



**TRANSPARENCY  
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the global coalition against corruption

# CORRUPTION IN SERVICE DELIVERY TOPIC GUIDE

Compiled by the  
Anti-Corruption Helpdesk



**Transparency International is a global movement with one vision: a world in which government, business, civil society and the daily lives of people are free of corruption. With more than 100 chapters worldwide and an international secretariat in Berlin, we are leading the fight against corruption to turn this vision into reality.**

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ISBN: 978-3-96076-066-5

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Design: [sophieeverett.com.au](http://sophieeverett.com.au)

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Image caption: A young woman in Nairobi, Kenya gazing with little hope at low wage jobs bulletin. A reoccurring scene around many countries where corruption and government nepotism results in the lack of opportunities for the youth.

With support from the European Commission



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# **CORRUPTION IN SERVICE DELIVERY**

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# WHY FIGHT CORRUPTION PUBLIC SERVICE DELIVERY?

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**The Sustainable Development Goals (SDGs) were adopted in September 2015 by the United Nations' High-level Political Forum on Sustainable Development as part of the 2030 Agenda for Sustainable Development.**

These 17 SDGs and 169 targets build on the Millennium Development Goals (MDGs) – eight anti-poverty targets that the world committed to achieving by 2015 – and aim to improve equity and justice across the globe by guiding countries in their efforts to end poverty, protect the planet, and ensure that all people enjoy peace and prosperity. Providing citizens around the world access to public services is at the core of the SDGs agenda.

Public service delivery broadly refers to services provided by governments (local, municipal or national) to their citizens. As such, it encompasses the provision of a wide range of services such as healthcare, education, water and sanitation, identification documents (such as voter registries and passports), telecommunications, licences, and many other services that governments or entrusted private entities, like civil society organisations (CSOs), or companies undertake for the benefit of citizens.

Many of these services are tied to the realisation of fundamental human rights. Article 21(2) of the Universal Declaration of Human Rights states that, “Everyone has the right of equal access to public service in his country”, while Article 25(1) emphasises that, “Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control”.<sup>1</sup>

Certain forms of corruption in service delivery (such as clientelism, patronage, bribery) undermine the human right of equal access to public services, and exacerbate fundamental inequalities that violate citizens access, affecting the most marginalised and underrepresented segments of the population the

most.<sup>2</sup> Moreover, rampant corruption can lead to breakdowns in the service delivery chain, rendering the state apparatus incapable of meeting its obligations to safeguard its citizens, with catastrophic consequences such as famine and lack of basic medical supplies. Inability or unwillingness to curb corruption can therefore be seen as a failure by states to adequately provide for human rights – civil, political, economic, social and cultural, as well as the right to development – by depriving citizens access to public services. This creates a greater divide and inequality in society as the wealthy can afford private services. There is, therefore, a compelling argument to consider the fight against corruption in service delivery as an integral part of the human rights-based approach to development.<sup>3,4</sup>

Corruption in service delivery is the form of corruption most frequently encountered by citizens, and can plague all kinds of interactions with the state. According to Transparency International's 2013 Global Corruption Barometer, 27 per cent of respondents worldwide claimed they had experienced corruption while dealing with a public service provider.<sup>5</sup> This primarily affects marginalised and vulnerable groups, as wealthier, more powerful groups of society are less reliant on state assistance. As such, corruption undermines the “redistributionary” nature of public services, distorts policy decisions away from the public interest and diverts available public resources into the hands of corrupt groups inside, outside and straddling the state apparatus.<sup>6</sup> By undermining the quality and quantity of public services, this type of corruption can fatally erode citizens' confidence in public institutions<sup>7</sup> and ultimately undermine political stability, as reflected by studies that have found a correlation between civil unrest and low-quality service supply.<sup>8</sup>

As well as reducing the quantity of public resources available for redistributionary purposes, corruption undermines the quality of services. This can happen



in a number of ways. Suppliers can use fraudulent or lower-grade inputs in infrastructure projects or essential supplies (like pharmaceutical products, equipment or textbooks) to increase their profit margin at the expense of intended beneficiaries. Bribery and extortion at the point of delivery can render public services unaffordable for a large segment of the population, effectively depriving the poor of access to key basic services they are entitled to.<sup>9</sup>

The malignant effect corruption has on the quantity and quality of public services has profound implications for human development outcomes and citizens' well-being and quality of life. Corruption in service delivery has been shown to have negative effects on poverty rates,<sup>10</sup> human development indicators,<sup>11</sup> mortality rates,<sup>12</sup> child mortality rates,<sup>13</sup> school drop-out rates,<sup>14</sup>

trust in governments,<sup>15</sup> and civil unrest.<sup>16</sup> It has also been revealed to have devastating effects on the natural environment,<sup>17</sup> which in some cases can lead to food and water insecurity and mismanagement of precious resources.

The world's poor are disproportionately affected by the impact of corruption on public services. Research shows that low-income households are more likely to have paid bribes to access basic services than wealthier households.<sup>18</sup> Corruption in service delivery thus exacerbates the effects of poverty<sup>19</sup> and may undermine the outcome of development policies.<sup>20</sup>



# KEY ISSUES AND CHALLENGES

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## Drivers of corruption in service delivery

There are a number of characteristics of service delivery mechanisms that render this area particularly vulnerable to corruption and some identifiable factors that increase integrity risks.

Service delivery is typically characterised by large-scale investments and considerable financial commitments, which can attract corrupt groups and foster rent-seeking behaviours. At the same time, while service delivery is at the centre of national budgets, the value and composition of individual projects may vary dramatically, with specific corruption challenges associated with various types of projects. At the procurement stage of service delivery, for example, companies and politicians may be tempted to offer or extort bribes to secure multimillion dollar contracts, often using beneficial ownership schemes to hide the proceeds of corruption. While not as lucrative as such deals, employees working at the point of service delivery can supplement their income by extorting bribes from service users for providing services that are supposed to be free of charge. This practice is especially prevalent in contexts where public servants' salaries are low and below the local living standards or where control and oversight mechanisms are weak.<sup>21</sup>

Moreover, service delivery processes and structures are often complex with overlapping responsibilities and jurisdictions. In many cases, services are delivered by a complex mix of private and public entities and pass through various levels of government with weak oversight and accountability mechanisms. In many developing countries, for instance, service delivery contracts between governments and private companies might not include appropriate quality control mechanisms to avoid increasing the cost of service provision. In some cases, companies or public institutions involved in service delivery might not have adequate regulations, ethics policies and procedures, compliance mechanisms, or integrity management systems in place to effectively prevent, detect and sanction corruption. Ethical rules and

codes of conduct for employees may be unclear or non-existent, ethical or technical training might not be available to staff involved in procurement or in service delivery processes.

In addition, resources are often thinly spread. Governments may be under pressure to reduce overhead costs, which can lead to them prioritising tangible goods and services while cutting back on accountability and control mechanisms. When governments or companies charged with delivering a service view service delivery as a zero-sum game, there can be structural incentives to cut corners by providing inferior services or charging higher prices for nominally free or low cost services.

Overall, the combination of composite structures and bureaucracies as well as a competition for resources make service delivery monitoring processes and accountability mechanisms challenging and costly to create and implement. This lack of adequate oversight can lead to high levels of discretionary power, which can produce arbitrary outcomes as well as significantly raising risks of corruption in the supply chain. Where this is the case, corruption in service delivery can become a low-risk, high-profit activity.

## Forms of corruption in service delivery

Corruption in service delivery takes a variety of guises and can be found at all levels of government and at all levels of the service delivery chain. The expansive nature of service delivery – which can involve infrastructure projects, contracting of private entities or public agencies, the management of organisational resources such as personnel, goods, supplies and budgets, as well as point of service interactions – presents a whole gamut of integrity risks.



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## BOX 1: COMMON FORMS OF CORRUPTION

**Bribery** is the act of offering someone money, services or other inducements to persuade them to do something in return.

A **kick-back** is a form of bribe referring to an illegal secret payment made as a return for a favour or service rendered. The term is often used to describe, in an “innocent” way, the returns of a corrupt or illegal transaction or the gains from rendering a special service.

**Speed money** is paid to quicken processes caused by bureaucratic delays and shortages of resources. It normally occurs in offices where licences, permits, inspection certificates and clearance documents are processed.

**Extortion** is the unlawful demand or receipt of property, money or sensitive information through the use of force or threat. A typical example of extortion would be when armed police or military personnel demand money for passage through a roadblock.

**Embezzlement** is the misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian. It also includes the diversion of property, funds, securities or any other thing of value entrusted to public officials by virtue of their position.

**Peddling influence** occurs when individuals solicit benefits in exchange for using their influence to unfairly advance the interests of a particular person or party.

**Patronage** refers to the support or sponsorship by a patron (a wealthy or influential guardian). Patronage is used, for instance, to make appointments to government jobs, facilitate promotions, confer favours and distribute contracts for work. Patronage transgresses the boundaries of political influence and violates the principles of merit and competition because providers of patronage (patrons) and receivers (clients) form a network to bypass existing lawful systems through which access to various resources is obtained.

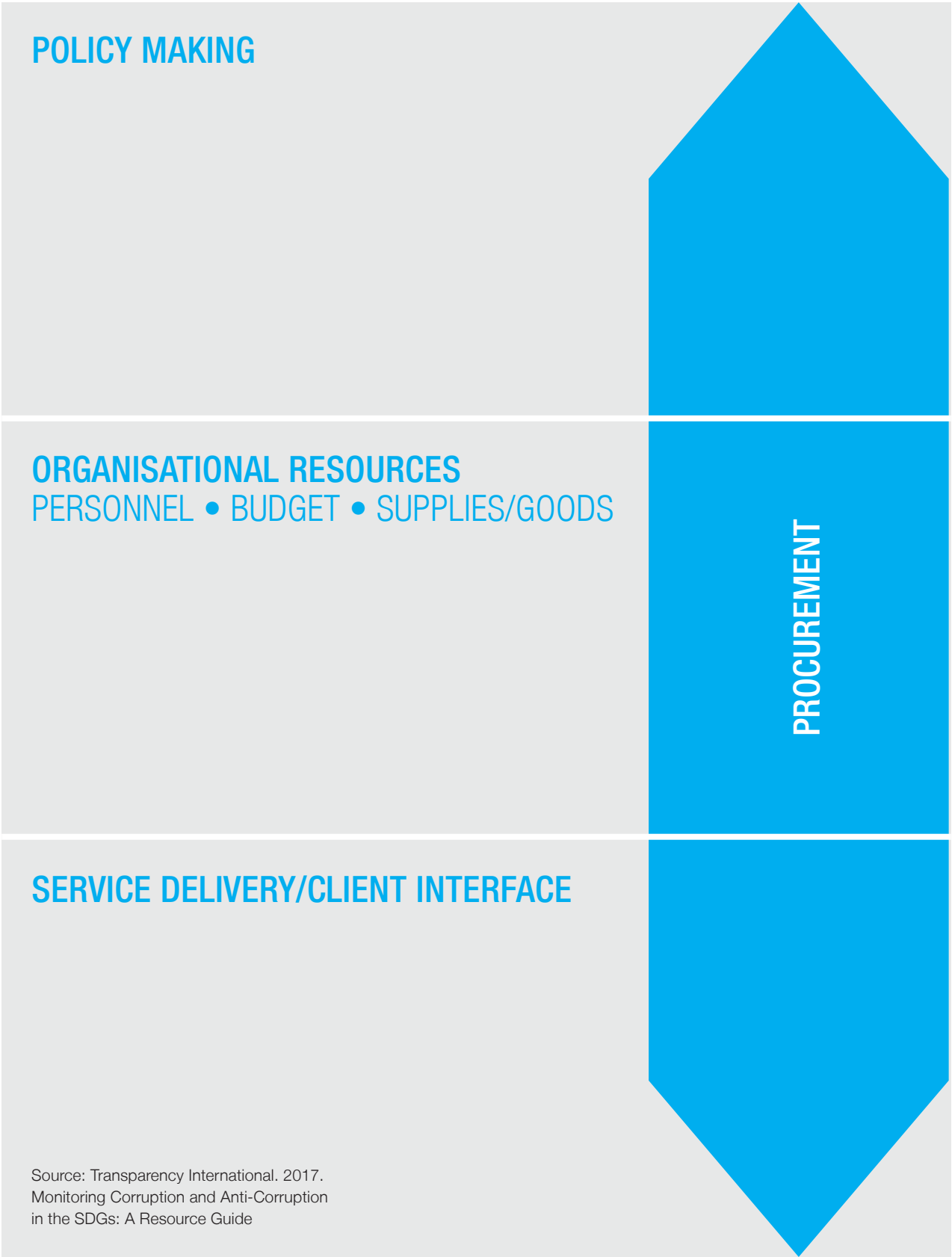
**Cronyism/clientelism** refers to the favourable treatment of friends and associates in the distribution of resources and positions, regardless of their objective qualifications.

**Nepotism** is a form of favouritism that involves family relationships. Its most usual form is when a person exploits his or her power and authority to procure jobs or other favours for relatives.

Source: Transparency International. 2017. Monitoring Corruption and Anti-corruption in the SDGs: A Resource Guide

The figure on the following page illustrates the various levels at which corruption may occur (policy making, organisations and client interface) and the procurement processes that connect them, as well as the specific organisational resources that may be vulnerable to corruption.<sup>22</sup>

Figure 1: A framework for understanding typologies of risks in sectors



## CORRUPTION IN POLICY MAKING

At the policy-making level, undue influence by individuals, firms or interest groups may lead to administrative bribery, political corruption and state capture. Public policy decisions can be bought to suit the interests of powerful elites, with private actors trying to influence the formulation of laws and regulations in ways that benefit them. On another level, local politicians may be tempted to “buy” votes by pushing for construction work in their local communities, for example. Such forms of “grand corruption”<sup>23</sup> by political and business elites often involve the development of corrupt networks of senior officials, politicians, and domestic or foreign businesses. These networks may use illegal payments and bribes to gain contracts and purchase of political power, but can also build “networks of influence” through legal means (donations to political parties, use of lobbyists, and so on).<sup>24</sup>

There are examples of such practices with a direct impact on service delivery at the global and national levels. For example, the influence of the pharmaceutical companies on political processes has been made visible recently at the global level, when the multinational GSK managed to convince the World Health Organization (WHO) to declare swine flu as a pandemic and to recommend the use of Tamiflu as the best form of prevention.<sup>25</sup>

The privatisation of many government functions in many countries – especially in post-communist European countries – through outsourcing of government contracts and services provide many incentives and opportunities for corruption and state capture. Long-term concessions for the provision of water, health or educational services often constitute unique opportunities to win a stream of government-backed revenue, for decades in some cases. Contractors can bribe, collude and form cartels to win valuable long-term contracts and concessions, while politicians can use government contracts to develop patronage networks, secure or reward political support.

At the local level, greater contracting-out, decentralisation, user fees and public-private partnerships (PPPs) can create fertile ground for corruption and increase discretion in spending without accountability. In Malawi, for example, the generalisation of such approaches led to contracts awarded to senior officers and their relatives and friends and “user fees” treated as personal income.<sup>26</sup>

Corruption and rent-seeking may also affect the allocation of resources and the general level of funding available for public services, diverting public resources towards more lucrative sectors, ultimately undermining the quality and quantity of services available to the public.

## CORRUPTION IN THE MANAGEMENT OF ORGANISATIONAL RESOURCES

Corruption in service delivery also occurs in the management of organisational resources, such as personnel, goods, supplies and budgets. In the context of complex bureaucracies with weak oversight and overlapping responsibilities and jurisdictions, bribery, leakages and embezzlement of funds is widespread in many developing countries as funds trickle down from central governments to their intended destinations. This risk is especially acute in sectors such as health, water and education, characterised by large flows of money, specialised equipment and complex organisational structures: administrative funds and supplies can be diverted before reaching the point of service delivery.

Procurement processes are typically confronted with major integrity challenges, with risks of bribery, diversion of resources, leakages, partiality in the drawing up of selection criteria or biased decision making in the contracts’ award. Private service providers can use bribery to secure long-term profitable contracts from procurement officials. Public officials can also favour their friends, relatives or their own companies in awarding lucrative government contracts. At the contract implementation stage, agencies or companies may procure fraudulent or lower quality equipment, materials or supplies to cut costs and increase profits, with a direct impact on the quality of public goods and services. At this level, individual projects might not be completed or completed with substandard materials because contractors did not follow specifications, faked their technical and financial capacities to win the contract or because the supervision was weak or oversight officials colluded with the contractors.

The nature of corruption challenges may greatly vary depending on the scale of the project and the profile of the companies involved. Large infrastructure projects are likely to involve big multi-national companies and complex collusion schemes that may require settlement resolution or somebody to come forward to uncover corruption. While bribing to obtain contracts and increase their profits, such companies will complete the project in most cases. In addition, politicians have greater incentives to rescue the project (through, for example, amendments and finance cost overruns) due to potential reputational damage if the project fails.

Smaller-scale projects are likely to involve a large number of bidders, family or individually owned businesses and smaller bribes. In some cases, these bribes are used to hide the company’s lack of capacity to implement the project, which could undermine the project’s completion. In addition, in smaller-scale projects, where smaller companies are involved,



beneficiaries may lack awareness of the the projec and its complexities, limiting their ability to monitor the works, while local governments involved may have mixed capabilities to implement the project. On the other hand, collusion schemes involving smaller companies are more likely to be detected by a well-trained evaluation committee analysing offers submitted by small companies and doing due diligence to detect simple red flags, such as similarities in information provided.<sup>27</sup>

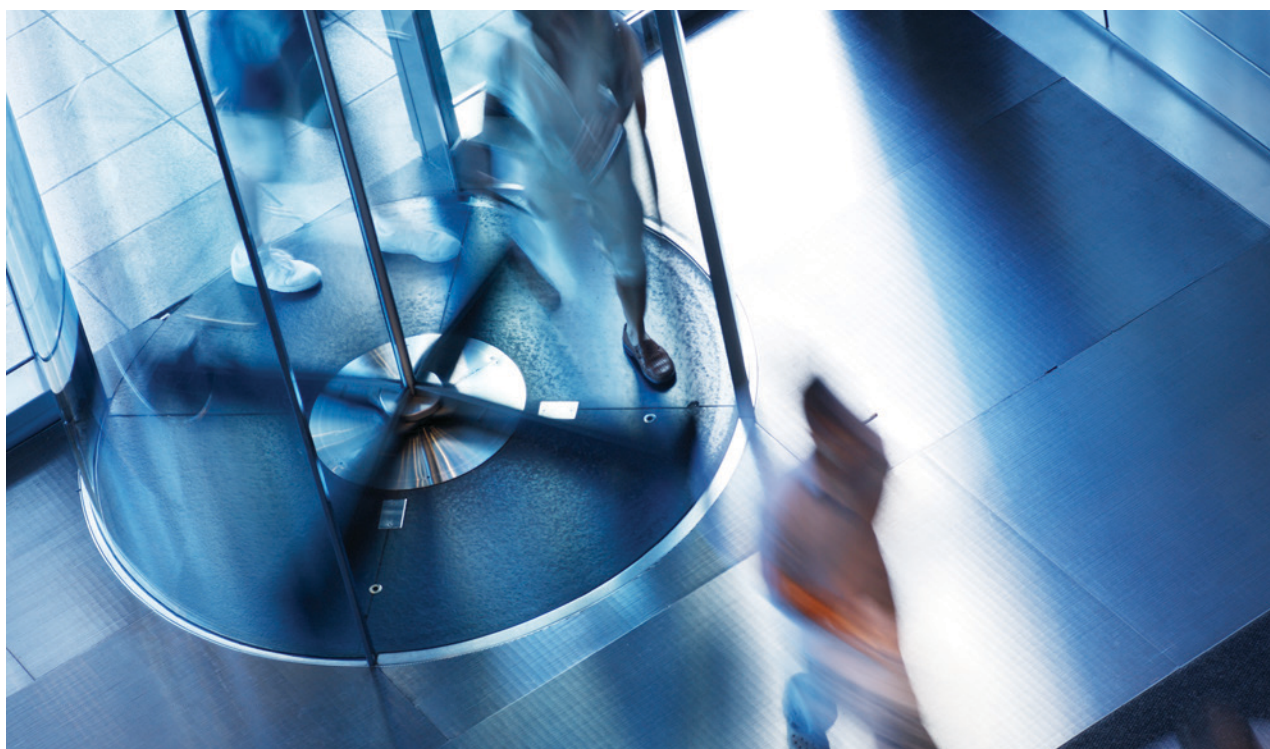
Corruption, particularly favouritism, nepotism and abuse of authority, can affect all personnel management processes, including the management of recruitments and promotions, compensation, conditions of service and personnel records. This can result in oversized and underqualified civil services, with distorted incentive structures and poor work ethics that ultimately undermine the goal of providing strong, efficient and accountable public services to all.<sup>28</sup>

## CORRUPTION AT THE POINT OF SERVICE DELIVERY/CLIENT INTERFACE

Corruption at the point of service often takes the form of bribery and extortion by low- and mid-level public officials in their interactions with ordinary citizens. This form of extortive or coercive bribery is referred to as petty corruption, where citizens are expected to pay bribes to private or public actors to access basic goods and services to which they are already entitled. Recipients can be either compelled to pay bribes to receive a service, or can offer bribes in exchange for a better service or access to a service to which they are not entitled.

This form of corruption is especially damaging where service providers enjoy a monopoly or when service recipients do not have the resources or ability to switch to another service provider. It can also raise the cost of service provision and decrease the service provider's profit and sustainability when service users pay bribes to receive a higher quality service or the same service at a lower price.

Overpricing of services and inputs is another common form of corruption in service delivery. Private and public service providers may charge more than market prices or what was stipulated in contractual agreements for services or inputs, resorting to fraudulent or faulty documentation, diagnostics or quality assessments to cover such practices.



# APPROACHES TO ADDRESS CORRUPTION IN SERVICE DELIVERY

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## Transparency, open data and e-government

Many approaches to addressing corruption in service delivery focus on transparency to move away from opaque dealings to provide public scrutiny. Generally, transparency mechanisms in service delivery fall into two categories: top-down and bottom-up initiatives.

### TOP-DOWN TRANSPARENCY INITIATIVES

Top-down transparency mechanisms refer to processes institutionalised by government or service providers to make information accessible to citizens.

Among top-down initiatives, open data is gaining popularity as a means of addressing corruption challenges in public services. Open data refers to the publication of data online by governments to allow third parties to analyse and use the data for various purposes, including but not limited to anti-corruption work. Published data can range from information on the location of public services, government service performance statistics, to public transport timetables, government budgets, public contracting and procurement processes, and environmental monitoring data.<sup>29</sup> While open data enables third parties to analyse a wide range of government datasets to detect corruption vulnerabilities, all datasets are not relevant to anti-corruption work and can only have an impact on corruption if skilled intermediaries access, interpret and work with the datasets published.<sup>30</sup> In Russia, for example, the GosZatraty project runs the Clearspending website, which monitors over 12 million contracts using open government data, and has so far helped flag more than 4 million procurement violations.<sup>31</sup>

E-governance is also increasingly promoted as a tool for improving transparency in public service delivery and reducing corruption. E-governance refers to mechanisms that aim to make government processes and information about processes available to service users in electronic or digital form, using information and communication technology (ICT). There is a

broad consensus that e-governance can help address corruption by automating and streamlining government processes, restricting officials' discretion and the need for citizens to negotiate with gatekeepers to access key services. It can also be instrumental in monitoring public officials and enhancing the effectiveness of internal and managerial control over corrupt behaviours.<sup>32</sup> E-government has been shown not only to reduce problems with bribery<sup>33</sup> but also to increase trust in government services.<sup>34</sup>

E-procurement is also gaining momentum as a means of preventing and reducing opportunities for corruption in the different stages of the public procurement process. This is expected to improve market access and competition, promote integrity, reduce information costs, facilitate easier access to information, and increase transparency and accountability. Albania, Georgia and South Korea have improved their procurement systems and reduced the opportunities for corruption by publishing information on procurement online, standardising and streamlining processes, and facilitating control and oversight over the procurement cycle.<sup>35</sup>

However, while promising, the introduction of e-governance and ICT is not a silver bullet to address corruption and may also not be equally effective on all types of corruption. Evidence from Bangladesh indicates that such approaches can be effective to address petty corruption involving street-level bureaucrats and reduce the need for citizens to interact with public officials to access public services, but less so for dealing with grand corruption involving higher-level officials.<sup>36</sup>

At the point of service, making information accessible to service users can also contribute to better and more accountable service delivery. As a type of contract between a public agency and the public, citizens' or service charters are formal documents produced by a public agency to inform citizens how an agency or institution works, what kind of services are provided, where and who to contact to obtain such services, what the costs of these services are, as well as what complaint and redress mechanisms are in place.

## BOTTOM-UP TRANSPARENCY INITIATIVES

Bottom-up transparency initiatives refer to transparency mechanisms that, while not institutionalised by governments or service providers, empower citizens to make processes more transparent. Participatory diagnostics of services through the use of citizen report cards, for example, provide citizens with a means of evaluating the way a service is being delivered and assess its reach and quality.

### BOX 2: USING ICT TO MONITOR PUBLIC SERVICE DELIVERY IN UGANDA

The iParticipate Uganda project, implemented since 2011 by the Collaboration on International ICT Policy in East and Southern Africa (CIPESA), uses ICT to catalyse civic participation and democracy monitoring in Uganda. The project involves capacity building sessions and awareness raising activities on how Ugandan citizens can effectively use different ICT for social accountability, including monitoring and demanding quality public services. In 2014, CIPESA worked with the Northern Uganda Media Club (NUMEC) to document service delivery failures as a result of donor aid cuts to the Peace, Recovery and Development Plan (PRDP). As part of this work, dialogue between community members and duty bearers has been promoted through community debates, radio talk shows and social media on how to improve service delivery for people living in post-conflict communities.

Source: ICT4Democracy<sup>37</sup>

The use of ICT for these initiatives can also have a significant effect on corruption in service delivery.<sup>38</sup> This can involve soliciting citizen input to improve public services and tapping citizens' potential to help deliver better services at a lower cost. This is expected to increase transparency and accountability in government agencies by raising the level of participation available to citizens in the processes of governing. For example, ICT can facilitate participatory budgeting initiatives and empower citizens to co-decide on how to spend part of a public budget, as

per the experiment in 1989 where it was used for the first time in the Brazilian city of Porto Alegre for the municipal budget.<sup>39</sup> ICT can reduce the need for citizens to interact with public officials to access public services, give a voice to citizens and provide feedback mechanisms to track satisfaction, identify problems and improve service quality.

## Accountability and oversight: public scrutiny and social accountability

Effective accountability and oversight systems can improve the quality and reach of the public services governments provide. Typically, bureaucratic hierarchies are intended to ensure that public officials can be held accountable by higher administrative officers, such as supervisors, public auditors, and legislative bodies. In addition, independent bodies, such as external auditors, ombudsmen or dedicated agencies (such as the anti-corruption commissions, environmental review boards, or commissions for sustainable development) can conduct administrative audits on public institutions that assess compliance issues against standards set by the national government at the sector level.<sup>40</sup>

However, in many countries, formal processes for monitoring and supervision are not followed or enforced, due to a poor definition and understanding of monitoring and supervision processes, weak regulations, lack of resources, capacity and bureaucratic performance disciplines, combined with a lack of commitment and political will to enforce laws.<sup>41</sup> Social accountability mechanisms offer a promising complementary approach to the public oversight of service delivery and can include citizen report cards, community scorecards, social audits, public hearings, citizens' juries and community radio.<sup>42</sup>

For example, citizen-based initiatives can complement internal government accountability mechanisms in monitoring the procurement and implementation of government contracts. Integrity pacts<sup>43</sup> offer promising opportunities for civil society to actively participate in the monitoring of public procurement processes. For example, since 2002, the Transparency International national chapter in Mexico has implemented pacts in over 100 contracts worth US\$30 billion and advocated for the use of independent monitors, so-called social witnesses. This initiative also resulted in the Mexican Public Administration Authority making social witnesses mandatory for public contracts above a certain threshold.<sup>44</sup>



Community monitoring of service delivery can also be instrumental in promoting efficient and accountable services, including participatory assessments and feedback surveys, and agreements on expected standards of services (citizens' charters). Citizens representation in service-specific institutions give service users a voice to exercise accountability and allow regular oversight.<sup>45</sup>

Social audits can help raise public awareness and knowledge of budget-related issues. They also empower citizens by allowing them to provide feedback, gather evidence, interpret findings and develop solutions to their problems. This tool can also enhance transparency by creating demand for information and even facilitating legislation on the right to information in service delivery, planning and implementation. Furthermore, when institutionalised, social audits allow for regular monitoring of public institutions, thus increasing the legitimacy of state actors and the trust between the citizens/CSOs and the government.<sup>46</sup>

### BOX 3: SOCIAL AUDITS IN INDIA

In India, social audits were first made statutory in the 2005 Rural Employment Act. As part of the process, an independent body – mandated by law – conducts an audit of the expenditure and is required to share documents with village-level auditors trained by the independent social audit team. A record of the accounts of the civil works is read out in public in the presence of beneficiaries of the scheme and public officials, encouraging villagers to question transactions. The government takes action against those found guilty of siphoning funds. This approach is likely to be extended and social auditing institutionalised as a monitoring tool for major welfare schemes across the country.

