ANTI-CORRUPTION AGENCIES STRENGTHENING INITIATIVE

RESEARCH IMPLEMENTATION GUIDE

This guide provides Transparency International's National Chapters, National Contacts and Chapters in Formation with a comprehensive overview of the initiative, theoretical background and practical information to implement the initiative at national level.

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BACKGROUND TO THE APPROACH

THE IMPORTANCE OF POLICY CONTEXT

Anti-corruption agencies (ACAs) do not operate in a vacuum, and their effectiveness depends also on whether they are operating in what the United Nations Development Programme (UNDP) has described as an "enabling environment"[1] or an unfavourable policy context fraught with obstacles that hinder the effective implementation of the anti-corruption laws.

In Anwar Shah's view, policy-makers "need to understand the local circumstances that encourage or permit public and private actors to be corrupt."[2] Indeed, "corruption reduction is not a one-size-fits-all endeavour," and each country must tailor reform strategies to suit its particular context.[3] Similarly, an Organisation for Economic Cooperation and Development (OECD) study concludes that "contextual peculiarities have proven to be the Achilles' heel of the anti-corruption movement" because anti-corruption reforms "applied across different countries have been criticised for their standardised approach whereby the specific nature of systemic corruption" has not been considered.[4]

For the purpose of the ACA Strengthening Initiative, three aspects of each country's policy context are emphasized: (1) land area, population, gross domestic product (GDP) per capita, and cultural values and practices; (2) type of government and level of governance according to the World Bank's 2013 five indicators of voice and accountability, political stability and absence of violence, government effectiveness, rule of law, and regulatory quality; and (3) the country's perceived level of corruption according to the World Bank's Control of Corruption for 2014, Transparency International's Corruption Perceptions Index (CPI) for 2014, and the *Global Competitiveness Report's* indicator on Irregular Payments and Bribes for 2014.

First, the size of a country defined in terms of its land area is an important factor affecting ACA effectiveness because a large country or archipelago encounters more problems in implementing anti-corruption laws in the provinces or outer islands than a small country or city-state. In large countries, the ACA's headquarters are usually based in the capital city, with the branch ACAs located in other cities and provinces. Other things being equal, the ACAs in those countries with large populations may have heavier workloads than their counterparts in countries with smaller populations. The level of economic development of a country is also important because a poor country would likely encounter more difficulty than an affluent country in implementing the anti-corruption measures, unless it receives financial and technical assistance from donor agencies and countries.[5] Furthermore, politics and commerce are "inextricably linked" in the small Pacific states of Fiji and Vanuatu because "the bonds of custom obligation" not only create opportunities for corruption to flourish but also hinder corruption control.[6] Those cultural values and practices which encourage corruption in the country should also be analysed.

Second, the country's political system can also affect the ACA's effectiveness in curbing corruption in a number of ways. Daniel Treisman observes that "a long duration of democracy appeared necessary to significantly reduce corruption"[7] as democracy also provides citizens with "an opportunity to punish governments that fail to control corruption."[8] However, Susan Rose-Ackerman has noted that "in democracies the desire for re-election will deter corruption so long as the electorate disapproves of

the practice and has some way of sorting out valid from invalid accusations."[9] Treisman also claims that former British colonies with common law legal systems had significantly lower perceived corruption because of their "superior administration of justice" and their "preoccupation with procedural fairness even at the expense of social hierarchy."[10] A major reason for this is that both Hong Kong and Singapore have benefited from the tradition of meritocracy introduced by the British colonial government with the establishment of the Public Service Commissions in both territories in 1950 and 1951, respectively because recruitment and promotion in their civil services are based on merit and not patronage.[11]

Furthermore, a country which has undergone a peaceful transfer of power through free and fair elections is more likely to be effective in combating corruption than a regime which has assumed power through conflict or a military coup. For example, post-conflict countries like Cambodia, Nepal, Papua New Guinea, Sri Lanka, Timor-Leste and Vietnam, which have endured protracted periods of civil war, are "particularly vulnerable" to corruption because of the combined effect of these three factors: "the legacy of wartime corruption," the management and distribution of "massive influxes of material wealth" from natural resources or foreign aid, and the "overall weakness of the state."[12]

The second aspect of a country's political system that affects the ACA's effectiveness is its level of governance measured in terms of these five indicators:

1. Voice and Accountability: "The extent to which citizens can participate in the selection of their government; and the independence of the media, which monitors those in authority and holds them accountable for their actions."

