REDUCING CORRUPTION ON OPERATIONS: A TOOL FOR INTERNATIONAL ORGANISATIONS

Transparency International (TI) is the world's leading non-governmental anti-corruption organisation. With more than 100 chapters worldwide, TI has extensive global expertise and understanding of corruption.

Transparency International Defence and Security (TI-DS) works to reduce corruption in defence and security worldwide.

Corruption undermines the success of international interventions, reducing mission effectiveness, diminishing public trust in intervention forces. Where intervention forces lack adequate oversight and control, for example, or procurement is based on the interests of a single individual or state rather than the requirements of the organisation, its ability to respond to crises suffers. International organisations are complex and political organisations, which can make ensuring accountability and oversight challenging. But where they are able to ensure that there is effective oversight of peace and military operations and corruption risks are limited, their ability to secure peace and stability will be much greater.

This tool is designed to help international organisations conducting peace or military operations assess their vulnerability to corruption, with the aim of helping institutions strengthen themselves against this risk, improve their effectiveness, and ensure their operations are in the best interest of those directly affected by them and the global public. It sets out good practice for accountability and good governance of peace or military operations conducted by international organisations, and to ensure that those operations are overseen effectively.

Drawing on the methodology of the Government Defence Anti-Corruption Index, this set of questions aim to assess levels of corruption risk and vulnerability and to enable institutions to assess how their systems compare to international good practice. It is separated into five sections: political risk, financial risk, personnel risk, operations risk, and procurement risk.

POLITICAL RISKS

If a corrupt individual or group is able to influence the policy of the organisation towards international operations to benefit the interests of an individual, group or company rather than the aims of the organisation, this is high-level corruption.

Key Terms

Peace and Security Policy Transparency - The process of developing peace and security policies can be manipulated or complicated in order to hide corrupt decisions and illicit enrichment; for example, if a policy approval procedure is lacking or policy decisions are not published. In the most extreme cases, corruption at the highest level might represent 'capture' of the organisation.

Budgeting - Transparency and openness in budgets for operations, and effective auditing, help ensure that expenditure is subject to scrutiny and debate, which helps prevent wasteful, compromised, or illicit spending. It is important that the sources of income streams that make up the budget are identifiable, to ensure that these sources are legitimate and are not connected to corrupt activity.

Auditing - Effective auditing ensures that decision makers and the public are provided with a clear assessment of the organisation's accounts, processes, functions and performance, and compliance with regulations.

Organised Crime - Organised crime is present in every country and is a growing transactional security threat. Increasingly technology-enabled, it does not respect national or international boundaries. Motivated by the acquisition of wealth, it is arguably beyond the power of any one agency or nation to contain effectively, and may have penetrated defence, security, and intelligence establishments.

Decision-making - Decisions about operations policy should be made in the best interests of the organisation's objectives, free from undue influence by individuals, elite groups, or companies.

Question	Good Practice
1. Is there provision for effective and independent scrutiny of overall policies on peace and security in the organisation?	Member states have oversight and scrutiny of policies on peace and security, and there is transparency about the decision-making mechanism; the agreed policies are transparent to the public.
2. Are decisions to initiate operations made based on clear criteria, clear assessment of needs, and in line with the organisation's overarching objectivesIs there formal provision for effective and independent scrutiny of the decision to initiate an operation? This might include, for example, the decision that an operation is required and the development of the mandate for the operation.?	Member states have oversight and scrutiny of policies on peace and security, and there is transparency about the decision-making mechanism; the agreed policies are transparent to the public.
3. Are any assessments related to mandate development made publically available?	Documents containing key recommendations and justifications for mandate decisions are made publically available.
4. Are mandates established in a consultative way?	Mandates are established in consultation with member states and civil society and those affected.

5. Is there formal provision for effective oversight of operations (including initiation, operation and closure), and of the institutional bodies that carry out operations?

Processes are in place for oversight of operations and the institutional bodies that implement them. Member states are involved in these processes and outcomes of deliberations and decisions are transparent.

6. Is strategy, policy and approach related to operations debated and publicly available? If there is public debate, do the relevant bodies within the organisation participate in this debate?

Material is made available to allow informed debate about both general security policies of the institution and about individual operations.

The organisation engages in regular debate with academia, opinion-formers, and CSOs about defence issues in collaborative ways. The organisation co-organises discussions with independent think tanks or civil society organisations, or through joint media briefings.

7. Is there a policy, or is there evidence of, openness towards civil society organisations (CSOs) when dealing with issues of corruption?

There is a policy that requires the organisation to be open towards CSOs (NGOs, think tanks, academia, media) and there are mechanisms established to enable this.

8. Is there an openly stated and actively implemented anti-corruption policy for operations?

There is an openly stated and actively implemented anti-corruption policy for operations, that takes into account
1) corruption in the host nation space (including political and strategic risks;
2) corruption within the operation;
3) matters affecting TCNs/TPNs

9. Are there independent, well-resourced, and effective institutions within the organisation tasked with building integrity and countering corruption in peace operations and political missions? How do these institutions communicate, influence and impact one another?

There are well-resourced, and effective institutions within the organisation tasked with building integrity and countering corruption in peace operations and political missions. These include institutions which are outside the chain of command of the body conducting the operation/mission. There is transparency and clarity of the roles of each.