Source: The Guardian 2012<sup>47</sup>

## Complaint and grievance mechanisms

Complaints mechanisms can increase accountability by providing service users with the opportunity to provide feedback on the quality and quantity of the services they receive, as well as to report potential wrongdoing. Citizens can flag faults or errors in service delivery to authorities or report having paid bribes or being solicited to pay a bribe to receive a service.

Complaint mechanisms can either be integrated into channels established by governments or service providers or set up as citizen-led initiatives. Where the information garnered is made public and efficiently relayed to relevant authorities, complaint mechanisms can be used to pinpoint corruption hotspots and provide evidence of the scale of the problem in different sectors, districts and programmes. As well as raising awareness in government agencies about integrity risks, these tools can be embedded into feedback loops to improve the quality of service provided.

## Management of human resources

Corruption, particularly in the form of favouritism, nepotism and abuse of authority, can affect all human resource (HR) management processes, notably recruitment and promotion, compensation, conditions of service and personnel records. Improving HR management is therefore an important way to combat corruption in service delivery, with a view to sanctioning corrupt officials and attracting and retaining qualified and scrupulous staff along the service delivery chain. While evidence is inconclusive on the extent to which salaries can reduce or increase incentives for corruption, there is an emerging consensus that increasing salaries above subsistence level may contribute to reducing corruption, if combined with effective controls and management of staff and resources.<sup>48</sup>

Preventing corruption in HR management involves merit-based HR and recruitment policies, transparent pay packages and internal controls, as well as integrity management systems, including the implementation of codes of ethics, ethics training and whistleblowing mechanisms.<sup>49</sup> Information management systems can also improve organisational efficiency and the effectiveness of financial and operational administration. Pay management systems also need to be in place to eliminate ghost workers or leakages of salary-related financial flows.

Raising public officials' ethical standards by establishing or improving codes of conduct and providing adequate training on the interpretation and application of these codes and standards is also an approach which is gaining momentum to address corruption in service delivery.<sup>50</sup>

## Decentralisation

Decentralisation refers to the delegation of responsibilities, jurisdiction and resources to lower sub-national entities charged with the management of essential public services. Decentralisation of service delivery has been touted in the past as an anti-corruption mechanism as it supposedly provides greater accountability to end beneficiaries, but evidence on whether this approach actually reduces corruption is mixed.<sup>51</sup>

Proponents of decentralisation suggest that it decreases corruption by bringing service delivery "closer to the people". As the distance between service recipients and the governments responsible for delivering these services decreases, the level of accountability to the end users increases. It is also expected that decentralisation increases the ability of governments and regulating agencies to control and assess the quality of the services delivered.

Others argue that the quality of service delivery may decrease with decentralisation, as central governments benefit from economies of scale and can coordinate service delivery and exercise control and oversight more efficiently than at the sub-national level. Costly inputs or services are also expected to be purchased at lower prices from a central government agency. In terms of corruption, the proximity of public officials and citizens may concentrate resources in the hands of local elites, creating opportunities for the development of corrupt networks, creating more avenues and positions for rent-seeking, nepotism, clientelism, and so forth.

In any case, it is clear that decentralisation (or centralisation) is not a one-size fit all cure for corruption. Levels of decentralisation vary across countries, with different degrees of delegation of political, administrative or fiscal power to sub-national governments, all with different effects on the quality of service delivery, which may have an impact on the anti-corruption potential of this approach. Just as in the nationalisation/privatisation debate, if decentralisation processes are not accompanied by governance reforms, it is unlikely that this approach alone will have a lasting impact on corruption.<sup>52</sup>

# GENERAL RESOURCES ON FIGHTING CORRUPTION IN PUBLIC SERVICE DELIVERY

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## BACKGROUND STUDIES

**World Bank Group. 2017. *Citizens as Drivers of Change: How Citizens Practice Human Rights to Engage with the State and Promote Transparency and Accountability*. Washington, DC: World Bank.**

<https://openknowledge.worldbank.org/handle/10986/27653>

This report uses three case studies to analyse the role of citizen engagement to reduce corruption in service delivery: in Afghanistan, improving education outcomes through community-based monitoring of schools; in Paraguay, monitoring sovereign wealth fund resources allocated to education to improve the infrastructure of marginalised schools; and in Serbia, promoting transparency and the integrity of physicians to reduce corruption in the health sector. The report concludes with recommendations for citizen engagement in the international development practice.

**Ezequiel Molina, Laura Carella, Ana Pacheco, Guillermo Cruces, Leonardo Gasparini. 2016. *Community Monitoring Interventions to Curb Corruption and Increase Access and Quality of Service Delivery in Low and Middle Income Countries: A Systematic Review*.**

<https://www.campbellcollaboration.org/library/corruption-community-monitoring-low-income-communities.html>

This report reviews 15 quantitative studies examining the effects of 23 community monitoring interventions (CMLs) in the areas of information campaigns, scorecards, social audits, combined information campaigns and scorecards in low- and middle-income countries. Most studies focused on interventions in the education sector, followed by health, infrastructure and

employment promotion. While evidence was found for CMLs having beneficial effects on reducing corruption and improving the quality of service delivery, it proved difficult to identify the mechanisms through which these effects come about. The study identifies the need for adequate information and tools to assist citizens in the process of monitoring. Further research on these mechanisms and their moderating effect on the effectiveness of CMLs is needed.

**Hasan Muhammad Baniamin. 2015. *Controlling Corruption through E-Governance: Case Evidence from Bangladesh*. Bergen: Chr. Michelsen Institute. U4 Brief 2015:5.**

<http://www.u4.no/publications/controlling-corruption-through-e-governance-case-evidence-from-bangladesh/downloadasset/3815>

This U4 Brief looks at the potential of e-governance to reduce corruption in service delivery. It features a case study on Bangladesh, which established e-governance for delivering some key government services. The author suggests that the effectiveness of e-governance varies according to its type and the nature of corruption (in this case the introduction of electronic and mobile ticketing for the Bangladesh Railway and district web portals for district land administration in Bangladesh), and tends to be more effective in dealing with petty corruption involving street-level bureaucrats than in dealing with grand corruption involving higher-level officials. The paper concludes that merely introducing e governance is insufficient for controlling corruption, as the nature and maturity of e-governance matters. Although e-governance can potentially improve monitoring of public services, whether it does depend on the effectiveness of related law enforcement efforts, among other factors.



**David Hall. 2012. *Corruption and Public Services*.**

[http://www.world-psi.org/sites/default/files/documents/research/en\\_psi\\_corruption\\_and\\_public\\_services\\_nov2012\\_text\\_with\\_annexes\\_final.pdf](http://www.world-psi.org/sites/default/files/documents/research/en_psi_corruption_and_public_services_nov2012_text_with_annexes_final.pdf)

This paper analyses major forms of corruption in public services, ranging from petty corruption at the point of service delivery to state capture. In particular, Hall finds that the privatisation and outsourcing of public services provided many opportunities and incentives for corruption. It then reviews the role of international actors such as the World Bank, the OECD and foreign governments in fighting corruption and their limitations. It concludes with recommendations, arguing that ending corruption requires public and political organising to demand that political leaders represent public interests, not the interests of rich and powerful elites and companies, and to hold them accountable. Transparency, accountability and public participation are key elements in this process as well as are strong and independent systems of audit, and courts prepared to prosecute, fine and ban corrupt companies and officials.

**Dena Ringold, Alaka Holla, Margaret Koziol, Santhosh Srinivasan. 2012. *Citizens and Service Delivery Assessing the Use of Social Accountability Approaches in Human Development*. The International Bank for Reconstruction and Development/The World Bank.**

<https://www.odi.org/sites/odi.org.uk/files/odi-assets/events-documents/4871.pdf>

This report looks at the use of social accountability in the human development sectors – health, education and social protection. As citizens frequently interact with service providers, they can influence the quality of service delivery provided they have access to information about their rights and the type and quality of services they should expect. Learning from the experiences gained from the implementation of World Bank projects, this review identifies lessons, knowledge gaps, and questions for further research while documenting a diverse set of cases including the rapid adoption of access to information laws, the use of public expenditure, tracking surveys by civil society organisations to “follow the money” from central government budgets to schools and health clinics, and the incorporation of grievance redress mechanisms into the design of conditional cash transfer programmes.

**Transparency International. 2010.**

***Gender and Corruption in Service Delivery: The Unequal Impacts*.**

[http://www.transparency.org/whatwedo/publication/working\\_paper\\_02\\_2010\\_corruption\\_and\\_gender\\_in\\_service\\_delivery\\_the\\_unequal](http://www.transparency.org/whatwedo/publication/working_paper_02_2010_corruption_and_gender_in_service_delivery_the_unequal)

Women and men are affected differently by corruption. Corruption exerts a particularly severe impact on women and girls due to power imbalances, their greater reliance on public service provision, level of participation in public life and lack of access to resources. There are also gender specific forms of corruption. These risks are particularly acute in service delivery in developing countries. Corruption in the provision of basic services, such as health and education, can have disproportionate and negative consequences for women and girls. It can seriously compromise their access to quality schools and clinics, their own social and economic empowerment and even their country's prospects for growth, gender equality and wider social change. Corruption directly thwarts progress in all these areas by exacerbating poverty and gender gaps. In developing countries, the effects can be stark when basic services are of low quality and gender inequalities are already high.

**John C. Bertot, Paul T Jaegar, and Justin M. Grimes. 2010. *Using ICTs to Create a Culture of Transparency: E-Government and Social Media as Openness and Anticorruption Tools for Societies*.**

[http://www.researchgate.net/profile/John\\_Bertot/publication/223369308\\_Using\\_ICTs\\_to\\_create\\_a\\_culture\\_of\\_transparency\\_E-government\\_and\\_social\\_media\\_as\\_openness\\_and\\_anticorruption\\_tools\\_for\\_societies/links/0f31752f23b8b4ea92000000.pdf](http://www.researchgate.net/profile/John_Bertot/publication/223369308_Using_ICTs_to_create_a_culture_of_transparency_E-government_and_social_media_as_openness_and_anticorruption_tools_for_societies/links/0f31752f23b8b4ea92000000.pdf)

Bertot, Jaegar and Grimes' article is an essential reference for researchers and practitioners looking to evaluate the utility and usefulness of ICTs as an anti-corruption strategy. The article begins by outlining the core principles that have inspired the push towards ICTs in governance, claiming that the use of ICTs is the natural progression of the open government movement. The article outlines the different types of initiatives in place, ranging from social media and crowdsourcing platforms to e-government. The authors provide appropriate examples that illustrate their use in practical situations. The article concludes with a sober look at the future of ICTs and barriers which might hinder their proliferation or their usefulness in different contexts.

**Ruhiiga Tabukeli Musigi. 2009. *Costing the Impact of Corruption on Service Delivery in South Africa: An Exploratory Overview.***

<http://www.journals.co.za/content/jpad/44/4/EJC51730>

This article presents an exploratory overview of the challenges of corruption in service delivery with specific reference to impact and cost. It surveys the theory of corruption, South Africa's relative ranking in terms of corruption perception, provides details on the institutional weaknesses in anti-corruption efforts and introduces a methodology for costing corruption. An interactive multiplier mechanism has been developed that could be used to quantify the cost of corruption. The article argues that the approach could then provide foundation tools for confronting corruption in an integrated and holistic manner. The significance of the discussion lies in its identification of a research agenda providing potential areas of focus and, in developing a methodology allowing for a systematic approach in the costing of corruption in service delivery.

**Daniel Kaufmann, Judit Montoriol-Garriga, Francesca Recanatini. 2008. *How does Bribery Affect Public Service Delivery? Micro-Evidence from Service Users and Public Officials in Peru.***

<http://documents.worldbank.org/curated/en/907081468293751633/pdf/wps4492.pdf>

This paper explores the price and quantity components of the relationship between governance and service delivery using micro-level survey data. The authors construct new measures of governance using data from users of public services from 13 government agencies in Peru. For some basic services, low-income users pay a larger share of their income in bribes than wealthier users do; that is, the bribery tax is regressive. Where there are substitute private providers, low-income users appear to be discouraged more often and not to seek basic services. Thus, bribery may penalise poorer users twice – acting as a regressive tax and then as a discriminating mechanism for access to basic services.

**Serdar Yilmaz, Yakup Beris, and Rodrigo Serrano-Berthet. 2008. *Local Government Discretion and Accountability: A Diagnostic Framework for Local Governance.***

<http://siteresources.worldbank.org/EXTSOCIALDEVELOPMENT/Resources/244362-1193949504055/LocalGovernmentDiscretionandAccountability.pdf>

This paper presents a conceptual framework to better analyse the factors that are likely to improve local governance. As decentralisation reforms grant local governments new powers and political, administrative and fiscal responsibilities, there is a need to introduce effective accountability systems, combining upward accountability to downward accountability to citizens. Public accountability mechanisms focused on effective, efficient, transparent and rules-based public financial management safeguard against misuse and abuse of local discretion, but they have imperfections. New forms of social accountability mechanisms, which enable direct engagement of citizens with government in budgeting and expenditure processes, can complement these approaches for better service delivery.

**Andrew Sunil Rajkumar and Vinaya Swaroop. 2007. *Public Spending and Outcomes: Does Governance Matter?***

[http://www.unicef.org/socialpolicy/files/Public\\_spending\\_and\\_outcomes\\_governance.pdf](http://www.unicef.org/socialpolicy/files/Public_spending_and_outcomes_governance.pdf)

This article analyses whether increases in public spending lead to improved outcomes when factoring in governance quality. The authors run a series of regressions and show that governance is an important factor when considering the utility and effectiveness of public spending. In other words, the efficacy of public spending can be largely explained by the quality of governance. Public health spending leads to better health and education outcomes in countries with good governance while public spending has virtually no impact in poorly governed countries. The authors conclude the paper by evaluating the implications these findings have on international development projects and health and education systems in the developing world, claiming that an increased focus on governance might lead to greater effectiveness of service delivery.

**Klaus Deininger and Paul Mpuga. 2005. *Does Greater Accountability Improve the Quality of Public Service Delivery? Evidence from Uganda.***

<http://www.agencyft.org/wp-content/uploads/2013/11/important-papers-2.pdf>

This article assesses whether there is a correlation between accountability mechanisms and the quality of public services. Using a large dataset from Uganda, the authors find that household knowledge on how to report inappropriate behaviour by bureaucrats and unsatisfactory quality of services makes a marked difference in the incidence of corruption and is also associated with significant improvements in service quality.

**Junaid Ahmad, Shantayanan Devarajan, Stuti Khemani, and Shekhar Shah. 2005. *Decentralization and Service Delivery. World Bank Policy Research Working Paper 3603, May 2005.***

<http://www1.worldbank.org/publicsector/decentralization/decentralizationcorecourse2006/CoreReadings/Ahmad.pdf>

This World Bank working paper provides a good overview of the debate around corruption and decentralisation. The paper looks at how governance issues play into the debate and if service quality is affected by decentralisation. The authors provide a detailed account of different studies that show the effects of decentralisation on the quality of services. While meant to be an informative study, the authors find common threads in the research, namely that good governance and accountability in government management systems are essential to improve the quality of services at any level of government.

## **PRACTICAL INSIGHTS: HANDBOOKS AND TOOLKITS**

**Claudia Baez Camargo, Franziska Stahl. 2016. *Social Accountability: A Practitioner's Handbook.***

<http://transparency.am/files/publications/1457166569-0-814669.pdf>

This handbook produced by the Basel Institute on Governance is meant to be used in conjunction with the handbook on participatory monitoring (see below). It has been developed as a tool to support those who wish to engage citizens in anti-corruption activities and is based on the findings of extensive research on the topic, which have been synthesised in the form of an assessment framework and methodology that capture the main elements that play a role in enabling the success of social accountability initiatives. These elements may be summarised as promoting changes in both supply and demand for corruption, addressing problems that are perceived as important and highly significant by the actors involved, and building upon locally legitimate accountability mechanisms. The understanding of the local context (including attributes such as institutional trust, social capital, community values and norms) is also a key factor contributing to the success of such initiatives, as well as the need to match the characteristics of the intended beneficiary communities to appropriate social accountability tools and approaches.

**Claudia Baez Camargo, Franziska Stahl. 2016. *Participatory Monitoring: A Practitioner's Handbook.***

<http://transparency.am/files/publications/1457167104-0-304807.pdf>

This handbook produced by the Basel Institute on Governance provides practitioners with a practical guide to the elements and steps necessary to develop a citizen monitoring programme. It has been tailored based on the experiences of experienced implementers in citizen monitoring initiatives as well as drawing from resources on the topic that have been made publicly available by development agencies. To illustrate the operationalisation of some key concepts, the handbook builds on the participatory monitoring experiences of G-Watch in the Philippines, specifically regarding the implementation of an agricultural subsidies monitoring programme – BULHON sa Panguma (BULHON) – in San Miguel, Bohol. After introducing the concept of participatory monitoring, the handbook



provides guidance on the various steps involved in implementing such activities, including preparatory activities, engagement and capacity building of project participants, implementing the monitoring and post-monitoring activities.

**Claire McLoughlin and Zoe Scott. 2014. *Service Delivery: Topic Guide*. Birmingham, UK: GSDRC, University of Birmingham.**

<http://www.gsdrc.org/go/topic-guides/service-delivery/>

This topic guide was first developed in 2007 and updated in 2014. It addresses equitable access to service delivery with a heavy focus on corruption and governance problems. It provides an overview of the best available evidence on inclusive service delivery, including lessons from cases where aid has been effective at addressing weak frontline incentives, where services have been delivered in very difficult environments, or where access has been expanded equitably over time. The topic guide features descriptions of the general barriers to equitable access to services, surveys and data related to the issue, and a compendium of common approaches to guarantee equitable access.

**UNESCO. 2005. *E-Government Toolkit for Developing Countries*.**

<http://unesdoc.unesco.org/images/0013/001394/139418e.pdf>

This E-Government Toolkit aims to strengthen the understanding of stakeholders involved in the planning and execution of e-government projects. It offers an action framework involving all the stakeholders in developing nations to guide them through various phases in their e-government initiatives. It covers the various aspects of initiating, implementing and sustaining e-government programmes in any developing nation, from defining the concept of e-government and discussing the e-readiness and e-government action plan to technology, infrastructure, capacity building as well as legislative and regulatory framework. Further, a number of case studies are discussed to provide successful examples of e-government initiatives, the challenges faced and how they were addressed.

## ASSESSMENT TOOLS AND DATABASES

**Transparency International. 2017. *Monitoring Corruption and Anti-Corruption in the SDGs: A Resource Guide*.**

[http://www.transparency.org/whatwedo/publication/monitoring\\_corruption\\_and\\_anti\\_corruption\\_in\\_the\\_sustainable\\_development\\_go](http://www.transparency.org/whatwedo/publication/monitoring_corruption_and_anti_corruption_in_the_sustainable_development_go)

As part of the follow-up and review mechanisms for the UN SDGs, member states are encouraged to conduct regular national reviews of progress made towards the achievement of these goals through an inclusive, voluntary and country-led process. This guide is intended to address the challenges of insufficient indicator coverage and data unavailability by providing CSOs with a range of alternative indicators, proxies and data sources, which can capture both the impact of and progress against corruption in the SDG framework. These resources will allow CSOs to develop sound baskets of indicators for selected targets and to effectively advocate for their adoption at national level. To this end, the scope of the guide goes beyond monitoring progress towards the specific SDG target on corruption (16.5) and considers how to monitor integrity risks related to other SDGs that are prone to corruption, with a specific focus on health, education, water and sanitation, and climate finance.

**Andrew McDevitt. 2012. *Education, Health, and Water Topic Guide*. Transparency International GATEway Corruption Assessment Toolbox.**

[http://gateway.transparency.org/files/uploads/Education,\\_Health\\_\\_Water\\_Topic\\_Guide.pdf](http://gateway.transparency.org/files/uploads/Education,_Health__Water_Topic_Guide.pdf)

This topic guide prepared for Transparency International's GATEway Corruption Assessment Toolbox gives the reader a detailed look at the complexity of corruption in service delivery by addressing key challenges found in diagnosing and fighting corruption. The topic guide contains practical advice for practitioners and for academics on assessment methodology and research areas to address.

**Ariel Fiszbein, Dena Ringold, and F. Halsey Rogers. 2011. *Making Services Work: Indicators, Assessments and Benchmarking of the Quality and Governance of Public Service Delivery in the Human Development Sectors*.**

<http://www.u4.no/recommended-reading/making-services-work-indicators-assessments-and-benchmarking-of-the-quality-and-governance-of-public-service-delivery-in-the-human-development-sectors/downloadasset/3061>

This World Bank working paper makes the case for measuring governance policies and performance, and the quality of service delivery in health and education. It develops a framework for selecting and measuring a set of indicators and proposes options, drawing from new and innovative measurement tools and approaches. The paper proposes the adoption of a more systematic approach that will both facilitate the work of health and education policy makers and allow for cross-country comparisons and benchmarking.

**USAID. 2005. *Tools for Assessing Corruption and Integrity in Institutions: A Handbook*.**

[http://pdf.usaid.gov/pdf\\_docs/Pnadf529.pdf](http://pdf.usaid.gov/pdf_docs/Pnadf529.pdf)

This handbook was developed for practical field use. It outlines a methodology that provides reliable quantitative, qualitative and comparative information that can be used to design, implement and evaluate sector- or government agency-specific anti-corruption programmes. Steps in the methodology include reviewing available information, conducting an expert assessment, conducting quantitative surveys of users and government officials, and using the assessment findings to inform programme design. A series of annexes provide technical depth, as well as a model scope of work to implement the assessment.

## RESOURCES FROM THE ANTI-CORRUPTION HELPDESK

**Marie Chêne. 2016. *Literature review: The Use of ICTs in the Fight against Corruption*.**

<http://www.u4.no/publications/literature-review-the-use-of-icts-in-the-fight-against-corruption/>

E-governance has gained popularity in recent years, with many countries resorting to ICT to modernise government, increase efficiency and improve public service delivery. As an additional benefit, ICT is also expected to reduce corruption by promoting transparency, opening government data to public scrutiny, and by automating government processes, restricting discretion of officials and limiting citizens' interaction with gatekeepers to access key services. Despite these high expectations and massive investments in e-government, evidence of impact is mixed and limited and there is a high rate of failure of e-government projects, due to contextual factors as well as the type of the ICT interventions.

**Marie Chêne. 2015. *Corruption and Anti-Corruption Practices in Human Resource Management in the Public Sector*. U4 Helpdesk Answer.**

<http://www.u4.no/publications/corruption-and-anti-corruption-practices-in-human-resource-management-in-the-public-sector/>

In many developing countries, weak HR management processes have resulted in oversized and underqualified civil services, with distorted incentive structures and poor work ethics that ultimately undermine the goal of building a strong, efficient and accountable public sector. Corruption, particularly in the form of favouritism, nepotism and abuse of authority, can affect all HR management processes, including the management of recruitments and promotions, compensation, conditions of services and personal records. Preventing corruption in HR management involves merit-based HR and recruitment policies, transparent pay packages and internal controls, as well as integrity management systems, including the implementation of codes of ethics, ethics training and whistleblowing mechanisms.

**Maira Martini and Thomas Luijken. 2014. *The Role of Technology in Reducing Corruption in Public Procurement*.**

[https://www.transparency.org/files/content/corruptionqas/The\\_role\\_of\\_technology\\_in\\_reducing\\_corruption\\_in\\_public\\_procurement\\_2014.pdf](https://www.transparency.org/files/content/corruptionqas/The_role_of_technology_in_reducing_corruption_in_public_procurement_2014.pdf)

The benefits of e-procurement are many and include improvements in market access and competition, promotion of integrity, reduced information costs, easier access to information, and increased transparency and accountability, among others. In this context, e-procurement also has the capacity to prevent and reduce the opportunities for corruption in the different stages of public procurement. Albania, Georgia and South Korea have improved their procurement systems and mitigated the opportunities for corruption by publishing information on procurement online, standardising and streamlining processes, and facilitating control and oversight over the procurement cycle. Nevertheless, the establishment of e-procurement as a standalone reform is unlikely to bring about positive transformational results. Countries have to invest in coherent legal frameworks, training and oversight capacity to ensure that the potential benefits of e-procurement in terms of reducing corruption are exploited to their maximum.

**Marie Chêne. 2013. *Good Practice in Community Complaints Mechanisms*.**

[https://www.transparency.org/files/content/corruptionqas/Complaint\\_mechanisms.pdf](https://www.transparency.org/files/content/corruptionqas/Complaint_mechanisms.pdf)

Complaints mechanisms can increase accountability to aid beneficiaries by providing them with the opportunities to give feedback on the quality and quantity of the services they receive as well as to complain about potential wrongdoing. There is no blueprint for setting up a complaints mechanism as it needs to be adapted to the local context, taking into account issues such as cultural norms and values, level of literacy, phone coverage and social patterns, among others. To address all of these issues, there is a broad consensus that beneficiaries should be consulted in the design of the complaints mechanism to develop appropriate culturally-sensitive and context-specific responses that identify and address the various barriers to reporting. Irrespective of the forms, procedures and channels for handling complaints, the mechanism should be transparent, independent, accountable, accessible, safe and easy to use.

**Marie Chêne. 2012. *The Impact of Community Monitoring*. U4 Helpdesk Answer.**

<http://www.u4.no/publications/impact-of-community-monitoring-on-corruption/>

There is an emerging but still mixed body of evidence on the impact of community monitoring interventions on corruption. Beyond anecdotal evidence of positive outcomes on detection/prosecution of corruption cases, such interventions have contributed in some cases to reducing corruption and leakages of funds as well as improving the quantity and quality of public services and strengthening the demand for longer term reforms. Partly due to conceptual and methodological challenges as well as the general scope and focus of impact tracking studies, it is difficult to isolate the factors or catalysts of change, underpinning the success of anti-corruption community-based initiatives. However, studies indicate that a combination of external – environmental/contextual dynamics that supported the implementation of the intervention – as well as internal factors – institutional design of the intervention, attributes and processes of the implementing agency – may have contributed to the effectiveness of such interventions.





A blurred background of a classroom with a green chalkboard and wooden desks. The text is overlaid in the center.

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# **CORRUPTION IN EDUCATION SERVICES**

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# WHY FIGHT CORRUPTION IN EDUCATION?