2. Political Stability and Absence of Violence: "Perceptions of the likelihood that the government in power will be destabilized or overthrown by possibly unconstitutional and/or violent means, including domestic violence and terrorism."

3. Government Effectiveness: "The quality of public service provision, the quality of the bureaucracy, the competence of civil servants, the independence of the civil service from political pressures, and the credibility of the government's commitment to policies."

4. Regulatory Quality: "The incidence of market-unfriendly policies such as price controls or inadequate bank supervision, as well as perceptions of the burdens imposed by excessive regulation in areas such as foreign trade and business development."

5. Rule of Law: Those indicators which "measure the extent to which agents have confidence in and abide by the rules of society" namely: "perceptions of the incidence of crime, the effectiveness and predictability of the judiciary, and the enforceability of contracts."[13]

Table 1 illustrates the diversity of factors that influence the policy context in 27 selected Asia Pacific countries.

Table 1: Comparison of Factors Influencing Policy Context in 27 Asia Pacific Countries[14]

COUNTRY	LAND AREA (SQ KM)	POPULATION (2013)	GDP PER CAPITA (2013)	POLITICAL SYSTEM
New Zealand	270,534	4.5 m	US$ 40,481	Parliamentary Democracy
Singapore	716	5.4 m	US$ 54,776	Parliamentary Democracy
Australia	7,682,300	23.2 m	US$ 64,863	Parliamentary Democracy

Hong Kong SAR	1,075	7.2 m	US$ 37,777	SAR, China
Japan	377,727	127.3 m	US$ 38,491	Constitutional Monarchy
Bhutan	47,000	0.7 m	US$ 2,665	Constitutional Monarchy
Taiwan	36,179	23.4 m	US$ 20,930	Presidential Democracy
Brunei Darussalam	6,000	0.4 m	US$ 41,703	Constitutional Monarchy
South Korea	99,274	50.2 m	US$ 24,329	Presidential Democracy
Malaysia	332,665	29.6 m	US$ 10,548	Constitutional Monarchy
China	9,560,900	1,360.8 m	US$ 6,747	Communist state
Mongolia	1,565,000	2.9 m	US$ 3,972	Presidential Democracy
Sri Lanka	66,000	20.8 m	US$ 3,162	Presidential Democracy
India	3,287,263	1,243.3 m	US$ 1,505	Parliamentary Democracy
Philippines	300,000	97.5 m	US$ 2,790	Presidential Democracy
Thailand	513,115	68.2 m	US$ 5,674	Military regime
Indonesia	1,904,443	248.0 m	US$ 3,510	Presidential Democracy
Nepal	147,000	27.9 m	US$ 693	Parliamentary Democracy
Vietnam	331,114	89.7 m	US$ 1,902	Communist state
Timor-Leste	15,000	1.2 m	US$ 3,670	Parliamentary Democracy
Pakistan	803,940	182.6 m	US$ 1,308	Presidential Democracy
Bangladesh	143,998	156.3 m	US$ 904	Parliamentary Democracy
Lao PDR	237,000	6.8 m	US$ 1,477	Communist state
Papua New Guinea	463,000	7.0 m	US$ 1,790	Parliamentary Democracy
Myanmar	677,000	64.9 m	US$ 869	Presidential Democracy
Cambodia	181,000	15.4 m	US$ 1,016	Constitutional Monarchy
Afghanistan	652,000	32.4 m	US$ 622	Presidential Democracy
North Korea	121,000	24.5 m	NA	Communist state