10. Does the public in areas affected by peace/military operations trust the organisation to tackle the issue and risks of bribery and corruption in their operations?

The public in areas affected by peace/military operations believe that there is a clear commitment from the defence establishment that bribery and corruption are not acceptable and must be prosecuted, and that their efforts to tackle the problem are sincere and effective.

11. Are there regular assessments of the areas of greatest corruption risk for staff and personnel on peace/military operations, including those of contributing countries, and are the findings used as inputs to the anti-corruption efforts?

Corruption risks are clearly identified. Departments and missions conduct their own risk assessments in a process that reflects a culture of corruption risk assessment. Assessments should be conducted in line with the requirements of a particular environment, but should take place at least on an annual basis.

Risk assessment findings are used to develop and regularly update the anti-corruption policy and institutional action plans.

12. Is there a clear process for acquisition planning for operations, including provisions for oversight? Is the process publicly available?

Processes are in place to forecast the organisation's requirements for equipment/services and how gaps will be filled (taking account of contingent-owned equipment). Connections between specific purchases and strategic requirements are made explicit. Information is publically available, and includes justification of purchases, lines of responsibility, timelines, mechanisms, and outcomes. There are strong external oversight functions that assess the acquisition plans, their legitimacy and likelihood that plans are going to function properly. Member states are involved in oversight of acquisition planning.

13. Is the budget for peace/military operations transparent, showing key items of expenditure? Is it sufficiently detailed to be overseen by member states?

The budget contains comprehensive and disaggregated information on expenditure across functions. Information includes personnel (salaries, allowances), training, construction, procurement/acquisitions, maintenance of equipment, disposal of assets, reimbursement to TCN/Ps, and administrative expenses. Member states are given a budget proposal at least 2 months before the start of the budget year.

14. Is there an appropriate body responsible for budget scrutiny and analysis in an effective way, and is this body provided with detailed, extensive, and timely information on the buget?

There is a committee (or committees) or similar institution with extensive formal rights of scrutiny of the peace and security operations budget. The committee (or similar institutions) has the power to scrutinise any aspect of budget and expenditures. The committee(s) is in a position to require expert witnesses to appear in front of it.

15. Is the approved budget for peacekeeping/ military operations made publicly available? In practice can the public, civil society, and the media, obtain detailed information on the budget?

The approved peace and security operations budget is proactively published for the public in disaggregated form. It is accompanied by an explanation of the budget intended for experts, as well as a concise summary with clear language for non-experts.

Information requested by member states and the media about the peace and security operations budget is provided in a timely fashion, without systematic and unjustifiable delays.

16. Do peacekeeping/military operations derive income from sources that are not sanctioned by member states, and if so are they published and scrutinised? (This off-budget income might include gifts in kind, revenue from sale of services or goods, etc.)

If such income exists, there is full publication of all sources of income, the amounts received, and the allocation of this income. Mechanisms of scrutiny are in place administered centrally, and the internal audit office within the institution.

17. Is there an effective internal audit process for expenditure on peacekeeping/military operations (HQ, operational)? Is this transparent, conducted by appropriately skilled individuals and subject to member state oversight?

The internal audit unit engages in ongoing reviews of peacekeeping/military operations and political missions' expenditures and has the flexibility to build its own work programme for the year. Staff expertise is appropriate (e.g. there is low staff turnover rate). Its findings are valued by the leadership of the organisation.

Oversight occurs for sensitive or critical issues. Member states are provided with non-redacted reports.

The organisation regularly addresses audit findings in its practices.

18. Is there effective and transparent external auditing of expenditure on peace/military operations? If so, is this external to the organisation or a separate body within the institution? If the latter, does this body have independence from the decision-making body, and is this body, and its budget protected?

The external audit unit has the mandate to review peace operations and political missions, and regularly audits spending in a formal, in-depth process. Both financial audits and performance audits (value for money) of spending are conducted.

The external audit unit is independent of the organisation's executive departments. It has its own budget (e.g. passed by member states rather than the organisation's leadership).

External audit information is published proactively and is accessible, and is provided within a reasonable timeline and in detail (e.g. including analysis on audited accounts, oral briefings, expert advice, investigative work).

The organisation regularly addresses audit findings in its practices.

19. Is there evidence of penetration (for example, through media investigations or other reports), of a penetration of organised crime into relevant bodies, and at operational level? If no, is there evidence that the institution is alert and prepared for this risk?

The organisation is aware of the riskof the pentration of organised crime in conflict areas and peace/military operations, and is taking action, or would be in a position to take action quickly should organised criminal activity take place. The issue is included in the anti-corruption policy.

20. Is there a body that conducts investigations of corruption and organised crime within the bodies responsible for peace/military operations? Is there a process for this body to refer cases to law enforcement bodies, and is this process effective?

There is a capability within the organisation and its missions to investigate corruption and involvement within organised crime.
The organisation/missions have the capability to refer cases to law enforcement bodies, either in the host nation or the troop contributing country.
The host nation/troop contributing countries have the judicial and law enforcement capability to process the case in accordance with international norms.
The organisation/mission follows up on cases to track progress and outcomes.

21. If lobbying occurs (e.g. by businesses or other outside actors) in relation to peace operations policy and mandate decision-making, is this well-recorded and transparent?

The organisation's relevant departments and member states are required to regularly publish and update records of lobbying meetings by specifying the details and frequency of interactions with lobbyists. They are also required to publish any conflicts of interest risks that have been identified and the mitigating actions taken.