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**With the formulation of the Sustainable Development Goals (SDGs), leaders from around the world have made a political commitment to “ensure inclusive and equitable quality education and promote lifelong learning opportunities for all” (SDG 4) by 2030.**

Education is a fundamental human right, a key driver of economic development and a social investment in the future. It provides citizens with the skills and tools to sustain their livelihoods, escape poverty and contribute to social and economic development. Education has a strong correlation with a number of development indicators, such as economic growth,<sup>53</sup> child mortality,<sup>54</sup> poverty rate,<sup>55</sup> inequality,<sup>56</sup> mortality rates, income growth,<sup>57</sup> and access to healthcare. It shapes the values of coming generations, and can impart principles such as dignity, integrity, liberty, equality, accountability and transparency which play a vital role in promoting development, social justice, human rights and anticorruption efforts. In light of this core societal function, it is no surprise that education accounts for over 20 percent of total government public sector expenditure in many countries of the world.<sup>58</sup>

Corruption in the education sector is a major obstacle to realising the universal right to education and to achieving SDG 4. Yet corruption in the education sector is widespread in many countries of the world. 41 percent of people globally think that the education sector in their country is corrupt or extremely corrupt.<sup>59</sup> Moreover, corruption in the education sector undermines one of the major aims of education, which is to transmit ethical values and behaviours: how to teach values in an environment that is corrupt itself?<sup>60</sup>

Corruption undermines the quality and availability of education services by distorting access to education. It disproportionately affects the poor, rendering disadvantaged children reliant on sub-standard education services where little learning can take place. It has a detrimental effect on virtually all aspects of education, from school infrastructure, to teacher salaries and academic curricula. Resources pilfered from education means scarcity of learning and research equipment, poor quality school facilities, the hiring of fewer and/or underpaid teachers, larger class sizes, and increased workload for teachers. Corruption therefore increases the cost of education and while leading to lower academic standards, resulting in

lower test scores, poor school rankings and lower satisfaction with the public education system.<sup>61</sup>

As a result, corruption undermines the public's trust in the education system and its usefulness, leading to higher drop-out and lower enrolment rates.<sup>62</sup> Lack of resources, low quality of education, or poorly qualified personnel in public education institutions may also drive students who can afford it to look for private alternatives, exacerbating inequalities and undermining equal access to education and personal development opportunities. Corruption in higher education also contributes to lower the quality of academic standards and the recognition of degrees and certificates,<sup>63</sup> ultimately undermining students' qualifications and prospects for employment.<sup>64</sup> Corruption in education may also open the door for a “brain-drain” at higher levels of education, forcing education professionals to leave an institution, region or country in order to better their income, improve their working conditions or increase their professional development opportunities. In turn, this “brain-drain” may erode further the quality and quantity of education services.

Corruption in the education sector does not only harm teachers and students, but the communities and societies they live in too. As the sector responsible for training future leaders and professionals, corruption in education has far reaching consequences on social and economic development, resulting in poorly trained doctors, judges or engineers or underqualified leaders running the economy. Corrupt education systems produce lower quality, less qualified employees and raises the costs (due to competition) of attracting and retaining skilled workers.<sup>65</sup> Corruption in education can also stifle creativity and innovation in businesses, affecting firm growth.<sup>66</sup> In higher education, undue influence from government and private sector not only undermines academic freedom, but can also skew research agendas and damage the credibility of academic research findings.

# KEY ISSUES AND CHALLENGES

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## Forms of corruption in education

While corruption in education is widespread in many countries of the world, education sector corruption diagnostics are often inadequate, and more resources would need to be allocated to measure the scope and scale of corruption in this sector.<sup>67</sup>

Corruption risks in education are the result of two particular characteristics of the sector.

Firstly, the stakes at play in educational attainment can be very high. The “opportunity cost” involved in failed exams or acceptance to prestigious schools, which potentially bestow enormous future benefits to successful students, mean that some are prepared to compromise on integrity. TI Vietnam found that a striking 38% of young people surveyed stated they would be prepared to pay a bribe to get into a good school, while 16% would be ready to bribe their teacher in order to pass an exam.<sup>68</sup>

Second, the large sums allocated to the education sector (which represents in most countries the first or second largest sector in terms of public budget<sup>72</sup>) combined with often weak oversight structures make it a tempting target for those looking to commit fraudulent activity.<sup>73</sup>

As such, while corruption is more visible at the point of service where teachers, professors and students interact, it can take many forms in the education sector and occurs at all stages of the service delivery chain, from school planning and management, to student admissions and examinations, to academic research as well as to teachers’ management and professional conduct. There are particular areas of concerns at the policy formulation stage, as well as the management of organisational resources and the service delivery phases, as illustrated in the diagram below:<sup>74</sup>

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### BOX 4: MASSIVE CHEATING INCIDENCE IN BIHAR, INDIA

This willingness provides the supply side of corruption and can generate petty bribery of staggering proportions, such as in the northern Indian state of Bihar where there exists a highly organised, well-known and widely accepted system by which teachers, administrators, students, parents and middlemen collude to rig examinations on a massive scale.<sup>69</sup> As a rigged paper costs around US \$600, the system further disadvantages those unable to afford to cheat. After footage emerged of family members scaling the walls of the examination hall to hand cheat sheets to students inside, the authorities launched a crackdown.<sup>70</sup> Revealingly, pass rates for these examinations immediately plummeted from around 75% to 50%.<sup>71</sup>

**Figure 2: Analysis of corruption along the education sector value chain**





## POLICY FORMULATION

At the policy stage, undue influence by interest groups can skew the allocation of resources and the formulation of laws and regulations, leading to administrative bribery, political corruption and policy capture.

An interesting consideration is how undue influence can affect the development of curricula which specify what is to be taught and the method of instruction. Academic curricula can be captured by political parties seeking to present their agenda in the most positive light to influence students' political views. Such political manipulation often relies on internal administrative or economic pressures on the universities.<sup>75</sup> Contentious choices about how to teach subjects are often clearly affiliated with specific political parties' agendas, as is the case when it comes to teaching history in India,<sup>76</sup> or creationism in the United States.<sup>77</sup>

However, partisan influences can also be subtler and go beyond party-political agendas to encompass ideology in a broader sense. In recent years, for instance, economic students from around the world have formed organisations such as the International Student Initiative for Pluralism in Economics and the Post-Crash Economics Society.<sup>78</sup> They contend that university economics courses are dominated by an "intellectual monoculture" backed by a system of state-funding which operates in a highly biased fashion in favour of rational choice models which are at the heart of free market ideology.<sup>79</sup>

Businesses might also want to influence curricula in order to highlight the benefits of their business, to show opponents or competitors in a bad light, or simply to hide facts related to their industry (for example, a hydrocarbon producer may want to omit topics related to climate change in science classes). These types of corruption may have a profound effect in shaping public opinion related to important subjects that require impartial analysis.

## ORGANISATIONAL RESOURCES

The management of organisational resources, such as personnel, goods, supplies and budgets, is another area of vulnerability of a sector characterised by large flows of money, specialised equipment and complex organisational structures. When combined with policy capture, mismanagement of resources can lead to unequal distribution patterns and the privileging of certain schools based on factors such as politicians' electoral machinations. Scholarships, free schools meals, or textbooks can also turn out to be allocated on subjective grounds, due to favouritism or bribes.<sup>80</sup>

Education-related procurement, such as contracts to maintain educational facilities or supply textbooks,<sup>81</sup> is confronted with a number of integrity challenges. Officials in the procuring agency may collude with applicants, contractors may defraud the agency, embezzle funds or deliver substandard products – all of which siphons off funds intended to benefit students. The procurement of services other than teaching, such as cleaning and catering services or specialised education services (students with special needs or second-language education) can also be affected by overpricing, back-room dealings and bribery.

Administrative funds and supplies can also be diverted before reaching the schools, as they are disbursed from central to local government through complex multi-layered distribution channels. In the 1990s, a public tracking expenditure survey conducted in Uganda revealed that schools received on average only 13 percent of the intended financial resources to rampant corruption and mismanagement.<sup>82</sup>

Bribery, patronage and nepotism can also affect the hiring, training and promotion of education professionals, while school payrolls can be inflated by "ghost teachers", providing opportunities to divert education resources for private gain.

## SERVICE DELIVERY/CLIENT INTERFACE

At the service delivery level, corruption often takes the form of bribery and extortion, whereby parents and students are asked to make informal payments to access education services that are supposed to be free of charge. For those with the means, entrance exam papers or even grades may be available for purchase in advance.

Interactions between teachers and students offer many opportunities for bribery and gift-giving. When under-resourced schooling systems inadequately prepare children for college, parents often resort to private tutoring to ensure that children pass the admission examination. Risks of manipulation are high when the mainstream teacher provides supplementary tutoring after school hours in place of formal teaching, as they may teach only part of the curricula during regular hours to “incentivise” students to attend private lessons.<sup>83</sup> Bribes or sexual favours can be extorted from students in exchange for good grades, qualifications or academic recognition by their institution or their teacher.

“Quieter” forms of malpractice by frontline providers may also occur when public servants fail to deliver services or inputs that have been paid for by the government. The most prominent form in education is teacher absenteeism in public schools.<sup>84</sup> Support staff might also extract bribes for the services they are hired for (like catering or maintenance) or may favour students and teachers disproportionately if offered a bribe for the same services.

Corruption in higher education institutions manifests itself in various forms, ranging from bribery in recruitment and admissions, on-campus accommodation and grading, nepotism and patronage in tenured postings, political and corporate undue influence in research, plagiarism and other editorial misconduct in academic journals.<sup>85</sup> Fake diplomas, bogus certifications, online diploma and accreditation mills, the manipulation of job placement data, and corruption in degree recognition in cross-border education are also common forms of corruption in the higher education sector.<sup>86</sup> Degree mills are institutions that “sell” degrees or diplomas, expecting little or no work or learning from the part of the student. Academic fraud, ghost-authorship or plagiarism involves the use of fraudulent documentation to obtain undue qualification or recognition, undermining the scientific method and scholarly dialogue, and stifling creativity and innovation.

## Challenges for addressing corruption in education

Corruption in the education sector is difficult to address due to the general complexity of a country’s education system, often characterised by a complex web of administrative layers on top of the general three tier education system. Adding to this complexity, several countries permit a multi-tier system of education where public and private funds and facilities interlace with different degrees of autonomy and independence.

Programmes linked to the education system such as school meals and transport for younger students add further complexity to the education sector, multiplying companies, agencies and institutions involved in service delivery.

These complexities create an administrative labyrinth that makes monitoring and accountability mechanisms more difficult to implement. In addition, it is difficult and sometimes contentious to assess the quality of education systems and services. Test-scores, grade averages, and other academic assessments are frequently criticised over their ability to assess an element as complex as “learning”.<sup>87</sup> In addition, many standardised tests can be forged or results falsified in order to hide actual test scores, casting doubt over the trustworthiness of such approaches to assess and monitor the quality of education services.





# APPROACHES TO ADDRESS CORRUPTION IN THE EDUCATION SECTOR

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Given the key role that the education system plays in shaping the values of future generations, addressing corruption in the education sector is an integral part of fighting corruption and building peaceful, inclusive and corrupt-free societies.

## Budget and expenditure monitoring

Transparent and participatory budget processes need to be in place to monitor how resources are being allocated and allow public scrutiny and control over the use of education resources. Regular internal and external audits must take place to detect and deter fraud and corruption. Preventative measures such as procurement guidelines, as well as transparency and monitoring procedures to track the flow of funds are instrumental to ensure that resources reach their intended destination. While internal systems of auditing are necessary, ordinary citizens to access budget information need to access national and district government budgets as well as school and university budgets to be empowered to demand accountability. In Uganda, dissemination of information to the public on public expenditures helped reduce leakages in the education sector dramatically; while from 1991-95 on average only 13 percent of allocated funds reached schools, by 2001 this was around 80 percent.<sup>88</sup>

Introducing a funding formula for education finance has also been promoted as a means to prevent corruption. Formula funding refers to “an agreed rule for allocating resources to schools that specifies the quantum of finance that each school can spend”.<sup>89</sup> When accompanied by complemented by the publication of allocations to each school - on websites and in hard copy - in order to make budgets accessible for public scrutiny, this is likely to enhance transparency and reduce opportunities for corruption.

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### BOX 5: FORMULA FUNDING, DECENTRALISATION AND CORRUPTION

Formula funding of schools reduces the potential for corruption by increasing transparency because the amount each school should receive and the basis for this is public knowledge. Decentralised financial management replaces the opportunity for large scale fraud by the few, which characterises a central system, by wider opportunities for smaller scale fraud by employees at school level, especially if schools have bank accounts. The potential for fraud in decentralised systems can be contained by well designed financial regulations that are adhered to, monitoring of schools' finances by a school council and the education authority, and independent and thorough audit of schools' accounts.

Source: Levacic and Downes <http://unesdoc.unesco.org/images/0013/001376/137631e.pdf>



## Education management information systems (EMIS)

Access to accurate information on the country's education system is crucial to its management, planning and evaluation. It is therefore important to ensure that education management information systems (EMIS) are in place to collect quality data pertaining to schools, students, teachers, infrastructure, assets and so on. Such information should enable assessment of the education sector's strengths and weaknesses, its pedagogical and institutional operations, and its performance. The data collected should be made publicly accessible in a clear and simple format to allow stakeholders to use the data as part of a feedback loop, informing the formulation, management and implementation of education policies. Training can be provided to district- and local-level administrators, school management committees and parent-teacher associations on how to access and use this for effective monitoring of the education sector.

## Management of human resources

As role models, teachers have a key role to play in the fight against corruption, leading by example and imparting values of integrity to their students. Transparent and merit-based human resource management processes for appointing, training, promoting and compensating education personnel need to be in place to ensure that teachers are not only adequately qualified and remunerated but also rewarded for ethical behaviour. Transparent and meritocratic hiring practices can help ensure that only teachers with sufficient qualification and experience are appointed. Adequate salaries and benefits can reduce incentives for education personnel to resort to bribery or other coping strategies to supplement their income. Frequent school inspections can prevent corruption in teacher management and behaviour. Effective disciplinary policies and consistent and dissuasive administrative and/or criminal sanctions need to be in place and enforced in the event of wrongdoing.

## Codes of conduct and integrity pledges

Codes of conduct based on accepted educational principles, reinforced by ethical training and adequate implementation mechanisms and backed by a solid political will can help improve the sector's integrity standards.<sup>90</sup> Codes of conduct can be developed at country level or also within schools and universities in consultation with all stakeholders, to provide guidance to educators on what behaviour is expected of them in the exercise of their duties. Teacher training is required to ensure their proper enforcement.<sup>91</sup> In cases of alleged breaches, codes should also provide for accessible and timely remedial action.

Another approach can be for school management boards, civil society groups and others to jointly adopt 'integrity pledges' between parent groups and school management and/or youth groups and universities, as an effective additional means to incentivise anticorruption practices and improve the reputation and quality of education at schools and higher education institutions.<sup>92</sup>

## Quality control mechanisms

Quality control mechanisms involving bottom-up and top-down approaches are also important and complementary tools to address corruption in education. Bottom-up approaches usually involve students, teachers, parents and communities in monitoring the quality of education services against a set of national or regional standards (for example, structurally sound schools, availability of textbooks for students, teacher attendance) to identify problematic institutions or aggregate the sector's areas of weaknesses. The use of citizen report cards or crowd sourcing platforms to data that can be used to inform advocacy campaigns and government efforts can be very fruitful, as in the case of the Check Your School initiative.

### BOX 6: USING TECHNOLOGY TO ADDRESS TEACHERS' ABSENTEEISM IN INDIA

Technology has proved effective in monitoring the provision of education services and addressing teachers' absenteeism in India. In an experiment conducted in a rural district in the state of Rajasthan, India, where the absentee rate was 44 per cent, teachers' attendance was monitored with cameras, while their salaries were linked to their attendance. Absenteeism declined by a fifth compared to a control group and the pupils' test scores went up. The cost of the programme was US\$6 per child per year.

Source: From the Global Corruption Report: Education

Top-down approaches to quality control includes commissions or school boards responsible for overseeing academic quality and ethics. These bodies can be either established by governments or by service providers themselves. Governance rankings of educational institutions can be used as a means to promote greater transparency and incentivise good governance of education institutions. Such governance rankings can be integrated as a dimension of centrally established university rankings such as standard university league tables. The Romanian Academic

Society for example, produced a ranking that took into account transparency, academic integrity and enforcement of rules and contributed to improve procurement transparency. The Academic Society – a Bucharest based think tank and NGO worked actively with universities to help them improve their rankings.<sup>93</sup>

## Complaints mechanism and whistleblowing protection

Confidential and safe complaint channels should be in place to report suspected corruption without fear of retaliation and discrimination. Whistleblower protection should cover the education sector, including legal protection, disclosure channels and follow-up mechanisms for education professionals and students at all levels of government (including central, district and local) as well as in schools and higher education institutions.

## Parent-led initiatives

Parents can also play an important role in reducing corruption in the education system. Many parents rely on schools not only to educate their children but also as caretakers for their children and, in some cases, to provide meals during the day. As they have important incentives to contribute to quality education services, parental participation and oversight at the school level can greatly contribute to fighting school corruption.

Parent-led anticorruption actions may range from complaint or suggestion boxes directed at principals, superintendents or ministers, to regular parent-teacher meetings, or disseminating information about the student rights to the wider community. For example, Guatemalan communities had significant problems with teacher absenteeism, leading to a decrease in school attendance. Community bulletin boards were used to provide parents with an outlet to complain about teacher absences, lack of resources and instances of corruption. These would become especially relevant during education inspector visits since most parents had to work and could not attend meetings during working hours.

# RESOURCES ON CORRUPTION IN EDUCATION

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## BACKGROUND STUDIES

Caveat: From the literature review conducted to compile this topic guide, there are few recent background studies on corruption in the education sector. Most papers and studies have been conducted before 2010.

**Muriel Poisson (Ed). 2014. *Achieving transparency in pro-poor education incentives*. Series: *Ethics and corruption in education*. Paris: IIEP-UNESCO.**

<http://unesdoc.unesco.org/images/0022/002269/226982E.pdf>

What are the best ways to ensure that scholarships, conditional cash transfers, free school meals, and so on, actually reach their intended beneficiaries? This book assumes that different models of design, targeting, and management of pro-poor incentives can prove more or less successful in maximizing efficiency, transparency, and accountability, and in minimizing the likelihood of errors, fraud, and corrupt practices. Comparing the cases of seven projects implemented worldwide, it demonstrates that some models may pose greater challenges to transparency and accountability than others (namely, targeted, in-kind, locally managed, or community-based). At the same time, these models may be the most adequate for local needs, especially if there are budget constraints, a vast and diverse territory, or demand for food at school. The authors argue that deliberate actions taken to confront related corruption risks, such as simplified targeting, legal definition of responsibilities, local transparency committees, school display boards, appeals mechanisms, informal whistleblowing, and social audits, among others, are of greater importance than the adopted incentive model. They conclude by highlighting the value of “mutual accountability systems”, where all actors are mutually accountable and subject to checks and balances.

**Transparency International. 2013. *Global Corruption Report: Education*.**

[http://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_education](http://www.transparency.org/whatwedo/publication/global_corruption_report_education)

The Global Corruption report provides an in depth look at corruption issues surrounding education. This report provides a comprehensive assessment of the current context in which corruption in the education sector is situated and the conditions that determine the effectiveness of anti-corruption efforts. The report is structured to follow the evolution of an education system. It begins with an overview of relevant norms, legal and regulatory frameworks, and presents key stakeholders that collectively shape education systems. It then assesses corruption risks at the source of financing education, and follows a chronology of the construction and supply of goods, staff appointment and retention, access to education, school management and corruption in the classroom. Then the report looks at how corruption can undermine each stage of the higher education experience. The report presents established diagnostic tools for measuring corruption in education and tailored approaches for dealing with specific forms of corruption, including, for example, the value of university governance rankings, public expenditure tracking, teacher codes of conduct, new incentives for parent participation in school management, human rights-based approaches, legal redress mechanisms, and the use of new media.

**Muriel Poisson. 2010. *Corruption and education. Education Policy Series.*** IIEP. International Academy of Education.

<http://unesdoc.unesco.org/images/0019/001902/190247E.pdf>

This booklet provides an overview of corruption challenges in the education sector and suggests how to improve transparency and accountability in educational planning and management covering areas such as financing, public procurement, teacher management, and examinations. It identifies specific challenges facing the education sector, such as the decentralisation of educational funding and management, the growing competition among both students and schools, and the boom in new technologies. The study reviews several tools to assess corrupt practices within the education sector, such as public expenditure tracking surveys, quantitative service delivery surveys, and report cards. It argues that addressing corruption challenges in the education sector requires concerted action on three main fronts: developing transparent regulation systems and standards, building management capacity, and promoting greater ownership of administrative and financial processes. Anticorruption efforts can also involve adopting codes of conduct, strengthening institutional capacities in some key areas such as management, accounting or audit, promoting the right to information of users and, more broadly, displaying strong political will at all levels of the system.

**World Bank 2010. *Silent and lethal: How quiet corruption affects Africa's development efforts***

[http://siteresources.worldbank.org/AFRICAEXT/Resources/english\\_essay\\_adi2010.pdf](http://siteresources.worldbank.org/AFRICAEXT/Resources/english_essay_adi2010.pdf)

The 2010 Africa Development Indicators essay sheds light on a different type of corruption, referred to by the authors as “quiet corruption”, by which they mean instances where public servants fail to deliver services or inputs that have been paid for by the government. Examples of such forms of corruption include teachers’ absenteeism in public schools and absentee doctors in primary clinics. The report looks at the impact of such forms of corruption in the long term on the well-being and education levels of citizens, including direct consequences such as the reduced productivity potential of households, firms, and farms, and the indirect consequences, such as distrust of public institutions frontline providers. Tackling quiet corruption is posited to require a combination of strong and committed leadership, policies, and institutions at the sectoral level, and — most important — increased accountability and participation by citizens, the demand side of good governance.

**Victoria Turrent. 2009. *Confronting corruption in education: Advancing accountable practices through budget monitoring.*** U4 Brief.

<http://www.u4.no/publications/confronting-corruption-in-education-advancing-accountable-practices-through-budget-monitoring/>

Education budget work conducted by civil society is a powerful way of holding governments accountable to their citizens, and drawing attention to corruption in the education system. This brief discusses the relevance of civil society budget work for anticorruption initiatives, focusing on the experience of the Commonwealth Education Fund, in which budget monitoring is employed as an anticorruption tool in the education sector. It presents its strengths and limitations - arguing for increased access to budget information and greater civil society participation in such processes.

**Leo Hamming. 2008. *The power of data: enhancing transparency in the education sector in Sierra Leone.*** U4 Brief.

<http://www.u4.no/publications/the-power-of-data-enhancing-transparency-in-the-education-sector-in-sierra-leone/>

This case study explores the introduction of an Education Management Information System (EMIS) in Sierra Leone, as a tool to highlight malpractices related to anything from local record keeping, teacher salaries, building new schools, and educational indicators. After outlining the potential benefits of EMIS, it describes the process and challenges of introducing such a tool in a post-conflict setting. It concludes that return on investment of such system is excellent. If linked with an intervention for a sustained improvement of the school inspectorate, it could result in large savings due to better use of resources and more efficient distribution of textbooks and teaching and learning materials. However, to ensure the success of the initiative in the longer term, the Ministry of Education need to take full ownership after the initial donor supported phase.



**Stephen P. Heyneman, Kathryn H. Anderson and Nazyn Nuraliyeva. 2008. *The Cost of Corruption in Higher Education*.**

<http://www.vanderbilt.edu/peabody/heynean/PUBLICATIONS/Heyneman.2008.CostsofCorruption.pdf>

This article looks at the manifestations and effects of corruption in higher education (tertiary education). This article assesses the extent of higher-education corruption based on surveys of university students in six countries—the Kyrgyz Republic, Kazakhstan, Croatia, Moldova, Serbia, and Bulgaria. These surveys suggest that corruption (in the form of bribes for entry, grades, or graduation, etc) varies in accordance with the market demand for the subject of study, with higher levels of corruption found for the subjects in highest demand (eg: law, economics, finance, and criminology). Also, corruption is more likely to be found in local universities with local professional codes of conduct and less likely to be found in universities accredited in Europe or North America.

**Jacques Hallak and Muriel Poisson. *Corrupt schools, corrupt universities: What can be done?* Series: Ethics and corruption. Paris: UNESCO Press.**

<http://unesdoc.unesco.org/images/0015/001502/150259e.pdf>

This book presents conclusions drawn from IIEP's research into ethics and corruption in education. It aims to build awareness among decision-makers and education managers of the importance of combating corruption, to provide them with tools to detect and assess corruption problems, and to guide them in formulating strategies to curb malpractices. After defining the key concepts of corruption, transparency, accountability and ethics, it identifies the main opportunities for corruption in education. It describes tools that can be used to assess corruption problems – such as perception and tracking surveys. Lessons are drawn from strategies used worldwide to improve transparency and accountability in educational management. The authors bring these together in a list of recommendations for policy-makers and educational managers. They argue that transparent regulatory systems, greater accountability through strengthened management capacity, and enhanced ownership of the management process can help build corruption-free education systems.

**U4 Anticorruption Resource Centre. 2006. *Corruption in the Education Sector*.**

<http://www.cmi.no/publications/file/2563-corruption-in-the-education-sector.pdf>

This article provides a comprehensive while synthetic overview of corruption in the education sector. The U4 Paper begins by providing a description of education sector corruption, its causes, its effects and how it can be tackled. The paper then goes more into depth into salaries, corruption in education sector procurement, budget transparency and formula funding - an agreed rule for allocating resources to schools specifying the quantum of finance that each school can spend. The article ends with a literature review, which outlines the most important academic works on corruption and anticorruption in the education sector until 2006.

**Ritva Reinikka and Jakob Svensson 2004. *The Power of Information: Evidence from a Newspaper Campaign to Reduce Capture***

<http://documents.worldbank.org/curated/en/883011468777296898/pdf/WPS3239.pdf>

This paper evaluates the effects of increased public access to information as a tool to reduce capture and corruption of public funds. In the late 1990s, the Ugandan government initiated a newspaper campaign to boost schools' and parents' ability to monitor local officials' handling of a large school-grant programme. The results were striking: capture was reduced from 80 percent in 1995 to less than 20 percent in 2001. The authors find that proximity to a newspaper outlet is positively correlated with the head teachers' knowledge about rules governing the grant programme and the timing of releases of funds from the centre.

**David Chapman. 2002. *Corruption and the Education Sector (Washington D.C.: USAID, 2002)***

[http://pdf.usaid.gov/pdf\\_docs/Pnact874.pdf](http://pdf.usaid.gov/pdf_docs/Pnact874.pdf)

This paper discusses the factors fuelling corruption in national education systems. It describes the forms that corruption takes within the education sector, and interventions that have been suggested for reducing corruption. The author argues that “petty” or small-scale corruption is more common than “grand” or large-scale corruption in the education sector, and emphasises specific vulnerabilities at the point of service delivery. The author argues that bribery, favouritism and fraud over merit can have profound effects on societies in the long-term. The article details the challenges pending for donors seeking to invest in education and provides a series of examples of anticorruption efforts in education.

**Sanjeev Gupta, Hamid Davoodi, and Erwin Tiongson. 2000. Corruption and the provision of healthcare and education services.**

<http://www.imf.org/external/pubs/ft/wp/2000/wp00116.pdf>

This article reviews the theoretical models and users' perceptions of corruption in the provision of public services and analyses the impact of corruption on those services in terms of cost of services and human development outcomes. Using cross country data sets, the authors find that corruption has adverse consequences for a country's child and infant mortality rates, percent of low-birthweight babies in total births, and dropout rates in primary schools. The authors conclude by examining the implications of their results for social policy formulation.

## STANDARDS AND GUIDELINES

Corruption in the education sector is presented by many education advocates as a direct failure to uphold International Law, as international conventions like the Universal Declaration for Human Rights, the Convention on the Rights of the Child and International Covenant on Economic and Social and Cultural Rights uphold the human right to free, compulsory and egalitarian primary education. This rights-based approach to viewing corruption in the education sector is by no means a standard or guideline to addressing corruption in the education sector, but provides the basis for international commitments and standards.

### **UNESCO Commitments: Education for All**

<http://www.unesco.org/new/en/education/themes/leading-the-international-agenda/education-for-all/>

The Education For All movement started in 1990 as a coalition of 164 governments worldwide who have pledged to address the deficiencies of primary education systems worldwide by identifying 6 goals and developing a framework to address the goals. The framework, labelled the Dakar Framework for Action, identifies corruption as a major obstacle to improving education and recommends that governments in the coalition take strong action to detect and address corruption in primary education. The commitments within the Framework are monitored through the UNESCO Institute for Statistics which releases annual reports on the successes and failures in meeting commitments.