Third, the perceived level of corruption in a country is another important factor influencing the ACA's workload and effectiveness because those ACAs operating in countries with widespread perceived corruption would likely have a heavier or different workload than their counterparts in countries where corruption is not overtly a serious problem. As the CPI has several limitations,[15] the country's perceived level of corruption is ascertained on the basis of these three indicators: the CPI for 2014[16]; the World Bank's control of corruption indicator for 2014[17]; and the *Global Competitiveness Report's* indicator on Irregular Payments and Bribes for 2014.[18] Table 2 shows the perceived level of corruption in 27 Asia Pacific countries according to their performance on these three international indicators.

Table 2: Perceived Level of Corruption in 27 Asia Pacific Countries, 2013-2014[19]

COUNTRY	CONTROL OF CORRUPTION 2014 PERCENTILE RANK AND GOVERNANCE SCORE	CORRUPTION PERCEPTIONS INDEX 2014 SCORE 0 (HIGHLY CORRUPT) TO 100 (VERY CLEAN)	IRREGULAR PAYMENTS AND BRIBES 2014 SCORE 1 (VERY COMMON) TO 7 (NEVER OCCURS)
New Zealand	100 (2.3)	2nd (91)	1st (6.7)
Singapore	97.1 (2.1)	7th (84)	3rd (6.5)
Australia	95.2 (1.9)	11th (80)	16th (5.9)
Hong Kong SAR	92.3 (1.6)	17th (74)	12th (6.2)
Japan	93.3(1.7)	15th (76)	11th (6.2)
Bhutan	88.5 (1.3)	30th (65)	39th (4.8)
Taiwan	77.4 (0.8)	35th (61)	31st (5.2)
Brunei Darussalam	71.6 (0.6)	NA	NA
South Korea	69.7 (0.5)	43rd (55)	52nd (4.4)
Malaysia	68.3 (0.5)	50th (52)	37th (4.9)

China	47.1 (-0.3)	100th (36)	66th (4.0)
Mongolia	38.5 (-0.5)	80th (39)	82nd (3.7)
Sri Lanka	46.6 (-0.3)	85th (38)	91st (3.5)
India	38.9 (-0.5)	85th (38)	93rd (3.5)
Philippines	39.9 (-0.4)	85th (38)	86th (3.6)
Thailand	42.3 (-0.4)	85th (38)	84th (3.7)
Indonesia	34.1 (-0.6)	107th (34)	87th (3.6)
Nepal	36.1 (-0.5)	126th (29)	119th (2.9)
Vietnam	37.5 (-0.5)	119th (31)	109th (3.2)
Timor-Leste	29.3 (-0.6)	133rd (28)	111th (3.1)
Pakistan	21.6 (-0.8)	126th (29)	123rd (2.9)
Bangladesh	18.8 (-0.9)	145th (25)	140th (2.3)
Lao PDR	25.0 (-0.8)	145th (25)	96th (3.4)
Papua New Guinea	15.4 (-1.0)	145th (25)	NA
Myanmar	17.3 (-0.9)	156th (21)	139th (2.3)
Cambodia	12.5 (-1.1)	156th (21)	129th (2.8)
Afghanistan	6.3 (-1.3)	172nd (12)	NA
North Korea	5.3 (-1.3)	174th (8)	NA
No. of countries	215	175	144

DIMENSIONS OF ASSESSMENT

Patrick Meagher and Caryn Voland identify the ten factors that are critical for the effectiveness of ACAs: their political mandate, cross-agency coordination, focus on prevention and monitoring government implementation, accountability, independence, powers, well-trained staff and adequate resources, an enabling environment, complementary institutions, and complementary legislation.[20] There are seven factors that influence or indicate the ACA's performance: its independence and legal status; its financial and human resources; its detection and investigation function; its prevention, education and outreach functions; its cooperation with other organisations; its accountability and oversight; and public perceptions of its performance. Table 3 shows the number of indicators for each of the seven dimensions of the ACA's performance.

