms in six Caribbean countries

The Bahamas, the Cayman Islands, Guyana, Jamaica, St. Kitts and Nevis, and Trinidad and Tobago

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Caribbean Public Accountability Mechanisms (CariPAM) data measures the comprehensiveness of legal frameworks in six Caribbean countries (The Bahamas, the Cayman Islands, Guyana, Jamaica, St. Kitts and Nevis, and Trinidad and Tobago) across four spheres of administrative transparency and accountability: access to information, financial disclosure, conflict of interest, and political finance. While all six countries possess strong access to information laws, most public accountability laws in other areas are relatively outdated. With the exception of Jamaica, all countries have very few rules on political financing. There is little accountability or transparency legislation for heads of state and ministers in the areas of financial disclosure and conflict of interest regulation. As a rule, more up-to-date legislation results in more comprehensive regulation.

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Query

Please provide a comparative analysis on the status and quality of legislation on financial disclosure, conflict of interest restrictions, access to information, and political financing in the Bahamas, the Cayman Islands, Guyana, Jamaica, St. Kitts and Nevis, and Trinidad and Tobago. In addition, please provide a short overview of country context and applicable legislation for each country, highlighting strengths and challenges.

Contents

Caribbean Public Accountability Mechanisms (CariPAM)....3

Access to information....4

Financial Disclosure....7

Conflict of Interest Restrictions....10

Political Financing....13

Country-level analysis....16

The Bahamas....16

The Cayman Islands....17

Guyana....18

Jamaica....19

St. Kitts and Nevis....20

Trinidad and Tobago....21

References....22

Main points

- There are few recent public accountability laws. More up-to-date legislation results in more comprehensive regulation.
- Strong access to information legislative frameworks are present in all six countries.
- Political financing rules are mostly absent in the countries analysed, with the exception of Jamaica.
- Accountability and transparency for heads of state and ministers in the areas of financial disclosure and conflict of interest is largely unregulated.

Caribbean Public Accountability Mechanisms (CariPAM)

Caribbean Public Accountability Mechanisms (CariPAM) data measures the comprehensiveness of legal frameworks in six Caribbean countries (The Bahamas, the Cayman Islands, Guyana, Jamaica, St. Kitts and Nevis, and Trinidad and Tobago) and focuses on four spheres of administrative transparency and accountability: access to information, financial disclosure, conflict of interest, and political finance. CariPAM is modelled on the World Bank's Public Accountability Mechanisms Initiative (PAM)[1] and the Hertie School of Governance's European Public Accountability Mechanisms (EuroPAM).[2] Both PAM and EuroPAM are primary data collection efforts that produce assessments of in-law and in-practice efforts to enhance the transparency of public administration and the accountability of public officials. The CariPAM database applies the same methodology to its analysis of legal frameworks, with the purpose of documenting the status and quality of public accountability legislation.

CariPAM provides an in-depth look at the breadth and depth of legal frameworks in the countries where it is being applied. However, it is worth noting that the mere existence of legal frameworks does not necessarily reflect the reality on the ground. Countries may have legislation that is in line with international best practices, but this does not mean that it is being evenly applied, nor does this automatically bring about compliance. Laws are often violated and loopholes exploited by those in power; governments may ignore or abuse regulations to further their own interests. What matters is that the principles governing an area of public accountability are clarified and publicised in a transparent legal framework, and that those who violate these principles are held to account for their actions. However, it is worth noting that while corruption may undermine enforcement, lack of sanctioning for corruption behaviour could be the result of low state capacity.

This report provides a comparative analysis of four public accountability mechanisms across six Caribbean countries, highlighting strengths and weaknesses of each country, as well as the region as a whole. It also provides an overview of legal frameworks in each country and documents their strengths as well as the challenges they face.

Methodology

CariPAM indicators are based on internationally-accepted legal standards established by organisations such as the World Bank, Article 19, Access Info Europe, Global Integrity, and the Institute for Democracy and Electoral Assistance.

To ensure the reliability of in-law data, a rigorous and systematic approach has been applied to the data collection and analysis. In cases where further consultation was required, the data has been sent to in-country experts for feedback on accuracy and relevance. The final data has been released in both quantitative and qualitative form for policy and research purposes. The data included in this study is current as of December 2018.[3]

Data is quantified on a simple 0-1 scale, with most indicators falling into a binary of 0 or 1, reflecting whether a provision exists within the law. Higher scores reflect a stronger legal framework. Scores for each sub-indicator are then aggregated into categories for each mechanism, and an overall country score is produced on a 0-100 scale for each mechanism.

[1] *PAM Initiative* *https://datacatalog.worldbank.org/dataset/public-accountability-mechanisms*

[2] *EuroPAM http://www.europam.eu/*

[3] *The data for each CariPAM mechanism is available for download as an Excel file*

Access to information

Access to information, as a right and a principle, entrenches the notion of transparency as a crucial element of good government. Where citizens have little information about their rights, for instance, they are less able to contest efforts to deny them basic services such as health and education. An access to information system (also known as right to information) aims to increase the transparency of government by providing regular and reliable information to the public and facilitating appropriate and relevant use of that information (Martini 2014).

Islam (2006), upon investigating whether more transparency in the form of access to information affects governance, found that countries with access to information laws have lower corruption levels. Mungiu-Pippidi (2013) found that the existence of a freedom of information act is positively associated with lower corruption and a significant positive trend in controlling corruption. Access to information laws are presumed to improve public services by allowing citizens to engage more meaningfully in public life (FOIAnet 2013). According to Mori, "the right to information is particularly powerful because it is a tool for claiming other rights" (2013).

Importance of Access to Information legislative frameworks

Art. 10(a) of UNCAC indicates that stay parties may adopt, "[…] procedures or regulations allowing members of the general public to obtain, where appropriate, information on the organization, functioning and decision-making processes of its public administration […]." Art. 13.1(b), calls state parties to take appropriate measures to ensure "[…] that the public has effective access to information."

International standards of practice for access to information start with a presumption of maximum disclosure.[4] It means that information must be available to the public whenever possible and that exceptions[5] should be limited and legitimate. Implementing active or proactive disclosure minimizes the number of requests on the basis that the most important information, which is of relevance to the public, should already be in the public domain. Globally, nearly 65% of countries with a right to information law favour maximum disclosure (Lemieux and Trapnell 2016). Only 20% of countries have no reference at all to the presumption of openness in their legal framework.[6]

National laws can guarantee the right to information and serve as a key safeguard against corruption by enabling citizens to monitor government actions. These laws define the scope (who can access what) as well as exceptions and refusals to access information (Chêne 2012). Access to information laws also signal government commitment to ensuring transparency in decision making and operations, and are a pivotal instrument in enabling civil society groups to hold governments to the principles of ethics and accountability.

An access to information framework aims at improving the efficiency of a government and increasing the transparency of its functioning by:

- Regularly and reliably providing government documents to the public;
- Educating the public on the significance of transparent government;
- Facilitating appropriate and relevant use of information in the lives of individuals.

Furthermore, in order to act as an effective anti-corruption tool, access to information depends upon a legally entrenched right to access documents held

[4] Article19: https://www.article19.org/resources/international-standards-right-information/

[5] Exceptions or exemptions tend to include measures to protect interests related to national security, personal and commercial privacy, law enforcement, and public order.
[6] Global RTI Rating: https://www.rti-rating.org/

by the government (as well as, in some cases, by private bodies). It also depends on the strength of the enabling environment, which includes a free and independent media, robust civil society, and strong rule of law. Access to information can be protected through a variety of legal mechanisms, from explicit constitutional safeguards to individual departmental orders.