Oversight bodies are able to investigate conflicts of interest.

22. Are senior positions within peace/military operations filled on the basis of objective selection criteria, and are appointees subject to investigation of their suitability and prior conduct?

Senior positions within peace/military operations are subject to objective selection criteria. There is no opportunity for intervention by third parties that may result in selection bias or undue influence in the selection of candidates. There is full investigation of candidates' suitability through vetting of their prior conduct.

FINANCIAL RISKS

In any organisation or department, sound management of assets, with timely and efficient accounting systems, is one of the most powerful devices for maintaining integrity. The better the systems in place, the less opportunity there will be for corruption. As well as providing opportunity for fraud, a poor and disconnected accounting system makes it easy to conceal irregularities. Even if irregularities are found, poor accounting makes it impossible to identify those responsible, and hold them to account.

Key Terms

Asset disposals - Asset disposals are a common category for corrupt management. This can occur through the misappropriation or sale of property portfolios and surplus equipment. Even large assets can be poorly controlled and easy to sell off corruptly or undervalued.

Budgets - Budgets for peace and security operations are a perennially difficult issue, and are open to abuse because they can be unpredictable, developed under pressure to act quickly, and complex to manage and distribute. A crucial ingredient in the creation of accountable organisations is an effective and transparent process of allocating, managing, and overseeing their resources.

Links to Businesses - Where decision-makers have links to businesses, particularly where there is no transparency on those links, it can lead to corruption.

Illegal private Enterprise - Misuse of military power in order to create personal wealth through businesses - for example, selling protection services - is a form of corruption.

Question	Good Practice
23. How effective are controls over the disposal of assets, and is information on these disposals, and the proceeds of their sale, transparent? Do these processes and controls cover asset disposal by host nations,TCCs, and member states that have donated equipment or supplies?	There is a clear policy or regulatory process related to disposal of assets, and there is an internal unit responsible for advising or overseeing the procedures, e.g., internal audit. There is a coordinating body within the organisation that is responsible for aggregating disposal database reports. Comprehensive information is published, including specific details on the items that are being sold (location, timing, type of item, etc.) The financial results of disposals are publicly available and they are comprehensive.
24. Is independent and transparent scrutiny of asset disposals conducted by the organisation, and are the reports of such scrutiny publicly available?	An audit body independent of the departments overseeing asset disposals scrutinises asset disposals that take place, and comprehensive audit reports detailing findings are made public and accessible.
25. What, if any, percentage of expenditure in the budget year is dedicated to spending on secret items relating to peace operations?	One per cent or less of expenditure is dedicated to secret items. (?)

26. Are member states or appropriate oversight bodies given full information for the budget year on the spending of all secret items (if any) relating to operations? Are they given information on all spending?

Member states or appropriate oversight bodies are provided with extensive information on all spending on secret items, if any, which includes detailed, line item descriptions of all expenditures, and disaggregated data.

27. Are audit reports of the annual accounts of bodies related to peace/military operations subject to member state scrutiny and debate?

Member states are provided with detailed audit reports related to peace/military operations. Audit reports examine all expenditures (major and minor), compare expected to actual impact, and include strategic recommendations linked to weaknesses or challenges. Member states debate and ask questions about the findings and the incorporation of audit recommendations.

28. Are off-budget expenditures permitted within, and for the initiation of, peace/military operations? If so, are they exceptional occurrences that are well controlled? In practice are there any off-budget military/peacekeeping expenditures? If so, does evidence suggests this involves illicit (economic) activity?

All peace/military operation expenditure is recorded in the official budget. If there are exceptions (for example, for emergency expenditure), there is a clearly stated manner in which they are recorded. In practice, off-budget expenditures are rare.

29. Are mechanisms for classifying and accessing information about operations (including mandate process, funding, budget, audit, impact) effective?

There is policy and guidelines that clearly stipulate: 1) how the public can access or request peace/military operations related information produced by UN bodies; 2) what information is and is not available 3) how those decisions are reviewed internally by the organisation 4) how classified information is categorised 5) how the public can appeal those decisions 6) that there is an active, accessible, independent appeal or review body to review access to information decisions. The organisation operates a system of classification of information under a clear regulatory framework to ensure that information is adequately protected. The public is able to access information regularly, within a reasonable timeline, and in detail.

30. Is there evidence that actors/bodies within the organisation (and/or personnel and/or member states) have beneficial ownership of commercial businesses that relate to peace/military operations (e.g. suppliers of equipment to the organisation, or major companies in host nations)? If so, how transparent are details of the operations and finances of such businesses? Are these interests publicly stated and subject to scrutiny?

There is no beneficial ownership of commercial businesses that relate to peace/military operations by actors within the organisation, or where beneficial ownership exists, the benficial owners subject their financial statements to an independent external audit, based on relevant international auditing standards. Full audit details are available to member states.

31. Are businesses or private sector links with the organisation's actors/institutions subject to transparent independent scrutiny at a recognised international standard? If so, what is this standard, what form does the scrutiny take, and how is it effective?

There are no businesses or private sector links with actors/ departments in the organisation responsible for peace/ military operations, or where these links exist, the relevant actors subject their financial statements to an independent external audit, based on relevant international auditing standards. Full audit details are available to the public.