Table 3: Dimensions of Assessment

DIMENSIONS OF ASSESSMENT	NUMBER OF INDICATORS
1. ACA's Legal Independence and Status	7
2. ACA's Financial and Human Resources	9
3. ACA's Detection and Investigation Function	9
4. ACA's Prevention, Education and Outreach Functions	9
5. ACA's Cooperation with other Organizations	5
6. ACA's Accountability and Oversight	4
7. Public Perceptions of the ACA's Performance	7
Total	50

ACA's Independence and Legal Status

Article 6 of the United Nations Convention Against Corruption (UNCAC) specifies that ACAs should be provided with (1) "the necessary independence" to perform their functions effectively and "free from any undue influence" and (2) the necessary material resources, specialised staff and training

required.[21] The first criterion of independence is perhaps the most important dimension because the ACAs "must command public respect and be credible, transparent, and fearless." They must also be given "considerable political independence so that they cannot be removed at a whim of an enraged political elite."[22]

The first criterion of independence means that the ACAs must be protected from undue political interference. This implies that political leaders commit to combating corruption by providing the ACAs with the structural and operational autonomy needed to perform their functions. In practice, can the ACA Commissioner and his officers operate independently without political interference? The first indicator of an ACA's independence is its location—is the ACA a permanent agency that exists separately and outside of government agencies or is it located as a unit or department within a ministry?

In terms of the ACA's legal status, is there a specific anti-corruption law? For example, the Prevention of Corruption Act identifies the CPIB as the ACA in Singapore and describes its extensive legal powers, which include the arrest and search of arrested persons and the investigation of their bank accounts, income tax records and other relevant documents.[23] Similarly, Mongolia's Anti-Corruption Law of 2006 identifies the functions of the Independent Authority Against Corruption (IAAC) and article 18.2 empowers it to investigate the assets and income declarations submitted by all officials holding political, administrative, or special office of the State in Mongolia.[24]

Other questions also need answers. Has the ACA investigated political leaders, senior civil servants and prominent citizens, without fear or favour if they are accused of corruption? Has the ACA been used by the incumbent government as a weapon against its political opponents?[25] Meagher and Voland have indicated that even though ACAs are not created to conduct witch hunts as their stated purpose, they are "often manipulated by the ruling party to attack and eliminate members of the opposition or to punish members of their own party who are perceived as having stepped out of line."[26] In the same vein, Robert Klitgaard observes that anti-corruption campaigns are sometimes used "to clean up political opponents rather than to clean up corruption."[27]

Finally, the procedures for appointing and removing the Director of the ACA must be transparent and there must also be proper human resource management and internal controls to prevent undue political interference. More importantly, independence should not imply that the ACAs are not accountable as they are required to adhere to the rule of law and human rights in their operations, submit regular performance reports to executive and legislative agencies, and provide public access to information on their work.[28]

ACA's Financial and Human Resources

The ACA must also have an adequate budget to perform its functions effectively. Indeed, the budget allocated by the Ministry of Finance to the ACA is an important indicator of the government's political will in combating corruption. Many ACAs have complained of their limited resources and the uncertainty of their budget allocation. While all governments face budget constraints, Francesca Recanatini contends that "the allocation of limited resources for ACA activities may signal the lack of a genuine commitment to the ACA's mission by the government."[29] Does the government provide the ACA with consistent funding and continuous political support to enable it to achieve concrete results?[30] What is the average proportion of the ACA's budget to the total government budget for the country for past three years? Is the ACA's budget sufficient for performing its functions? Has the ACA's budget been secure and stable during the past three years?

For those countries with more than one ACA, the budget details of the all ACAs should be provided. For those ACAs which perform both corruption and non-corruption-related functions, the respective budgets for these functions should be specified. For example, Table 4 shows that 42 per cent of the 2012 budget of the Office of the Ombudsman (OMB) in the Philippines was allocated to preliminary investigations and the investigation of corruption cases, followed by 21 per cent for prosecution, and

13 per cent for corruption prevention. The remaining 24 per cent was used for the non-corruption-related functions of administrative adjudication and public assistance.