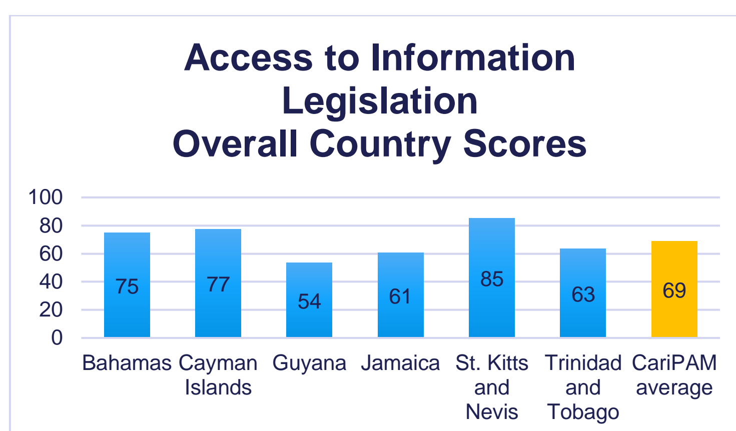
Findings on Access to Information in CariPAM

In order to determine the strength of legislative framework in the field of access to information, 35 CariPAM indicators analyse five categories: scope and coverage of the right to access information, information access and release, exceptions to disclosure, appeal mechanisms, and monitoring and oversight.

Overall, the six countries in the Caribbean sample possess relatively strong access to information legislative frameworks, with an average regional score of 69 on a 0 to 100 scale (see Figure 1 for overall regional scores, and Figure 2 for scores by five categories). St. Kitts and Nevis received the highest score of 85, primarily due to its perfect scores in information access and release, exceptions and appeals, and monitoring and oversight. By contrast, Guyana, with a score of 54, ranked the lowest of the countries across all categories except for monitoring and oversight. The Bahamas and the Cayman Islands achieved very similar scores of 75 and 77, respectively, placing them higher than average in the sample. Jamaica and Trinidad and Tobago obtained almost identical scores of 61 and 63, largely due to poor monitoring and oversight regulations.

The access to information laws of the countries sampled have a clear right to information laid out (as opposed to a discretionary administrative grant of access by government), as well as comprehensive definitions of information and records. In addition, all six countries specify proactive disclosure of information, a remarkably progressive requirement that obligates governments to regularly disclose information to the public without need for a specific information request.

Figure 1: Access to Information legislation overall scores in CariPAM countries, 2018



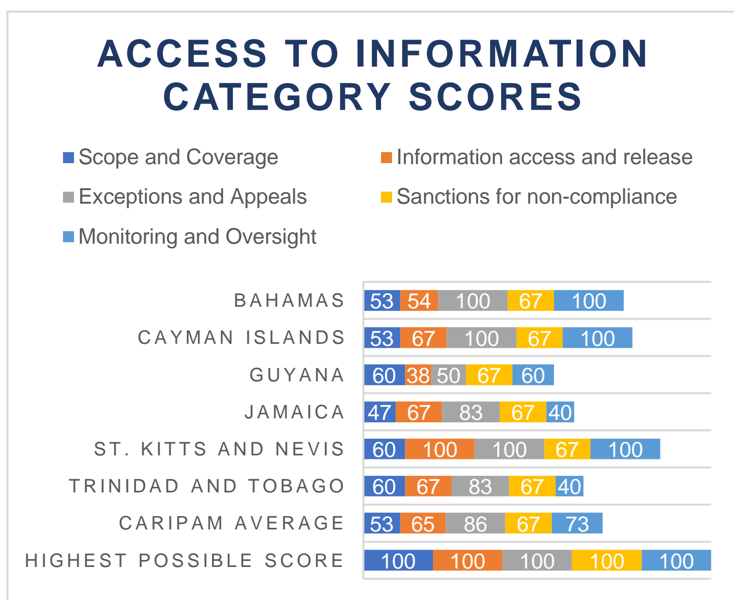
In the case of the Caribbean countries in this study, areas of strength include a clear appeals process, clear exceptions to release of information, regular reporting requirements, and judicial involvement in the application of sanctions. However, there are also gaps. Parts of government are not subject to the access to information law (i.e., courts and the private sector are exempt, as well as some parliaments).

Limits in the scope of public bodies subject to access to information laws serve to weaken the extent to which access to information can be institutionalised across government. Though all legal frameworks make the executive branch and state-owned enterprises subject to provisions in the access to information law, three countries exempt their legislatures (The Bahamas, the Cayman Islands, and Jamaica), and nearly all countries exempt the judicial branch.[7] Notably

[7] *However, court administrative records fall under the purview of the access to information laws in all countries.*

missing is the private sector, though this is a common shortcoming across access to information laws globally.

Figure 2: Access to Information legislation category scores in CariPAM countries, 2018



Another shortcoming in the legal frameworks is the lack of proactive disclosure requirements for specific documents that include:

- Enacted laws
- Draft laws
- Annual budgets
- Annual expenditures or chart of accounts
- Annual reports of public entities and programs

Although these documents may be released in practice, there is no legal obligation for the government to do so, leaving citizens without a mechanism for holding government to account should regular access through proactive disclosure be rescinded.

All countries in the CariPAM sample prescribe a 30-day deadline (or less) for release of information, with an additional 30-day extension available to public authorities This falls outside the international best practice standard of 20 days (maximum 40 days) for release of information. Procedural access across the sample received relatively high scores, but upon closer inspection, it is not clear that legal provisions are easily implemented. Costs for access to information are mentioned in all legal frameworks; however, there are no fee schedules available to requesters, making it unclear how fees will be calculated.

A personal data protection law exists in four of the six countries (The Bahamas, the Cayman Islands, St Kitts and Nevis, and Trinidad and Tobago), affording a higher degree of privacy protection with much more guidance for public entities on how to store, correct, protect, and release information of a personal nature.

The appeals mechanism is robust in legal frameworks across the sample, except for Guyana and Trinidad and Tobago. In effect, these two countries have no accessible appeals mechanism. They rely on the courts to hear first appeals, which is a costly and time-intensive process and requires significant expertise on the part of the requester/appellant.

For effective and consistent implementation of access to information across ministries and agencies, it is important that at least one national-level authority of government is responsible for coordinating the implementation process, often by articulating a framework for the implementation of access to information. This body is often referred to as a “nodal authority”. Nodal authorities are specified in only three countries (The Bahamas, the Cayman Islands, and St. Kitts and Nevis). However, access to information reporting requirements are clearly laid out across all countries, with timing and receiving institution specified. Sanctions are applied through the courts, which, although ensuring a clearly delineated process for applying penalties, may also lead to delays in application.

Financial Disclosure

Financial disclosure systems require that public officials disclose their income, assets, and financial interests. They are intended for a variety of purposes, most fundamentally to detect and prevent the abuse of public office for private gain. They also help to build a climate of integrity by providing guidance to officials regarding the principles and behaviours of ethical conduct in public office, reminding public officials that their behaviour is subject to scrutiny, and generating a valuable source of information for financial or corruption investigations (Trapnell 2017).