32. Is there evidence of unauthorised private enterprise by the organisation's employees or contractors on peace operations, and is there guidance to control against their engagement in such enterprises? If so, what is the organisation's response? How does it audit, monitor and identify such behaviour?

The organisation strictly forbids any unauthorised private enterprise, with appropriate sanctions in place to deal with offenders. Unauthorised private enterprise does not occur.

PERSONNEL RISKS

Personnel can abuse their positions for personal gain or fall victim, directly or indirectly, to others' corruption. Personnel and recruitment processes are particularly susceptible to corruption, especially if it is endemic throughout an institution. The most common effect of corruption in personnel is that it undermines the confidence of staff, making them increasingly prone to participating in or condoning corrupt practices. Staff with trust in the establishment they work for is key to the effective functioning of the armed forces and defence and security establishments.

Key Terms

Values and leadership committment. - For top officials and officers themselves, leadership behaviour requires committed and visible engagement by strong role models. They, in turn, need feedback through honest and objective assessment through, for example, third parties and opinion surveys. When leaders engage in corruption themselves, or knowingly permit it, the integrity of the organisations they lead is greatly compromised.

Payroll, Promotions, Appointments, Rewards. - Areas of particular concern include corruption involving skimming and misdirection of the payroll, favours in appointments, and misuse of reward and discipline processes. Rewarding those who can pay, giving positions or money to those who haven't earned it, and sabotaging others to preserve power are unethical practices that undermine international organisations

Troop engagement - The terms and processes through which troop contributing countries are engaged should be transparent and fair to avoid a particular country or individual from engaging TCCs in their interest.

Salary Chain - The salary chain is the long link from the national treasury right down to payment to the individual soldier. In many corrupt environments those funds are stolen or diverted en route, so that far less of the due amount finally reaches the soldier.

Values and Standards - Tackling corruption requires attention to the values and ethical behaviour of troops, officers and officials. Building a strong ethical culture of adherence to policies, rules, and guidelines minimises corruption risk.

Small Bribes and Favours - Many citizens' experience of corruption is likely to be in the payment of small bribes in daily life. These might include payments for speeding up administrative procedures, bribes at checkpoints or payments to avoid predatory police. Policymakers who put in place a plan that focuses only on high-value corruption are unlikely to succeed; the general public needs to see benefit at a local level.

Question	Good Practice
33. Does the organisation publicly commit, through, for example, speeches, media interviews, or political mandates, to anti-corruption and integrity measures?	There is a clear commitment to anti-corruption and integrity measures by the leadership of the organisation. Internal commitment is demonstrated through proactive anti-corruption measures, and regular communications about integrity from top level officials. Public commitment is demonstrated through interviews with journalists and CSOs, and statements at events and conferences. Anti-corruption is part of public talking points for top level officials, with explicit reference to integrity and good defence governance, and management of corruption risks. These activities are supported by member states.

34. Are there effective measures in place for personnel found to have taken part in forms of bribery and corruption, and is there evidence of these measures being carried out? This includes oversight and leadership roles.

Cases are investigated through formal processes and without political influence. There are a range of clearly defined offences that clearly apply to all personnel. These offences cover (at a minimum) offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or legal duty. Possible sanctions include dismissal, and referral to law enforcement bodies in host nation/troop countries.

35. Is whistleblowing encouraged and are whistleblowers in operations, and at headquarters, afforded adequate protection from reprisal for reporting evidence of corruption, in regulations and in practice?

Internal regulations on whistleblowing and reporting corruption exists and is applicable to military and official personnel. There is explicit reference to protection of whistleblowers, including: protection of identity, protection against retribution, reversed burden of proof regarding retaliation, waiver of liability for the whistleblower, no sanctions for misguided reporting, right of the whistleblower to refuse participation in wrongdoing. Whistleblowing is actively encouraged through training, information, and guidance on the reporting of corruption and protections for whistleblowers. There is a well-resourced independent unit that handles claims, and institution-wide campaigns about whistleblowing that covers personnel at all levels. Officials and personnel are confident that adequate protections (and protection of identity) are provided for whistleblowers and individuals reporting corruption claims.

36. Is special attention paid to the selection, time in post, and oversight of personnel in sensitive positions, including officials and personnel in procurement, contracting, financial management, and commercial management?

Special attention is paid to personnel in sensitive positions, i.e., individuals with significant autonomy over personnel, resources, and the policies/plans that determine them. This includes decision-making power in procurement, recruitment, contracting, financial and commercial management. There is an open recognition that certain positions are sensitive, and procedures limit conflicts of interest with revolving door limitations and stringent vetting. Standard appointment/recruitment processes are followed for particular technical competencies. There is internal oversight in the organisation to scrutinise appointment and promotion decisions of personnel in sensitive positions.

37. Is the number of personnel related to peace/military missions accurately known and publicly available?

The number of civilian and military personnel is updated on at least a quarterly basis and made available publicly, disaggregated by rank bracket.

38. Are pay rates and allowances for civilian, military and other personnel working in peace/military operations (HQ and operations) openly published?

Pay rates for all civilian and military personnel are openly published and publicly accessible, disaggregated by rank. Allowances for all civilian and military personnel are openly published, including criteria for eligibility and calculation methods.