Table 4: Philippines OMB's 2012 Budget Output by Function[31]

FUNCTION	BUDGET OUTPUT	PERCENTAGE
Preliminary investigations	317,483,000 pesos	24%
Prosecution	275,942,000 pesos	21%
Investigation	241,167,000 pesos	18%
Administrative adjudication	190,955,000 pesos	15%
Corruption prevention	176,251,000 pesos	13%
Public assistance	122,183,000 pesos	9%
Total	1,323,980,000 pesos	100%

The criteria of specialisation and adequate training are two important aspects of the ACA's capacity. The UNDP defines capacity as "the ability of individuals, organizations and societies to perform functions, solve problems, and set and achieve objectives in a sustainable manner," and capacity development as "the process through which capacities are obtained, strengthened, adapted and maintained over time."[32] The capacity assessment of an ACA focuses on its functional or core capacities - those capacities that are required for its management - and its technical capacities - those capacities that are related to the areas of expertise needed for performing its functions.[33]

The specialisation of the ACA refers to the "availability of specialised staff with special skills and a specific mandate for fighting corruption."[34] As the ACA's major functions are the investigation of corruption cases, corruption prevention and corruption education, its personnel should have the necessary skills for performing these functions. The training opportunities made available to the ACA personnel are also important for maintaining and enhancing their level of expertise. A key factor responsible for the ACA's effectiveness is its ability to recruit and select personnel on the basis of their technical competence.[35] To assess the ACA's capacity, it is necessary to identify the selection criteria and procedures for the ACA personnel, including the conditions for their dismissal. What is the level of expertise of the ACA personnel in terms of their qualifications and skills? Do they have the required skills to perform the three functions of corruption investigation, prevention and education effectively? Does the ACA have sufficient personnel to perform these functions effectively? What are the on-the-job and off-the-job training opportunities for the ACA's personnel to upgrade their expertise? Are the ACA's personnel provided with adequate salaries and favourable working conditions? Is it difficult for the ACA to recruit and retain talented personnel? What is the turnover and resignation rate of the ACA personnel?

ACA's Detection and Investigation Function

As the ACA's primary function is the detection and investigation of corruption cases, the indicators focus first on the ACA's accessibility which is reflected in the number of corruption complaints received from the public and whistle-blowers during the past three years. As not all the complaints received are corruption-related or valid, information should also be provided on the percentage of corruption reports which are investigated by the ACA. The second indicator is the ACA's responsiveness in terms of the number of corruption complaints received and the number of corruption cases investigated by the ACA during the past three years. Third, how willing is the ACA in initiating corruption investigations during the past three years? Fourth, what is the average number of cases investigated by the ACA personnel during the past three years? Fifth, how efficient and professional are the ACA personnel in investigating corruption cases as reflected in the percentage of corruption cases completed per year as well as the average time taken to complete the investigation of a corruption case per year?

The ACA's effectiveness in investigating corruption cases is ascertained by its prosecution rate and conviction rate, that is, the percentage of cases investigated by the ACA that result in prosecution and conviction in court. The sixth indicator is the average conviction rate of corruption cases investigated by the ACA during the past three years. The investigation of political leaders, senior bureaucrats and "the rich and famous" by the ACA reflects not only its independence but its impartiality in enforcing the anti-corruption law. The seventh indicator is the ACA's willingness to investigate influential persons for corruption without fear or favour during the past three years. Eighth, what is the ACA's role in restitution, asset recovery, freezing and confiscation during the past three years? Finally, does the ACA identify gender in compiling information on corruption complaints and monitoring corruption trends?

