





### Coordination Mechanisms of Anti-Corruption Institutions

#### Query:

"Are there any good examples of multiple anti-corruption agencies working within the same country and how best can one ensure effective coordination?"

### **Purpose:**

I operate out of a country where we have three key anti-corruption agencies. One agency takes care of Corruption in the Civil Service and of Public Servants, another takes care of Money Laundering, Private Sector related Corruption as well as Politically Exposed Persons, and the third keeps record of assets declaration of public officers. The three hardly work together, resulting in serious gaps in the entire anti-corruption implementation effort, especially in the absence of a national anti-corruption strategy.

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### **Summary:**

The success of Anti-Corruption Commissions (ACCs) strongly relies on the effectiveness and cooperation of

many other complementary institutions such as the prosecutor, the ombudsman, the auditor general and the courts whose contribution and interaction play a crucial role. Yet, experience worldwide indicates that in most countries, cross-agency coordination remains weak or inexistent. Law enforcement agencies are often not well connected and integrated, due to their wide diversity, overlapping mandates, competing agendas, various levels of independence from political interference and a general institutional lack of clarity.

Channels for ensuring effective inter-agency cooperation often involve setting up a new coordinating body or unit. Country experience from Uganda, South Africa, Bulgaria, Georgia or New South Wales indicate that this coordinating agency should have sufficient authority, resources, capacity and political backing to perform its mandate and compel line ministries to implement the national anti-corruption agenda. Further accompanying measures can be envisaged to foster effective cross-agency cooperation, including the organisation of joint training, pro-active communication information exchange using technology, monitoring the implementation of anticorruption efforts or support provided to government agencies to implement anti-corruption programmes.

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### Part 1: Coordination Challenges Faced by Anti-Corruption Institutions

Faced with challenges of endemic corruption, many governments in developing countries have opted for the establishment of one (or more) strong and centralised anti-corruption bodies, whose mandate is to provide leadership and technical expertise on key areas of anticorruption work. In most cases, these new specialised anti-corruption bodies are established in parallel of existing traditional institutions that retain jurisdictions on various aspects of corruption related issues such as courts, prosecutors, line ministries, auditor general, ombudsman, etc. While centralising core capacity, expertise, responsibility and resources, specialised anti-corruption agencies need to interact with other bodies, as their success greatly depends on the cooperation and effectiveness of other institutions. Yet, the coordination of anti-corruption institutions has generally received little political and operational attention and anti-corruption efforts continue to face major coordination challenges in most countries.

### **Multiplicity of Actors**

While in theory the success of anti-corruption institutions greatly depends on effectiveness and cooperation of a wide range of complementary institutions, in practice these are often not well connected and integrated, due to their wide diversity, overlapping mandates, competing agendas, various levels of independence from political interference and a general institutional lack of clarity. Against such background, the establishment of an Anti-Corruption Commission (ACC) has been seen in many cases as adding another layer of (ineffective) bureaucracy to the law enforcement sector. One alternative strategy to address coordination challenges consists of building the anti-corruption capacity of existing institutions rather than setting up new specialised bodies. A 2005 UNDP comparative study of institutional arrangements to combat corruption provides an overview of the multiplicity of actors involved in the fight against corruption that need to cooperate with the ACCs:

#### **Public Prosecutor**

The relation between a country's prosecutor and the ACC is critical, as the prosecutor plays a key role in bringing corruption cases before the courts. However, in many developing countries, the prosecutor lacks sufficient independence to effectively bring a case to court, especially when it involves senior officials close

to the political power. The weakness of the anti-corruption architecture becomes most visible at the crossroads of investigation (by the ACC or a similar body) and prosecution by the judiciary and/or court proceedings. Some countries have opted for the establishment of special anti-corruption units under the Public Prosecutor rather than a specialised ACC as a way to address coordination challenges, such as Mongolia with its Special Investigation Unit, Nicaragua with its Investigations and Advice Unit or Mozambique with the Central Anti-Corruption Unit. This approach reflects the strong functional links that exist between anti-corruption and public prosecution institutions.