39. Do personnel receive the correct pay on time, and is the system of payment well established, routine and published?

Personnel receive pay on time. Personnel receive the correct pay. The payment and allowances system is openly published, and these standards are acceptable across troop contributing states. It includes all of the following, at a minimum:
- Pay brackets for all ranks, disaggregated by seniority.
- Details on how individual pay is calculated, including time starting in post / away from post
- A list of all permitted allowances and expenses, the entitlement criteria, and caps on entitlement
- Separated administrative, unit and audit responsibilities.

40. Is there an established, independent and objective appointment system for the selection of personnel (troops, police, civilian) at middle and top management level?

The system for appointment of mission personnel at middle and top management applies objective job descriptions and standardised assessment processes. Appointments are subject to external scrutiny for high profile positions, which includes both process audits and a sample of individual promotions. Member states scrutinise decisions for very high level appointments. The system for appointment of military personnel at middle and top management applies objective job descriptions and standardised assessment processes. Promotion boards are open and representatives from other departments are invited and regularly sit on the board. 40

41. Are personnel within the organisation promoted through an objective, meritocratic process? -

Personnel promotions are conducted through formal appraisal processes and promotions boards for all personnel. Promotions to senior ranks are open to scrutiny by member states. Service members from separate departments sit on the boards as independent observers. Details of postings and promotions are published regularly (normally at least annually) within the system, and in advance of their effective date. Name, rank, new post and effective date are publicly declared at least one month ahead for all senior level positions.

42. Are the processes by which TCCs are engaged clear, transparent, and based on a clear assessment of needs and requirements?

43. Are chains of command separate from chains of payment within the organisation's peace/military operations personnel? And does the organisation ensure that funds provided to TCCs are distributed to troops effectively and separately from their command chains?

Chains of command are strictly separated from chains of payment throughout the organisation's peace/military operations. The organisation sets clear conditions for funds provided to TCCs, requiring that payment is distributed to troops separately from their chains of command.

44. Is there a Code of Conduct for all military/ peacekeeping personnel that includes, but is not limited to, guidance with respect to bribery, gifts and hospitality, conflicts of interest, and post-separation activities? Is there evidence that breaches of the Code of Conduct are effectively addressed?

The organisation has a code of conduct for all military/ peacekeeping personnel, which comprehensively explains bribery, gifts and hospitality, conflicts of interest, and post-separation activities. It provides specific guidance on how to proceed in the face of these events.The code of conduct is available to the public and effectively distributed to all personnel. Guidance on the code of conduct is included in induction training. Breaches of the code

45. Does regular anti-corruption training take place for military and civilian peacekeeping personnel? At both operational and headquarters level?

Anti-corruption training addresses the connection between corruption and the following topics: organisational values and standards, impact of the organisation, military effectiveness; identification and reporting of corruption, and risk management. Anti-corruption training is delivered upon induction, once a year and upon entry to high risk positions and environments, and once a year for high risk personnel. It is also woven into promotion courses at all levels.

46. Is there a policy to make public outcomes of the investigation/ disciplinary action of military/ peacekeeping personnel (operational and at HQ) for corrupt activities, and is there evidence of effective investigations/disciplinary action in recent years?

There is a formal policy of the organisation to make outcomes of investigations publicly available. Cases are investigated through formal processes and without political influence.

47. Are there effective measures in place to discourage facilitation payments (which are illegal in almost all countries)?

Facilitation payments are strictly and clearly prohibited. Cases are investigated or prosecuted through formal processes. There is little substantive concern expressed from independent commentators over undue political influence. Facilitation payments are rare.

OPERATIONAL RISKS

Peace and Special Political operations are complex—with a wide array of actors, a constantly changing environment, and often serious consequences. Their complexity means that they are rife with opportunities for corruption. The institution's image is vital in promoting and retaining public confidence and respect. Operations are the context in which the general population has most face-to-face daily conduct with the institution's personnel, so their conduct is of paramount importance.

Key Terms

Disregard of Corruption in-Country - When international forces intervene in a country in conflict, their approach to corruption once in theatre is critical to the success of their mission. Disregard of corruption in-country runs a high risk of being seen as complicit in it.

Corruption within Mission - There are too many cases where intervention or peacekeeping forces are themselves a source of corrupt behaviour, and corruption within mission occurs. Corruption during operations is not a one-way street, and military missions must address the corruption risks in their ranks as well as those in the countries they operate in.

Contracting - In a conflict environment, the flow of money into a country represented by local contracting and logistics – whether aid money or military support – is an important part of helping to develop that country. With all the problems in a conflict situation, it is easy for corrupt contracts to be awarded, and for non-performance to be tolerated. If carried out effectively, local contracting holds the potential to be a vehicle for resuscitating the local economy. However, widespread international military contracting also runs the risk of increasing corruption.

Private Security Companies - Private military contractors are a growing feature of interventions. These companies often operate without the ethical guidelines, accountability to the public, and oversight that govern most traditional armed forces—the risk of corruption is therefore high.

Question	Good Practice
48. Does organisational doctrine address corruption as a strategic issue on peacekeeping/military operations?	There is doctrine in place that addresses corruption as a strategic issue on operations. The doctrine addresses corruption issues for peace and conflict operations at strategic, operational and tactical levels. The doctrine recognises that international actors can contribute to increasing corruption risks and offers guidance on mitigating these risks. Issues addressed by the doctrine include support for political actors, contracting, interaction with local population, partnering with local forces, and security sector reform in operational contexts. The doctrine also details the practicalities of implementation. It is made publicly available.
49. Do mandates for individual peace/military missions properly reflect governance and corruption challenges in the intervention context?	Mandates for interventions reflect corruption as a strategic issue specific to the local context. Where relevant, it addresses corruption in the host nation space, including at a political level, and makes accoutability and good governance an aim of the mission. Mandates are made publicly available.