ACA's Prevention, Education and Outreach Functions

The importance accorded by the ACA to its prevention, education and outreach functions is reflected first in the average proportion of its operating expenditure allocated for these functions during the past three years. Second, how many corruption prevention projects have been initiated by the ACA during the past three years? Third, what is the number of organizational procedures conducted by the ACA to prevent corruption during the past three years? As the ACA usually makes recommendations to prevent corruption in its investigation reports, the fourth indicator is the frequency of including corruption prevention recommendations in these reports during the past three years. Fifth, does the ACA have a plan for outreach and education, and how comprehensive is this plan, and what is the extent of its implementation? Sixth, what is extent of collaboration between the ACA and other stakeholders in its outreach and education activities? Seven, does the ACA conduct research on the corruption risks, context and conditions in the country? The eighth indicator focuses on the extent of the ACA's dissemination of corruption prevention information and whether it relies on campaigns to disseminate this information. Finally, as the ACA's website and social media are important channels for providing information on its activities and reaching out to the public, is the amount of information provided on the website and the ACA's reliance on these channels for spreading information on corruption prevention.

ACA's Cooperation with Other Organisations

Meagher and Voland contend that the ACA's success depends on cooperation with other government agencies "since it forces anti-corruption champions to achieve strategic consensus and to commit to concrete forms of cooperation." However, they observe that such cooperation is rare in reality because ACAs are "regularly frustrated by their inability to secure information, cooperation, and prosecutions." Consequently, the ACA's effectiveness will be hindered if there is lack of cooperation and "buy-in" from other government agencies.[36] As the ACA does not operate in isolation, its performance also depends on its relations with other agencies in the country. If the ACA is not responsible for prosecuting corruption cases, what is the level of support and cooperation provided by the Attorney-General's Office for this function? If it is the lead ACA, is there cooperation or competition between it and the other ACAs in the country? Is the lead ACA effective in coordinating its activities with other ACAs? If there is only one ACA, does it cooperate with other government agencies and private sector agencies? Are there civil society organizations (CSOs) which are concerned with anti-corruption activities in the country? If these CSOs exist, is there cooperation or conflict between the ACA and these CSOs? Does the ACA cooperate with other ACAs in the region in sharing information and providing assistance in cross-border arrests of corruption offenders? Does the ACA provide technical assistance or conduct training for the ACA personnel in other countries?

Accountability and Oversight of the ACA

As the ACA has been entrusted with legal powers and human and financial resources to minimize corruption in a country, it is necessary to ensure that the ACA is accountable for its actions, especially when its personnel are guilty of misconduct. ACA personnel must be incorruptible for two reasons. First, if ACA personnel are corrupt, the legitimacy and public image of the ACA is undermined. Second, internal corruption prevents ACA personnel from performing their tasks impartially and effectively.[37]

There are three ways to enhance the ACA's accountability. First, the ACA's annual report provides important and relevant information on its activities to the public. Apart from ensuring accountability to Parliament, the ACA's annual report should provide comprehensive information on its activities during the previous year to all citizens. Is the ACA's annual report, which is submitted to Parliament, published on its website to ensure that it is accessible to the public? The submission of the ACA's annual report indicates that it is accountable to Parliament for its activities. It will be difficult to hold the ACA accountable for its actions if it does not submit an annual report to Parliament.

Second, is there external oversight of the ACA's operations in the form of advisory or review committees? Are civil servants and/or citizens included in these committees? Hong Kong's ICAC has these four advisory committees which consist of both citizens and civil servants: the Advisory Committee on Corruption; the Operations Review Committee; the Corruption Prevention Advisory Committee; and the Citizens Advisory Committee on Community Relations.[38]

Third, how many complaints are made by the public against the ACA's personnel per year and how many personnel are found guilty and punished? Are the complaints against the ACA's personnel investigated by an external organization or by an internal conduct unit within the ACA? How are such complaints handled in the absence of this unit? In Hong Kong, the ICAC internal investigation and monitoring group (L Group) investigates breaches of staff discipline and allegations of corruption against ICAC officers and non-criminal complaints against them. There is also an independent ICAC Complaints Committee to monitor and review the ICAC's handling of non-criminal complaints against its personnel. In 2013, the L Group investigated two cases alleging corruption against ICAC officers, and 31 non-criminal complaints against ICAC staff were received by the ICAC Complaints Committee.[39]

Thus, the ACA must ensure that it is staffed by honest and competent personnel. There should also be no overstaffing and any staff member found guilty of corruption must be punished and dismissed. Details of such punishment must be widely publicized in the mass media to deter others and to demonstrate the ACA's integrity and credibility to the public.[40] What is the proportion of ACA personnel disciplined or dismissed for misconduct during the past three years?