### **UNESCO/OECD Guidelines for Quality Provision in Cross-Border Higher Education**

<http://www.oecd.org/edu/skills-beyond-school/35779480.pdf>

Cross border higher education broadly refers to the movement of people, knowledge, programs, providers and curriculum across national or regional jurisdictional borders, offering students/learners new opportunities, increased access to higher education, improvement of international co-operation and innovations in higher education systems. These guidelines were established to enhance the quality provision in cross-border higher education and to establish an international framework of cooperation to maintain and assure quality in higher education. The guidelines are directed towards both governments (through their respective education ministries) and to institutions dedicated to tertiary education. The guidelines aim to establish a transparent and fair system of internationally recognised accreditation and create a space for international cooperation for improving education and establish a framework for cooperation in addressing issues like certification/qualification fraud linked to higher education.

### **IIEP/CHEA Advisory statement for effective international practice. Combatting corruption and enhancing integrity: A contemporary challenge for the quality and credibility of higher education**

<http://unesdoc.unesco.org/images/0024/002494/249460E.pdf>

This advisory statement is a call to action that highlights the problems posed by academic corruption in higher education and suggests ways that quality assurance bodies, government and higher education institutions around the world can combat corruption. It notes that although effective quality assurance is a central element in addressing academic corruption, it cannot do the job alone. Corruption affecting the integrity of universities' academic operations occurs both upstream (at the government level) and downstream (at all levels in higher education institutions) from the work of quality assurance bodies. "Action on a broad front is needed to attack the problem," the advisory statement concludes.

## PRACTICAL INSIGHTS: HANDBOOKS AND TOOLKITS

### **Education Development Centre. 2012. *Addressing Corruption in Education: A Toolkit for Youth from Youth***

<https://resourcecentre.savethechildren.net/library/addressing-corruption-education-toolkit-youth-youth>

Part of a bigger USAID funded programme on transparency in the education sector, this toolkit was developed “by youth for youth” with the objective of providing guidelines for increasing transparency in education. The toolkit addresses the nature and scope of corruption in education before delving into concrete strategies for promoting transparency. The toolkit advocates for the Transparent Education Network (TEN) – an association of individuals and organisations from the Europe & Eurasia region – framework for community development projects which involves, first, a community-led diagnostic assessment of the problems; second, awareness raising activities aimed at the community; third, alliance building with regional, national and international actors; and finally, the development of integrity packs and codes of conduct. The toolkit outlines each step, establishing clear objectives, providing detailed descriptions and a wide use of examples.

### **UNDP. 2011. *Fighting Corruption in the Education Sector: Methods, Tools and Good Practices***

<http://www.undp.org/content/dam/undp/library/Democratic%20Governance/IP/Anticorruption%20Methods%20and%20Tools%20in%20Education%20Lo%20Res.pdf>

This 2011 report by the UNDP is a comprehensive guide to addressing corruption in the education sector. The article focuses on measures in three broad categories: legal and integrity mechanisms, public and education sector reform and transparency and accountability measures. The paper examines major trends in these categories and methodically assesses the effectiveness of these in general and specific situations. The authors reach two key findings that serve as practical advice for practitioners: the first is that education sector corruption diagnostics are inadequate, and more needs to be done to measure the scope of corruption in this sector. The second finding is that the complexity of education systems makes one-size-fit-all solutions a pipe-dream. The authors recommend analysing the local circumstances carefully before applying corrective mechanisms.

### **Poisson, Muriel. 2009. *Guidelines for the design and effective use of teacher codes of conduct*. Series: Ethics and corruption in education. Paris: IIEP-UNESCO.**

<http://unesdoc.unesco.org/images/0018/001850/185010e.pdf>

These guidelines have been prepared to help countries successfully design a teacher code of conduct (or review an existing one) and put in place the appropriate mechanisms to ensure its proper dissemination, application, and monitoring at all levels of the system. They are aimed both at national and local stakeholders. They follow the major steps involved in the development of a code. For more detailed information on each aspect of the guidelines, the reader is directed to the Resources and Tools which are included in annexes.

### **GIZ. 2004. *Preventing Corruption in the Education System: A Practical Guide***

<http://www.u4.no/recommended-reading/preventing-corruption-in-the-education-system/>

This practical guide is targeted at those responsible for development cooperation projects in education. It aims to promote reform in the education sector by providing ideas and indicating ways to integrate corruption-prevention components appropriately into education projects. The guide is built around the identification of integrity vulnerabilities in terms of 1) personnel, 2) the finance and procurement system in educational institutions, 3) access to educational institutions, and 4) quality and quantity of education. The guide proceeds to point out measures to prevent corruption for each of these areas, ranging from personnel training and contracting to procurement of resources and university management. The guide offers a comprehensive look at anticorruption mechanisms and strategies directly addressed at each of these sectors as well as overarching guidelines directed at the broader education system.

## ASSESSMENT TOOLS AND DATABASES

The World Bank and OECD databases on economic development feature numerous indicators related to education, including enrolment and investment in education. These, however, do not provide comprehensive data specifically on corruption in the education sector. Transparency International's Global Corruption Barometer identifies corruption perception trends worldwide for education services and professionals.

**Transparency International. 2017. Monitoring corruption and anticorruption in the SDGs: A resource guide**

[http://www.transparency.org/whatwedo/publication/monitoring\\_corruption\\_and\\_anti\\_corruption\\_in\\_the\\_sustainable\\_development\\_go](http://www.transparency.org/whatwedo/publication/monitoring_corruption_and_anti_corruption_in_the_sustainable_development_go)

As part of its follow-up and review mechanisms for the United Nations Sustainable Development Goals (SDGs), member states are encouraged to conduct regular national reviews of progress made towards the achievement of these goals through an inclusive, voluntary and country-led process. This guide is intended to explain the role of civil society organisations in monitoring corruption in the SDGs, as well as how to identify potential indicators and data sources for this purpose. Throughout the guide, there are country examples of indicator selection, inclusive follow-up review processes and approaches to corruption monitoring. A chapter is dedicated to mainstreaming anticorruption in monitoring SDG 4.

**International Institute for Education Planning. ETICO resource platform on ethics and corruption in education**

<http://etico.iiep.unesco.org/>

This is a web-based resource platform focused on issues surrounding ethics and corruption in education. The platform provides easy access to IIEP's research and training materials. It also features more than 640 references on publications, projects, policies, and norms; thematic pages on key issues in the area of ethics and corruption in education; a glossary with definitions of the most important terms used in the fight against corruption in education; a blog that offers the global anti-corruption community a space to publish new ideas and discuss them; a media library; and a selection of over 1,000 newspaper articles on corruption in education issues from all over the world going back to 2001.

**Centre for International Higher Education: Higher Education Corruption Monitor**

<http://www.bc.edu/research/cihe/>

The Higher Education Corruption Monitor is a knowledge depository set up by the CIHE to monitor news articles related to higher education corruption in English-language news outlets around the world. It features a search engine to filter these articles, categorizing them into three categories: (1) general corruption, (2) corruption in examination and admissions, and (3) degree fraud.

**Council for Higher Education Accreditation. 2013. Important Questions about Accreditation, Degree Mills and Accreditation Mills**

<http://www.chea.org/degremills/default.htm>

The CHEA is a U.S.-based institution which aims to educate citizens and public officials about accreditation fraud and seeks to advocate for stronger legislation regarding the issue. The CHEA has produced a number of documents related to accreditation fraud including this web-entry which provides information about accreditation fraud. The webpage provides a tool to assess whether an institution is a degree/accreditation mill. The webpage also includes a link to a database of recognised U.S. accrediting institutions.

**RESOURCES FROM THE ANTICORRUPTION HELPDESK**

**Sofia Wickberg. 2013. Literature review on corruption in higher education.**

Available on request at: [tihelpdesk@transparency.org](mailto:tihelpdesk@transparency.org)

Corruption in higher education is a universal problem that takes various forms across regions, countries and institutions. Corruption in this sector can be found both at the systemic (fraud, undue influence, false accreditations etc.) and individual (academic misbehaviour, plagiarism, cheating etc.) levels. Corruption in higher education has significant social and economic consequences because of the crucial role that universities play in societies, both as a neutral point of reference and as a “future-leader maker”. Corruption undermines the integrity and the quality of academic research and diverts higher education from its fundamental goals. This paper provides a non-exhaustive list of relevant readings on the various corruption challenges in higher education



**Marie Chene. 2012. *Fighting corruption in education in fragile states.***

[https://www.transparency.org/whatwedo/answer/fighting\\_corruption\\_in\\_education\\_in\\_fragile\\_states](https://www.transparency.org/whatwedo/answer/fighting_corruption_in_education_in_fragile_states)

Fighting corruption in education has the potential to mitigate some of the root causes of fragility and restore citizens' trust in the government's capacity to deliver public services. Corruption can occur at all stages of the education service delivery chain, from school planning and management, to student admissions and examinations as well as to teacher management and professional conduct. These risks can be exacerbated in fragile settings, which are often characterised by weak governance structures, limited infrastructures, inadequate political leadership and reduced human, organisational and institutional capacity of government. There is still relatively little evidence of what comprises good practice on how to fight corruption in fragile states, including as it relates to the education sector. Recommendations typically include the establishment of transparent regulations and procedures, reforms of the procurement and public finance management (PFM) system, transparent teacher management systems, the introduction of codes of conduct for educational staff, robust information systems in the area of teacher registration and management, examination and access to university. Social accountability initiatives also have potential and may be the most viable option in some challenging environments.

**Marie Chene. 2009. *Gender, corruption and education.***

<http://www.u4.no/publications/gender-corruption-and-education/>

There are few governance indicators that systematically capture the gender dimension of corruption in education. However, there is a growing consensus that corruption undermines the quality and quantity of public services, and reduces the resources available for the poor and women, ultimately exacerbating social and gender disparities. Corruption hits disadvantaged groups – including women – harder, as they rely more on state infrastructure, have fewer resources to make informal payments to access education services and less recourse to legal protection. Women are also more vulnerable to specific forms of corruption such as sexual extortion in exchange for schooling, good grades and other school privileges. There is no empirical evidence available on the long term impact of corruption on gender disparities in the education sector. However, there is a general consensus that such practices have long term consequences on women's education outcomes, psychological and physical health as well as gender equity, ultimately affecting long term social and economic progress.

## **SELECTED ACTORS AND STAKEHOLDERS**

### **UNESCO**

<http://www.unesco.org/new/es>

UNESCO is the UN Agency responsible for topics in education. The agency is an advocate for free and accessible primary education, and has worked under this mandate on several anticorruption projects in education particularly through its specialized institute IIEP (see below). UNESCO has several programmes and documents related to education governance and accountability.

### **UNESCO International Institute for Education Planning (IIEP)**

<http://www.iiep.unesco.org/en/our-mission/ethics-and-corruption>

A capacity building institute within UNESCO, the IIEP runs the Ethics and Corruption in Education Programme, which is aimed at reshaping educational planning by taking into account transparency and accountability concerns. As part of its Ethics and Corruption in Education Programme, IIEP has published more than 15 books on issues such as reducing corruption in fund allocation to schools, transparency in teacher management, adverse effects of private tutoring, academic and accreditation fraud among others. It trained more than 2,200 people on transparency, accountability, and anti-corruption issues in the education sector. Finally, it provides support to countries that are in the process of conducting an integrity assessment of their education sector, of launching a public expenditure tracking surveys (PETS), or of designing a teacher code of conduct. The Institute manages the ETICO online resource platform.

### **Education International**

[http://www.ei-ie.org/en/websections/content\\_detail/3247](http://www.ei-ie.org/en/websections/content_detail/3247)

Education International is a federation of education workers' unions and individual teachers which promotes equity and quality in education, both for students and for teachers. The federation is an advocate for good governance in regards to education and has frequently spoken out against mismanagement of funds destined for education, corruption in procurement and corruption at point-of-service in education systems.

### **Open Society Institute**

<https://www.opensocietyfoundations.org/>

The Open Society Institute has two operative areas, one on Education and Youth, another on Governance and Accountability, which frequently overlap to produce research and to fund projects related to education system integrity. Their website has access to national case studies in Northern Africa and South-eastern Europe, as well as several documents dealing directly with transparency and accountability in the education sector. They have worked with local anticorruption advocates like Anticorruption Student Network in South East Europe (ACSN SEE) and experts on these matters to add to their research.

### **Anticorruption Student Network in South East Europe**

<http://www.bos.rs/cde-eng/implemented-projects/309/2013/10/15/anticorruption-student-network-in-south-east-europe.html>

Beginning in 2006, this coalition of students and higher education institutions in South Europe was formed to provide a collaborative space to identify corruption problems in higher education and to give students tools and formal avenues through which to identify and fight against corruption. The coalition has produced some research related to these topics and currently translating them into English. The coalition is made up of actors for Serbia, Macedonia, Croatia, Bulgaria, and Moldova.









A photograph of a hospital room. In the background, there is a white wall with medical equipment, including a power outlet and a device with various tubes and wires. To the right, there are colorful, striped curtains. The floor is a light-colored, polished surface. The text "CORRUPTION IN HEALTH SERVICES" is overlaid in the center in a large, bold, white font, flanked by two horizontal white lines.

# **CORRUPTION IN HEALTH SERVICES**

# WHY FIGHT CORRUPTION IN THE HEALTH SECTOR?

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**Access to healthcare is one of the fundamental rights of every human being, enshrined in the International Covenant on Economic, Social and Cultural Rights.**

It is fundamental to people's well-being and quality of life and an essential condition to inclusive human and economic development. As part of the 2030 Agenda for Sustainable Development, leaders from the world have committed to "ensure healthy lives and promote well-being for all at all ages" (SDG 3) by 2030.

Corruption in the health sector is a major impediment to these commitments. Empirical evidence shows that corruption reduces immunisation rates, delays the vaccination of new-borns, discourages the use of public health clinics, reduces satisfaction of households with public health services and increases waiting time at health clinics.<sup>94</sup> Corruption reduces public resources available for medical equipment, drugs, and salaries,<sup>95</sup> thereby undermining the quantity and quality of health services and of patient care.<sup>96</sup> It increases the risks of malpractice and hospital infections. It distorts health policies, denies citizens access to hospitals, medicines and qualified staff and undermines efforts to combat major health challenges, such as malaria and HIV/AIDS. This in turn has a direct negative effect on mortality rates and child mortality rates<sup>97</sup> and life expectancies at birth,<sup>98</sup> and leads to higher incidences of epidemics and disease.<sup>99</sup> Addressing corruption in the health sector is a matter of life and death.

Corruption in health services also has major economic impacts, raising the cost of healthcare for individuals, healthcare institutions and society in general.<sup>100</sup> Corruption also increases the cost of providing healthcare to citizens on an aggregate scale, as poor healthcare provision may result in incorrect diagnosis or inefficient treatments, which may evolve into other, more costly health conditions. Similarly, as low-quality prevention systems within healthcare lead to more serious disease outbreaks, corruption at the level of primary care provision can generate additional strains on public health systems.<sup>101</sup>

Corruption in healthcare also has significant effects on the persistence of poverty in developing countries.<sup>102</sup> As they are more reliant on public services to access healthcare, the poor are disproportionately affected by the impact of corruption in the health sector. In addition, corruption in healthcare can have negative effects on productivity and working hours, undermining people's livelihood as well as economic development and growth prospects.<sup>103</sup>

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## BOX 7: CORRUPTION AND THE OUTBREAK AND MANAGEMENT OF THE EBOLA CRISIS<sup>104</sup>

Between 2013 and 2015, the Ebola virus claimed thousands of lives, devastating fragile healthcare systems and ravaging the economies and societies of Sierra Leone, Liberia and Guinea-Conakry. Large flows of aid were channelled to these countries with weak institutions and governance structures to contain the epidemic. Corruption was a particular challenge for these countries' strained health systems, fuelling low trust levels in government institutions and leading Ebola-affected communities to resist the efforts of medical personnel to isolate and treat victims, collect data and dead bodies. Corruption further undermined efforts to contain and mitigate the disease, with diversion of relief funding and supplies, mismanagement by public officials and petty corruption compromising containment measures, such as roadblocks, quarantines, body collection and burials.

Yet, corruption in the health sector is widespread in many countries. World Bank surveys suggest that, in some countries, up to 80 per cent of non-salary health funds never reach local facilities.<sup>105</sup> There are a number of factors that make the health sector particularly vulnerable to corruption. Health systems are characterised by complex administrative structures and involve large-scale investments as well as a large number of public and private providers, making it harder to establish effective accountability systems.

At the same time, there are vast funds at stake and these financial flows are attractive targets for abuse. According to a 2008 WHO report, total expenditures on health worldwide represent 8 per cent of the world's GDP. Every year, more than US\$3 trillion is spent on health services globally, primarily financed by taxpayers.<sup>106</sup> The sector is also characterised by a fundamental imbalance of information between health practitioners and patients and risks of conflicts of interest between health officials and private companies.

## KEY ISSUES AND CHALLENGES

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### Forms of corruption in healthcare

All major forms of corruption are present in the health sector, ranging from petty bribery and nepotism to informal payments and mismanagement of resources, absenteeism and state capture. In many countries, health services are also affected by various forms of clientelism as personal relationships between patients, doctors or even key bureaucrats help people gain access to healthcare programmes take the form of patron-client relationships.

Corruption can affect every stage of the health service delivery chain, including policy formulation, management of organisational resources and procurement of medical supplies, as well as bribery and extortion at the point of service delivery. Areas that are particularly vulnerable to corruption include:<sup>107</sup>

1. provision of services by medical personnel
2. human resources management
3. drug selection and use
4. procurement of drugs and medical equipment
5. distribution and storage of drugs
6. regulatory systems
7. budgeting and pricing

As part of general healthcare reforms in certain regions, such as in Eastern and Southern Europe, other areas of vulnerability include the construction and equipping of new healthcare centres as public-private partnership projects, with specific corruption risks associated with such partnerships. Often these centres may become hotbeds of corruption when considering the types of machineries being purchased and used. In other countries, special healthcare programmes (such as prevention, monitoring and educational programmes) are not available to all, particularly not low-income and indigenous populations.<sup>108</sup>

These vulnerabilities across the health service delivery chain can be synthesised, as highlighted in the diagram on the following page.

**Figure 3: Analysis of corruption along the health sector value chain**





## POLICY FORMULATION

Governments are responsible for ensuring that health professionals are qualified and licensed and that health products, services and drugs are safe and effective.<sup>109</sup> At the policy stage, undue influence by interest groups can affect the design of health policies to the benefit of a particular societal group – usually the rich and the powerful – at the expense of others. For example, priority can be given to tertiary hospitals using costly equipment to the detriment of smaller primary care clinics that are left with inadequate staffing and equipment.

An area of particular concern at the regulatory level in the health sector is the registration and approval process of new drugs and the establishment of national lists of essential medicines.<sup>110</sup> The uneasy relationship between pharmaceutical companies, governments and health professionals, exacerbated by dubious lobbying and marketing practices make this process particularly vulnerable to capture by private interests. In many countries, including developed countries, pharmaceutical companies lobby and bribe government officials to favour their companies or have their drugs approved by the national drug monitoring agency.

## ORGANISATIONAL RESOURCES

As with other public services, the health sector is characterised by large flows of money, specialised equipment and complex organisational structures, which makes the management of organisational resources, such as personnel, goods, supplies and budgets particularly complex and vulnerable to corruption.

Procurement of medical services and supplies are especially at risk of corruption, due to the high costs and technical complexity of medicine, machinery and specialist services (for example, specialised equipment maintenance). Private companies often compete for a few, but highly lucrative contracts, providing incentives for corruption and rent-seeking. In addition, pharmaceutical and medical supply companies often have more information about their products than the purchasing public officials, resulting in an information asymmetry that can be manipulated for corrupt purposes. As a result, budgets can be distorted with large portions of healthcare centre budgets diverted to purchase equipment and drugs that are not needed or in unjustified quantities. Bribery, undue influence through lobbying and gift-giving may distort medical considerations during contract negotiations. When medical professionals are not consulted during the

procurement process, contracts can be loaded with vague or unnecessary equipment and inputs. Further risks in the selection process include kickbacks from suppliers and payoffs so that selected drugs are not necessarily the most appropriate or cost-effective.

Fraud and embezzlement can lead to the provision of substandard goods and services, resulting in the supply of faulty equipment or weak, dangerous, useless or even counterfeited pharmaceutical drugs.<sup>111</sup>

Theft of medical supplies and budget leakages lead to drug shortages and poor-quality services. In Cambodia, it is estimated that between 5 per cent and 10 per cent of the health budget disappears before it is even transferred from the Ministry of Finance to the Ministry of Health. In Kenya in 2004, the US\$41 million allocated to set up the National Aids Control Council was marred by corruption.<sup>112</sup> Such egregious budgetary practices have direct effects on target populations, denying millions access to essential medicines and proper treatment.

The management of health personnel, including appointment, training, promotion and compensation can also be affected by bribery, patronage and nepotism. In many developing countries, the quality of public service delivery is seriously undermined by high rates of absenteeism among medical staff.<sup>113</sup>

## SERVICE DELIVERY/CLIENT INTERFACE

In many developing countries, corruption at the point of service delivery takes the form of extortive bribery, where doctors and nurses charge small informal payments to patients to supplement incomes, especially in countries where wages are below living standards. They may demand bribes for medication or services which should be free such as beds, bandages or anaesthetics.

There have been documented instances of collusive bribery between patients and healthcare professionals. Under the table payments can be made to medical staff for preferential treatment, timely care, better drugs and so on. Patients may bribe health professionals to obtain drugs that were not prescribed to them or to “skip the line” in operation or organ donation lists. The use of fraudulent prescriptions is an important factor in the illegal commerce of prescription drugs.<sup>114</sup>

However, corruption at the point of service delivery does not always involve any monetary transfer between medical professionals and patients. Physicians may provide preferential treatment to family members and friends, treating them first or in a better manner than those patients that need the service most. For severe

conditions that require organ transplant, for example, this practice can mean the difference between life and death.

Corruption in payment systems is also an area of concern in many countries, including waiving fees or falsifying insurance documents for particular patients or using hospital budgets to benefit favoured individuals. Risks also include the illegal billing of insurance companies, government or patients for services that are not covered or carried out, as well as the falsification of invoice records, receipt books or utilisation records, or creation of “ghost” patients.<sup>115</sup>

Doctors may perform unnecessary medical interventions to maximise fee revenue. Illegal referral of patients to specific private pharmacies to purchase prescribed medicines that are not on the supply list of the public facility is common practice, resulting from unethical arrangements between pharmacies/pharmaceutical companies and doctors. Some pharmaceutical companies use aggressive marketing practices and gift-giving to influence individual doctors to favour their company's drugs at the time of prescription. In countries such as the US, some doctors are practically paid by pharmaceutical companies to prescribe their drugs, sometimes on a commission basis.<sup>116</sup> This type of influence may not always be illegal, but it may significantly influence the quality of healthcare provided and the types of drugs available to patients.<sup>117</sup>

It is also common for doctors in developing countries to run their own private practices while on the public health system payroll as a coping strategy to supplement their wages. Doctors are then likely to refer their public patients to their own private clinics, depriving the poorer clients of quality treatment and fuelling inequalities in access to healthcare.

## Challenges for addressing corruption in health

Healthcare provision is extremely complex, with an intermingling of private and public actors, different government levels involved, weak and under-resourced regulatory systems, complicated health insurance systems, opaque relations between medical suppliers, healthcare providers and policy makers. Regulators, payers, healthcare providers, suppliers and consumers face a complex mix of incentives that pose major challenges for anti-corruption measures. In addition, health markets are often extremely volatile, leading to fluctuations in prices for pharmaceuticals and equipment which can make overpricing and accounting fraud easy to commit and difficult to detect. This

exacerbates the challenge of generating and analysing information, and distinguishing between corruption, inefficiency and honest mistakes.<sup>118</sup>

The fact that healthcare needs and outbreaks of diseases can be difficult to anticipate also makes it challenging for policy makers to effectively plan, manage resources and design robust health insurance schemes. The risk of corruption is even higher in emergency situations such as humanitarian crises, when medical care is needed urgently and oversight mechanisms are often bypassed.<sup>119</sup> Similarly, at the level of individual patients, combatting corruption in healthcare is problematic due to the emergency nature of many healthcare interventions: in life or death situations, corruption may be the only option, and critically ill patients are rarely in a position to make formal complaints.<sup>120</sup>

Another challenge is related to the asymmetry of information between doctors and patients who know more about what ails patients than the patients themselves. Particularly in public-private partnerships where private providers are contracted by the state to offer healthcare, this can leave patients vulnerable to over-diagnosis and maltreatment in facilities which may be unaccountable and poorly regulated.<sup>121</sup> Likewise, pharmaceutical companies know more about their products than public officials responsible for purchasing them. Knowledge in these cases gives enormous power to medical professionals and pharmaceutical companies who can misuse their power and information for private gain.

As healthcare provision is easily associated with issues of interpersonal trust, favouritism and patronage in the relationships between healthcare service providers and seekers, there may be many societal and cultural conditions under which transparency and corruption are not opposite poles. In countries where face-to-face and informal relations are the norm, it may be less important to promote anti-bribery and gift policies than to grant efficient and fair access to services among the population.<sup>122</sup>

Finally, the health sector in many countries is understaffed and under-resourced. In India, where 47 per cent of children are underweight,<sup>123</sup> public spending on healthcare hovers around 1 per cent of GDP and the majority of this is typically on recurrent items like salaries, rather than capital investment in infrastructure or capacity building.<sup>124</sup> Doctors and healthcare professionals operate under poor and stressful working conditions and, in many cases, deal with delayed pay, no vacation days or long working hours. In many situations, corruption is a coping strategy for health professionals to supplement their meagre income or repay costly medical school bills.

# APPROACHES TO ADDRESS CORRUPTION IN THE HEALTH SECTOR

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## Budget transparency and oversight

Budget transparency can limit opportunities for the budget to be misused to serve vested interests. Governments and health authorities need to publish regularly updated information on health budgets and performance at the national and local levels and ideally by individual clinics. The information needs to be published in easy-to-understand formats and in plain language to enhance transparency and possibilities for public scrutiny. Participatory budgeting has also been used as a tool to enhance transparency and accountability by providing citizens with an opportunity to participate in the budget from the formulation stage. Government departments, hospitals, health insurance entities and other agencies handling health resources also need to be subject to robust oversight mechanisms. Regular external and internal audits can help ensure budgets are allocated and spent appropriately.

## Codes of conduct and prevention of conflicts of interest

Codes of conduct for physicians date back as far as the Hippocratic Oath. Raising ethical standards among health professionals, including regulators, medical practitioners, pharmacists and health administrators can be done through the promotion of codes of conduct combined with ethical training across the health system. These codes can be developed by professional bodies, such as doctors' associations, or published by health ministries. They should cover the prevention of conflicts of interest, provide for effective and dissuasive sanctions for breaches of the code and include enforcement mechanisms overseen by an independent body. Sanctions for non-compliance can range from debarment from practising and temporary or permanent revocation of licences to fines and criminal sanctions.

It is also important that pharmaceutical, biotech and medical device companies commit to refraining from bribery, adopt and enforce robust anti-corruption programmes and policies such as Transparency International's Business Principles for Countering Bribery. Codes of conduct should disqualify individuals or groups with interests in the manufacturer from participating in clinical drug trials. Similarly, regulators and medical licensing authorities need to define specific conflict of interest rules for physicians, regulate the promotion of medicines, restrict the ability of doctors to overprescribe drugs, and ensure closer monitoring of relationships between health departments and the pharmaceutical industry.<sup>125</sup>

## Proactive transparency: price indexes and citizen rights

Transparency can go a long way to help prevent corruption at all stages of the health delivery chain.