50. Is there clear and transparent division of responsibility between TCCs and the organisation itself in relation to addressing corruption risks on operations?

There are regulations and/or guidance in place that sets out the division of responsibility between troop contributing states and the organisation itself. This guidance includes, for example, which is responsible for the following: training of personnel; sanction and punishment for corrupt behaviour; receiving whistleblower reports; and investigations of corrupt behaviour by troops. These regulations/guidance are made publicly available.

51. Is there training in corruption issues for commanders at all levels in order to ensure that these commanders are clear on the corruption issues/risks they may face during deployment? If so, is there evidence that they apply this knowledge in the field?

There is comprehensive training in corruption issues that is required for commanders at all levels. Training is delivered as part of the organisation's leadership or professional development training, and in pre-deployment training for specific missions.

52. Are trained professionals regularly deployed to monitor corruption in the field? How are they trained (on corruption risks), and are they independent from the operation itself? Are their reports made available to member states and the public?

Expert personnel capable of monitoring corruption are regularly deployed and report on the status of corruption within mission at least once every six months. Reports contain assessments of the most significant corruption risks, the manner in which corruption can affect the goals of the mission, and the effectiveness of mitigation measures being employed. M&E guidance for the mission clearly specifies how to monitor corruption risks, and establishes the procedural basis for personnel to monitor corruption. Reports are made available to member states and the public. Any content that is withheld is legitimately justified.

53. Is there evidence that personnel from the organisation and/or TCCs have controlling or financial interests in businesses associated with natural resource exploitation in countries subject to peace/military operations, or potential operations? If so, are these interests publicly stated and subject to scrutiny by member states?

The organisation and its personnel are entirely prohibited from having controlling or financial interests in businesses associated with natural resource exploitation in host nations in which there is a mission. There are no cases of the organisation being involved in such businesses. There is evidence that this risk is monitored particularly in states with lucrative natural resources, and procedures in place for halting exploitation if it is found to occur.

54. Are there procedures in place to ensure that missions have strong inventory management processes in place and that they are implemented?

The organisation has strong inventory management processes in place, and there is evidence that they are well implemented. The inventory should include consumable/perishible items as well as fixed inventory.

55. What considerations does the organisation give to the transfer of equipment for use in peace/military operations, and/or to host governments?

The organisation assesses the risk of transferring equipment to host governments and into mission environments, and these decisions are subject to debate by member states.

56. Is there oversight in place to ensure that arms and equipment are put to appropriate and effective use within a peace/military operation context, both by the Mission, TCCs, and host government?

There is regular monitoring to ensure that arms and equipment are used appropriately on operations. Any allegations of misuse are investigated through formal processes and without political influence.

57. Are there guidelines, and staff training, on addressing corruption risks in contracting whilst on peacekeeping/military operations?

Guidelines exist specifically for operations (e.g. standard operating procedures at the level of contracting). The guidelines address the following risks in contracting in operations: asset disposals, local power brokers, contract delivery monitoring, security of equipment and personnel. Staff are specifically trained in relation to corruption risks in contracting whilst on deployed operations or peacekeeping missions - this may be conducted by the organisation itself, or by troop contributing countries.

58. Are private (military) contractors employed? If so, are they subject to similar level of scrutiny as the armed forces of the TCCs and PCCs? What form does this scrutiny take?

The use of private military contractors is forbidden by the organisation's regulations, or it may allow them to be employed in extremely limited circumstances which do not expose them to risk of corruption. The standard applicable to PMCs does not vary widely from standards applied to troop contributing countries in the same roles. A clear policy on use of PMCs should include a well-established procedure for selecting PMCs, criteria for dealing with PMCs which had been convicted of corruption, and provisions for contract language which enables the state to fire PMCs for offence, including those related to integrity. The policy should also address the ways in which PMCs' work will be contracted and overseen, specifying that the contracting states will have oversight over subcontractors and laying out the policy for increases in costs and monitoring of results. Where PMCs are used, there are clear provisions for their oversight in organisational regulations, and oversight bodies actively scrutinise them.

PROCUREMENT RISKS

Procurement is often cited as the area in which corruption is greatest, with vulnerabilities at every stage of the process. It is also the one where there is the largest range of anti-corruption tools to address the problem.

Key Terms

Procurement Policy - Corruption risk will be particularly high where regulation exempts or ineffectively governs procurement, and where scrutiny is lacking.

Capability Gap and Requirements Definition - Who defines where there is a capability gap or need for procurement? Where requirements are backed by a solid, transparent strategy, and where openly published security classifications are applied to defence procurement, we may be more comfortable that corruption prompted by exaggerated and inaccurate 'requirements' will be averted.

Tender solicitation, Assessment and Contract Award - Corruption risk is increased where there is lack of open competition for procurement awards, where bidders are in any way favoured, and where assessment criteria are not objective or fair. Collusion between bidders poses a further risk.