#### The Auditor General

The Auditor General has a key role to play in promoting sound and transparent financial management and contributes to both preventing and detecting corruption. As such, cooperation with the ACC is crucial, as regular audits help identify strengths and weaknesses in administrative structures and procedures, detect corrupt practices and make them riskier. In some countries such as Bulgaria, the Auditor General has been given a prominent role in fighting corruption. In other countries such as **Bolivia**, the audit office is even tasked with co-ordinating anti-corruption activities among agencies. In other countries, annual reports of the Auditor General are shared with the ACC and vice versa. In Indonesia for example, the Corruption Eradication Commission (KPK) is required to report its activities to the Audit Board. Nevertheless, the latter falls under the supervisory mandate of the former, as it is equally essential to ensure that KPK has access to audit reports.

But in many developing countries, such coordination arrangements are hampered by the existence of secrecy laws, whereby these reports are not made public or only circulated to restricted circles to protect sensitive information from too broad disclosure.

#### The Ombudsman

As independent body receiving citizens' complaints, the Ombudsman protects citizens from abuse by the public administration. Although its mandate goes beyond corruption, the Ombudsman typically investigates complaints, determines whether corruption is present or not and can refer the matter to the prosecutor or the ACC for further action. Like the ACC, the Ombudsman should work in close cooperation with other independent institutions such as the courts and audit

bodies. In some countries such as Papua New Guinea and Uganda, the Ombudsman operates as the main anti-corruption body and has power to directly investigate complaints of corruption. In New South Wales, the Ombudsman also monitors the activities of the Police Integrity Commission, which is in charge of preventing, detecting and investigating serious misconduct within the police.

#### The Courts

In many developing countries, the judiciary is often the weakest part of the overall institutional arrangements for anti-corruption, undermining the credibility of the national integrity system as a whole. For example, Botswana has experienced several instances where trials have been delayed, affecting the conviction rate of the cases brought before the courts by the Directorate on Corruption and Economic Crime (DCEC). In **Argentina**, the ACC had developed a poor relationship with the courts and had to defend in many occasions its right to appear in lower courts, despite the federal appeal courts' recognition in two occasions of its right to do so. These examples illustrate the deep interconnections between the anti-corruption institutions and the overall governance system and the crucial need to establish effective coordination mechanisms that promote effective cooperation between the various institutions involved.

#### **Public Service Reform Agency**

Prevention of corruption is an implicit component of public sector reforms, as their objective is to increase the effectiveness, transparency and accountability of the public sector through improved administrative, financial and control systems. In countries that haven't explicitly formulated an anti-corruption strategy, anti-corruption efforts are implicitly embedded into broader governance reforms, making anti-corruption a by-product of public sector reform. ACCs should therefore work closely with public sector institutions and usually have the mandate to make recommendations on how to improve public management to reduce opportunities for corruption as part of its preventive mandate. In some countries, these recommendations are binding, not in others.

#### Other Specialised Anti-Corruption Bodies

In some countries like **Zambia** or **Nigeria**, the coordination of anti-corruption activities is further challenged by the creation of several specialised

bodies, such as public service omissions and task forces, with complementary and sometimes overlapping mandates. This can potentially have a positive impact in creating enough constructive rivalry and competition between agencies so as to stimulate them to expose corruption if the primary ACC fails to do so.

### **Confusion of Roles and Overlaps**

However, in the absence of an effective coordination mechanism that promotes interagency cooperation, the approach of specialised anti-corruption bodies may also raise issues of duplication, redundancy and waste of resources. In some countries where specialised anti-corruption bodies have been established to bypass existing corrupt or dysfunctional police or prosecutorial services, effective interagency cooperation has been an even greater challenge. (Please see: Measuring success of Anti-Corruption Commissions).

Due to design flaws and failure many ACCs have failed to bring harmony to the overall institutional architecture for anti-corruption. The oversupply of institutions with conflicting or unclear mandates is widespread across countries and the existence of an ACC along side other structures create risks of overlaps and confusion over their respective roles in the fight against corruption. This can lead to serious gaps in the implementation of anti-corruption policies. In **Zambia** for example, the Police, the ACC and the Electoral Commission have been all denying that it was their responsibility to implement electoral law, undermining effective enforcement of electoral provisions. (Please see: 2005 UNDP comparative study).