Importance of Financial Disclosure frameworks

UNCAC article 52(5) requires that "[e]ach state party shall consider establishing, in accordance with its domestic law, effective financial disclosure systems for appropriate public officials and shall provide for appropriate sanctions for non-compliance." Despite this, there are, as yet, no specific international standards detailing how disclosure regimes are best designed, implemented, and monitored. A World Bank study (2013) has shown that 78% of the surveyed countries had some variety of financial disclosure arrangement, while also revealing the wide range of approaches.

Financial disclosure systems can be designed to focus on detection or prevention of certain acts of corruption.

On one hand, financial disclosure systems focused on detection of acts such as illicit enrichment require public officials to disclose the ownership of real estate, moveable assets, cash, amounts and sources of income, and liabilities. Independent agencies can then compare this information with other datasets (such as land and vehicle registries, private firm registries, bank account information, tax databases) to identify anomalies that point to corruption. Non-government watchdogs such as the media and civil society organisations can also play a key role in analysing the data and conducting lifestyle checks to see if officials are living beyond their means, which can indicate complicity in illicit activity. This type of approach can also serve a preventive function, since the threat of detection serves as a deterrent to behaviour that enriches officials at the expense of the public.

On the other hand, preventative systems are often focused on stopping and remedying conflicts of interest between an official's employment responsibilities and private financial interests. A preventative approach can be collaborative, encouraging participation of both employer and employee in a discussion about appropriate behaviour and solutions to potential conflicts, without the immediate threat of sanction. Many countries' systems have evolved from restrictions-based models to a hybrid model that incorporates some form of disclosure.

Most financial disclosure regimes are combinations of prevention and detection mechanisms, incorporating measures aimed at preventing conflicts of interests and abuse of office, as well as aiding in the detection of disproportionate increases in the wealth of public officeholders.

In all cases, the verification process should be designed to identify inconsistencies, inaccurate data, and red flags, which can ultimately lead to the detection of the following (World Bank 2017):

- False statements (including both omitted information and over-disclosure of assets or income not held by the official);
- Unjustified variations of wealth;
- Illicit enrichment;
- Potential and actual conflicts of interest;
- Incompatibilities between an official's mandate and other positions;
- Information relevant for corruption/tax crime/money-laundering investigations.

There are various approaches to reviewing declarations to monitor for suspicious changes in wealth and to ensure that the income and assets declared are consistent with an official's legitimate earnings and that they do not present any indicators of potential or actual conflicts of interest. These approaches include (World Bank, 2017):

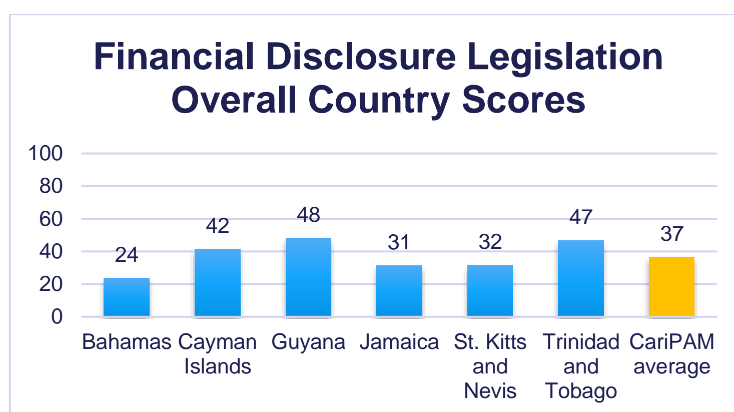
(a) checking individual declarations for internal consistency in responses;
(b) comparing declarations to monitor changes over time;
(c) cross-checking declarations with external sources and databases (land, auto, tax, banking, and so forth);
(d) analysing declarations for potential incompatibilities (or conflicts between private interests and official duties); and
(e) conducting lifestyle checks (to verify that lifestyle is consistent with declared income).

Findings on Financial Disclosure in CariPAM

In order to determine the strength of legal frameworks in the area of financial disclosure for four types of public officials, i.e., heads of state, ministers, members of parliament, and civil servants, the 120 CariPAM indicators analyse six categories: scope of public officials subject to disclosure requirements, filing frequency, sanctions for filing violations, disclosure content, verification of declaration content, and public access to declaration content.

The financial disclosure frameworks of CariPAM countries fall in the lower half of the scoring range, with an average score of 37 on a 0 to 100 scale (see Figure 3 for overall regional scores). This is largely due to the lack of regulation for heads of state and ministers. Heads of state in the CariPAM countries are royally appointed Governors-General, since the Queen of England is still considered the reigning sovereign of many commonwealth countries.[8] Even if the data pertaining to heads of state are removed from the scoring rubric, however, scores only increase 12 points on average. The disclosure for cabinet ministers is inadequate. As they have preferential access to power, financial disclosure should be required for ministers.

Figure 3: Financial Disclosure legislation overall scores in CariPAM countries, 2018



Guyana and Trinidad and Tobago received the highest scores of 48 and 47, respectively. The Cayman Islands, with a score of 42, lacks regulation on financial disclosure for the head of state and the ministers, but possesses the most comprehensive regulation when it comes to financial disclosure for members of parliament and civil servants. Jamaica and St. Kitts and Nevis fell slightly below the average, with scores of 31 and 32, respectively. The Bahamas obtained the lowest score (24) of the countries in the sample, mainly due to a poor regulation of civil servants in addition to a lack of regulation for the head of state and ministers.

[8] *The exception to this is Guyana, which has a democratically-elected President.*

Table 1. Financial Disclosure scores by public official group in CariPAM countries, 2018

	Head of State	Ministers	Members of Parliament	Civil Servants
Bahamas	0	0	77	13
Cayman Islands	0	0	83	83
Guyana	64	0	65	64
Jamaica	0	0	63	62
St. Kitts and Nevis	0	0	63	63
Trinidad and Tobago	0	47	70	70
CariPAM Average	11	8	70	59

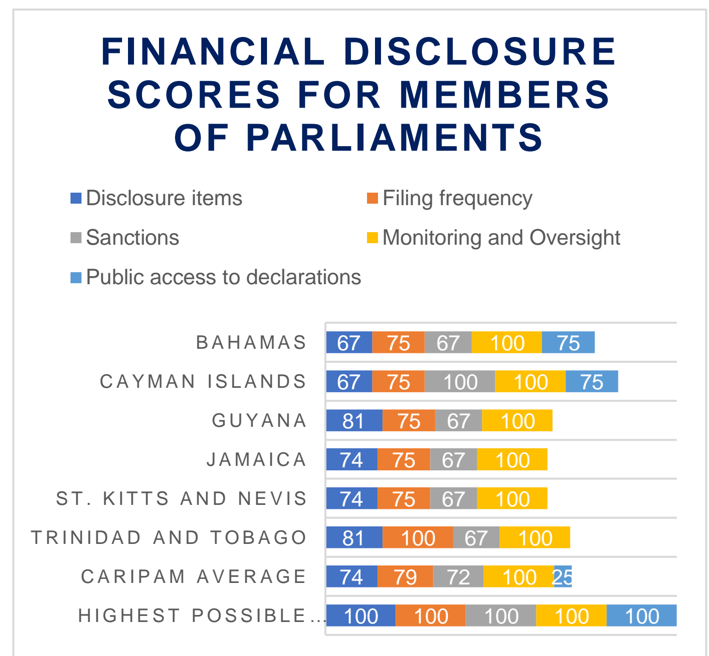
In terms of the scope of public officials subject to financial disclosure requirements (see Table 1), Guyana and Trinidad and Tobago are the positive outliers. Guyana regulates financial disclosure for its president, since it is not part of the commonwealth, while Trinidad and Tobago is the sole country to require additional disclosure obligations for its ministers, a provision which functions as part of its comprehensive ethics framework. The scores for members of parliament and civil servants average 70 and 60, respectively. In general, members of parliament are more strictly regulated than civil servants, but weaknesses exist in the frameworks for both groups.