Contract Delivery and In-Service Support - Where procurement staff are knowledgeable of suppliers' obligations in procurement contracts, and corrupt suppliers are appropriately punished, we can be more confident that procurement officials themselves are likely to be clean. This is enhanced where companies are given protection to complain about corrupt activity. It is also important that there is scrutiny of money flows during the in-service performance of equipment: corrupt exchanges may occur when payment is made for modifications and repairs.

Agents/Brokers - Agents and brokers bring with them a variety of corruption risks. The use of undisclosed agents or middlemen is more widespread in defence than in any other industry. Whilst representatives have legitimate tasks in assisting companies to operate in unfamiliar cultures and styles of government, there is no doubt that the use of middlemen also facilitates the payment of bribes to decision makers. Nearly every case of defence sector bribery shows that an agent is the conduit through which bribes were paid. Arrangements involving agents and brokers tend to be secretive and they add an additional layer between the supplier and the supplied parties. Scrutiny of these intermediaries may be insufficient or lacking entirely.

Financing Package - Complex and secretive financing packages, where payment timelines, rates, and terms and conditions are poorly defined, pose a clear corruption risk. In many cases the main contract has a high level of scrutiny, but the same is very rarely true of the financing package.

Sub-contractors - Large contracts involve many layers of sub-contractors. The compliance programmes of sub-contractors are usually significantly weaker than those of the platform-makers, which leads to additional potential for corruption. To ensure propriety it is prudent for a government to not only conduct appropriate due diligence on the main defence contractor, but to ensure that the main contractor conducts comparable due diligence on the sub-contractors it employs.

Political influence of procurement decision-making - When procuring equipment and services for operations, the interests of the mission should be the central issue. International political deals and arm-twisting can mean that the contract is awarded to a company because of its nationality, rather than its bid. To avoid corruption, it is important that the institution bases procurement decisions on legitimate need, and is not pressured into purchases by sellers.

Question	Good Practice
59. Are there regulations covering procurement relating to peace/military operations with clauses specific to corruption risks, and are any items exempt from these regulations?	The organisation has clear and comprehensive procurement regulations, and these regulations recognise the risk of corruption and makes clear provisions to mitigate this risk. These regulations are implemented with no exceptions.
60. Is the procurement cycle process, from assessment of needs, through contract implementation and sign-off, all the way to asset disposal, disclosed to the public ?	The entire procurement cycle, from assessment of needs through to contract implementation and sign off, and asset disposal, is formalised. It also details policies and procedures for each step of the implementation process of the procurement cycle and there is evidence that these are followed in practice. Detailed procedures for the entire procurement cycle are disclosed, with clear explanation and in disaggregated form. This includes assessment of needs, contract implementation and sign-off, asset disposal; process of awarding contracts, and mechanisms for contract implementation.
61. Are oversight mechanisms for peace/military operations procurement in place, and are these oversight mechanisms active and transparent?	Procurement oversight mechanisms are independent, formalised processes. They are apolitical and their activity is consistent across changes in organisational leadership. Member states, troop contributors, and politically well-connected individuals have no undue influence on their performance. Procurement oversight mechanisms are highly active in summoning witnesses and documents, demanding explanations, issuing recommendations or conclusions that are being followed or implemented, and they can exercise their ability to cancel projects. Comprehensive evidence of activity (e.g. reports, announcements in the press of the cancellation of procurement programmes, the release of financial information) is made available to the public.
62. Are potential purchases for peace/military operations made public?	The organisation publishes comprehensive forward planning for potential purchases which extends at least years in advance, e.g. through a strategic defence review, white paper or similar. The organisation publishes the plans for purchases in detail for at least the next 3 years. The adequate and timely information (e.g. elements of the defence equipment plan, itemized budget proposals) is sufficient to enable prospective suppliers to prepare and seek further information, and enough for oversight agencies and civil society to debate the necessity of the proposed purchases (e.g. the average procurement duration, justification of exceptions, and specific overview records by type of bidding procedure).

63. Are actual purchases for peace/military operations made public?

Purchases are made public in detail, with almost no exceptions. Very little data from the tender/contract is redacted, if any. For both confidential and non-confidential purchases, there is disclosure of the tender and the contract award. For the contract, there is a description of the item purchased, the winning bidder, the beneficial owners, price paid, whole of lifecycle costs, cost of servicing, costs of parts, and delivery/completion date. Data is almost always released in an accessible format (e.g. excel file) which allows for useful comparisons (e.g. how many tenders a company has won).

64. What procedures and standards are companies required to have – such as compliance programmes and business conduct programmes – in order to be able to register as a vendor and bid for work for the organisation's peace/military operations?

There are regulations detailing how the institution discriminates in its selection of suppliers and sub-contractors on the basis of their integrity. For example, suppliers and sub-contractors are required to show that they have a formal and publicly declared anti-corruption programme in place that adheres to minimum standards established and specified by the procurement authority. The substance of the programme and standards are included in the main contract as well as subcontracts throughout the supply chain. There is evidence that these policies and laws are consistently implemented, including for strategically important suppliers.

65. Is procurement conducted in line with peace/ military operations requirements identified in mandates, agreed budgets, and policy, and are those requirements clear? Are procurement decisions well-audited?