In some countries, the establishment of additional specialised anti-corruption bodies may in practice implicitly undermine the credibility of other existing anti-corruption mechanisms. In **Zambia** again, in addition to creating confusion about their respective mandate, the creation of the Task Force on Economic Plunder along side the ACC was perceived as affecting the confidence of the public in the commission, ultimately undermining its credibility. As a result, many ACCs operate between governmental isolation and bureaucratic duplication.

### Competition over Resources and Leadership

The coexistence of a myriad of institutions with an anticorruption mandate in countries is also likely to stretch

the level of resources allocated to anti-corruption work. This is especially so in countries where resources are scarce and therefore establishing specialised bodies entails the risk of fuelling fierce inter-agency struggle for scarce resources and promote competition rather than effective cooperation.

Beyond competing for resources, anti-corruption institutions may also compete for influence and leadership in the fight against corruption. Some institutions are more powerful, have more political leverage than others and enjoy higher levels of independence from political interference, which is likely to reinforce existing conflicts and ultimately hinder any genuine coordination efforts.

### **Basic Infrastructure for Inter-Agency Cooperation**

In many countries, the effective coordination of anticorruption work is greatly undermined by the failure to consider cooperation issues from the design stage of the anti-corruption institutional arrangements, resulting in inadequate or inexistent coordination mechanisms, which lack resources, capacity and political backing.

A U4 report on anti-corruption policy making based on six case studies concludes that coordination of anti-corruption is usually weak, rare and inconsistent. While roles and responsibilities of the various agencies are generally to some extent defined in anti-corruption policies and strategies, they tend to exist more on paper than in practice.

The units or bodies appointed for coordination usually do not take a pro-active approach, and often lack the visibility, powers and political leverage to fulfil their mandate effectively. This is partly due to the fact that the institutional arrangements to coordinate and oversee the implementation received little political attention at the design stage and tend to be ill conceived, lacking authority, leadership and political backing to compel powerful ministries to comply with anti-corruption measures. In some of the countries studied, some experts criticised the absence of a high level anti-corruption policy coordinator located close to the president, to give anti-corruption more visibility and connect the technocratic and political levels, while others questioned the independence of ACCs situated to close to the political power, with a high risk of political interference.

Effective inter-agency cooperation also implies that adequate **resources and capacity** are allocated to the coordinating body, which was not the case in most of the countries studied. In most countries, in addition to lacking adequate political backing, anti-corruption agencies are seriously understaffed and underfinanced, with little resources allocated to cross-agency coordination and cooperation.

In **Tanzania** for example, although provisions are made for coordination on paper, they have had little impact in practice. The Tanzania Prevention and Combating of Corruption Bureau (PCCB) is located in the President's Office along with the Good Governance Coordinating Unit (GGCU), the body responsible for the coordination of the anti-corruption strategy. Initial commitments for support were obtained across government agencies, but in the absence of a legal duty on the part of the other agencies to cooperate and facilitate the PCCB and GGCU's work, these commitments appear to have had little impact in practice. The GGCU lack the authority to demand compliance with the agencies' quarterly reporting obligations and its role has been reduced to collecting and publishing the agencies' selfassessments. The GGCU capacity has been further constrained by limited staffing of only 3-4 professionals, a limited vision and lack of proactive attitude with regard to its coordinating role.

Lack of communication and awareness is a major challenge to effective coordination of efforts in most countries. Given their cross-cutting nature, anticorruption reforms depend on good communication between all implementing agencies and the public at large. The U4 report indicates that communication is weak in virtually all countries studied. Anti-corruption policies and documents are not easily accessible and most public agencies have little awareness of their existence. (Please see: U4 report on anti-corruption policy making).

### **General Lack of Integration in the overall Governance System**

A 2005 U4 report assessing the performance of five African Anti-Corruption Commissions indicates little integration of ACCs into the governance system. The report concludes that there is little evidence of the positive relationship between the strategies and activities of each ACC and wider governance reforms. While, for instance, in Uganda there is a certain degree of inter-agency communication under the auspices of the Minister for Ethics and Integrity (see below), this

doesn't exist at the level of policy development, implementation or monitoring and evaluation.