A closer look at financial disclosure regulation for members of parliament (see Figure 4) reveals that the filing frequency is primarily limited to filing upon assuming office and annual filings thereafter. However, ad hoc filings are considered good practice because they require updating of declarations when assets, income, or incompatibilities change. In the fluid practice of governing, circumstances change frequently, and annual filings are often not able to capture the ongoing finances of public officials.

In all six countries both fines and criminal sanctions are stipulated for the failure to file a declaration and for providing false information. These requirements follow international best practice by criminalising false disclosure. Penalties for violation range from 1-10 years' imprisonment.

Though all CariPAM countries specify the public entities that are mandated to receive, store, and verify declarations, few countries perform regular review of declarations. In cases, where legal framework does not envisage public access to declaration content, the lack of verification effectively nullifies the credible threat of consequences for violating the provisions of a financial disclosure framework.

Figure 4. Financial Disclosure scores for members of parliament in CariPAM countries, 2018



Only the Bahamas and the Cayman Islands allow for public access of declaration content, and even this is restricted access. The Bahamas publishes a summary of declarations for members of parliament in the official gazette, while the Cayman Islands allows in-person public inspection of documents. There is no opportunity to perform analysis of the data, nor is there any possibility to conduct a review of declaration content for verification by members of civil society.

Conflict of Interest Restrictions

One of the central tenets of public service is the subordination of personal interests to public interests. Failure to do so is the underlying cause of most unethical behaviour in the public sector (Powers 2009). The presence of a conflict of interest (or incompatibility) is not an indicator of improper conduct, but rather a warning, or risk, of its possibility. In fact, the appearance alone of a conflict of interest may be sufficient to damage an institution's reputation. Given that officials inherently occupy multiple social roles, conflicts are almost bound to occur. With the right measures in place, conflicts of interests are quickly detected and easily defused, usually voluntarily, before any impropriety can take place (Transparency International 2015).

However, if these situations are not identified promptly and managed adequately, opportunities materialise for public officials to take advantage of their position to pursue private advantage at the expense of the public interest (OECD 2005). This private advantage should be understood broadly to include not merely illicit financial gain but also attempts to gain access to potential future benefactors or employers and the professional advancement of friends and family.

While a clear legal definition of conflicts of interest is an essential part of any public sector integrity system, it is impossible to legislate for all possible conflicts of interest. It is therefore advisable for public officials to be able to seek guidance from an internal ethics commissioner or, better still, an external public ethics body (Reed 2008: 6). Ethics training to educate public sector workers about conflict of interest legislation is also recommended (Trapnell 2017).

Importance of Conflict of Interest Restrictions

According to Art. 7(4) of UNCAC, "[e]ach State Party shall, in accordance with the fundamental principles of its domestic law, endeavour to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest." UNCAC Art. 8(5) prescribes that "[e]ach State Party shall endeavour, where appropriate and in accordance with the fundamental principles of its domestic law, to establish measures and systems requiring public officials to make declarations to appropriate authorities regarding, inter alia, their outside activities, employment, investments, assets and substantial gifts or benefits from which a conflict of interest may result with respect to their functions as public officials."

Measures to address conflicts of interest can take different forms, from legislation explicitly designed to deal with conflicts of interest to more general codes of conduct and management guidelines. Indeed, alongside general civil service legislation, individual public bodies should draft their own specific behavioural standards. Whatever form they take, regulating conflicts of interest is essential to the development of accountable and scrupulous procedures in decision making. Three major areas should be covered by conflict of interest regulation, namely prohibition, interest disclosure, and resolution of conflict of interests. Taken together, regulation of these areas, combined with effective oversight and enforcement, minimises opportunities for impropriety in public office.

Bearing these three strands in mind, national legal frameworks on conflicts of interest should seek to regulate the following areas:

- Secondary employment;
- Procurement;
- Revolving doors;
- Sharing confidential information and insider trading;
- Nepotism and cronyism;

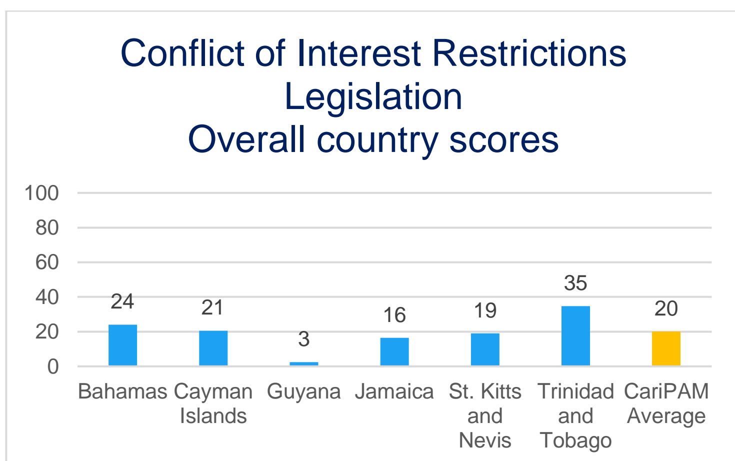
- Private financial interests;
- Fraud and bribery.

Findings on Conflict of Interest Restrictions in CariPAM

In order to determine the strength of legal frameworks in the area of conflict of interest restrictions, the 60 CariPAM indicators analyse three elements: scope of public officials covered, monitoring and oversight arrangements, and scope of restrictions for four types of public officials: head of state, ministers, members of parliament, and civil servants.

Overall, the frameworks governing conflict of interest restrictions in CariPAM countries are weak, with the average score being 20 on a 0 to 100 scale (see Figure 5 for overall regional scores and Table 2 for score by type of public official). Trinidad and Tobago obtained the highest score (35) and is the only country sampled where conflict of interest for all types of public official is regulated. Guyana, on the other hand, with a score of 3, has almost no regulation. The Bahamas (24), the Cayman Islands (21), St. Kitts and Nevis (19), and Jamaica (16) fall around the regional average, mainly because they have no regulations on conflict of interest for heads of state and ministers.

Figure 5: Conflict of Interest Restrictions legislation overall scores in CariPAM countries, 2018



A comparison of conflicts of interest restrictions and financial disclosure regimes highlights gaps in the ethics frameworks for countries in the CariPAM sample. As with financial disclosure, there is a clear lack of coverage for heads of state and ministers. However, the low scores in this area reflect a common situation across regions and income categories. Several well-established democracies deliberately avoid restricting the behaviour of public officials. These countries include the Netherlands, Denmark, Iceland, and Belgium, among others.