Procurement requirements are derived from requirements set out in mandates, agreed budgets, and organisational policy, and are clear. There is a logical flow down from organisational policy and mandates to individual procurements, with no exceptions. There is active scrutiny conducted by oversight mechanisms (e.g. the office of internal oversight or similar) to confirm that procurement is in line with organisational policy and mission mandates, or that work is undertaken to quantify the need for purchases.

66. Is procurement generally conducted as open competition, or is there a significant element of single-sourcing?

The vast majority (90%+) are conducted as open procurement, though a significant minority of the value of contracts (10%-30%) are single-sourced. All single source and restricted competition procedure contracts must be justified, and are subject to external scrutiny (such as by member states or audit bodies), who have the power to reject the competition procedure selected.

67. Are tender boards subject to regulations and codes of conduct and are their decisions subject to audit to ensure due process and fairness?

Officials with a role in designing tender specification, or in tender board decisions, are subject to regulations or codes of conduct that are designed to prevent conflict of interest. Procurement officials are subject to restrictions on professional activity (e.g., shareholders of contracting firms, board member, advisor, or company officer of private firm, post-employment, etc.) and are required to file financial disclosure reports to demonstrate that neither the official nor his or her family have financial conflicts of interest in their work. Annual training is provided to procurement officials to avoid conflicts of interest. There is a comprehensive audit trail of which officials were involved in selecting suppliers and designing tender specification. There is external verification that the particular specifications that have been included are necessary. There is an audit trail of which officials (including from member states) are involved in tender award decisions. Tender board regulations and codes of conduct are fully transparent.

68. Is there regulation in place to discourage and punish collusion between bidders for peace/military operations contracts?

Regulations are in place that prohibit collusion within the suppliers for contracts, where collusion is defined as between an official and a bidder or between bidders. Procurement officials are trained to identify collusion patterns and report potential malpractice.where there is a conviction or reasonable evidence of bribery & corruption related offences. An offence can result in debarment from current and future competitions, heavy fines, or, where possible, prosecution and imprisonment. Cases are investigated or prosecuted through formal processes and without third-party interference (e.g. undue political influence).

69. Are there mechanisms and procedures that ensure contractors meet their obligations on reporting and delivery?

There are formal policies and procedures that outline how to monitor, assess and report upon a supplier's service and or delivery obligations. These include resolution or sanctioning procedures for incomplete or inadequate service delivery. All contracts are publicly available including modifications post award (such as change of sub-contractor, change of beneficial owner, additional costs, such as a consultant) are publicly available alongside the original contract award enabling scrutiny and oversight of changes. Oversight agencies receive information on and scrutinise quality of product and service delivery. Officials regularly produce contract monitoring and completion reports. These include supplier and subcontractors performance appraisals, which is separately verified. If the contract was not sufficiently completed, action is taken for breach of contract. All breaches of contract are adequately acted upon. Issues are either dealt with internally, or raised with higher management in the executive. If not resolved, issues are referred for further external scrutiny e.g. to the office of internal oversight or similar.

70. Are there mechanisms in place to allow companies to complain about perceived malpractice in procurement, and are companies protected from discrimination when they use these mechanisms?

Formal mechanisms are in place to allow companies to complain about perceived malpractice in procurement. This may include both an internal complaints mechanism, and a process of registering complaints through member states. The complaints mechanisms available to companies are efficient and reasonably priced, and are regularly used. For genuine (non-malicious) complaints, companies believe that they will not be discriminated against in future procurements.

71. What sanctions are used to punish the corrupt activities of a supplier?

There is clear legislation and implementing guidelines empowering procurement officials to exclude companies and senior company officials where there is a conviction or credible evidence of bribery & corruption related offences. Cases are investigated or prosecuted through formal processes and without undue political influence. An offence can result in exclusion from current and future competitions, or other sanctions, including heavy fines; it may also result in cases being taken up by member states' justice systems.

72. How strongly does the organisation control a company's use of agents and intermediaries in the procurement cycle?

The use of agents and intermediaries is prohibited, or is regulated by a strict and clear policy which requires as a minimum that anti-corruption clauses are included in contracts with agents, companies register agents and declare all forms of remuneration, agents receive payments into local accounts and company contracts outline the right to audit agent financial accounts by government agencies. Sanctions are usually applied when policies and regulations on the use of agents are violated.

73. Are the principal aspects of the financing package surrounding major deals (such as payment timelines, interest rates, commercial loans or export credit agreements) made publicly available prior to the signing of contracts?

Principal aspects of the financing package surrounding major procurements are comprehensively detailed and made publicly available after the signing of the contracts. This information includes payment timelines, interest rates, commercial loans or, if they are used, export credit agreements.

74. Does the organisation formally require that the main contractor ensures subsidiaries and sub-contractors adopt anti-corruption programmes, and is there evidence that this is enforced?

The organisation requires that the main contractor ensures that subsidiaries and sub-contractors adopt anti-corruption programmes, and there is evidence that this is enforced. For example, suppliers and sub-contractors are required to show that they have a formal and publicly declared anti-corruption programme in place that adheres to minimum standards established and specified by the procurement authority. The substance of the programme and standards are included in the main contract as well as subcontracts throughout the supply chain. There is evidence that these regulations are consistently implemented.

75. How common is it for acquisition decisions related to peace/military operations to be based on political influence by member nations?

No acquisitions are granted as a result of political influence by member nations. The organisation cites clear and justifiable operational need for purchases and from particular supplier.