This dislocation between the priorities and activities of the ACC and the development of mechanisms of government transparency and accountability results in the marginalisation of the ACC and subsequent failure to incorporate corruption detection and prevention in the wider reforms.

### Lack of Political Will, Leadership and Cohesion

The report further states that, while this disconnection between the ACC and the wider governance reform agenda could reflect a desire to maintain the independence of the ACC, in reality, it might also reflect a lack of political commitment.

Lack of coordination may also reflect internal lack of a government's political cohesion and difficulty to overcome resistance to change in some government agencies and sectors of society. In Tanzania, for example, the disappointing record of the PCCB and its coordinating mechanism could also partly be explained by the local political equation. President Mkapa did not assume office as the head of the ruling party, as this role still belonged to Julius Nyerere, who was known to oppose reforms that threaten the party's dominance. As a result, although located in the President Office, the PCCB lacked a strong independent political base to operate. In Argentina, the troubled relations between the ACC and the President and Congress have even threatened its existence. Peronist congressmen close to former President Menem and concerned about investigations of their political allies, had argued for its disbandment. (Please see: Anti-Corruption Agencies: Rhetoric versus reality).

As a result, in many countries, the coordination mechanisms in place lack the leadership and political weight to effectively fulfil their mandate and compel the various institutions to cooperate.

### Part 2: Country Examples of Coordination Mechanisms

Faced with these various coordination challenges, cross-agency cooperation seem to be more the exception than the rule across countries, due to the dispersion of actors and interests, insufficient political will, as well as lack of capacity, resources, awareness

or political weight of the anti-corruption lead agency(ies) and its/their coordinating mechanisms.

In the absence of good practices, it is not possible to assert firmly which cooperation mechanisms may be most conducive to ACC success. As the effectiveness of the anti-corruption architecture strongly depends on the local context and political economy, there is no model for cooperation that stands out as the most effective mechanism. Only a few examples offer some indications of success in bringing the various bodies involved in anti-corruption work to improve their cooperation and coordination. In many countries, coordination challenges have been primarily addressed through the establishment of specific coordination units or bodies.

#### **Uganda**

Uganda's institutional arrangements for anti-corruption include several anti-corruption agencies with different roles and mandates, including the Inspectorate of Government, the Directorate of Ethics and Integrity, the Inter Agency Forum, the Auditor General, the Directorate of Prosecutions, etc. (Please see: http://www.business-anti-corruption.com/en/country-profiles/sub-saharan-africa/uganda/snapshot/)

The **Inspectorate of Government** (IGG) is the primary anti-corruption agency. It also functions as an Ombudsman, but its mandate has been extended to investigate, arrest and prosecute cases involving corruption, abuse of authority or abuse of public office. The IGG has developed into an independent public office with an Inspector General of Government appointed by the President as its head. In spite of a general lack of human and financial resources and instances of political and executive influence pressure, the IGG has been able to draw on cross-agency cooperation. It has benefitted in this regard by its authority to enforce the leadership code of conduct across government agencies and the Inspector's role as the chair of the Inter Agency Forum, the national coordinating committee overseeing the anti-corruption action plan.

The Directorate of Ethics and Integrity (DEI) was established in 1986 to raise the issue of corruption to cabinet level, to coordinate government efforts in its fight against corruption through the Inter Agency Forum, and to establish an integrity system that promotes good governance. The DEI is mandated to implement the government's zero tolerance towards corruption policy as well as the National Strategy to

Fight Corruption and maintains an extensive collection of anti-corruption resources that are open to the public.

The Inter Agency Forum (IAF) has been established by the government to ensure effective coordination of agencies on corruption issues. It is composed of Uganda's major anti-corruption institutions, including the judiciary and police. The IAF has been used by anti-corruption agencies to work together in the design and implementation of national anti-corruption strategies and to promote awareness and the advancement of reforms.

Despite these modest outcomes, coordinating functions are seriously constrained by DEI's lack of sufficient funding and qualified staff, undermining its practical capacity to fulfil its mandate. As a result, the activities of anti-corruption agencies continue to lack coordination and information gathering and sharing within and between the agencies remain weak.