Table 2. Conflict of Interest scores by public official group in CariPAM countries, 2018

	Head of State	Ministers	Members of Parliament	Civil Servants
Bahamas	0	0	37	64
Cayman Islands	0	0	34	48
Guyana	3	0	7	0
Jamaica	0	0	10	56
St. Kitts and Nevis	0	0	20	71
Trinidad and Tobago	34	27	54	23
CariPAM Average	6	4	28	40

The areas of strength in regulating incompatibilities in CariPAM countries lie in monitoring and oversight arrangements. In two countries, there is an established integrity agency that provides guidance to public officials and oversees the financial disclosure process. In Trinidad and Tobago, a standing ethics committee revises and reports on the Code of Ethics and investigates ethics complaints and potential conflicts of interest. However, the responsibility for enforcing adherence to the regulations governing conflicts of interest is either not specified or lies in the hands of supervisors or personnel officers who may not be familiar with requirements for ethical conduct.

For members of parliament, several troubling patterns emerge when comparing legal frameworks

governing financial disclosure and conflict of interest restrictions across the CariPAM countries:

- A general obligation to avoid conflicts of interest as they arise (i.e., blanket requirement) is missing in half of the countries.
- Public access to declaration content is limited or absent in all countries.
- Holding government contracts while in public office is permitted in all countries.
- Serving in private firms as board members, advisors, or company officers is permitted all countries. Guyana is the only country that requires disclosure of this practice, there is no public access to this information for the public.
- Post-employment practices (e.g., revolving door) are completely unregulated across all countries.
- There is no legal ban on nepotism in public office in any of the countries.
- Participating in decision-making processes that affect private interests is permitted in half the countries.
- Guidance for members of parliament in avoiding conflicts of interest is only stipulated in the Cayman Islands and St. Kitts and Nevies.

For civil servants, there are generally more restrictions on behaviour. Financial disclosure is limited to the senior civil service or high-risk categories of public servant. Several challenges exist:

- ➢ Public access to declaration content is limited or absent in all countries.
- ➢ Holding government contracts while in public office is permitted in all countries.
- ➢ Serving in private firms as board members, advisors, or company officers is permitted in more than half the countries.
- ➢ Post-employment practices (e.g., revolving door) are completely unregulated across all countries.
- ➢ There is no legal ban on nepotism in the civil service in five of the six countries. Jamaica is the only exception.
- ➢ Participating in decision-making processes that affect private interests is permitted all countries, with the exception of the Bahamas.
- ➢ Guidance for public officials in avoiding conflicts of interest is stipulated in the Bahamas, the Cayman Islands, and St. Kitts and Nevis, but in the Bahamas this is provided by supervisors or heads of departments rather than trained ethics officers.

Political Financing

Political finance is defined as the legal and illegal financing of ongoing party activities and electoral campaigns (International IDEA 2014). The funding of political parties is an important element of democracy and is essential for parties to carry out their activities throughout the year and during election periods (Transparency International 2014). However, many problems may arise if political finance does not take place in a fair manner, including the lack of a level playing field among political parties, unfair representation, and overall distrust in political parties and political processes more generally. In fact, in many countries, the profound crisis of legitimacy faced by political parties has been directly linked to a widespread perception of their allegedly corrupt behaviour. This is reflected in the 2013 Global Corruption Barometer, which found that political parties were seen to be among the most corrupt institutions in 51 out of 107 countries that took part (Transparency International 2013). Corruption in political finance usually "involves the improper and unlawful conduct of financial operations (often by a candidate or a party) for the profit of an individual candidate, political party or interest group" (Walecki 2004).

Importance of Political Financing Frameworks

Political financing frameworks regulate the role that money plays in the political sphere. Financing is necessary for inclusive democracy and effective governance, allowing candidates and parties to reach out to voters, and for the building of long-term political platforms/organisations. However, unregulated behaviour creates opportunities for donors to exert undue influence over the actions of public officials. For example, government contracts may be awarded not to the company with the best bid but to the firm that provided the largest financial donation during the last election campaign.

Countries have sought to regulate political finance to guarantee a level playing field and reduce opportunities for favouritism and corruption. Nevertheless, several challenges remain in implementing and enforcing such laws and ensuring fairness in the process.

UNCAC Article 7 (3) stipulates that "[e]ach State Party shall consider adopting appropriate legislative and administrative measures […] to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties."

According to the International IDEA Database on Political Finance, all 180 countries assessed have some variety of regulation on the flow of money in politics. Nevertheless, in many cases implementation is hampered by ambiguous rules, lack of political will, or simply because the rules are not suitable for the country's context. While international evidence shows that there is no universal prescription ensuring the effectiveness of political finance regimes, regulations on party funding play an important role in strengthening democracy, curbing opportunities for corruption and undue influence, and enhancing transparency and accountability (Transparency International 2014).

Corruption in political finance can take advantage of unregulated or unfair aspects of the law, Corruption can be facilitated by unchecked spending by political parties or candidates, a lack of reporting requirements on income and expenditures, and lack of public funding. It is often a result of weak or absent bans on donation sources, and can encompass the following activities:

- the appropriation of political funds by individual politicians,
- funding from sources such as organised criminal groups, drug trafficking, or terrorist groups,
- use of legally obtained funds for goals other than legitimate political activities,

- restrictions that target funding for opposition parties, and
- contributions from companies or individuals in exchange for favourable policies (for example, contributions from prohibited sources, undisclosed donations, or contributions above the established ceiling, among others).

In the past years, two main areas have been considered promising in the fight against corruption in political finance. They include the involvement of civil society, media, and voters in external oversight, as well as the use of technology and open data sources by both government and non-governmental organisations to better monitor compliance with the law, identify potential corruption risks and wrongdoings, and help voters to make informed decisions. In addition to monitoring political party financing, civil society organisations can play a role in advocating for appropriate political finance rules. This role can also be successfully played or supported by international donors operating in developing countries. The international community can provide support in building impetus for reform; offer technical assistance to governments to strengthen the enforcement capacity of dedicated national bodies; and provide funding for civil society activities in this area.

Findings in CariPAM: Political Financing

Political financing frameworks establish legal provisions limiting who can contribute and how much can be contributed to political parties and electoral candidates, how such funds can be used, how actors must report on their finances, and how oversight and enforcement is to be achieved. In order to determine the strength of legal frameworks in the area of political finance, 89 CariPAM indicators analyse four categories: bans and limits on private income; public funding; regulations on spending; and reporting, oversight, and sanctions.

Political financing is poorly regulated in the CariPAM countries, with an average score of 25 on a 0 to 100 scale (see Figure 6 for overall regional scores and Table 3 for score by different areas). The Bahamas and St. Kitts and Nevis have very poorly regulated frameworks, with scores of 6 and 10 respectively. The Cayman Islands obtained a score of 19, with strong regulations on reporting, oversight, and sanctions but a lack of regulation in other areas. Both Guyana and Trinidad and Tobago scored 27 points, slightly higher than the CariPAM average. The exception is Jamaica, with a score of 59, where recent legislation has established a more definitive legal framework governing the financing of political parties and candidates.