At the procurement stage, public disclosure of medical goods' supply prices can help prevent collusion. Government ministries can cooperate with private companies to update and publish market prices related to medical equipment and pharmaceutical supplies to keep hospitals and other healthcare facilities from being overcharged. This includes establishing lists of reliable and well performing suppliers as well as making price information widely available and providing information on the availability of less expensive drugs by smaller pharma companies. At the global level, initiatives such as the WHO's Drug Price Information Service or the MSH International Price Guide aim to make price information more widely available to allow comparisons in order to improve procurement of medicines for the lowest possible price.<sup>126</sup>

## BOX 8: THE IMPACT OF PRICE TRANSPARENCY ON HOSPITAL CORRUPTION IN BUENOS AIRES<sup>127</sup>

In the late 1990s, the city of Buenos Aires started collecting information about prices paid for a wide range of medical supplies – including needles, syringes, intravenous solutions, x-ray films and sanitary materials – and reported back this information to hospital procurement offices, allowing comparisons for basic medical goods and services. The publication of hospital procurement prices revealed a very wide dispersion of prices, up to 10 times higher in some facilities than in others. Purchase prices for the monitored items immediately fell by an average of 12 per cent, possibly due to fear of detection by corrupt procurement officers. Prices eventually began to rise again, but stayed below the baseline purchase price. However, lessons from this experiment establish that, unless there are consequences for fraud and malpractices, monitoring and publishing price information is unlikely to guarantee sustained gains over time.

Information about tender processes, including offers to tender, terms and conditions, the evaluation process and final award decisions should be made publicly available online and subject to public scrutiny.

Integrity pacts can also be used for preventing corruption in health procurement. These consist of a signed document committing a contracting authority and all bidders to comply with best practice and maximum transparency. They are typically monitored by a third independent actor, usually a civil society organisation.

The public also need to be informed on drug development and effectiveness. Medical associations can provide governments with information about drug trials, composition, effectiveness and adverse effects. Effective nationwide systems for reporting adverse drug effects can be established and physicians incentivised to report such effects. Reporting by the drug industry on clinical drug trials should also be made mandatory and a public database listing the protocols and results of all clinical drug trials be accessible to the public.

There online platforms that publicise the findings of drug trials, such as the WHO's clinical trial database or the US National Institute of Health's ClinicalTrials.gov database. All financial contributions made to medical research units from pharmaceutical companies should also be disclosed.<sup>128</sup>

Proactive transparency can be useful at the point of service delivery to inform citizens about their rights and entitlements when accessing health services. This includes their rights to privacy and the cost of the services to prevent patients from being charged for services that are supposed to be free.

## Management of HR resources

As with other public services, HR management provides many entry points to raise the ethical standards of health professionals. Expectations for ethical behaviours are typically communicated to staff via codes of conduct and training programmes. But ethical behaviour can also be influenced by mainstreaming ethical values in HR processes. This can include transparent and merit-based recruitment that screens candidates for ethical behaviour, adequate and fair compensation systems, performance appraisals that consider not only technical and team factors but also ethical standards, on-going personnel development and career management that rewards ethics, restrictions to external activities and outside interests of staff to prevent conflicts of interests and effective disciplinary policies in the event of wrongdoing.<sup>129</sup>

## Health information management systems

Transparency in the health sector can be supported by information management systems and access to information mechanisms for both regulatory agencies as well as by the public.

Integrated management systems aim to store a wide range of health-related data within a centralised and coordinated system of data management. This can include data related to beneficiary, health facilities and practitioners, the flow and management of funds, the financial status of the different entities of the system, the costs and quality of health services delivered, contract management with health insurers and health providers, and the prices and quality control of drugs.



Integrated management systems allow oversight and regulatory institutions to analyse large quantities of data to assess the effectiveness of doctors and services, the prescription rates of certain medicines, and the effectiveness of procured drugs and equipment, among others. These systems, though costly (in both resources and time) to implement, allow for fast diagnoses of problems and can prove effective in identifying issues with medical professionals and input suppliers.<sup>130</sup> Leveraging ICT for managing health resources through the development and implementation of a comprehensive health management information system can be an important tool to detect and address areas of vulnerability. A pre-requisite is to ensure a good and accountable management of data, especially sensitive information and big data on patients that may, in cases of misconduct, be misused by private entities for marketing purposes.

## Quality control testing

Establishing and enforcing quality standards in healthcare services is a good starting point to tackle corruption. By developing quality standards and testing hospital performance against these criteria, anti-corruption practitioners can identify problem areas and red flags in service delivery. Rating systems can also be used to incentivise health service providers to raise standards. Patients can also be involved in quality control through citizen scorecards, crowdsourcing platforms and patient feedback. Quality testing is especially important for drugs and medical supplies. By testing samples distributed among patients and comparing them to standard certified drugs, effective auditing can be undertaken to identify fraudulent drugs and their suppliers.

## Complaint mechanisms and whistleblower protection

Complaint mechanisms are also important accountability mechanisms that can be instrumental to detect instances of fraud and corruption. They can provide useful insights for auditing and quality control processes undertaken by government authorities. For example, Transparency International Uganda established a monitoring system of hospitals linked to a virtual complaint mechanism. Patients are invited to present their complaints about corruption and low-quality service through these platforms. Complaints are then presented to government authorities to assist them in identifying problem areas in the hospitals.<sup>131</sup> Governments also need to introduce effective reporting channels and whistleblower protection for individuals working in procurement bodies, health authorities, health service providers and suppliers of medicines and equipment. Such approaches should also be introduced by pharmaceutical companies.

# RESOURCES ON CORRUPTION IN HEALTH SERVICES

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## BACKGROUND PAPERS AND CASE STUDIES

**Tim Macke Bryan Liang. 2013. *Combating Healthcare Corruption and Fraud with Improved Global Health Governance*.**

<https://www.semanticscholar.org/paper/Combating-healthcare-corruption-and-fraud-with-imp-Mackey-Liang/e4b6252f5a8b98df3cecad86b60952dc1baec436>

Corruption poses major challenges to global health outcomes, with severe financial and health consequences. Yet, endemic forms of corruption affect global health systems worldwide in public and private sectors, and in developed and resource-poor settings alike. Fraud and misuse of resources in global health initiatives also undermine future investment. Current domestic and sectoral-level responses are fragmented and have been criticised as ineffective. To address this issue, the authors propose a global health governance framework calling for international recognition of “global health corruption” and development of a treaty protocol to combat this crucial issue.

**European Commission. 2013. *Study on Corruption in the Healthcare Sector*.**

[https://ec.europa.eu/home-affairs/sites/homeaffairs/files/what-is-new/news/news/docs/20131219\\_study\\_on\\_corruption\\_in\\_the\\_healthcare\\_sector\\_en.pdf](https://ec.europa.eu/home-affairs/sites/homeaffairs/files/what-is-new/news/news/docs/20131219_study_on_corruption_in_the_healthcare_sector_en.pdf)

This study aims to promote a better understanding of the extent, nature and impact of corrupt practices in the healthcare sector across the EU and to assess the capacity of the member states to prevent and control corruption within the healthcare system. It also considers the effectiveness of these measures in practice, with a particular focus on medical service delivery; procurement and certification of medical devices; and procurement and authorisation of pharmaceuticals. The latter part of the study explains current anti-corruption efforts in the health sector and provides general recommendations that are applicable to medium and high-income countries. The report finds that what is needed is a combination of effective generic anti-corruption policies and practices (legislation, enforcement), policies and practices aimed

at addressing fundamental health system weaknesses (managerial and financial), a general rejection of corruption by society (including a self-regulation by health sector actors), as well as specific anti-corruption policies and practices in healthcare.

**Jillian Kohler & Natalia Ovtcharenko. 2013. *Good Governance for Medicines Initiatives: Exploring Lessons Learned*. U4 Issue 2013:3.**

<http://www.u4.no/publications/good-governance-for-medicines-initiatives-exploring-lessons-learned/>

Corruption in the pharmaceutical system results in wasted resources, limited access to health services and poorer outcomes. This U4 Issue paper explores select global initiatives promoting good governance and medicines by the World Bank, WHO, Global Fund and the Medicines Transparency Alliance that have been applied since the year 2000. These initiatives have been particularly useful in generating greater awareness about the issue, as well as fostering political and policy dialogue around the issue of pharmaceutical good governance systems.

The initiatives are found to have some success in identifying weaknesses in the pharmaceutical system and providing baseline data. They have also created important multi-stakeholder alliances and implemented sector-specific governance initiatives. However, a significant gap between the identification of problems, the strategic design to address problems and their implementation remain. Recommendations include the need for political analysis, and monitoring and evaluation – particularly in the measurement of results – and the streamlining and uniformity of assessment tools across institutions.

**Soren Holmber and Bo Rothstein. 2010. *Dying of Corruption*. Health Economics, Policy and Law.**

<http://www.tryggaremanskligare.goteborg.se/pdf/kalendarium/Korruption2.pdf>

In many poor countries, over 80 per cent of the population have experienced corrupt practices in the health sector, while in rich countries, corruption takes other forms, such as overbilling. This article explores

the correlation between corruption, healthcare quality and health indicators, by reviewing the literature and then running regressions based on the assumptions of previous theoretical studies. Using cross-sectional data from more than 120 countries, this paper finds that a quality of government variable is positively associated with higher levels of life expectancy, lower levels of mortality rates for children and mothers, higher levels of healthy life expectancies and higher levels of subjective health feelings. In contrast to the strong relationships between the quality of government variables and health indicators, the relationship between the health-spending measures and population health are rather weak most of the time and occasionally non-existent. The authors conclude improving health levels around the world, in rich countries as well as in poor countries, will require improved quality of government rather than spending. A secondary finding is that healthcare systems primarily financed with public rather than private money are more effective.

**Taryn Vian and Carin Nordberg. 2008. *Corruption in the Health Sector. Bergen: Chr. Michelsen Institute. U4 Issue 2008:10.***

<http://www.u4.no/publications/corruption-in-the-health-sector-2/>

This comprehensive article outlines the complexities of fighting corruption in the health sector, providing an elaborate overview of the factors that contribute to health sector corruption. It focuses on procurement and financial resources management, the management of medical supplies and healthcare provider-patient relationships. It provides several strategies to combat corruption in health, including budget transparency and participation, improved resource control and accounting systems, decentralisation, tracking resource flows and information campaigns. The paper concludes with a literature review of important material on healthcare corruption.

**William Savedoff. 2008. *The Impact of Information and Accountability on Hospital Procurement Corruption in Argentina and Bolivia. U4 Brief.***

<http://www.bu.edu/actforhealth/pdf/the-impact-of-information.pdf>

Argentina and Bolivia have both attempted to curb corruption in the procurement of hospital supplies by monitoring and publicising information on prices. In the late 1990s, the city Buenos Aires collected information about prices paid for a wide range of non-pharmaceutical medical supplies commonly purchased by hospitals, allowing a comparison of the prices that

different hospitals paid. Data collected showed that the dispersion of prices, as well as the average price, fell quite dramatically in the first months of the experiment. In the same period, Bolivia devolved numerous responsibilities to municipalities and to representative bodies that included local citizens. Local supervision appeared to be more effective at controlling corruption than the standard “vertical” controls embedded in the management and administrative channels of the public health system. However, lessons drawn from these experiences suggest that, unless there are consequences attached to identified malpractice, monitoring and publicising information will not guarantee sustained gains.

**Jillian Cohen, Monique Mrazek & Lorraine Hawkins. 2007. *Corruption and Pharmaceuticals: Strengthening Good Governance to Improve Access.***

<https://openknowledge.worldbank.org/bitstream/handle/10986/6848/399850REPLACEMENT101OFFICIAL0USE0ONLY1.pdf?sequence=1&isAllowed=y>

Inequalities in access to pharmaceuticals are caused by many variables, including poverty, high drug prices, and poor health infrastructure and corruption, and has a devastating impact on a country's health outcomes. Inadequate quality control regulations can result in unsafe counterfeit drugs, with severe health and economic consequences. Capture of the pharmaceutical regulatory system can result in irrational public spending on medicines that are appropriate, effective or even safe.

The chapter of “*The many faces of corruption: tracking vulnerabilities at the sector level*” provides an overview of the pharmaceutical sector's vulnerabilities to corruption, provides examples of how corruption occurs, highlights diagnostic tools for detecting it and offers recommendations designed to minimise its occurrence.

**Transparency International. 2006. *Global Corruption Report: Corruption and Health.***

[http://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2006\\_corruption\\_and\\_health](http://www.transparency.org/whatwedo/publication/global_corruption_report_2006_corruption_and_health)

The Global Corruption Report 2006 focused on corruption and health. The book includes expert reports on the risks of corruption in different healthcare systems; the scale of the problem, from high-level corruption in Costa Rica and counterfeit medicines in Nigeria to healthcare fraud in the United States; the costs of corruption in hospital administration and

the problem of informal payments for healthcare; the impact of corruption at various points of the pharmaceutical chain; and anti-corruption challenges posed by the fight against HIV/AIDS.

**Rafael Di Tella, and Ernesto Schargrodsky. 2003. *The Role of Wages and Auditing during a Crackdown on Corruption in the City of Buenos Aires. Journal of Law & Economics* 46, no. 1 (April 2003): 269–92.**

<http://www.people.hbs.edu/rditella/papers/JLECorrHospital.pdf>

This study measured the effects anti-corruption campaigns have on the prices that hospitals pay for basic equipment, pharmaceuticals and hygiene products in Argentine hospitals. The study finds that during the anti-corruption campaigns (which involved specialised auditing of hospital accounts), prices paid for these inputs tended to drop. The authors found that, while increasing wages in the hospitals also led to a drop in prices, anti-corruption campaigns had a greater effect.

## STANDARDS AND GUIDELINES

### **World Medical Association's International Code of Medical Ethics.**

<https://history.nih.gov/research/downloads/ICME.pdf>

The International Code of Medical Ethics, first adopted in 1949 and last amended in 2006, establishes a code to which all medical physicians should adhere. The code is meant to complement and guide existing national medical codes. The code gives three specific nodes to healthcare sector integrity namely: i) physicians shall not allow their judgement to be influenced by personal profit or unfair discrimination; ii) physicians shall deal honestly with patients and colleagues, and report to the appropriate authorities those physicians who practice unethically or incompetently or who engage in fraud or deception; and iii) a physician shall not receive any financial benefits or other incentives solely for referring patients or prescribing specific products.

### **European Association Medical Devices of Notified Bodies (TEAM NB) Code of Conduct.**

<http://www.team-nb.org/wp-content/uploads/2015/05/documents2015/CodeofConductMedicalNotifiedbodiesv3-3dd14-1-2015.pdf>

This code of conduct is directed at medical equipment manufacturers and health procurement officials and aims to provide an ethical framework to follow when contracting or buying medical equipment. Among its central policies is the use of a common certification system to grade quality.

### **World Health Organisation. 2014. *Good Governance for Medicines Model Framework.***

[http://www.who.int/medicines/areas/governance/ggm\\_modelframe\\_updated/en/](http://www.who.int/medicines/areas/governance/ggm_modelframe_updated/en/)

The model framework for good governance for medicines is intended to be a guideline and can be adapted by each country according to its needs. It includes the basic components required by the Good Governance for Medicines programme and steps necessary to achieve these. This framework is comprised of two major complementary strategies: i) a value base strategy that includes the definition of key ethical principles, a code of conduct, the “socialisation” of the key ethical principles and the promotion of ethical leadership; and ii) a discipline-based strategy covering enforcement of existing anti-corruption legislation, mechanisms for whistleblowing, sanctions on reprehensible acts, transparent and accountable regulations and administrative procedure, collaboration among anti-corruption and transparency initiatives and management, coordination and evaluation. The first edition was published in 2008 and is revised annually by experts and country representatives. The framework was updated in 2014.



## PRACTICAL INSIGHTS: HANDBOOKS AND TOOLKITS

**Sujata Chaturvedi. 2014. *Combating Corruption in Healthcare Organisations: Methods, Tools, and Good Practices*. Medicine and Society 1 No. 2.**

<http://astrocyte.in/article.asp?issn=2349-0977;year=2014;volume=1;issue=2;spage=150;epage=153;aulast=Chaturvedi>

This article provides a comprehensive analysis of the different anti-corruption tools available for health management professionals, primarily focused on: procurement processes; so-called “speed money”; theft, pilferage and malpractices; and staff recruitment. The article details a methodology of how to choose and implement different tools, as well as a taxonomy of available tools and practices. Tools that can be used to address corruption in hospital procurement include: a two-bid system of technical and price bid; demanding users' lists, demonstration, or onsite visits to ensure equipment meets the required standard; transparency initiatives; and participation of users and anti-corruption networks. Risks of informal payments or speed money can be addressed by encouraging and facilitating users' feedback, involving hospital neighbourhoods in anti-corruption efforts and introducing video surveillance in key areas. Administrative vigilance and strict handling of the instances of theft, pilferage and malpractice are argued to serve as a deterrent. Having a labour law professional or a trustworthy NGO on recruitment panels is posited as one way of reducing corruption in recruitment, especially in the case of contractual jobs.

**Taryn Vian. 2013. *Complaints Mechanisms in Health Organisations*. Bergen: Chr. Michelsen Institute (U4 Brief 2013:6) 4 p.**

<http://www.bu.edu/actforhealth/pdf/U4-brief-2013-complaint-mechanisms.pdf>

Complaints mechanisms have been promoted as a strategy to increase transparency and accountability, providing channels for organisations to respond to individual suspicions of corruption and other grievances. This U4 Brief discusses two cases of successful complaints mechanisms, one in India and the other in the United States. These cases suggest that complaints mechanisms should be reinforced by political and judicial systems that support investigation and prosecution. A focus on individual level grievances should be balanced with institutional reforms that address any management and accountability problems that complaints may uncover.

**Taryn Vian & Laura Sabin. 2012. *Per Diem Policy Analysis Toolkit*. U4 Issue 2012:8.**

<http://www.u4.no/publications/per-diem-policy-analysis-toolkit/>

Most organisations use per diems to reimburse out-of-pocket expenses for travel and to encourage staff to attend professional development activities. However, weaknesses in policy design and control of spending can cause problems, including distortions of human resource systems, fraud and abuse by staff. Governments and NGOs need to adopt and implement fair, transparent and efficient policies which provide adequate compensation for work-related travel without creating adverse incentives.

This toolkit proposes a methodology to study per diem policies of the health sector in a given country, whether in government, international or non-governmental organisations. It presents tools designed to describe and analyse the different types of per diems, policy characteristics and control systems, per diem spending, and attitudes and perceptions of staff as a means for identifying corruption risks.

**Karen Hussman. 2011. *Addressing Corruption in the Health Sector: Securing Equitable Access to Healthcare for Everyone*. U4 Brief.**

<http://www.u4.no/publications/addressing-corruption-in-the-health-sector-securing-equitable-access-to-health-care-for-everyone/>

The development community is striving to achieve results and value for money with its investments in health around the world. Yet, donors often work in countries where the risk of corruption is high and where public management and oversight systems are weak. In many countries, international assistance has strengthened accountability bodies, such as anti-corruption commissions and the office of the auditor general. This U4 Issue aims to increase awareness of corruption in the health sector and provide practical guidance on how to identify and prevent it by: i) explaining the different forms corruption can take in the health sector; ii) identifying vulnerabilities to corruption and mitigating strategies; iii) presenting instruments to identify and track corruption in health; and iv) suggesting ways to integrate anti-corruption approaches into health sector programmes.

**UNDP. 2011. *Fighting Corruption in the Health Sector: Tools, Methods and Good Practices.***

<http://www.undp.org/content/dam/undp/library/Democratic%20Governance/IP/Anticorruption%20Methods%20and%20Tools%20in%20Health%20Lo%20Res%20final.pdf>

This publication presents methods, tools and good practices to map corruption risks, develop strategies and sustain partnerships to address challenges and tackle corruption in the health sector. This report considers several quantitative and qualitative studies that analyse and present evidence of the negative impact of corruption on health outcomes. The study reviews existing literature and discusses methods, tools and good practices on how to address corruption at various levels in the health sector. Finally, it presents concrete evidence for building multi-stakeholder partnerships, including with direct beneficiaries of the public health sector, to promote accountability and improve service delivery.

**Taryn Vian. 2009. *Approaches to Teaching and Learning About Corruption in the Health Sector. U4 Brief 2009:30.***

<http://www.u4.no/publications/approaches-to-teaching-and-learning-about-corruption-in-the-health-sector/>

This U4 Brief highlights how training and education programmes which deal with the topic of corruption and health can help change the way people approach their jobs as public administrators or development agency workers, and increase transparency and accountability. It summarises experiences and approaches to educating new and experienced public health professionals and donor agency practitioners about how to analyse problems of corruption in the health sector and design strategies to address them. Lessons learned are drawn from educational programmes which have already been developed, including a graduate-level course for in public health masters students, and professional workshops aimed at development agency staff and government officials in several countries.

## ASSESSMENT TOOLS AND DATABASES

**Transparency International. 2017. *Monitoring Corruption and Anticorruption in the SDGs: A Resource Guide.***

[http://www.transparency.org/whatwedo/publication/monitoring\\_corruption\\_and\\_anti\\_corruption\\_in\\_the\\_sustainable\\_development\\_go](http://www.transparency.org/whatwedo/publication/monitoring_corruption_and_anti_corruption_in_the_sustainable_development_go)

As part of its follow-up and review mechanisms for the SDGs, member states are encouraged to conduct regular national reviews of progress made towards the achievement of these goals through an inclusive, voluntary and country-led process. This guide explains the role of civil society organisations in monitoring corruption in the SDGs, as well as how to identify potential indicators and data sources for this purpose. Throughout the guide, there are country examples of indicator selection, inclusive follow-up review processes and approaches to corruption monitoring. A chapter is dedicated to mainstreaming anti-corruption in monitoring SDG 3.

**Management Sciences for Health. 2016. *International Drug Price Indicator Guide.***

<http://mshpriceguide.org/en/home/>

This tool by Management Sciences for Health provides practitioners and healthcare procurement agents with an effective guide of international drug prices. It obtains these prices from pharmaceutical suppliers and procurement agencies and cross-checks the prices with those obtained from international development organisations and government agencies. The tool has been active since 2001 and currently contains drug prices from 2014.

**Maureen Lewis & Gunilla Pettersson. 2009. *Governance in Healthcare Delivery: Raising Performance.***

<http://documents.worldbank.org/curated/en/792741468330936271/pdf/WPS5074.pdf>

The impacts of healthcare investments in developing and transition countries are typically measured by inputs and general health outcomes. This paper contends that measures of performance should rather reflect whether health systems are meeting their objectives and whether public resources are being used appropriately. The authors propose performance

indicators that offer the potential for comparable measures and whose collection is not overly complex nor costly. These measures, when available, are useful tools for cross-country comparisons and for tracking relative health performance, and provide the context for the discussion of good governance in health service delivery.

**Health Action International (HAI). No date. *Medicine Promotion: Assess the Nature and Extent of Countries' Pharmaceutical Promotion Control and Its Impact on Promotional Practices.***

<http://haiweb.org/wp-content/uploads/2015/05/Assessing-the-Nature-Extent-and-Impact-of-Regulation-of-Medicines-Promotion-Methodology.pdf>

With the support of the Medicines Transparency Alliance (MeTA), HAI has developed an innovative methodology to assess the nature and extent of countries' pharmaceutical promotion control. The methodology aims to investigate the regulatory framework of medicines promotion in the context of national settings. As a tool to gather data on regulation, it complements WHO's Ethical Criteria for Medicinal Drug Promotion. The project has been conducted under the guidance of an advisory group of international experts. HAI's methodology combines desk research, interviews and data collection to provide a complete profile of the national situation, highlighting the strengths and weaknesses of the regulatory framework and provide analysis of stakeholder positions.

**Brenda Waning. 2008. *Transparency and Accountability in an Electronic Era: The Case of Pharmaceutical Procurements. U4 Brief 2008:10.***

<http://www.u4.no/publications/transparency-and-accountability-in-an-electronic-era-the-case-of-pharmaceutical-procurements/>

Secrecy in the pharmaceutical industry and the intentional non-disclosure of information on medicine prices have made it difficult for purchasers to negotiate a fair price and hold procurement staff accountable for good procurement practices. In addition, procurement systems which allow critical decisions to be made by a few powerful public officials exacerbate corruption risks in the procurement of antiretroviral (ARV) medicines for treatment. Transparency of ARV prices is the first

step towards identifying and minimising corruption in procurement. Recent advances in information technology can help improve transparency in drug price information, and to help manage and store drug procurement information in electronic formats. This U4 Brief describes how international partners and national procurement agencies have used information technology to improve transparency and increase accountability in the procurement of HIV/AIDS medicines. In particular, it describes how Boston University researchers drew on publicly available data from the Global Fund to Fight AIDS, TB, and Malaria (GFATM) and WHO's Global Price Reporting Mechanism to improve transparency in medicine procurement by strengthening data quality, creating performance indicators and benchmarking reports, and promoting public dialogue.

## RESOURCES FROM THE ANTI-CORRUPTION HELPDESK

**Maira Martini. 2013. *Corruption in the Health Sector: Hospital Management, Procurement and Interest Groups' Influence.***

Available on request: [tihelpdesk@transparency.org](mailto:tihelpdesk@transparency.org)

This answer looks at corruption risks and possible solutions to prevent and combat corruption in the healthcare sector, focusing on the appointment of hospital chief executive officers, oversight practices post-hiring, procurement processes, as well as lobbying by pharmaceutical industries. In all these three areas, transparency and accountability mechanisms combined with effective and dissuasive sanctions may help to enhance quality in healthcare delivery and reduce opportunities for corruption. More specific interventions, such as the disclosure of medicine prices, the adoption of meritocratic procedures to appoint hospital directors, or the establishment of a mandatory register of lobbyists may help to further enhance transparency and therefore curb corruption.

**Marie Chêne. 2010. *Gender, Corruption and Health*.**

<http://www.u4.no/publications/gender-corruption-and-health/>

The consequences of expensive, ill-tailored, inaccessible or unsafe health products and services hit women particularly hard. This is because they often have higher and differentiated needs for health services and because they bear the brunt of inadequate services as primary providers of homecare and are less able to demand accountability and assert entitlements. Corruption in the health sector, therefore, contributes to and exacerbates persistent disparities in access to health services. This has hugely detrimental effects, not only on the health of women but also on their capabilities for educational attainment, income-generation and thus, ultimately, their status and the attainment of gender equity. Strategies to address gender disparity in access to health caused by corruption include support for women's participation in both the design of health services that are responsive to women's needs and their delivery.

**Marie Chêne. 2009. *Approaches to Corruption in Drug Management*.**

<http://www.u4.no/publications/approaches-to-corruption-in-drug-management/> There

There is a broad consensus and much anecdotal evidence that corruption in drug management affects the price, availability and quality of drugs, undermining safe and affordable access to essential medicines in many developing countries. The complexity, heavy regulation and opacity of health systems combined with the large flows of money involved provide opportunities for fraud and corruption at all points of the pharmaceutical chain, from the registration, selection, procurement to distribution and the promotion of medicines. This is likely to have a long-term impact on health and economic outcomes, especially in developing countries affected by the AIDS pandemic. A number of initiatives are currently being implemented at national and international levels to address corruption risks in drug management. Approaches to address corruption risks in drug management include the enforcement of strong and harmonised drug

regulations, the promotion of open, transparent and competitive procurement processes, the establishment of effective and participatory monitoring mechanisms, and vigorous prosecution of health related corruption. Cutting across most promising anti-corruption interventions is the need to promote transparency at all stages of the drug supply chain system, especially in the quality, availability and prices of medicines.

## SELECTED ACTORS AND STAKEHOLDERS

### **European Healthcare Fraud and Corruption Network (EHFCN).**

<http://www.ehfcn.org/>

EHFCN was created in 2004 by the EU to help member countries with enforcement activities in all areas of healthcare and pharmaceutical systems. It is a not-for-profit organisation whose members are healthcare and counter-fraud organisations in Europe.

### **Gavi Alliance.**

<http://www.gavi.org/about/>

Created in 2000, Gavi is an international organisation – a global vaccine alliance, bringing together public and private sectors with the shared goal of creating equal access to new and underused vaccines for children living in the world's poorest countries.

### **Global Healthcare Anti-Fraud Network (GHCAN).**

<http://www.ghcan.org>

GHCAN's mission is to promote partnerships and communications between international organisations to reduce and eliminate healthcare fraud around the world. GHCAN aims to further this mission by raising awareness internationally about the issue of healthcare fraud, gathering and sharing information on the trends, issues, facts and figures relating to the problem, working cooperatively to improve international standards of practice around fraud prevention, detection, investigation and prosecution and developing joint educational training programmes to bolster and prepare the world's healthcare anti-fraud professionals.