#### South Africa

South Africa is interesting as it is an example of a country that decided against establishing a specialised body and opted for strengthening the anti-corruption capacity of existing institutions instead. In this model, anti-corruption specialisation and expertise can be achieved by establishing dedicated units within existing enforcement agencies, resulting in less coordination challenges with other agencies. However, coordination all the same remains a major problem. In South Africa, the anti-corruption mandate has been divided between various institutions, including among others the South African Police Service, the National Prosecuting Authority (NPA), the Auditor General, the South African Revenue Services, the Special Investigating Unit (SIU), the Public Protector (Ombudsman), and the Public Service Commission. All these agencies have core functions aimed at strengthening employee integrity, financial management and the quality of administration within the public service.

Within the Department of Public Service and administration, the Public Service Anti-Corruption Unit has a coordinating function and is responsible for the implementation of anti-corruption policies and legislation as well as convening the anti-corruption coordinating committee. This unit does not carry out investigations. It is composed of all agencies that have an anti-corruption function, including national as well as provincial departments. However, in spite of laudable

efforts, coordination remains problematic because of overlapping legislative mandates.

South Africa had established in 2001 a special investigating and prosecuting unit, the Directorate of Special Operations (also known as DSO or the Scorpions). It had achieved some degree of crossagency cooperation until it was disbanded in 2009, because it touched on sensitive issues. The DSO was a multidisciplinary agency under the National Prosecuting Authority that was charged with the investigation and prosecution of organised crime and corruption. Its staff of 536 consisted of some of the best police, financial, forensic and intelligence experts in the country and had pioneered a new approach, combining intelligence, investigation and prosecution. With the DSO's success in high-profile cases, public confidence grew and money laundering and racketeering were added to its priorities. As of 2004, out of 380 prosecutions, 349 resulted in convictions, representing an average conviction rate of 93,1%. According to experts consulted within the framework of this guery, the "Scorpions" had managed to achieve some level of cross-agency cooperation at the operational level, by building initial trust across agencies with a proactive strategy of volunteering information exchange on specific cases. The "Scorpions" have been disbanded by President Kgalema Motlanthe in January 2009.

### **Bulgaria**

Bulgaria is another example of a country that decided against establishing a specialised body, but opted for strengthening the anti-corruption capacity of existing institutions. The National Service of the Police, the National Service on Combating Organised Crime, the Financial Intelligence Agency and the Financial Control Agency contribute to the fight against corruption while the Ombudsman and the National Audit Office have been given a primary role in corruption prevention. The National Audit Office is composed of a president and ten members elected by the National Assembly for nine years. Not only does it hold the register of asset declarations, but it is also responsible for auditing financial activities of political parties. However, it does not have an enforcement role and is supposed to refer cases to the Public Prosecutor should it uncover criminal acts.

A coordination mechanism has been established under the form of the Commission for Coordinating Actions against Corruption established in 2002. This is an inter-ministerial commission that is composed of

representatives from the Ministry of Finance, the Ministry of Interior, the Ministry of Justice and the Audit Office. The main functions of the commission are to coordinate and control implementation of the National Anti-Corruption Strategy and assess effectiveness of anti-corruption efforts. It does not have investigative powers and is not allowed to intervene in specific cases. The Helpdesk has found no assessment of the effectiveness of this mechanism in practice.

### Georgia

In Georgia, a **State Minister for Reform Coordination Office** has been charged with the coordination of anticorruption reforms. He has the political power to
compel compliance, as a powerful and charismatic
figure close to the president, to whom he is required to
report required to report twice a year.

According to the 2005 National Anti-Corruption Strategy, each ministry is responsible for implementing its own anti-corruption measures and to recruit and train the necessary staff to do so. Some agencies have also established internal groups to coordinate anti-corruption activities. As monitoring implementation of reforms by the various agencies can be a powerful way to promote better coordination of anti-corruption efforts, the 2005 Anti-Corruption Action Plan further requires that ministries report on quarterly basis to the State Minister for Reform Coordination on progress of implementation.

However, although an Anti-Corruption Action Plan Implementation Group has been set up as a reporting forum composed of representative from responsible ministries, it has not been effectively institutionalised and in practice, most reporting happens on the phone informally. (Please see: U4 report on anti-corruption policy making).