Figure 6: Political Finance legislation overall scores in CariPAM countries, 2018

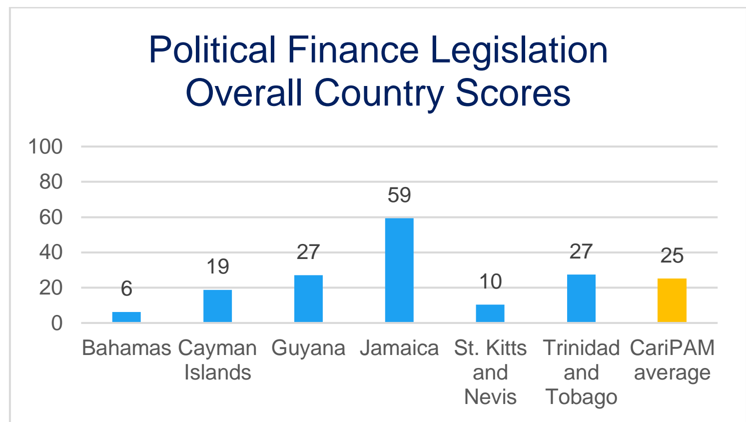


Table 3. Political financing scores by areas in CariPAM countries, 2018

	Bans and limits on private income	Public funding	Regulations on spending	Reporting, oversight and sanctions
Bahamas	0	0	25	0
Cayman Islands	8	0	0	67
Guyana	0	0	50	58
Jamaica	50	38	75	75
St. Kitts and Nevis	0	0	25	17
Trinidad and Tobago	14	13	50	33
CariPAM Average	12	8	38	42

Areas of strength in CariPAM countries include moderately extensive regulations on spending as well as reporting requirements for candidates. Challenges include inadequate bans on private income and limited public funding.

Generally speaking, there are few legal provisions banning specific types of donations. Bans on donations from foreign interests and corporate donations are present only in Jamaica. However, bans on anonymous donations are included in the frameworks for the Cayman Islands, Jamaica, and Trinidad and Tobago. Limits on donation amounts are, again, present in the Jamaican framework, as well as in Trinidad and Tobago.

Table 4 shows details on vote buying and limits on spending in CariPAM countries. Vote buying is illegal in all countries except the Cayman Islands, and there are clear penalties specified for violations of this provision. In all six countries, no ban exists on state resources being used in favour or against a political party or candidate. Spending limits are legally specified for candidates in Guyana, Jamaica, and Trinidad, and also for political parties in Jamaica, though these limits are quite high in Jamaica.

Reporting on finances is required for campaign-related expenses in four of the countries, and three countries require that this information be made public, along with the identity of donors.

The oversight of political financing provisions is usually assigned to elections bodies, who are also responsible for investigating violations and reviewing financial reports. The Cayman Islands, Guyana, Jamaica, and St. Kitts and Nevis have specific penalties for violations of campaign finance provisions, ranging from fines and imprisonment to fewer standard penalties of forfeiting elected office, loss of nomination, and loss of the right to vote.

Table 4. Bans on vote-buying and limits on spending in CariPAM countries

	Bahamas	Cayman Islands	Guyana	Jamaica	St. Kitts and Nevis	Trinidad and Tobago
Ban on vote buying	yes	no	yes	yes	yes	yes
Ban on state resources being used in favour or against a political party or candidate	no	no	no	no	no	no
Limits on the amount a political party can spend	n/a	n/a	n/a	$630m JMD	n/a	n/a
Limits on the amount a candidate can spend	n/a	n/a	$50K GYD	$15m JMD	n/a	$50K TTD

Country-level analysis
The Bahamas

In 2019, the Bahamas scored 64 (out of 100) on the CPI, ranking it 29th (out of 180 countries). This demonstrates that perceived levels of public sector corruption are low. The Global Corruption Barometer (GCB) for Latin America and the Caribbean reports that in 2019, 45% of respondents in the Bahamas said they believed levels of corruption had risen in the past year, while only 22% believe that it has decreased. 20% of Bahamians claim to have paid a bribe to a public service provider within the last year, and 17% claim to have been offered bribes in exchange for votes. Bahamians expressed particular concern over corruption by members of parliament and government officials, as well as the Prime Minister and the police, with 41% believing that most or all members of parliament are corrupt (see Table 5). These numbers demonstrate the need for stronger public accountability mechanisms in the Bahamas.

Table 5. Corruption by Institution in the Bahamas, GCB for Latin America & the Caribbean, 2019

Institution	Percentage*
Members of Parliament	41%
Government officials	37%
Prime Minister	35%
Police	34%
Business executives	25%
Bankers	23%
Local government officials	22%
Religious leaders	22%
NGOs	22%
Judges and magistrates	19%
Journalists	14%

** Percentage who think that most or all people in these institutions are corrupt.*

When it comes to public accountability legislation in the Bahamas, some of the laws are outdated, such as the Public Disclosure Act (1976) and Parliamentary Election Act (1992). This may explain very low scores in the areas of political financing and financial disclosure (see Table 6). The same situation exists within conflict of interest regulation: the Public Service Commission Regulations (1966), the Powers and Privileges Act (2001), and the Rules of the House Assembly (2001) are all outdated. The sole recent instrument is the Freedom of Information Act (2017), which may explain the high score of 75 (out of 100) on access to information.

Table 6. The Bahamas, ranking in CariPAM, 2018

Public Accountability Mechanism	Bahamas	CariPAM average
Access to Information	75	69
Financial Disclosure	24	37
Conflict of Interest Restrictions	24	20
Political Financing	6	25

Strengths

- ✓ Information officers must be appointed to public offices, and there is an Information Commissioner responsible for appeals, public outreach, monitoring, and oversight.
- ✓ The financial disclosure framework for members of parliament is comprehensive with respect to income and assets.
- ✓ Some conflict of interest restrictions for civil servants are clearly laid out in the law.

Challenges

- ➢ Foreigners are not allowed to submit information requests unless they are part of the financial system.
- ➢ Neither the legislature nor the courts are subject to access to information provisions.
- ➢ Heads of state and ministers are exempt from financial disclosure and conflict of interest frameworks.
- ➢ Declaration content is not regularly reviewed, nor is it publicly accessible in disaggregated format.
- ➢ Incompatibilities are not well-regulated in either disclosure or restrictions.
- ➢ Political financing is essentially unregulated.

The Cayman Islands

Unfortunately, the Cayman Islands is not covered by Transparency International's CPI or GCB, and therefore it is not possible to compare its scores with other countries in the region. According to the World Bank's Worldwide Governance Indicators Control of Corruption, the Cayman Islands has a score of 0.49 on a scale from -2.5 to 2.5. A significant decrease has been recorded from 2013, when it had a score of 1.36. This demonstrates a downward trend and a necessity for adopting new legislation aimed at increasing transparency and accountability.

Legislation in the area of public accountability is relatively recent or has been recently amended. The Cayman Islands scores above average in the areas of access to information and financial disclosure. Access to information is regulated by the Freedom of Information Law (2007, amended 2018) and the Freedom of Information (General) Regulations (2008). Financial disclosure framework consists of the Public Management and Finance Law (2013, amended 2017) and the Standards in Public Life Law (2014, amended 2016). The area of political financing has no special regulations or codes of ethics and is only somewhat regulated by the Elections Law (2016). Finally, the area of conflict of interest is regulated by the Legislative Assembly Standing Orders (1976, amended 2006) and the Standards in Public Life Law (2014, amended 2016). To improve public accountability, it is advisable to adopt new regulations that meet international standards in the areas concerned.