**Health Action International.**

<http://www.haiweb.org>

HAI works to increase access and improve the rational use of essential medicines. Since 2001, it has partnered with the WHO to provide technical guidance on drug price monitoring and drug usage monitoring. Two of its most important programmes relate directly to healthcare integrity: one concerning international drug price monitoring and another on conflicts of interest. The former is not only concerned with drug prices but also the process of evaluation of prices by procurement agencies within governments and how the prices are generated by pharmaceutical distributors. The latter programme provides advice on how to monitor and control conflict of interest in the health sector.

**Medicines Transparency Alliance (MeTA).**

<http://medicines Transparency.org/>

MeTA brings together all stakeholders in the medicines market to improve access, availability and affordability of medicines for the one-third of the world's population to whom access is currently denied. In the pilot phase, participants made existing information on the medicines supply chain publicly available and added data where there were gaps in information. This data opacity included information on availability, price, promotion and use of medicines, and MeTA considered possible ways of overcoming these challenges. The second phase of MeTA began in August 2011, and is being guided by the WHO and HAI who together provide the secretariat to the seven countries in which the pilot took place during 2009 and 2010.

**World Health Organisation.**

<http://www.who.int/en/>

The World Health Organisation is a UN Agency that focuses on health and healthcare systems. During the last decade, WHO began to focus on governance issues related to the health sector, publishing several studies on corruption in the health sector and some insights into the relationship between corrupt health management officials and pharmaceutical companies. Additionally, WHO has the Good Governance for Medicines programme, aimed at reducing corruption, overpricing and fraud in relation to procurement of medicines.

**World Medical Association.**

<http://www.wma.net/es/index.html>

The World Medical Association (WMA), founded in 1947, is an international organisation representing physicians. The organisation was created to ensure the independence of physicians and to work for the highest possible standards of ethical behaviour. Its main areas of focus related to healthcare sector integrity refers to ethics, human rights and integrity in healthcare systems. It has produced several guides for practitioners and physicians that aim to increase the ethical treatment of patients worldwide.

**Transparency International UK: Pharmaceuticals & Healthcare Programme.**

<http://www.transparency.org.uk/our-work/pharmaceuticals-healthcare-programme/>

This programme by Transparency International's UK chapter is a multi-country initiative to shed light on illicit or unethical dealings between pharmaceutical companies and healthcare facilities and governments. The programme aims to engage pharmaceutical and healthcare companies, civil society, regulatory bodies and international organisations to gather knowledge, expertise, insight and funds regarding the relationship between pharmaceutical companies and healthcare providers.







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# **CORRUPTION IN WATER & SANITATION SERVICES**

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# WHY FIGHT CORRUPTION IN THE WATER AND SANITATION SECTOR?

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**Water and sanitation services are essential to sustainable development. Yet 844 million people do not have access to basic drinking water and almost 2.3 billion do not have access to basic sanitation.<sup>132</sup> Every year, 3.5 million people die from diseases and viruses transmitted through untreated water.<sup>133</sup>**

In the face of climate change, sustainable water management practices are even more urgent as the quality and availability of water resources become increasingly fraught. Recognising these high stakes, world leaders have committed to “ensure availability and sustainable management of water and sanitation for all” (SDG 6) by 2030 as part of the 2030 Agenda for Sustainable Development.

Yet, corruption in water management is a major obstacle to this goal, endangering health outcomes, food security and people’s livelihoods, which in turn undermine economic development, environmental sustainability and socio-political stability. Corruption can pervade all aspects of water management, inflating the costs of drinking water, hampering the reliable supply of irrigation, or fuelling large-scale water pollution in many countries,<sup>134</sup> all of which complicate efforts to mitigate and adapt to climate change.<sup>135</sup>

Corruption in water management has a devastating impact on food security. In places with little precipitation, low water tables, scarce access to water sources or drought, water conservation becomes essential to agricultural production. In India, for instance, which has the largest area of irrigated land in any country,<sup>136</sup> agriculture constitutes an astonishing 92.6 per cent of the country’s annual national water footprint.<sup>137</sup> Globally, irrigated land helps produce 40 per cent of the world’s food.<sup>138</sup> The Food and Agriculture Organization of the UN (FOA) estimates that almost 70 per cent of all water withdrawals worldwide are for farming, and that by 2050 demand for food is expected to grow by more than 50 per cent.<sup>139</sup>

Yet irrigation systems can be captured by the rich and powerful for their own benefits. Spillages, leakages and bad water treatment can lead to water shortages or make irrigation water toxic and dangerous for agriculture. These situations may strain food security by causing crop failure in communities reliant on subsistence agriculture or leading to a precipitous rise in local food prices for the urban poor.<sup>140</sup>

Women and the poor are often disproportionately affected by water scarcity as they tend to live in areas not connected to the water table. In many developing countries, women and girls often walk long distances to access water in the dry season, while about 80 per cent of health problems can be linked to inadequate water and sanitation.<sup>141</sup> Yet, resources allocated to water management can be stolen or diverted, undermining the quality and quantity of infrastructure intended to deliver water and transport human waste. The opportunity costs of such an insufficient water supply are especially high for women.<sup>142</sup>

Beyond its effect on human development, corruption in water management has a devastating impact on environmental integrity, which is of particular concern in the face of climate change. Corruption facilitates activities like illegal logging or illegal mining that lead to water overuse, pollution and the degradation of fragile water-based ecosystems, with a long-term impact on environmental sustainability. Climate adaptation initiatives, such as building flood defences and facilities to use scarce water resources more efficiently, also offer ample room for corruption. For example, in Bangladesh a number of officials were arrested for corruption in the construction of wetlands’ embankments.<sup>143</sup>



Corruption also results in faulty infrastructure and low-quality water treatment. This increases risks of leakage of human waste and infiltration of pollutants into the soil, creating chemical imbalances that threaten freshwater ecosystems, put species at risk of disappearing and jeopardise potable water supplies.<sup>144</sup> This is exacerbated by corruption, while the lack of control in the management of industrial discharge has

also been identified as a major source of water pollution, for example, in the garment industry in Bangladesh.<sup>145</sup>

As such, corruption is an enabling factor in the environmental degradation which exacerbates the looming global water crisis; by 2025 it is estimated that more than 3 billion people will be living in water-stressed countries.<sup>146</sup>

## KEY ISSUES AND CHALLENGES

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A number of factors make water management particularly vulnerable to corruption. Growing water scarcity due to climate change, population growth, urban sprawl and economic development raises the stakes in the water sector and thereby exacerbates the integrity risks.

Water management also typically involves large-scale infrastructure projects, such as dams, that are technically complex, capital intensive and difficult to monitor, and involve a small number of actors and providers with sweeping discretionary power. Indeed, the technical complexity of the sector makes it difficult for civil society to meaningfully participate in decision making, monitoring and oversight.<sup>147</sup> In addition, water resources increasingly become a security issue in many

countries and such large projects are perceived to be of high strategic and security value.<sup>148</sup> In this context, civil society operates in a restricted space, which limits further its opportunities to provide oversight. In some countries, protestors of these mega-projects are quashed by the state security forces, where 2016 saw a record number of land and water rights defenders killed.<sup>149</sup>

As with other public services, corruption can occur at all stages of the water supply chain, from policy formulation to the management of organisational resources and to the point of service delivery.

Figure 4: Analysis of corruption along the drinking water and sanitation sector value chain



# Forms of corruption in water and sanitation delivery

## POLICY FORMULATION

At the regulatory level, decisions made for water allocation and sharing can be captured to favour the interests of a small number of water service providers and users. Undue influence at the policy-making level can also distort or prevent effective enforcement of environmental regulations, with private companies and corrupt public officials colluding to cover up the environmental and social impact of major water projects, or distort the selection and approval of major water schemes.<sup>150</sup> This is ultimately likely to affect the cost and quality of large-scale water infrastructure projects and undermine the sustainability of water resources.

## MANAGEMENT OF ORGANISATIONAL RESOURCES

Corruption can distort the allocation of resources, with rent-seeking behaviour resulting in the promotion of inappropriate projects and high-cost infrastructure investment instead of lower cost and more efficient solutions. Fraud, falsification of accounts and embezzlement can also affect water management budgets and divert funds for a water supply network into the pockets of corrupt actors.

The sector is also characterised by high-risk procurement, with various forms of bribery in relation to licensing, procurement and construction. Water infrastructure and water treatment services tend to involve heavy and long-term investments for storage, extraction, treatment and conveyance of water, with highly lucrative contracts and a relatively small number of service providers and public officials involved. This can create rent-seeking opportunities and provide fertile ground for bribery, extortion and collusion in the awarding of contracts. Bribery, collusion or bid rigging in the water sector are widespread in both the developed and developing countries, and involve both international and national actors.<sup>151</sup> A well-documented example of corruption in the water sector occurred in the Lesotho Highlands Water Project, where the chief executive of the project was found guilty of taking US\$6 million in bribes from 12 multinational construction firms and consortiums and sentenced 15 years in prison in 2002.<sup>152</sup>

Beyond the tendering process, costly infrastructure projects like hydroelectric dams and dykes are particularly prone to corruption, as construction companies may seek to lobby, bribe or influence decision makers to amend the terms of the contract, change infrastructure locations or use substandard material and equipment to cut costs and maximise the profitability. Beyond the negative impact on the quality and sustainability of the physical infrastructure, these kinds of corruption risks can cripple a project's economic viability.

The process of conducting environmental impact assessments (EIAs) to ensure that such large-scale projects will have minimal disruptive impact on local ecosystems and communities can also be corrupted. In India, for example, EIAs are commissioned to private consultants and funded by the very companies seeking licences. In the mining sector (which also impacts the water table), this has meant that fewer than 3 per cent of EIA applications are refused.<sup>153</sup> "Prior and informed consent" mechanisms, by which local communities are supposed to agree to an infrastructure project, can also be manipulated and communities offered cash, jobs or other benefits to agree to the project.

Corruption can also affect the management of human resources, as the water sector offers many possibilities for personal enrichment and extortion. In some countries, cronyism, nepotism, political patronage and bribery often drive appointments, promotion and transfers to lucrative positions within water-related public bodies.

## SERVICE DELIVERY/CLIENT INTERFACE

At the point of service delivery, there are fewer opportunities for interaction between service providers and users than for other public services such as health and education. However, even if less visible, there are still opportunities for corruption at the point of service delivery.

There are relatively few agents responsible for delivering water to ordinary citizens, households and companies. In some countries, bribes may be extorted by service providers in exchange for access to a water connection. Administrative or petty corruption can also enable households, farmers, companies and other users to get access to water more quickly or cheaply. Public officials can be bribed to secure preferential treatment, such as securing access to water during the dry season, droughts or diverting water from one area to another.

In some water-scarce countries, there are not always water connections in urban areas and various private providers (sometimes subsidised by the state) will deliver water via trucks to slum-dwellers. In such contexts, the interaction with service providers is as direct as for health and education services and often involves cash changing hands in exchange for water. There are well-documented cases of corruption scandals in New Delhi where basically a water mafia in league with local politicians and slum lords are at work.<sup>154</sup>

Kickbacks and bribes can also be offered to regulatory officials to turn a blind eye to water overuse or pollution discharge. In water treatment and sanitation services, corrupt water quality inspectors can provide false documentation on the quality of water that water treatment plants produce or the toxicity of waste water produced by industry. Companies and individuals may bribe officials to dispose of more waste than government regulated quotas, while corrupt inspectors can overlook the excessive extraction of water from fragile ecosystems and low water tables or the illegal dumping of raw industrial waste or sewage into natural ecosystems. Finally, inspectors involved in monitoring infrastructure quality may also be bribed to turn a blind eye to substandard materials and equipment.

## Challenges for addressing corruption in water and sanitation

Water is becoming an increasingly scarce resource, with intensified competition over access to and control over water supplies.<sup>155</sup> In addition, private investment in water is growing in countries with high risks of corruption, weak governance and institutions, posing particular challenges for international investors.<sup>156</sup> State-owned water and sanitation companies have often been shown to face many problems, such as overstaffing, high levels of unaccounted for water, lack of funds for investment and political interference in all areas.<sup>157</sup> Therefore, privatisation of water has been an option that was often posited as a “solution” to corruption in the 1990s, yet private investment in the water sector has had mixed results. On the one hand, it can play an important role in infrastructure financing, development and management, ensuring water supplies where the public sector cannot deliver.<sup>158</sup> On the other hand, it also brings major challenges to local populations. The Global South's water resources are

increasingly owned and managed by Northern water firms who do not hesitate to turn off the tap if bills are not paid. In South Africa in 2002, for want of a \$7 reconnection fee the community's previously free clean water supply was turned off by the private service provider, exacerbating a cholera outbreak which ultimately infected 140,000 citizens.<sup>159</sup>

Inadequate or complex institutional arrangements, weak environmental protection frameworks and the lack of adequate sanctions for environmental degradation all combine to leave corrupt actors plenty of room for manoeuvre.<sup>160</sup>

At the national level, water management may be the responsibility of more than one agency or ministry, with irrigation, sanitation, urban water services and hydroelectric infrastructure falling under the jurisdiction of different government bodies. It is therefore challenging to design comprehensive anti-corruption strategies for the sector. Watercourses are not confined to national borders, and differing governance arrangements in countries sharing the same water body can lead to regulatory loopholes that can be exploited for corrupt purposes.<sup>161</sup>

Water management is also mostly considered to be a technical issue and an engineering challenge in most countries, with little attention paid to corruption and its impact on the political and social dimensions of water management.<sup>162</sup> Faults in the delivery and quality of water and sanitation services are usually ignored until emergencies arise, at which point repair or improvement of these systems may be too late or too costly.<sup>163</sup>

In spite of its impact on human development and environment sustainability, monitoring the quality of water services is often costly and requires technological capital and capacities that may not be available to low-income countries. Contracting water quality assessments on a regular basis to audit the work of water inspectors may be costly and time consuming too. Nevertheless, clean-up costs are pricey, and the lasting environmental impact of corruption passes the bill to future generations.



# APPROACHES TO ADDRESS CORRUPTION IN WATER AND SANITATION

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## Scaling up diagnosis of corruption in water

While awareness of corruption challenges in water has increased in recent years, more systematic research need to be conducted to better understand the scope and nature of corruption in water, adapting tools such as corruption impact assessments, public expenditure tracking or corruption risk-mapping to the different areas of the water sector. When designing specific anti-corruption interventions, it is also important to develop a solid understanding of the local water context, including the conditions of supply and demand, existing infrastructure, and governance systems as well as the incentives of the local stakeholders to design targeted and effective reforms that are tailored to the local circumstances.<sup>164</sup>

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### BOX 9: ANNOTATED WATER INTEGRITY SCAN (AWIS)<sup>165</sup>

The Water Integrity Network developed AWIS as a participatory and qualitative tool to assess integrity levels in specific sub-sectors of the water sector. It consists of a one-day multi-stakeholder workshop to assess integrity risks, identify priority areas for action and raise awareness about the water integrity situation. AWIS aims to improve integrity by facilitating constructive dialogue between different water sector stakeholders on issues related to transparency, accountability and participation as well as the existing anti-corruption framework and anti-corruption measures. AWIS does not measure corruption directly but rather sheds light on systemic weaknesses in the governance framework, which leave the water sector vulnerable to corruption. So far, AWIS has been applied to the context of urban and rural water supply and sanitation, but it can be easily adapted for use in other sub-sectors, such as water resource management, irrigation or hydropower.

## Strengthening monitoring and oversight

Governments are primarily responsible for establishing effective regulatory oversight of the water sector. Measures aimed at curbing regulatory capture can include capacity building and training for regulatory staff, the provision of adequate resources (human, financial, technical and administrative), the creation of a clear institutional mandate, the implementation of transparent operating principles and the introduction of a public consultation and appeals process.<sup>166</sup>

As monitoring and oversight mechanisms are key to ensure the enforcement of regulations, monitoring and oversight activities conducted by various institutions, such as the central audit agency, parliament, anti-corruption agency, ombudsman, complaint offices and specific sector and local government organisations, need to be robust.<sup>167</sup> This requires increasing the risks of detection by conducting regular independent audits, providing transparent access to public accounts, as well as establishing effective complaints mechanisms and whistleblower protection that encourages citizens and employees to report illicit behaviour without fear of retaliation. It also requires enforcing adequate and dissuasive sanctions, as deterrence must be supported by the effective implementation of regulations.

Separating policy making and regulatory functions from the operational (provision) function has also been promoted as one approach to improving accountability and strengthening regulatory oversight in the sector and implemented in countries such as South Africa and Kenya. However, this approach is likely to effectively increase accountability only where and if the regulatory function is properly performed.<sup>168</sup>

Though this may involve investing in equipment and technology, monitoring mechanisms should also go beyond auditing of accounts and agent performance, and include monitoring of the water quality at each stage of the water cycle. Increasingly, such monitoring systems provide for citizen participation and input with tools such as citizen report cards, hotlines, feedback mechanisms to monitor the quality of water services

provided by public and private utilities. Citizens and scientists can fill the gap in countries where governments lack the capacity to regularly monitor the water quality.<sup>169</sup>

## Improving human resource management practices

Water management institutions need adequate human, financial, technical and administrative resources to fulfil their mandate, including a professional and qualified workforce. Measures promoting transparency and integrity in employee appointment and job promotion constitute a first step to addressing corruption challenges in the sector's human resource management. This involves promoting merit-based appointments, compensation, promotion and transfer management systems and raising ethical standards through the introduction of codes of conduct, business principles and ethical training. The professionalism of the sector's workforce can also be strengthened through adequate remuneration to attract and retain qualified staff and on-the-job training and capacity building measures, including ethical training and awareness raising activities on the causes and consequences of corruption and measures to address it in the sector.<sup>170,171</sup>

## Promoting fair and transparent competition for water contracts

Preventing corruption in the water sector also involves improving financial and procurement rules, including enforcing stricter standards, coherent rules and increased supervision of disbursements, competitive bidding and contract implementation. Different tools exist to curb collusion and bid rigging in tender procedures. Transparency in the selection of contractors can be promoted by providing easy access to information through a more systematic use of the internet and e-procurement. This helps minimise interactions between public officials and bidding companies and pre-empts the development of corrupt networks.

Tendering companies can also be required to commit to a no-bribe policy and be subject to debarment procedures if they are found to engage in fraud or corruption. Strengthened due diligence measures are also instrumental to ensure fair competition for water contracts. In particular, given the large investments in the sector, export credit agencies, commercial banks and international financial institutions have a key role to play by integrating anti-bribery provisions in their due diligence requirements.<sup>172</sup>

Integrity pacts have also been used in some water projects, such as the Greater Karachi Water Supply Scheme in Pakistan, whereby a government and all bidders for a public sector contract agree that neither the government nor the contractor shall pay, offer, demand, or accept a bribe or collude with competitors to obtain the contract.<sup>173</sup> Such commitments can be monitored by civil society organisations or other independent parties. Bidders are also required to disclose all commissions paid to contractors.

Civil society can also play an important role in the process from the design stage of water projects to the monitoring of contract implementation. Citizens can also be involved in decision-making processes for the development of new water infrastructure to inform project design. Reporting mechanisms provide other avenues for citizens participation, and they can use ICT to monitor and report problems and issues related to water and sanitation services. The Mobile for Water (M4W) Programme<sup>174</sup> in Uganda allows citizens to use text messages to report faulty pumps or other problems with the water supply, which then gets sent directly to the responsible mechanic. However, these programmes only work if complaints are leading to improvements, as can be seen with the crowdsourcing platforms used in Daraja, Tanzania, which provided citizens with digital platforms from which to complain about the lack of access to water or to report problems to engineers responsible for maintenance,<sup>175</sup> but citizens did not get positive responses from the authorities.<sup>176</sup> These platforms contributed to reorient government water policy and increase maintenance and infrastructure budgets consistently for five years.

## Promoting transparency and participation

Meaningful citizens' participation in water governance can increase accountability and transparency and contribute to building trust and confidence. Communities can be involved at all stages of the process, from water budgeting and policy development to the selection of sites for developing water infrastructure and the management of water schemes in a way that ensures equitable access to water for all.

Citizens can also contribute to water pollution mapping and performance monitoring of water utilities,<sup>177</sup> which has been proven successful in many places but also faces pushback by lawmakers.<sup>178</sup> Project budgets can be open to scrutiny, and water users can participate in decision making through public hearings involving citizens, regulators and water sector officials, social budgeting and social auditing. In Peru, for example, the management of large-scale irrigation systems was transferred to water users' associations, resulting in improved financial and water delivery performance.<sup>179</sup>





# RESOURCES ON CORRUPTION IN WATER AND SANITATION SERVICES

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## BACKGROUND PAPERS AND CASE STUDIES

**Water Integrity Network. 2016. *Water Integrity Global Outlook*. 266p.**

<http://cen.acs.org/articles/93/i36/Citizen-Science-Faces-Pushback.html>

This report gives a comprehensive overview of the integrity challenges in the water sector. Using country examples, it examines the strengths and weaknesses of the water sector, and shows that the sector needs openness and citizen involvement. The report also provides examples of innovative programmes and projects and demonstrates tools and techniques that can be used to improve integrity in the water sector.

**John Butterworth & Alana Potter. 2014. *Mainstreaming Anticorruption Initiatives: Development of a Water Sector Strategy in Mozambique*. Bergen: Chr. Michelsen Institute (U4 Practice Insight no. 2014:2) 14 p.**

<http://www.u4.no/publications/mainstreaming-anti-corruption-initiatives-development-of-a-water-sector-strategy-in-mozambique/>

Sectoral approaches to combatting corruption have gained momentum in recent years, yet the strategic prioritisation of sector anti-corruption initiatives is still the exception. The National Water Directorate in Mozambique is one of the few public sector departments in the world known to have allocated its own resources to developing a sector-specific anti-corruption strategy. Its experience offers valuable lessons for others considering integrating anti-corruption in the sector. Leadership needs to come from ministries with inter-sectoral mandates or through formal collaboration between different ministries. Government-led processes must be complemented by locally-driven social accountability processes. Sectoral strategies need strong political

commitment, at sector and central government levels, since multi-stakeholder processes are complex and time consuming, and the implementation of sector strategies must include sector-level human resources and management systems.

**Aled Williams, Gulnaz Isabekova, Kubanychbek Ormuchev, Toktobek Omokeev and Natalai Zakharchenko. 2013. *Leaking Projects: Corruption and Local Water Management in Kyrgyzstan*. Bergen: Chr. Michelsen Institute (U4 Practice Insight no. 2013:3) 8 p.**

<http://www.u4.no/publications/leaking-projects-corruption-and-local-water-management-in-kyrgyzstan/>

Poor water infrastructure in Kyrgyzstan from the Soviet era led international donors to support investments in agricultural irrigation and potable freshwater systems. The financial investments made, however, did not always underpin improvements in local water delivery. This U4 Practice Insight contrasts two project approaches to local water management in Kyrgyzstan from an anti-corruption perspective, including agricultural irrigation projects involving water user associations (WUAs) and a large-scale potable freshwater project entitled Taza Suu, which did not involve WUAs. It examines the extent to which project goals were affected by issues of corruption and fraud, and identifies lessons for future donor engagement in the country's local water sector. These include the need for paying greater attention to the local political economy, for greater transparency and clarity of bidding procedures and the requirements for entering the tender process, for more stringent monitoring and evaluation procedures involving multiple stakeholders, and for improving the quality of the technical assessments used to establish baselines for some WUA projects. Further research into the governance characteristics underpinning the most effective WUA projects should be conducted.



**OECD. 2011. *Water Governance in OECD Countries: A Multi-Level Approach*.**

[http://www.oecd-ilibrary.org/environment/water-governance-in-oecd-countries\\_9789264119284-en](http://www.oecd-ilibrary.org/environment/water-governance-in-oecd-countries_9789264119284-en)

This report addresses multilevel governance challenges in water policy implementation and identifies good practices for coordinating water policy across ministries, between levels of government and across local actors at the sub-national level. Based on a methodological framework, it assesses the main "coordination gaps" in terms of policy making, financing, information, accountability, objectives and capacity building, and provides a platform of existing governance mechanisms to bridge them. Based on an extensive survey on water governance, the report provides a comprehensive institutional mapping of roles and responsibilities in water policy making at national and sub-national levels in 17 OECD countries. It concludes on preliminary multilevel governance guidelines for integrated water policy and recommendations for practitioners and researchers involved in water and sanitation sector governance.

**Maria Gonzalez de Asís, Donal O'Leary; Per Ljung And John Butterworth. 2010. *Improving Transparency, Integrity and Accountability in Water Supply and Sanitation*. Washington D.C.: The World Bank. 200pp.**

<https://www.oecd.org/env/outreach/44475062.pdf>

This manual, which was developed under the Open and Participatory Government Program at the municipal level (Gap Municipal Programme), argues that tackling corruption in municipal water supply and sanitation services requires a holistic approach, focusing on governance reform and particularly on developing and implementing anti-corruption strategies at the sectoral and institutional levels. The manual consists of five modules analysing the nature of corruption in the sector, investigative tools to determine the extent of corruption, tools to address corruption, as well as case studies and information on the creation and implementation of action plans.

**John Butterworth and Jean de la Harpe. 2009. *Not So Petty: Corruption Risks in Payment and Licensing Systems for Water*. Bergen: Chr. Michelsen Institute (U4 Brief 2009:26).**

<http://www.u4.no/publications/not-so-petty-corruption-risks-in-payment-and-licensing-systems-for-water/>

The water "business" involves large numbers of consumers using water in different ways including households, industries and farms. Management of water at the user level, and the associated collection of charges or fees, carries a potential corruption risk. This U4 Brief focuses on the risks at the service provider/consumer interface associated with the small but numerous transactions involved in service payments or maintenance. The article looks at how donors and local governments can help prevent petty corruption. The related losses of revenue and harm to consumer confidence can seriously threaten the financial sustainability and viability of service providers. This article serves as a good introduction to corruption at the point of service delivery in the water sector.

**John Butterworth and Jean de la Harpe. 2009. *Improving the Framework? Institutional Reform and Corruption in the Water Sector*. Bergen: Chr. Michelsen Institute (U4 Brief 2009:28) 4 pp.**

<http://www.u4.no/publications/improving-the-framework-institutional-reform-and-corruption-in-the-water-sector/>

This U4 Brief looks at institutional reform in the water sector, such as separating the provision and regulatory roles, decentralisation and seeking alternative institutional options for the provision of water services, including corporatisation and privatisation, and provides examples illustrating the actors and processes involved. An underlying premise is that corruption is persistent and manifests itself dynamically, challenging any pursuit of an ideal set of institutional arrangements. It suggests that more effort should be focused on effective regulation and oversight to address corruption. It examines how donor support to water sector institutional reform could potentially open space for corrupt practices and how donors can minimise or prevent these risks. In particular, the authors argue that while using aid modalities such as direct budget support and sector budget support is in line with the Paris Declaration, these modalities presuppose a partnership based on efficiency, transparency, honesty and good governance, with minimal corruption.

**John Butterworth. 2009. *Grand Designs: Corruption Risks in Major Water Infrastructure Projects*. Bergen: Chr. Michelsen Institute (U4 Brief 2009:27).**

<http://www.u4.no/publications/grand-designs-corruption-risks-in-major-water-infrastructure-projects/downloadasset/163>

From dams and dykes to urban sanitation systems, the article provides a detailed introduction to corruption in water sector infrastructure and outlines the areas vulnerable to corruption in water infrastructure. The author provides a case study of the Lesotho Highlands Water Project, a landmark case which showed the vulnerability of donor-backed trans-boundary water projects. The article concludes by offering advice to donors and practitioners to establish transparent and accountable procurement processes and management systems in major infrastructure projects.