#### **Other Examples**

While establishing specific coordination institutions is a way to address cooperation issues, further accompanying measures can be envisaged to foster effective cross-agency cooperation. The following examples illustrate how the organisation of joint training, pro-active communication and information exchange using information technology, monitoring the implementation of anti-corruption efforts or support provided to government agencies to implement anti-corruption programmes can help develop trust and

facilitate formal and informal forms of coordination across the various agencies involved.

Part of the success of Australia's New South Wales Independent Commission Against Corruption (ICAC) is attributed to its successful cooperation with other agencies. Established in 1988 by the Independent Commission against Corruption Act, the ICAC adopted a three pronged approach of investigation, prevention as well as education, similar to the Hong Kong model, with a crucial emphasis on corruption prevention. The NSW ICAC is often referred to as a model for establishing anti-corruption agencies. The NSW ICAC is credited to have fostered cooperation from other government agencies by working with them to resolve their diminish problems that anti-corruption effectiveness. The ICAC routinely supports the public sector by providing advice and building government's agencies' resistance to corruption through training and resources. The ICAC also uses internet and information technology to promote inter-agency and public cooperation through a set of electronic tools for preventive analysis. (Please see: Anti-corruption Agencies: Rhetoric versus Reality)

The UNDP comparative study provides further country examples of coordination mechanisms. (Please see: 2005 UNDP comparative study):

In the **Philippines**, formalised information exchange has been established between relevant law enforcement agencies through the establishment of inter-agency consultative bodies and ad hoc task forces and/or the organisation of joint training programmes.

**Korea** operates an anti-corruption policy coordination body composed of ten related agencies such as ministries and supervisory bodies.

In Latvia, the Corruption Prevention and Combating Bureau has been given a clear coordination mandate in national and local government institutions, and all bodies with an investigate mandate are required to assist the bureau in carrying out its investigations. In practice, the multiplicity of law enforcement agencies creates major coordination challenges. A Parliamentary Crime and Corruption Prevention Council was therefore established, headed by the Prime Minister and tasked with coordinating and supervising all state authorities.

In the **USA**, at the federal level, following the Watergate scandal, the Government established the Office of Government Ethics (OGE) that carries the central

coordinating role of an anti-corruption agency. It does so by developing rules and regulations, providing guidance and interpretation, evaluating the effectiveness of rules and agency based ethics programs and conducting outreach and education for executive officials and staff. The OGE has also been given a prominent role in reviewing financial disclosure statements of White House employees and presidential appointees. (Please see: Anti-corruption Agencies: Rhetoric versus Reality).

#### **Lessons Learnt**

The above mentioned examples indicate that in order to enforce effective cross-agency cooperation, the agency in charge of coordinating and monitoring the implementation of the anti-corruption policies should have sufficient authority, resources, capacity and political backing to perform its mandate and compel line ministries to implement measures and report on progress. Emerging lessons include:

### Political and operational attention from the design stage

Many coordination efforts have failed because of initial design flaws. Sufficient political and operational attention should be given to the coordination of anticorruption efforts from the onset, with coordination issues considered from the design stage of anticorruption policy making, and integrated in the overall anti-corruption architecture.

#### Strong leadership and political determination

Securing support and collaboration from other agencies usually implies positioning the anti-corruption institution at a point of maximum influence. The overall responsibility for coordination needs to be assigned to a high level political authority or a lead figure, usually in the Office of the President or a State Minister with the view to providing the requisite political leverage to deal with powerful line ministries and other public agencies. Some authors recommend locating the lead agency at the maximum point of influence to give it the necessary political backing and visibility to allow it to take leadership in promoting coordination and if need be, compelling other institutions to cooperate.

#### Clear mandate and lines of responsibility

Coordination is as needed as a clear mandate granted to the coordinating body. For effective cooperation, the

establishment of specialised anti-corruption bodies should relate to what's already in place and respective roles and mandates clearly defined and well understood. This implies understanding where and how the various mandates and responsibilities meet and interact. The establishment of a new anti-corruption architecture involves to a certain degree a reallocation of roles and responsibilities and necessarily implies that mandates competences are readjusted, institutional hierarchies clarified. Respective institutions should be given clear lines of responsibility, especially with regard to who should deal with particular cases of corruption. Clear rules of engagement should also guide the interaction and collaboration between the various institutions involved.