Table 7. The Cayman Islands, ranking in CariPAM, 2018

Public Accountability Mechanism	Cayman Islands	CariPAM average
Access to Information	77	69
Financial Disclosure	42	37
Conflict of Interest Restrictions	21	20
Political Financing	19	25

Strengths

- ✓ There is universal access to information regardless of requester location, and requesters with disabilities are entitled to additional assistance.
- ✓ Information officers must be appointed to public offices, and the Ombudsman is mandated with responsibility for appeals, public outreach, monitoring, and oversight.
- ✓ The financial disclosure framework for members of parliament is comprehensive with respect to income and assets.
- ✓ There is a Commission for Standards in Public Life with broad powers related to the ethical conduct of public officials.

Challenges

- ➢ Neither the legislature nor the courts are subject to access to information provisions.
- ➢ Heads of state and ministers are exempt from financial disclosure and conflict of interest frameworks.
- ➢ Declaration content is not regularly reviewed, nor is it publicly accessible in disaggregated format.
- ➢ Incompatibilities are not well-regulated in either disclosure or restrictions.
- ➢ Political financing is essentially unregulated, aside from the reporting requirement for candidates.

Guyana

In 2019, Guyana scored 40 (out of 100) on the CPI, ranking it 85th (out of 180 countries). Guyana managed to significantly improve from its 2015 score of 29, gaining 11 points. This demonstrates that perceived levels of public sector corruption are decreasing. The Global Corruption Barometer (GCB) for Latin America and the Caribbean reports that in 2019, 40% of respondents in Guyana said they believed levels of corruption had risen in the past year, while an equal share, 40%, believe that corruption has decreased. 27% of Guyanese claim to have paid a bribe to a public service provider within the last year, while only 6% claim to have been offered bribes in exchange for votes. Guyanese expressed particular concern over corruption by the police and members of parliament, with 42% believing that most or all members of the police force are corrupt (see Table 8).

Table 8. Corruption by Institution in Guyana, GCB for Latin America & the Caribbean, 2019

Institution	Percentage*
Police	42%
Members of Parliament	36%
President/Prime Minister	29%
Government officials	27%
Local government officials	24%
Business executives	24%
NGOs	21%
Judges and magistrates	20%
Religious leaders	16%
Journalists	15%
Bankers	14%

** Percentage who think that most or all people in these institutions are corrupt.*

There are no recent public accountability laws in Guyana. The Representation of the People Act dates to 1964 (amended in 2006), the National Assembly (Disqualification) Act to 1996, and the Integrity Commission Act to 1998. The Access to Information Act (2011) is comparatively old, which may explain Guyana's low score on access to information (see Table 9). These laws demonstrate the need for new public accountability regulations across all four mechanisms in Guyana, particularly in the area of conflict of interest.

Table 9. Guyana, ranking in CariPAM, 2018

Public Accountability Mechanism	Guyana	CariPAM average
Access to Information	54	69
Financial Disclosure	48	37
Conflict of Interest Restrictions	3	20
Political Financing	27	25

Strengths

- ✓ The legislative branch is included in access to information obligations.
- ✓ The financial disclosure framework for the head of state and members of parliament is comprehensive on income and assets.
- ✓ There are clear reporting requirements for candidates and political parties, and regulations exist for making information public.

Challenges

- ➢ Only citizens and permanent residents are allowed to submit information requests, and the only means of appeal is through the courts.
- ➢ Ministers are exempt from financial disclosure and conflict of interest frameworks.
- ➢ Declaration content is not regularly reviewed, nor is it publicly accessible in disaggregated format.
- ➢ Incompatibilities are not well-regulated in either disclosure or restrictions.
- ➢ Political financing is poorly regulated regarding bans on private income and public funding.

Jamaica

In 2019, Jamaica scored 43 (out of 100) on the CPI, ranking it 74th (out of 180 countries). In 2019, the Global Corruption Barometer (GCB) for Latin America and the Caribbean reports that 49% of respondents in Jamaica said they believed levels of corruption had risen in the past year and only 19% believe that corruption has decreased. 18% of Jamaicans claim to have paid a bribe to a public service provider within the last year, and 12% claim to have been offered bribes in exchange for votes. Jamaicans expressed particular concern over corruption by the police, members of parliament, and government officials, as well as by local government officials and the Prime Minister, with 49% believing that most or all members of the police force are corrupt (see Table 10).

Table 10. Corruption by Institution in Jamaica, GCB for Latin America & the Caribbean, 2019

Institution	Percentage*
Police	49%
Members of Parliament	44%
Government officials	39%
Local government officials	37%
Prime Minister	34%
Business executives	25%
Judges and magistrates	23%
NGOs	22%
Bankers	21%
Religious leaders	19%
Journalists	14%

** Percentage who think that most or all people in these institutions are corrupt.*

A close look at public accountability legislation in Jamaica shows that the Representation of the People (Amendment) Act (2016) may be the reason Jamaica has a very high regional score on political financing (see Table 11). On the other hand, Jamaica scores below average in the areas of access to information, conflict of interest, and financial disclosure regulations. These areas are regulated by the Standing Orders of the House (1964), the Standing Orders of the Senate (1964), the Parliament (Integrity of Members) Act (1973), the Corruption Prevention Act (2000), the Access to Information Act (2002, amended 2003), the Access to Information Regulations (2003), and the Staff Orders for the Public Service (2004). To improve public accountability, it is advisable to adopt new regulations that meet international standards.

Table 11. Jamaica, ranking in CariPAM, 2018

Public Accountability Mechanism	Jamaica	CariPAM average
Access to Information	61	69
Financial Disclosure	31	37
Conflict of Interest Restrictions	16	20
Political Financing	59	25

Strengths

- ✓ There is universal access to information regardless of requester location, and requesters with limited language skills and disabilities are entitled to additional assistance.
- ✓ The financial disclosure framework for members of parliament is comprehensive on income and assets.
- ✓ Some conflict of interest restrictions for civil servants are clearly laid out in the law.
- ✓ Political financing is moderately well-regulated, with a clear ban on donations from foreign interests.

Challenges

- ➢ Neither the legislature nor the courts are subject to access to information provisions.
- ➢ Heads of state and ministers are exempt from financial disclosure and conflict of interest frameworks.
- ➢ Declaration content is not regularly reviewed, nor is it publicly accessible in disaggregated format.
- ➢ Incompatibilities are not well-regulated in either disclosure or restrictions.
- ➢ There are no bans on donations from corporations with government contracts or limits on donations to political parties outside of elections.

St. Kitts and Nevis

Unfortunately, St. Kitts and Nevis is not covered by Transparency International's CPI or GCB, and therefore it is not possible to compare its scores with other countries in the region. According to the World Bank's Worldwide Governance Indicators Control of Corruption, St. Kitts and Nevis has a score of 0.45 on a scale from -2.5 to 2.5 and has recorded a decrease since 2013, when it had a score of 0.94. This demonstrates a downward trend and a necessity to adopt new legislation aimed at increasing transparency and accountability.

St. Kitts and Nevis has the highest regional score on access to information, as well as the most recent Freedom of Information Act (2018) among the countries sampled. The areas of financial disclosure and conflict of interest are regulated largely by the Integrity in Public Life Act (2013), as well as by the Public Service (Conduct and Ethics of Officers) code (2014) and the Public Service Code of Discipline (2013). Despite these laws being comparatively recent, St. Kitts and Nevis scores below the regional average in the areas of conflict of interest and financial disclosure. Finally, political financing is regulated by the National Assembly Elections Act (1952, amended 2009), which clearly requires updating.