**Transparency International. 2008. *Global Corruption Report: Corruption in the Water Sector*.**

[http://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](http://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)

This report provides an in-depth look at issues related to corruption in the water sector, the scope and nature of corruption challenges and strategies to address them. The report shows that corruption is a cause and catalyst for the current water crisis, which is likely to be further exacerbated by climate change. Corruption affects all aspects of the water sector, from water resource management to drinking water services, irrigation and hydropower. Scholars and professionals document the impact of corruption in the sector, with case studies from around the world offering practical suggestions for reform. After providing an introduction about the nature and scope of corruption in the water sector, the report covers four areas: water management, water supply, irrigation, and water for energy use. Each chapter focuses on the nature of the manifestations of corruption in these sectors and case studies. A final chapter is dedicated to policy lessons to combat corruption in the water sector.

**Janelle Plummer. 2007. *Making Anticorruption Approaches Work for the Poor: Issues for Consideration in the Development of Pro-poor Anticorruption Strategies in Water Services and Irrigation*.**

<http://www.u4.no/recommended-reading/making-anti-corruption-approaches-work-for-the-poor-issues-for-consideration-in-the-development-of-pro-poor-anti-corruption-strategies-in-water-services-and-irrigation/>

This Swedish Water House report highlights the need for greater attention to the poor in the development of anti-corruption strategies in the water sector, providing some pointers as to how this could look. To this end, the paper first considers how the poor interact with corruption, how they are affected by it, and how they use it to their benefit. It then considers some of the key factors that determine corruption in the water sector as it affects the poor. Finally, borrowing from the efforts of other sectors, it explores some of the key ingredients that might be considered in the development of a pro-poor anti-corruption water sector strategy. This involves getting to know the nature of corruption in water as it affects the poor by disaggregating the types of corruption involving the poor, identifying corrupt practices and opportunities on the value chain, identifying key actors and their incentives in transactions involving the poor (and including the poor in this stakeholder analysis), integrating the poor into macro and institutional reforms and targeting anti-corruption interventions on the poor, among others. This paper concludes by emphasising the importance of pro-poor anti-corruption approaches for the water sector and stresses the need to develop an understanding of the poor and their “water world”. Creating islands of excellence at the project, community and local government levels are key starting points for sector action, and a focus on areas and processes (such as community management) where the poor are directly affected, all create the shift that is more likely to bring about pro-poor impacts.

**Janelle Plummer and Piers Cross. 2006. *Tackling Corruption in the Water and Sanitation Sector in Africa*.**

[http://www.wsp.org/sites/wsp.org/files/publications/712200782528\\_Tackling\\_Corruption\\_in\\_the\\_Water\\_and\\_Sanitation\\_Sector\\_in\\_Africa.pdf](http://www.wsp.org/sites/wsp.org/files/publications/712200782528_Tackling_Corruption_in_the_Water_and_Sanitation_Sector_in_Africa.pdf)

This article looks at tackling corruption in the water sector in Africa. The authors start by evaluating the scope of the problem, providing insight into how different methodologies for diagnoses can be used by practitioners to understand corruption challenges. The article then considers potential anti-corruption strategies to address the different types of water sector corruption in an integrated manner. The authors conclude on a somewhat sombre note by addressing the challenges of fighting corruption in the water sector in Africa and looking at what has been learned so far.

**Patrik Stålgren. 2006. *Corruption in the Water Sector: Causes, Consequences and Potential Reform. Swedish Water House Policy Brief Nr. 4. SIWI, 2006*.**

<http://www.waterintegritynetwork.net/2006/03/05/corruption-in-the-water-sector-causes-consequences-and-potential-reform/>

This policy brief looks at corruption in the water sector from a practitioner's perspective and aims to offer practical advice about the challenges of fighting corruption in the water sector worldwide. The article begins by providing a taxonomy of corrupt acts related to the water sector and suggests potential reforms to address these challenges, including: i) legal and financial reform; ii) reform on public service delivery systems; iii) reform in the private sector; and iv) public awareness and capacity building. It concludes by providing a set of recommendations to guide practitioners' actions.

## STANDARDS AND GUIDELINES

***Dublin Statement on Water and Sustainable Development (1992).***

<http://www.un-documents.net/h2o-dub.htm>

This statement provides a guideline for basic water governance directed at UN members. The statement recognises the problems surrounding water sustainability and supports the actions of member states in establishing participatory, integrated water management systems. It represents one of the first multi-country memoranda on the importance of integrity in water management and development surrounding water issues.

***SADC Shared Watercourse Protocol.***

<http://www.internationalwaterlaw.org/documents/regionaldocs/Revised-SADC-SharedWatercourse-Protocol-2000.pdf>

Considered by the Water Governance Facility (WGF) to be a groundbreaking agreement in water sustainability networks, the SADC Shared Watercourse Protocol of 1995 (revised in 2000) is the commitment of 14 southern African governments to implement a shared water management system. The protocol essentially provides a framework to confront water scarcity and water conflict and provides a guideline for dialogue on trans-boundary water issues.

***OECD. 2015. *OECD Principles on Water Governance*.***

<http://www.oecd.org/cfe/regional-policy/OECD-Principles-on-Water-Governance-brochure.pdf>

The OECD Water Governance Principles provide 12 must-does for governments to design and implement effective, efficient and inclusive water policies in shared responsibility with a broad range of stakeholders. They were developed using a multi-stakeholder approach within the OECD Water Governance Initiative, and backed by ministers at the OECD Ministerial Council Meeting on 4 June 2015. The principles have been endorsed by 42 countries and 140+ major stakeholder groups. The first 65 signatures from public, private and non-profit organisations were gathered through the Daegu Declaration.

## PRACTICAL INSIGHTS: HANDBOOKS AND TOOLKITS

**Water Governance Facility. 2017. WGF Report 6: Developing Capacities for Water Integrity: Reflective Review of Approach and Impact of Training Courses.**

<http://watergovernance.org/resources/developing-capacities-water-integrity-reflective-review-approach-impact-training-courses/>

This report provides a reflective review of the approach to training and capacity development as a contribution to improved water governance and reduced risk of corruption in the water sector. It draws on the experience gained from implementing several regional water integrity capacity development programmes primarily in sub-Saharan Africa and Latin America. Although still too early to assess the long-term impact of these training initiatives, the report draws some lessons from capacity development for water integrity to date. Capacity development should be treated as a process cycle, starting with assessing the current situation, planning, implementing and above all following up and supporting the intended new capabilities and behaviours. The success of capacity development initiatives also relies to a large extent on their ability to be relevant and to respond to the capacity needs of the target group, and to understand the political and institutional context. Finally, it is important to sustain capacity development over time, including training, but also putting greater emphasis on the institutional and societal enabling environment to promote water integrity.

**UNDP-SIWI Water Governance Facility & UNICEF. 2015. WASH and Accountability: A Reference Guide for Programming. Accountability for Sustainability Partnership: UNDP-SIWI Water Governance Facility and UNICEF. Stockholm and New York: SIWI and UNICEF.**

<http://watergovernance.org/wp-content/uploads/2016/09/2015-UNICEF-Reference-Guide-ENG-digital-160927.pdf>

This reference guide for programming contains guidance on existing mechanisms promoting accountability, illustrated by examples of how they are currently being operationalised in different contexts. The aim of the document is to provide external support agencies with structured and concise information that can help programming support to accountability-related actions.

**OECD Water Governance Initiative. 2014. OECD Inventory: Existing Tools, Practices and Guidelines to Foster Governance in the Water Sector.**

<http://www.oecd.org/cfe/regional-policy/Inventory.pdf>

This collection shows which tools, practices and guidelines exist to foster governance in the water sector up to 2014.

**Water Integrity Network and WaterLex International. 2013. Corruption and the Human Right to Water and Sanitation.**

[http://www.waterlex.org/new/wp-content/uploads/2013/12/2013-WaterLex-WIN\\_Corruption-and-the-HRWS-.pdf](http://www.waterlex.org/new/wp-content/uploads/2013/12/2013-WaterLex-WIN_Corruption-and-the-HRWS-.pdf)

This joint paper elaborates a human rights-based approach to fighting corruption in the water sector. By associating corruption to a violation of a basic human right, one can potentially raise more awareness and gather more support for establishing counteractive measures. The document is especially useful for its fourth chapter on developing a legal framework to establish transparency, accountability and participation (TAP) mechanisms in water management systems, procurement and irrigation.

**UNDP. 2011. Fighting Corruption in the Water Sector: Methods, Tools and Good Practices.**

<http://www.undp.org/content/dam/undp/library/Democratic%20Governance/IP/Anticorruption%20Methods%20and%20Tools%20in%20Water%20Lo%20Res.pdf>

This study provides a comprehensive look at the nature and effects of corruption in the water sector. It describes corruption in water supply and sanitation, water management systems, irrigation and hydropower, elaborating the challenges related to each type of corruption. After mapping corruption risks in the water sector, the study presents methods and tools to measure corruption in the sector, looking in particular at increased government oversight, pro-market water sector reforms and increased user and civil society oversight. The guide concludes by providing analyses of expected and desired outcomes of anti-corruption measures in the water sector.



**Water Integrity Network. 2010. *Integrity Pacts in the Water Sector: An Implementation Guide for Government Officials*.**

<http://www.waterintegritynetwork.net/2015/02/26/budgeting-and-procurement-tools/>

This integrity pact implementation manual is designed to help leaders and champions within their own governments across the world who are determined to overcome corruption in public contracting, particularly in the water sector. This manual is a hands-on, practical guide to familiarise government officials in charge of public procurement processes in the water sector with the integrity pact process and to provide them with tools and ideas for its application.

**UNDP-SIWI Water Governance Facility, WIN, Cap-Net and WaterNet. 2009. *Training Manual on Water Integrity*. Stockholm: SIWI.**

[http://www.watgovernance.org/documents/WGF/Reports/Trainin\\_Manual/Final\\_training-manual-English.pdf](http://www.watgovernance.org/documents/WGF/Reports/Trainin_Manual/Final_training-manual-English.pdf)

This training manual is developed to assist capacity builders in developing training and educational programmes on water integrity and how it can be promoted and worked with in more practical ways. The overall goal is to develop institutional capacities and prepare for change through increased knowledge and action on integrity, accountability and anti-corruption in any country or region. It looks at the following issues: water governance, corruption in the water sector, identifying corruption risks, anti-corruption laws, institutions and instruments, transparency and access to information, accountability, integrity in integrated water resources management.

**Global Water Partnership (GWP) and the International Network of Basin Organisations (INBO). 2009. *A Handbook for Integrated Water Resources Management in Basins*.**

<http://www.inbo-news.org/IMG/pdf/GWP-INBOHandbookForIWRMinBasins.pdf>

Many countries are introducing an integrated approach to water resources management at the national and basin level. This handbook provides guidance for improving the governance of freshwater resources with a particular focus on effective implementation of the integrated water resources management

(IWRM) approach in lake, river and aquifer basins. Targeted at basin managers and government officials and non-governmental actors who are involved in basin activities, it provides guidance for integrated water resources management that can be applied in basins regardless of the context (developed or developing countries, humid or arid conditions) or the current state of water governance. In particular, the handbook: i) articulates the links between challenges and IWRM responses; ii) suggests ways of setting up or modernising basin organisations to facilitate the adoption of the IWRM approach; and iii) is practical and user-friendly with many examples of experiences in river, lake and aquifer management.

## ASSESSMENT TOOLS AND DATABASES

**Transparency International. 2017. *Monitoring Corruption and Anti-Corruption in the SDGs: A Resource Guide*.**

[http://www.transparency.org/whatwedo/publication/monitoring\\_corruption\\_and\\_anti\\_corruption\\_in\\_the\\_sustainable\\_development\\_go](http://www.transparency.org/whatwedo/publication/monitoring_corruption_and_anti_corruption_in_the_sustainable_development_go)

As part of its follow-up and review mechanisms for the SDGs, member states are encouraged to conduct regular national reviews of progress made towards the achievement of these goals through an inclusive, voluntary and country-led process. This guide is intended to explain the role of civil society organisations in monitoring corruption in the SDGs, as well as how to identify potential indicators and data sources for this purpose. Throughout the guide, there are country examples of indicator selection, inclusive follow-up review processes and approaches to corruption monitoring. A chapter is dedicated to mainstreaming anti-corruption in monitoring SDG 6 on water and sanitation.

**OECD Water Governance Initiative. 2015. *OECD Inventory: Water Governance Indicators and Measurement Frameworks*. 44p.**

[http://www.oecd.org/cfe/regional-policy/Inventory\\_Indicators.pdf](http://www.oecd.org/cfe/regional-policy/Inventory_Indicators.pdf)

This collection shows which indicators and measurements exist to foster governance in the water sector up to 2015.

**Water Governance Facility. 2013. *User's Guide on Assessing Water Governance*.**

[http://www.watergovernance.org/documents/WGF/Reports/20058-UNDP-Assessing-water\\_web.pdf](http://www.watergovernance.org/documents/WGF/Reports/20058-UNDP-Assessing-water_web.pdf)

This document outlines current methodologies to measure and assess the quality of water governance and management in medium- and low-income countries. The guide proposes a framework that can be applied to any water governance assessment, based on different approaches for assessments around water integrity and anti-corruption in the water sector. It evaluates the usefulness of the application of different tactics to assess corruption and provides an eight-step assessment plan for any water governance integrity assessment.

**Water Governance Facility. 2013. *Mapping Integrity of Water Resource Management and Relevant Capacities in Latin America*.**

<http://www.watergovernance.org/documents/WGF/Reports/WaterIntegrityMappingofLatinAmerica-ENG-Final.pdf>

This report by the WGF is a mapping exercise of integrity of water management in Latin America that can be adapted for other regions and places. The report provides a flexible methodology to assess how current water management systems operate and to assess their internal governance. While Latin America is a large region with different climates and with differing water management systems, the report makes a point of saying that the information within it can be translated to other regions, and that the advice they provide for practitioners is applicable on a global scale.

## RESOURCES FROM THE ANTI-CORRUPTION HELPDESK

**Marie Chêne. 2009. *Good Practice in Addressing Corruption in Water Resource Management Projects*. U4 Helpdesk Answer.**

<http://www.u4.no/publications/good-practice-in-addressing-corruption-in-water-resource-management-projects/>

Specific characteristics of water resource management (WRM) make this sector especially vulnerable to corruption. All major forms of corruption are prevalent in the WRM sector, including grand corruption, high-risk procurement, state and regulatory capture and the mismanagement of public resources. Measures to address corruption risks in WRM projects include addressing the sector's diffuse governance system, strengthening institutional arrangements as well as monitoring and oversight mechanisms, and cleaning up procurement processes with the support of awareness raising and capacity building interventions. Transparency and participation are guiding principles for all water governance interventions, with the view to promoting citizen participation through open access to regulatory decisions, information disclosure, public hearing, and the introduction of effective complaint mechanisms and whistleblowing protection.

## SELECTED ACTORS AND STAKEHOLDERS

**IRC International Water and Sanitation Centre.**

<http://www.ircwash.org>

A self-described “think and do”-tank, IRC International Water and Sanitation Centre is a global advocate for accessible and sustainable water, sanitation and hygiene services. IRC works with governments, international organisations and other NGOs to address governance issues related to the water sector. The organisation has several projects in different parts of the world aimed at increasing community involvement in water governance.

**International Rivers.**

<http://www.internationalrivers.org>

International Rivers is a non-profit organisation that advocates for healthy, sustainable river systems and promotes control and monitoring of hydroelectric infrastructure projects. International Rivers has launched several local-oriented campaigns focused on awareness of environmental and social impacts of dams and has worked together with the World Commission on Dams to put hydroelectric procurement and decision standards on the agenda of large infrastructure donors like the World Bank.

**Water Integrity Network.**

<http://www.waterintegritynetwork.net/>

WIN was founded by IRC, SIWI, Swedish Water House, Transparency International and the World Bank Water and Sanitation Programme in 2006 to respond to increasing concerns among water and anti-corruption stakeholders regarding the impact of corruption in the water sector. The network, through its partner organisations, advocates for a greater focus on issues of transparency and accountability in the water and sanitation sectors. WIN has produced a number of studies about the impact of corruption in these sectors. The network also promotes individual awareness raising and company codes of conduct to deter corruption in the water sector.

**Water Governance Facility.**

<http://www.watergovernance.org/>

The Water Governance Facility (WGF) is a partnership between UNDP and Stockholm International Water Institute (SIWI) established in 2005, with the support of the Swedish International Development Cooperation Agency (Sida), serving to strengthen UNDP's capacity to provide relevant policy support and advice to countries, and to build the knowledge and capacities for improved water governance within governments and civil society as well as among UN agencies. It implements parts of the UNDP Water and Ocean Governance Programme by encouraging and coordinating water governance support for low- and middle-income economies. The goal is for these countries to achieve socially equitable, environmentally sustainable and economically efficient water governance policies. It runs programmes like the Shared Water Partnership, the GoAL WaSH Programme, the Water Integrity Programme, and the Accountability for Sustainability programme, each espousing a different process for advocacy and change but all of them focused on increasing water governance.

**Stockholm International Water Institute.**

<http://www.siwi.org/>

This Swedish think-tank and advocate for water governance and sustainability has worked closely with the UNDP and other water advocates, especially within the Water Integrity Network. This organisation has published several reports on various topics related to water sector governance and has also published a number of region- and nation-specific case studies.

# END NOTES

1. <http://www.un.org/en/universal-declaration-human-rights/index.html>
2. Chêne. M. 2014. The Impact of Corruption on Growth and Inequality. [https://www.transparency.org/whatwedo/answer/the\\_impact\\_of\\_corruption\\_on\\_growth\\_and\\_inequality](https://www.transparency.org/whatwedo/answer/the_impact_of_corruption_on_growth_and_inequality)
3. Adopted in 2003, the UN Statement of Common Understanding on Human Rights-Based Approaches to Development Cooperation and Programming aims at ensuring that UN agencies, funds and programmes apply a consistent human rights-based approach to common programming processes at global, regional and country levels. <http://hrbportal.org/the-human-rights-based-approach-to-development-cooperation-towards-a-common-understanding-among-un-agencies>
4. UN Development Programme – Oslo Governance Centre. 2004. The Impact of Corruption on the Human Rights Based Approach to Development. [http://www.albacharia.ma/xmlui/bitstream/handle/123456789/30538/0284The\\_Impact\\_of\\_Corruption\\_on\\_the\\_Human\\_Rights\\_Based\\_Approach\\_to\\_Development\(2005\).r.pdf?sequence=1](http://www.albacharia.ma/xmlui/bitstream/handle/123456789/30538/0284The_Impact_of_Corruption_on_the_Human_Rights_Based_Approach_to_Development(2005).r.pdf?sequence=1)
5. Transparency International, 2013. Global Corruption Barometer. <https://www.transparency.org/gcb2013>
6. OECD. 2017. Preventing Policy Capture: Integrity in Public Decision Making, OECD Publishing, Paris. [http://www.keepeek.com/Digital-Asset-Management/oecd/governance/preventing-policy-capture\\_9789264065239-en#.WZ7sbShJY2w](http://www.keepeek.com/Digital-Asset-Management/oecd/governance/preventing-policy-capture_9789264065239-en#.WZ7sbShJY2w)
7. Clausen, Kraay and Nyiri. 2010. Corruption and Confidence in Public Institutions: Evidence from a Global Survey. Police Research Working Paper 5157. The World Bank. <https://elibrary.worldbank.org/doi/pdf/10.1596/1813-9450-5157>
8. Bhagwan. 2014. Water Scarcity: An Unresolved Issue in Many Parts of the Country Leads to Protests over Service Delivery. <http://www.wrc.org.za/News/Pages/Waterscarcity%E2%80%93a%20unresolvedissueinmany%20partsofthecountryleadstoprotestsoverservicedelivery.aspx>
9. Kaufmann, Montoriol-Garriga, & Recanatini. 2008. How Does Bribery Affect Public Service Delivery? Micro-Evidence from Service Users and Public Officials in Peru. <http://documents.worldbank.org/curated/en/907081468293751633/pdf/wps4492.pdf>
10. Chetwynd, Chetwynd, & Spector. 2003. Corruption and Poverty: A Review of Recent Literature. <http://www.u4.no/recommended-reading/corruption-and-poverty-a-review-of-recent-literature/>
11. UNDP. 2004. UNDP National Human Development Reports (NHDR) and the Use of Democratic Governance Indicators. <http://www.gaportal.org/sites/default/files/NHDR.pdf>
12. Gupta, Davoodi, & Tiongson. 2001. Corruption and the Provision of Health Care and Education Services. <http://www.imf.org/external/pubs/ft/wp/2000/wp00116.pdf>
13. Azfar and Gurgur. 2005. Does Corruption Affect Health and Education Outcomes in the Philippines? [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=723702](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=723702)
14. Azfar and Gurgur. 2005. Does Corruption Affect Health and Education Outcomes in the Philippines?
15. Rose-Ackerman. 2001. Trust, Honesty, and Corruption: Reflection on the State-Building Process. [http://digitalcommons.law.yale.edu/cgi/viewcontent.cgi?article=1013&context=lepp\\_papers](http://digitalcommons.law.yale.edu/cgi/viewcontent.cgi?article=1013&context=lepp_papers)
16. Corruption Watch. 2014. Corruption Fuels Poor Service Delivery. <http://www.corruptionwatch.org.za/corruption-fuels-poor-service-delivery/>
17. Chetwynd, Chetwynd, & Spector. 2003. Corruption and Poverty: A Review of Recent Literature. <http://www.u4.no/recommended-reading/corruption-and-poverty-a-review-of-recent-literature/>
18. Justesen & Bjørnskov. 2014. Exploiting the Poor: Bureaucratic Corruption and Poverty in Africa. <https://www.files.ethz.ch/isn/151822/afropaperno139.pdf>
19. Chêne. 2014. The Impact of Corruption on Growth and Inequality. [https://www.transparency.org/whatwedo/answer/the\\_impact\\_of\\_corruption\\_on\\_growth\\_and\\_inequality](https://www.transparency.org/whatwedo/answer/the_impact_of_corruption_on_growth_and_inequality)
20. Transparency International. 2014. Preventing Corruption in Humanitarian Operations. [https://www.transparency.org/whatwedo/publication/preventing\\_corruption\\_in\\_humanitarian\\_operations](https://www.transparency.org/whatwedo/publication/preventing_corruption_in_humanitarian_operations)
21. Chêne, M. 2014. Low Salaries, the Culture of Per Diems and Corruption. <http://www.u4.no/publications/low-salaries-the-culture-of-per-diems-and-corruption/>
22. Transparency International. 2017. Monitoring Corruption and Anticorruption in the SDGs: A Resource Guide. [https://www.transparency.org/whatwedo/publication/monitoring\\_corruption\\_and\\_anti\\_corruption\\_in\\_the\\_sustainable\\_development\\_go](https://www.transparency.org/whatwedo/publication/monitoring_corruption_and_anti_corruption_in_the_sustainable_development_go)
23. Grand corruption refers to “acts committed at a high level of government that distort policies or the central functioning of the state, enabling leaders to benefit at the expense of the public good”. Transparency International's Anti-Corruption Plain Language Guide. 2009.



24. Hall, D. 2012. Corruption And Public Services. [http://www.world-psi.org/sites/default/files/documents/research/en\\_psiu\\_corruption\\_and\\_public\\_services\\_nov2012\\_text\\_with\\_annexes\\_final.pdf](http://www.world-psi.org/sites/default/files/documents/research/en_psiu_corruption_and_public_services_nov2012_text_with_annexes_final.pdf)
25. Hall, D. 2012. Corruption and Public Services. [http://www.world-psi.org/sites/default/files/documents/research/en\\_psiu\\_corruption\\_and\\_public\\_services\\_nov2012\\_text\\_with\\_annexes\\_final.pdf](http://www.world-psi.org/sites/default/files/documents/research/en_psiu_corruption_and_public_services_nov2012_text_with_annexes_final.pdf)
26. Hall, D. 2012. Corruption and Public Services. [http://www.world-psi.org/sites/default/files/documents/research/en\\_psiu\\_corruption\\_and\\_public\\_services\\_nov2012\\_text\\_with\\_annexes\\_final.pdf](http://www.world-psi.org/sites/default/files/documents/research/en_psiu_corruption_and_public_services_nov2012_text_with_annexes_final.pdf)
27. Based on input provided by an expert consulted within the framework of this research
28. Chêne, M. 2015. Corruption and Anti-Corruption Practices in HR Management in the Public Sector. [https://www.transparency.org/whatwedo/answer/corruption\\_and\\_anti\\_corruption\\_practices\\_in\\_human\\_resource\\_management\\_in\\_th](https://www.transparency.org/whatwedo/answer/corruption_and_anti_corruption_practices_in_human_resource_management_in_th)
29. Chêne, M. 2016. Literature Review: The Use of ICTs in the Fight against Corruption. <http://www.u4.no/publications/literature-review-the-use-of-icts-in-the-fight-against-corruption/>
30. Davies & Fumiga. 2014. Mixed Incentives: Adopting ICT Innovations for Transparency, Accountability, and Anti-Corruption. <https://www.cmi.no/publications/5172-mixed-incentives>
31. <http://www.worldbank.org/en/news/feature/2015/01/13/unleashing-the-potential-of-open-data>
32. Chêne, M. 2016. Literature Review: The Use of ICTs in the Fight against Corruption. <http://www.u4.no/publications/literature-review-the-use-of-icts-in-the-fight-against-corruption/>
33. Naz. 2009. E-Governance for Improved Public Service Delivery in Fiji. <http://workspace.unpan.org/sites/Internet/Documents/UNPAN93241.pdf>
34. Mossberger & Tolbert. 2005. Trust and Confidence in Government and Public Services. <https://www.routledge.com/Trust-and-Confidence-in-Government-and-Public-Services/Llewellyn-Brookes-Mahon/p/book/9780415896191>
35. Martini & Luijken. 2014. The Role of Technology in Reducing Corruption in Public Procurement. [https://www.transparency.org/whatwedo/answer/the\\_role\\_of\\_technology\\_in\\_reducing\\_corruption\\_in\\_public\\_procurement](https://www.transparency.org/whatwedo/answer/the_role_of_technology_in_reducing_corruption_in_public_procurement)
36. Baniamin. 2015. Controlling Corruption through E-Governance: Case Evidence from Bangladesh. <http://www.u4.no/publications/controlling-corruption-through-e-governance-case-evidence-from-bangladesh/>
37. Nalwoga, L. 2015. Promoting Inclusive Use of ICT in Monitoring Service Delivery in Uganda. <http://ict4democracy.org/promoting-inclusive-use-of-ict-in-monitoring-service-delivery-in-uganda/#more-256>
38. Shrivastava & Bhattacharjee. 2014. ICT Development and Corruption: An Empirical Study. In Americas Conference on Information Systems <http://aisel.aisnet.org/cgi/viewcontent.cgi?article=1602&context=amcis2014>
39. <https://www.participatorybudgeting.org/pb-map/>
40. Yilmaz, Beris, & Serrano-Berthet. 2008. Local Government Discretion and Accountability: A Diagnostic Framework for Local Governance <http://siteresources.worldbank.org/EXTSOCIALDEVELOPMENT/Resources/244362-1193949504055/LocalGovernmentDiscretionandAccountability.pdf>
41. ODI. 2012. Common Constraints and Incentives Problems in Service Delivery. <https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/7791.pdf>
42. [http://gateway.transparency.org/guides/intro/social\\_accountability](http://gateway.transparency.org/guides/intro/social_accountability)
43. An integrity pact is both a signed document and an approach to public contracting which commits a contracting authority and bidders to comply with best practice and maximum transparency. A third actor, usually a civil society organisation, monitors the process and commitments made. [https://www.transparency.org/whatwedo/tools/integrity\\_pacts/4/](https://www.transparency.org/whatwedo/tools/integrity_pacts/4/)
44. Transparency International website: [https://www.transparency.org/whatwedo/tools/integrity\\_pacts/4/](https://www.transparency.org/whatwedo/tools/integrity_pacts/4/)
45. Yilmaz, Beris, & Serrano-Berthet.. 2008. Local Government Discretion and Accountability: A Diagnostic Framework for Local Governance <http://siteresources.worldbank.org/EXTSOCIALDEVELOPMENT/Resources/244362-1193949504055/LocalGovernmentDiscretionandAccountability.pdf>
46. Kukutscka, R. CSO Budget Monitoring 2016, p 8. [https://www.transparency.org/whatwedo/answer/civil\\_society\\_budget\\_monitoring](https://www.transparency.org/whatwedo/answer/civil_society_budget_monitoring)
47. The Guardian. 2012. Social Audits in India – a Slow but Sure Way to Fight Corruption. <https://www.theguardian.com/global-development/poverty-matters/2012/jan/13/india-social-audits-fight-corruption>
48. Lindner, S. 2013. Salary Top-Ups and Their Impact on Corruption. [https://www.transparency.org/whatwedo/answer/salary\\_top\\_ups\\_and\\_their\\_impact\\_on\\_corruption](https://www.transparency.org/whatwedo/answer/salary_top_ups_and_their_impact_on_corruption)
49. Chêne, M. 2015. Corruption and Anti-Corruption Practices in Human Resource Management in the Public Sector [https://www.transparency.org/whatwedo/answer/corruption\\_and\\_anti\\_corruption\\_practices\\_in\\_human\\_resource\\_management\\_in\\_th](https://www.transparency.org/whatwedo/answer/corruption_and_anti_corruption_practices_in_human_resource_management_in_th)