#### Legal obligation to cooperate

Some countries such as Hong Kong and Singapore impose stringent legal duties of cooperation on government and the public, compelling them by law to support the agency's work. Malaysia follows same patterns with 16 deputy public prosecutors being assigned by the Attorney General's office to work on Anti-Corruption Agency's cases. Whatever the solution, there should be a framework of control to ensure effective enforcement of collaboration.

#### Cooperation as a long-term process

Effective cooperation of anti-corruption efforts is a long-term process that requires times and resources allocated to trust building efforts. While ad-hoc cooperation on specific cases can contribute to this process, it is recommended to approach coordination as a long term and ongoing process and establish the necessary structures to facilitate effective long term cooperation in the form of regular interagency forums that allows exchange of information, discussions, etc.

#### Appropriate coordinating committees or structures

Where coordination remains challenging, special committees or institutions may be established to address cross-agency cooperation. They can be composed of representatives from the executive, judiciary, legislature, and civil servants in key departments (such as customs, procurements, revenue collection and law enforcement and from local governments). They can also include members from civil society such as business representatives, NGOs, religious leaders, etc. In all cases, they need to have

sufficient power, resource and capacity to deal with powerful ministries.

#### Information and communication strategy

By nature, cross-cutting reforms depend on good communication and information sharing between all implementing agencies and the public, including access and dissemination of supporting anti-corruption policies and documents. Recent developments in information technology open new opportunities in this field as well as provide innovative tools to promote effective data and information sharing across agencies, such as the development of cross-agency databases, computerised case-management tracking systems, etc. At another level, a proactive strategy of systematic information sharing between agencies may help build trust relationships and foster longer term cooperation. The anti-corruption agency can take the lead in unilaterally volunteering information exchange as a strategy to gain the other agencies' confidence.

#### **Part 3: Further Reading**

### Anti-Corruption Agencies: Between empowerment and irrelevance (2009)

Independently of their format and powers, ACAs encounter various constraints to their mandate, which explain their mixed impact. This paper tries to understand the rise, future and implications of this new kind of "integrity warriors".

http://ancorage-net.org/content/documents/anticorruption%20agencies%20between%20empowerment %20and%20irrelevance.pdf

## Anti-Corruption policy making in practice: what can be learnt for implementing Article V of UNCAC? (2007)

This report provides insights of countries' experience in anti-corruption policy making and implementation and presents six country case studies including Georgia, Indonesia, Nicaragua, Pakistan, Tanzania and Zambia http://www.cmi.no/publications/file/?2914=anti-corruption-policy-making-in-practiceht

### Comparative Study of Institutional Arrangements to fight corruption (2005)

This UNDP in-depth comparative study provides an overview and analysis of various arrangements for combating corruption, lessons learned and conditions for success drawing on 14 country briefs. http://regionalcentrebangkok.undp.or.th/practices/gover

nance/documents/Corruption\_Comparative\_Study-200601.pdf

### Measuring Success in Five African Anti-corruption Commissions (2005)

This report analyses the political, economic and social drivers and inhibitors of the success of Anti-Corruption Commissions (ACAs) in five African countries, namely Ghana, Malawi, Tanzania, Uganda and Zambia by looking into factors such as the overall governance context, the role of donor and recipient governments and the performance of anti-corruption agencies.

http://www.u4.no/themes/aacc/finalreport.pdf

### Anti-Corruption Agencies: Rhetoric versus reality (2005)

This study charts the emergence of anti-corruption agencies (ACAs), and examines experiences with these bodies in developing countries. It proposes a set of criteria for assessing and explaining their performance. The analysis applies within strict limits to those countries that have established the minimum political, legal, and socio-economic conditions for effective governance. Where these conditions are in place, success is possible. However, ACAs in poor and badly governed states are generally ineffective, if not actively harmful.

http://ideas.repec.org/a/taf/jpolrf/v8y2005i1p69-103.html