Table 12. St. Kitts and Nevis, ranking in CariPAM, 2018

Public Accountability Mechanism	St. Kitts and Nevis	CariPAM average
Access to Information	85	69
Financial Disclosure	32	37
Conflict of Interest Restrictions	19	20
Political Financing	10	25

Strengths

- ✓ There is universal access to information regardless of requester location, and requesters with limited language skills and disabilities are entitled to additional assistance.
- ✓ Information officers must be appointed in public entities, and there is an Information Commissioner with responsibility for appeals, public outreach, monitoring, and oversight.
- ✓ The financial disclosure framework for members of parliament is comprehensive with respect to income and assets.
- ✓ There is an Integrity Commission with broad powers related to the ethical conduct of public officials.

Challenges

- ➢ Heads of state and ministers are exempt from financial disclosure and conflict of interest frameworks.
- ➢ Declaration content is not regularly reviewed, nor is it publicly accessible in disaggregated format.
- ➢ Incompatibilities are not well-regulated in either disclosure or restrictions.
- ➢ Political financing is essentially unregulated.

Trinidad and Tobago

In 2019, Trinidad and Tobago scored 40 (out of 100) on the CPI, ranking it 85th (out of 180 countries). The Global Corruption Barometer (GCB) for Latin America and the Caribbean reports that in 2019, 62% of respondents in Trinidad and Tobago said they believed levels of corruption had risen in the past year, while only 11% believe that corruption has decreased. 17% of Trinbagonians claim to have paid a bribe to a public service provider within the last year, while only 6% claim to have been offered bribes in exchange for votes. Trinbagonians expressed particular concern over corruption by the members of parliament, government officials, and the police, as well as the President/Prime Minister, local government officials, and business executives, with 51% believing that most or all members of parliament, government officials, and the police force are corrupt (see Table 13).

Table 13. Corruption by Institution in Trinidad and Tobago, GCB for Latin America & the Caribbean, 2019

Institution	Percentage*
Members of Parliament	51%
Government officials	51%
Police	51%
President / Prime Minister	47%
Local government officials	39%
Business executives	38%
Judges and magistrates	30%
Bankers	26%
Religious leaders	24%
NGOs	24%
Journalists	18%

** Percentage who think that most or all people in these institutions are corrupt.*

Trinidad and Tobago possesses regulation in all four areas of public accountability, but only two areas score above the regional average: financial disclosure and conflict of interest restrictions. Several laws regulate these areas, namely the Integrity in Public Life Act (2000), the Civil Service (Amendment) Regulations (1996), the Code of Ethics for Parliamentarians (including Ministers) (1987), the Code of Ethics for Ministers and Parliamentary Secretaries, and the Code of Ethics for Ministers Concerning the Receipt of Gifts. In the areas of freedom of information and political financing, Trinidad and Tobago scores close to the regional average. Both the Freedom of Information Act (1999, amended 2005) and the Representation of the People Act (1967, amended 2007) are partially outdated. To improve public accountability, it is advisable to adopt new regulations that meet international standards in these areas.

Table 12. Trinidad and Tobago, ranking in CariPAM, 2018

Public Accountability Mechanism	Trinidad and Tobago	CariPAM average
Access to Information	63	69
Financial Disclosure	47	37
Conflict of Interest Restrictions	35	20
Political Financing	27	25

Strengths

- ✓ There is universal access to information regardless of requester location, and requesters with limited language skills and disabilities are entitled to additional assistance.
- ✓ The financial disclosure framework for members of parliament is comprehensive on income and assets, and ministers are required to file additional information on finances and incompatibilities.
- ✓ There are clear reporting requirements for candidates and political parties, and regulations exist for making information public.

Challenges

- ➢ The only effective means of appeal for information denials is through the courts.
- ➢ Heads of state are exempt from financial disclosure and conflict of interest frameworks.
- ➢ Declaration content is not regularly reviewed, nor is it publicly accessible in disaggregated format.
- ➢ Incompatibilities are not well-regulated in either disclosure or restrictions.
- ➢ Political financing is poorly regulated with respect to bans on private income and public funding.

References

Chêne, M. 2012. Good Practice in Access to Information Laws. Anti-Corruption Helpdesk Answer, Berlin: Transparency International. https://knowledgehub.transparency.org/helpdesk/good-practice-in-access-to-information-laws

FOIAnet, 2013. Global Right to Information Update: An analysis by region. http://www.law-democracy.org/live/wp-content/uploads/2013/07/GRTIUa4.pdf

International IDEA. 2014. Funding of Political Parties and Election Campaigns: A Handbook on Political Finance. https://www.idea.int/publications/catalogue/funding-political-parties-and-election-campaigns-handbook-political-finance

Islam, R., 2006. "Does More Transparency Go Along with Better Governance?" *Economics and Politics* 18 (2): 121– 167.

Lemieux V. L. and Trapnell S. E. 2016. *Public Access to Information for Development: A Guide to the Effective Implementation of Right to Information Laws*. Directions in Development. Washington, D.C.: World Bank Group. http://documents.worldbank.org/curated/en/983941467996646873/Public-access-to-information-for-development-a-guide-to-effective-implementation-of-right-to-information-laws

Martini, M. 2014. Right to information laws: Impact and implementation. U4 Expert Answer. Berlin: Transparency International. Date: 9 May 2014. https://www.u4.no/publications/right-to-information-laws-impact-and-implementation.pdf

Mori, J., 2013. Access to information laws and the transparent university in Global Corruption Report Education, Transparency International.

Mungiu-Pippidi, A., 2013. FOIA as an Anti-Corruption tool. Hertie School of Governance. http://www.againstcorruption.eu/wpcontent/uploads/2013/04/WP-34-FOIA-as-an-anti-corruptiontool1.pdf

OECD, 2005. Fighting corruption and promoting integrity in public procurement. https://www.oecd-ilibrary.org/governance/fighting-corruption-and-promoting-integrity-in-public-procurement_9789264014008-en

Powers, G., 2009. Handbook on parliamentary ethics and code: A guide for parliamentarians, GOPAC Global Task Force on Parliamentary Ethics. http://gopacnetwork.org/Docs/PEC_Guide_EN.pdf

Reed, Q., 2008. Sitting on the fence: Conflicts of interest and how to regulate them, U4 Issue 2008. https://www.u4.no/publications/sitting-on-the-fence-conflicts-of-interest-and-how-to-regulate-them

Transparency International. 2013. Global Corruption Barometer. http://www.transparency.org/gcb2013

Transparency International. Topic Guide: Political Corruption, 2014. https://knowledgehub.transparency.org/product/topic-guide-on-political-corruption

Transparency International. Topic Guide: Conflicts of Interest, 2015. https://knowledgehub.transparency.org/guide/topic-guide-on-conflicts-of-interest/5856

Trapnell, S. E., 2017. Considering Ethics Systems: A Comparative Study on the Implementation of Ethics Frameworks. http://dx.doi.org/10.2139/ssrn.2921944

Walecki, M. 2004. Political Money and Corruption. Global Corruption Report. Transparency International. https://www.transparency.org/whatwedo/publication/global_corruption_report_2004_political_corruption

World Bank Public Sector and Governance Group, 2013. Financial disclosure systems declarations of interests, income, and assets.

World Bank 2017. Getting the Full Picture on Public Officials: A How-to Guide for Effective Financial Disclosure. https://star.worldbank.org/sites/star/files/getting-the-full-picture-on-public-officials-how-to-guide.pdf

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