50. Transparency International. 2012. Calling Out Public Officials on Corruption: Codes of Conduct. [https://www.transparency.org/news/feature/calling\\_out\\_public\\_officials\\_on\\_corruption\\_codes\\_of\\_conduct](https://www.transparency.org/news/feature/calling_out_public_officials_on_corruption_codes_of_conduct)
51. Ahmad, Devarajan, Khemani, & Shah. 2005. Decentralization and Service Delivery. <http://www1.worldbank.org/publicsector/decentralization/decentralizationcorecourse2006/CoreReadings/Ahmad.pdf>
52. Ahmad, Devarajan, Khemani, & Shah. 2005. Decentralization and Service Delivery. <http://www1.worldbank.org/publicsector/decentralization/decentralizationcorecourse2006/CoreReadings/Ahmad.pdf>
53. Hanushek & Wossman, 2007. The role of education quality for economic growth. <https://ideas.repec.org/p/wbk/wbrwps/4122.html>
54. Chapman, 2002. Corruption and the education sector. [http://pdf.usaid.gov/pdf\\_docs/PNACT874.pdf](http://pdf.usaid.gov/pdf_docs/PNACT874.pdf)
55. Heyneman, 2008. The Cost of Corruption in Higher Education. <http://www.vanderbilt.edu/peabody/heyne/PUBLICATIONS/Heyneman.2008.CostsofCorruption.pdf>
56. Osipian, 2008. Corruption in Higher Education: Does it differ across the nations and why? [https://www.researchgate.net/publication/228618433\\_Corruption\\_in\\_Higher\\_Education\\_Does\\_it\\_Differ\\_across\\_the\\_Nations\\_and\\_Why](https://www.researchgate.net/publication/228618433_Corruption_in_Higher_Education_Does_it_Differ_across_the_Nations_and_Why)
57. Jamison, Jamison, & Hanushek, 2006. The effects of education quality on income growth and mortality decline <http://www.nber.org/papers/w12652>
58. Transparency International 2013. Global Corruption Report: education. [https://www.transparency.org/gcr\\_education](https://www.transparency.org/gcr_education)
59. [http://www.transparency.org/gcb2013/in\\_detail/](http://www.transparency.org/gcb2013/in_detail/)
60. Hallak & Poisson. 2007. Corrupt schools, corrupt universities: What can be done? <http://unesdoc.unesco.org/images/0015/001502/150259e.pdf>
61. Chene, 2014, p. 7. The impact of corruption on growth and inequality. [https://www.transparency.org/whatwedo/answer/the\\_impact\\_of\\_corruption\\_on\\_growth\\_and\\_inequality](https://www.transparency.org/whatwedo/answer/the_impact_of_corruption_on_growth_and_inequality)
62. Suryadarma 2012 . How Corruption Diminishes the Effectiveness of Public Spending on Education in Indonesia. [https://www.researchgate.net/publication/254231326\\_How\\_Corruption\\_Diminishes\\_the\\_Effectiveness\\_of\\_Public\\_Spending\\_on\\_Education\\_in\\_Indonesia](https://www.researchgate.net/publication/254231326_How_Corruption_Diminishes_the_Effectiveness_of_Public_Spending_on_Education_in_Indonesia)
63. Transparency International 2013. Global corruption report: education [https://www.transparency.org/gcr\\_education](https://www.transparency.org/gcr_education); Gupta, Davoodi, & Tiongson, 2001. Corruption and the provision of health care and education services. <http://www.imf.org/external/pubs/ft/wp/2000/wp00116.pdf>
64. Council for Higher Education Accreditation, 2013. Important Questions about Accreditation, Degree Mills and Accreditation Mills. <https://vn.usembassy.gov/education-culture/educationusa/accreditation-resources/mills/>
65. Bó & Rossi, 2007. Corruption and inefficiency: Theory and evidence from electric utilities [http://eml.berkeley.edu/~webfac/bardhan/e271\\_f06/bo.pdf](http://eml.berkeley.edu/~webfac/bardhan/e271_f06/bo.pdf)
66. Starosta de Waldemar 2010. New Products and Corruption: Evidence from Indian Firms. <http://econpapers.repec.org/paper/halcesptp/halshs-00595048.htm>
67. UNDP. 2011. Fighting Corruption in the Education Sector: Methods, Tools and Good Practices. <http://www.undp.org/content/dam/undp/library/Democratic%20Governance/IP/Anticorruption%20Methods%20and%20Tools%20in%20Education%20Lo%20Res.pdf>
68. Towards Transparency Vietnam 2011. Youth integrity in Vietnam: piloting Transparency International youth integrity surveys. [https://towardstransparency.vn/wp-content/uploads/2014/07/YIS-2011-Summary\\_FINAL\\_EN.pdf](https://towardstransparency.vn/wp-content/uploads/2014/07/YIS-2011-Summary_FINAL_EN.pdf)
69. BBC 2014. The students who feel they have the right to cheat <http://www.bbc.com/news/magazine-29950843>
70. BBC 2015 India students caught 'cheating' in exams in Bihar <http://www.bbc.com/news/world-asia-india-31960557>
71. BBC 2016 Why cracking down on cheating in India's Bihar state is tough <http://www.bbc.com/news/world-asia-india-36431885>
72. Hallak & Poisson. 2007. Corrupt schools, corrupt universities: What can be done? <http://unesdoc.unesco.org/images/0015/001502/150259e.pdf>
73. Transparency International 2013. Global Corruption report: Education. [https://www.transparency.org/gcr\\_education](https://www.transparency.org/gcr_education)
74. Transparency International 2017 Monitoring corruption and anticorruption in the SDGs: A resource guide. [https://www.transparency.org/whatwedo/publication/monitoring\\_corruption\\_and\\_anti\\_corruption\\_in\\_the\\_sustainable\\_development\\_go](https://www.transparency.org/whatwedo/publication/monitoring_corruption_and_anti_corruption_in_the_sustainable_development_go)
75. Chapman 2002. Corruption and the education sector [http://pdf.usaid.gov/pdf\\_docs/PNACT874.pdf](http://pdf.usaid.gov/pdf_docs/PNACT874.pdf)
76. Ruhee Neog 2013 Writing history: school textbooks in India <https://southasianvoices.org/writing-history-school-textbooks-in-india/>
77. The Independent 2017 US states consider laws allowing creationism to be taught by science teachers <http://www.independent.co.uk/news/world/americas/us-states-texas-creationism-science-teacher-state-law-evolution-religion-a7632931.html>
78. Financial Times 2014 Angry economic students are naïve and mostly right <https://www.ft.com/content/23da4f1e-df48-11e3-86a4-00144feabdc0>

79. The Guardian 2013 Economics students aim to tear up free-market syllabus <https://www.theguardian.com/business/2013/oct/24/students-post-crash-economics>  
The Guardian 2013 Academics back students in protests against economics teaching <https://www.theguardian.com/education/2013/nov/18/academics-back-student-protests-neoclassical-economics-teaching>
80. Poisson (Ed). 2014. Achieving transparency in pro-poor education incentives. <http://unesdoc.unesco.org/images/0022/002269/226982E.pdf>
81. Leguéré. 2003. Approvisionnement en livres scolaires. Vers plus de transparence. Afrique francophone. <http://unesdoc.unesco.org/images/0013/001362/136266f.pdf>
82. Ritva Reinikka and Jakob Svensson 2004 Local capture: evidence from a central government transfer programme in Uganda <http://www1.worldbank.org/publicsector/anticorrupt/FlagshipCourse2003/ReinikkaSvensson.pdf>
83. Bray. 2003. Adverse effects of private supplementary tutoring: dimensions, implications and government responses <http://unesdoc.unesco.org/images/0013/001330/133039e.pdf>
84. World Bank 2010. Silent and lethal: How quiet corruption affects Africa's development efforts [http://siteresources.worldbank.org/AFRICAEXT/Resources/english\\_essay\\_adi2010.pdf](http://siteresources.worldbank.org/AFRICAEXT/Resources/english_essay_adi2010.pdf)
85. Transparency International 2013. Global Corruption Report: education. [https://www.transparency.org/gcr\\_education](https://www.transparency.org/gcr_education)
86. IIEP/CHEA. 2016. Advisory statement for international practice. Combating corruption and enhancing integrity: A contemporary challenge for the quality and credibility of higher education <http://unesdoc.unesco.org/images/0024/002494/249460E.pdf>
87. Popham, 1999. Why standardized tests don't measure educational quality. <http://www.ascd.org/publications/educational-leadership/mar99/vol56/num06/Why-Standardized-Tests-Don't-Measure-Educational-Quality.aspx>. Prais, 2003. Cautions on OECD'S Recent Educational Survey (PISA) <http://www.oecd.org/edu/school/programme-for-international-student-assessment-pisa/33680693.pdf>
88. Hubbard, 2007. Putting the power of transparency in context: Information's role in reducing corruption in Uganda's education sector [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1100131](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1100131)
89. U4 Anticorruption Resource Centre. 2006. Corruption in the Education Sector. <http://www.cmi.no/publications/file/2563-corruption-in-the-education-sector.pdf>
90. Deininger & Mpuga, 2005. Does Greater Accountability Improve the Quality of Public Service Delivery? Evidence from Uganda [https://www.researchgate.net/publication/23722906\\_Does\\_Greater\\_Accountability\\_Improve\\_the\\_Quality\\_of\\_Public\\_Service\\_Delivery\\_Evidence\\_from\\_Uganda](https://www.researchgate.net/publication/23722906_Does_Greater_Accountability_Improve_the_Quality_of_Public_Service_Delivery_Evidence_from_Uganda)
91. Poisson. 2009. Guidelines for the design and effective use of teacher codes of conduct <http://unesdoc.unesco.org/images/0018/001850/185010e.pdf>
92. Transparency International 2013. Global Corruption Report: Education [http://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_education](http://www.transparency.org/whatwedo/publication/global_corruption_report_education)
93. Transparency International 2013. Global Corruption Report: Education . [http://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_education](http://www.transparency.org/whatwedo/publication/global_corruption_report_education)
94. Azfar and Gurgur. 2005. Does Corruption Affect Health and Education Outcomes in the Philippines? [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=723702](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=723702)
95. Di Tella and Schargrodsk. 2003. The Role of Wages and Auditing during a Crackdown on Corruption in the City of Buenos Aires. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=269490](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=269490)
96. Rogers, Hwang, Scott, Aiken, & Dinges. 2004. The Working Hours Of Hospital Staff Nurses And Patient Safety. <http://content.healthaffairs.org/content/23/4/202.full>  
Aiken. 2002. Hospital Staffing, Organisation, and Quality of Care: Cross-National Findings. <https://academic.oup.com/intqhc/article/14/1/5/2739511/Hospital-staffing-organization-and-quality-of-care>. Landrigan et al. 2007. Effects of Health Care Provider Work Hours and Sleep Deprivation on Safety and Performance. <https://www.jointcommission.org/assets/1/18/S2-JQPS-11-07S-lockley.pdf>
97. Gupta, Davoodi, & Tiongson. 2001. Corruption and the Provision of Health Care and Education Services. <https://www.imf.org/external/pubs/ft/wp/2000/wp00116.pdf>
98. Nikoloski & Mossialos. 2013. Corruption, Inequality and Population Perception of Healthcare Quality in Europe. <https://www.ncbi.nlm.nih.gov/pubmed/24215401>
99. Save the Children. 2015. Wake-Up Call: Lessons from Ebola for the World's Health Systems. <http://www.eldis.org/document/A72270>
100. Hillman. 2004. Corruption and Public Finance: An IMF Perspective. [https://www.researchgate.net/publication/4911791\\_Corruption\\_and\\_public\\_finance\\_An\\_IMF\\_perspective](https://www.researchgate.net/publication/4911791_Corruption_and_public_finance_An_IMF_perspective); Nikoloski & Mossialos. 2013. Corruption, Inequality and Population Perception of Healthcare Quality in Europe. <https://www.ncbi.nlm.nih.gov/pubmed/24215401>; Hollander, Moreno, Andel, & Davidow. 2012. The Economics of Health Care Quality and Medical Errors. <http://www.wolterskluwerlb.com/health/resource-center/articles/2012/10/economics-health-care-quality-and-medical-errors>
101. Savedoff & Hussmann. 2006. Cause of Corruption in the Health Sector: the Focus on Medical Attention Systems.
102. Mshana, Zilihona, Gesase, Sinda & Nsimba. 2013. Health Services Delivery and the Increase of Poverty in Tanzania: The Invisible Factor [http://www.scitecpub.com/World%20Research%20Journal%20of%20Public%20Health%20and%20Epidemiology/WRJPHE\\_Vol.%201,%20No.%201,%20November%202013/HEALTH%20SERVICES.pdf](http://www.scitecpub.com/World%20Research%20Journal%20of%20Public%20Health%20and%20Epidemiology/WRJPHE_Vol.%201,%20No.%201,%20November%202013/HEALTH%20SERVICES.pdf)

103. OECD, 2004. Health and the Economy: A Vital Relationship. [http://oecdobserver.org/news/archivestory.php/aid/1241/Health\\_and\\_the\\_economy:\\_A\\_vital\\_relationship\\_.html](http://oecdobserver.org/news/archivestory.php/aid/1241/Health_and_the_economy:_A_vital_relationship_.html)
104. Kendra Dupuy and Boris Divjak. 2015. Ebola and Corruption: Overcoming Critical Governance Challenges in a Crisis Situation <http://www.u4.no/publications/ebola-and-corruption-overcoming-critical-governance-challenges-in-a-crisis-situation/>
105. Transparency International. 2006. Global Corruption Report: Corruption and Health.
106. Transparency International 2006. Global Corruption Report: Corruption and Health.
107. Taryn Vian and Carin Nordberg. 2008. Corruption in the Health Sector 2008.
108. Davide Torsello. 2016. Corruption In Public Administration: An Ethnographic Approach. <http://www.e-elgar.com/shop/corruption-in-public-administration>
109. UNDP. 2011. Fighting Corruption in the Health Sector: Tools, Methods and Good Practices.
110. Essential medicines are selected by countries to satisfy the priority healthcare needs of the population. They are intended to be available at all times, in adequate amounts, in appropriate dosage forms, with assured quality and adequate information, and at affordable prices (WHO. 2015. Understanding the Role and Use of Essential Medicines Lists. <http://apps.who.int/medicinedocs/documents/s21980en/s21980en.pdf>)
111. Light, Lexchin, & Darrow. 2013. Institutional Corruption of Pharmaceuticals and the Myth of Safe and Effective Drugs. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2282014](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2282014)
112. WHO. 2006. Bulletin of the World Health Organization. <http://www.who.int/bulletin/volumes/84/2/news.pdf>
113. World Bank. 2010. Silent and Lethal: How Quiet Corruption Affects Africa's Development Outcomes. [http://siteresources.worldbank.org/AFRICAEXT/Resources/english\\_essay\\_adi2010.pdf](http://siteresources.worldbank.org/AFRICAEXT/Resources/english_essay_adi2010.pdf)
114. Zachariah. 2010. Illegal Prescription-Drug Trade Now Epidemic Illegal Prescription-Drug Trade Now Epidemic.
115. Transparency International. 2006. Global Corruption Report: Corruption and Health.
116. Charles Ornstein, Ryann Grochowski Jones, Mike Tigas. 2016. Drug Company Payments Mirror Doctors' Brand-Name Prescribing. <http://www.npr.org/sections/health-shots/2016/03/17/470679452/drug-company-payments-mirror-doctors-brand-name-prescribing>
117. Light, Lexchin, & Darrow. 2013. Institutional Corruption of Pharmaceuticals and the Myth of Safe and Effective Drugs. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2282014](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2282014)
118. Transparency International. 2006. Global Corruption Report: Corruption and Health. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2006\\_corruption\\_and\\_health](https://www.transparency.org/whatwedo/publication/global_corruption_report_2006_corruption_and_health)
119. Transparency International. 2006. Global Corruption Report: Corruption and Health. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2006\\_corruption\\_and\\_health](https://www.transparency.org/whatwedo/publication/global_corruption_report_2006_corruption_and_health)
120. Holmberg & Rothstein. 2010. Dying of Corruption. Health Economics, Policy and Law. <http://anticorr.eu/publications/dying-of-corruption/>
121. Shiva Kumar, A K. 'The Neglect of Health, Women and Justice', Economic & Political Weekly, 8 June 2013, vol. 48 (23) p 26-7. <http://www.epw.in/journal/2013/23/commentary/neglect-health-women-and-justice.html>
122. Davide Torsello. 2016. Corruption in Public Administration: An Ethnographic Approach. <http://www.e-elgar.com/shop/corruption-in-public-administration>
123. Wahi, Namita. 2012. 'Litigating the Right to Health in India: Can Litigation Fix a Health System in Crisis?' CMI Brief Vol. 11 (4) May 2012, p1. <http://www.cmi.no/publications/file/4475-litigating-the-right-to-health-in-india.pdf>
124. Dreze, Jean and Amartya Sen. An Uncertain Glory: India and Its Contradictions. London, 2013. p148. <http://press.princeton.edu/titles/10175.html>  
Bajpai, Nirupam and Sangeeta Goyal. 2004. 'Primary Health Care in India: Coverage and Quality Issues', Center on Globalisation and Sustainable Development Working Paper no. 15. June 2004. [http://globalcenters.columbia.edu/mumbai/files/mumbai/content/pdf/3.\\_bajpai\\_primaryhealth\\_2004\\_15.pdf](http://globalcenters.columbia.edu/mumbai/files/mumbai/content/pdf/3._bajpai_primaryhealth_2004_15.pdf)
125. Transparency International. 2006. Global Corruption Report: Corruption and Health. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2006\\_corruption\\_and\\_health](https://www.transparency.org/whatwedo/publication/global_corruption_report_2006_corruption_and_health)
126. Chêne M. 2009. Approaches to Corruption in Drug Management. <http://www.u4.no/publications/approaches-to-corruption-in-drug-management/>
127. Savedoff, W. 2008. The Impact of Information and Accountability on Hospital Procurement Corruption in Argentina and Bolivia. U4 Brief 7:2008. <http://www.cmi.no/publications/publication/?3027=the-impact-of-information-and-accountability-on>
128. Transparency International. 2006. Global Corruption Report: Corruption and Health. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2006\\_corruption\\_and\\_health](https://www.transparency.org/whatwedo/publication/global_corruption_report_2006_corruption_and_health)
129. Chêne, M. 2015. Corruption and Anti-Corruption Practices in HR Management in the Public Sector. [https://www.transparency.org/whatwedo/answer/corruption\\_and\\_anti\\_corruption\\_practices\\_in\\_human\\_resource\\_management\\_in\\_th](https://www.transparency.org/whatwedo/answer/corruption_and_anti_corruption_practices_in_human_resource_management_in_th)



130. National Academy of Engineering and Institute of Medicine. 2005. Building a Better Delivery System: A New Engineering/Health Care Partnership <https://www.ncbi.nlm.nih.gov/books/NBK22862/>
131. Transparency International Uganda. 2014. ICT for Health Service Delivery. <http://ict4democracy.org/ict-for-health-service-delivery/>
132. WHO and UNICEF. 2017. Progress on Drinking Water, Sanitation and Hygiene: 2017 Update and SDG Baselines. <https://washdata.org/report/jmp-2017-report-final>
133. WHO. 2002. WHO World Water Day Report. [http://www.who.int/water\\_sanitation\\_health/takingcharge.html](http://www.who.int/water_sanitation_health/takingcharge.html)
134. Corruption in water is a problem throughout the world. A forthcoming report by the Water Crimes Project shows that corruption in the water sector is a high frequency and high impact crime type within Europe. <http://www.watercrimes.eu/>
135. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
136. Indian National Congress (INC). 2012. 'Green Revolution: Making India Self-Sufficient in Food'. <http://inc.in/In-Focus/252/Green-Revolution-Making-India-self-sufficient-in-food>
137. Mekonnen, M.M. and Hoekstra, A.Y. 2011. 'National Water Footprint Accounts: The Green, Blue and Grey Water Footprint of Production and Consumption', Value of Water Research Report Series No. 50, (Delft) page 8. <http://waterfootprint.org/media/downloads/Report50-NationalWaterFootprints-Vol1.pdf>
138. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
139. FOA. No date. Water Scarcity – One of the Greatest Challenges of Our Time. <http://www.fao.org/zhc/detail-events/en/c/880881/>
140. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector); Water Integrity Network. 2011. Corruption Risks and Governance Challenges in the Irrigation Sector. <http://www.waterintegritynetwork.net/?docs=6601>
141. Transparency International 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
142. UNDP. 2010. Corruption, Accountability and Gender: Understanding the Connections. <http://www.undp.org/content/dam/aplaws/publication/en/publications/womens-empowerment/corruption-accountability-and-gender-understanding-the-connection/Corruption-accountability-and-gender.pdf>
143. <http://www.theindependentbd.com/printversion/details/101872>
144. WHO. 2002. World Health Report: Reducing Risks, Promoting Healthy Life. <http://www.who.int/whr/2002/en/>
145. <http://www.waterintegritynetwork.net/2017/07/27/wastewater-management-garment-industry/>
146. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
147. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
148. Houdret, A. 2004. Water As a Security Concern: Conflict of Cooperation? [http://www.afes-press.de/pdf/Hague/Houdret\\_Water\\_Security.pdf](http://www.afes-press.de/pdf/Hague/Houdret_Water_Security.pdf)
149. <https://www.globalwitness.org/en-gb/campaigns/environmental-activists/defenders-earth/>
150. Chêne, M. 2009. Good Practice in Addressing Corruption in Water Resource Management Projects.
151. Transparency International. 2009. Global Corruption Report: Corruption in the Water Sector.
152. UNDP. 2011. Fighting Corruption in the Water Sector: Methods, Tools and Good Practices. <https://www.ircwash.org/resources/fighting-corruption-water-sector-methods-tools-and-good-practices>
153. Human Rights Watch. 2012: Out of Control: Mining Regulatory Failure, and Human Rights in India p9. <https://www.hrw.org/report/2012/06/14/out-control/mining-regulatory-failure-and-human-rights-india>
154. BBC. 2015. Water Mafia: Why Delhi is Buying Water on the Black Market. <http://www.bbc.com/news/world-asia-india-33671836>; Sethi, A. 2015, At the Mercy of the Water Mafia. <https://foreignpolicy.com/2015/07/17/at-the-mercy-of-the-water-mafia-india-delhi-tanker-gang-scarcity/>
155. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
156. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector.. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
157. Berg. 2013. Best Practices in Regulating State-owned and Municipal Water Utilities. ECLAC. [http://repositorio.cepal.org/bitstream/handle/11362/40791/S2013252\\_en.pdf](http://repositorio.cepal.org/bitstream/handle/11362/40791/S2013252_en.pdf)
158. <http://www.waterintegritynetwork.net/wigo/special-topics/private-space-in-public-water/>

159. Goldman, M. 2007. 'How "Water for All!" Policy Became Hegemonic: The Power of the World Bank and its Transnational Policy Networks', *Geoforum*, 38 (5), pp 786-800. [https://www.researchgate.net/publication/222173476\\_How\\_Water\\_for\\_All\\_policy\\_became\\_hegemonic\\_The\\_power\\_of\\_the\\_World\\_Bank\\_and\\_its\\_transnational\\_policy\\_networks](https://www.researchgate.net/publication/222173476_How_Water_for_All_policy_became_hegemonic_The_power_of_the_World_Bank_and_its_transnational_policy_networks)
160. Chêne, M. 2009. Good Practice in Addressing Corruption in Water Resource Management Projects. <http://www.u4.no/publications/good-practice-in-addressing-corruption-in-water-resource-management-projects/>
161. Transparency International. 2008. Global Corruption report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
162. Allan, J. A. 2003. 'Integrated Water Resources Management is More a Political than a Technical Challenge', *Developments in Water Science*, vol. 50 (2003), pp 9–23  
Ingram, H. 2008. 'Beyond Universal Remedies for Good Water Governance', *The Sixth Biennial Rosenberg Water Policy Forum on Water for Food: Quantity and Quality in a Changing World – 24-27 June 2008, Zaragoza, Spain*. [www.zaragoza.es/contenidos/medioambiente/cajaAzul/IngramACC.pdf](http://www.zaragoza.es/contenidos/medioambiente/cajaAzul/IngramACC.pdf)  
Mukhtarov, F. and A. Cherp. 2015. 'The Hegemony of Integrated Water Resources Management as a Global Water Discourse', in V.R. Squire, H.M. Milner and K.A. Anne Daniell (eds), *River Basin Management in the Twenty-First Century: Understanding People and Place*, (New York)
163. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
164. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
165. WIN. 2011. Annotated Water Integrity Scans: A Manual to Help Assess Integrity Levels in Specific Sub-Sectors of the Water Sector. [http://www.waterintegritynetwork.net/wp-content/uploads/2015/02/WIN\\_AWIS\\_Manual\\_EN\\_2011.pdf](http://www.waterintegritynetwork.net/wp-content/uploads/2015/02/WIN_AWIS_Manual_EN_2011.pdf)
166. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
167. UNDP. 2011. Fighting Corruption in the Water Sector: Methods, Tools and Good Practices. <https://www.ircwash.org/resources/fighting-corruption-water-sector-methods-tools-and-good-practices>
168. Butterworth & de la Harpe. 2009. Improving the Framework? Institutional Reform and Corruption in the Water Sector. <http://www.u4.no/publications/improving-the-framework-institutional-reform-and-corruption-in-the-water-sector/>
169. For more on monitoring and evaluation in the water sector see: Water Integrity Network. 2016. What Counts? Monitoring and Evaluating Water Integrity. <http://www.waterintegritynetwork.net/wigo/chapters/what-counts-monitoring-and-evaluating-water-integrity/>
170. Chêne, M. 2009 Good Practice in Addressing Corruption in Water Resource Management Projects. <http://www.u4.no/publications/good-practice-in-addressing-corruption-in-water-resource-management-projects/>
171. The Integrity Management Toolbox gives an overview of measures to address risks specific to water organisations. <http://www.waterintegritynetwork.net/imtoolbox/>
172. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector. [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
173. Transparency International Pakistan. Integrity pacts: A Pakistan Success Story. <http://www.transparency.org.pk/documents/KW&SB.pdf>
174. <http://washinnovations.r4d.org/program/mobile-for-water-m4w>
175. Schouten, T. 2012. ICT for Open Contracting in Fragile and Conflict-Affected States.
176. WIN. 2016. Water Integrity Global Outlook. <http://www.waterintegritynetwork.net/?docs=4959>
177. Transparency International. 2008. Global Corruption Report: Corruption in the Water Sector [https://www.transparency.org/whatwedo/publication/global\\_corruption\\_report\\_2008\\_corruption\\_in\\_the\\_water\\_sector](https://www.transparency.org/whatwedo/publication/global_corruption_report_2008_corruption_in_the_water_sector)
178. Gibb. 2015. Citizen Science Faces Pushback. <http://cen.acs.org/articles/93/i36/Citizen-Science-Faces-Pushback.html>
179. UNDP. 2011. Fighting Corruption in the Water Sector: Methods, Tools and Good Practices. <https://www.ircwash.org/resources/fighting-corruption-water-sector-methods-tools-and-good-practices>

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