Public Perceptions of the ACA's Performance

Finally, it is important to ascertain the perceptions of citizens regarding the ACA's effectiveness in corruption control in the country. The final six indicators are the questions to be included in the ACA-commissioned national survey of a large representative sample of citizens. The survey questions relate to the public confidence in the ACA and their perceptions of its effectiveness in corruption control. Is the public confident that the government has provided the ACA with the necessary powers and resources for combating corruption? Is the public confident that the ACA has followed due process and is impartial and fair in enforcing the law and investigating corruption cases? Are those persons with direct contact with the ACA confident that it has followed due process and is impartial and fair in performing its functions? The next three indicators focus on the public perceptions of the ACA's effectiveness in corruption control, including the perception among those persons with direct contact with the ACA and those female citizens who had submitted complaints to the ACA.

The *Global Corruption Barometer 2013* did not include a specific question on the performance of the ACAs in the countries included in the survey. However, it found that 54 per cent of the respondents in 88 countries believed that their government was ineffective in fighting corruption. This percentage is higher than the 47 per cent of respondents who said that their government was ineffective in curbing corruption in the *Global Corruption Barometer 2010/2011*.[41]

Hong Kong's ICAC initiated its Community Relations Department (CRD) in early 1975 with 28 personnel.[42] The ICAC found that there was widespread public awareness of its role as its survey in 1977, and every subsequent survey, found that almost everyone in Hong Kong had heard of the ICAC.[43] An analysis of the answers to the question: "How effective is the ICAC's work?" in the ICAC's annual surveys from 1997-2011 by Ian Scott found that between 60.2 to 87.8 per cent said that the ICAC was very effective or quite effective in its work.[44] Among other things, the ICAC Annual Survey in 2013 found that 95.3 per cent of the respondents said that the ICAC deserved their support, and 79.7 per cent of them believed that the ICAC's anti-corruption work was effective.[45]

The CPIB in Singapore commissioned Forbes Research to conduct a public perception survey of 1,000 Singaporeans between 16 and 60 years old in October 2002. This survey found that 13 per cent of the respondents rated corruption control in Singapore as excellent, 42 per cent as very good, 39 per cent as good, and only 7 per cent as fair. Furthermore, 71 per cent of the respondents agreed or strongly agreed that the CPIB had done well in solving corruption offences; 61 per cent of them trusted the CPIB to keep Singapore corruption free; and 56 per cent of them agreed or strongly agreed that the CPIB was world-class in curbing corruption. Similarly, the second public perception survey commissioned by the CPIB in December 2005 found that (1) 89 per cent of the respondents believed that corruption was very much under control in Singapore; (2) 86 per cent of them felt that corruption control in Singapore was better than other countries; and (3) 67 per cent of the respondents said that the CPIB was doing a good job.[46]

Since 1993, the ICAC in New South Wales (NSW) has conducted periodic surveys to monitor the changes and trends in community awareness of corruption, and perceptions and attitudes to it. In 2012, the ICAC conducted a community attitude survey which focuses on these four areas: perceptions of the severity of corruption in NSW; public awareness of the ICAC; evaluation of the ICAC; and attitudes to reporting corruption.[47]

Bhutan, South Korea and Mongolia have conducted integrity assessments of public agencies in their countries. Bhutan's Anti-Corruption Commission (ACC) has conducted the National Integrity Assessment survey in 2009 and 2012. In 2012, 64.9 per cent of the respondents said that Bhutan's ACC was very effective compared to 31 per cent in the 2009 survey of the public attitudes towards corruption and the ACC.[48] In 2011, the Anti-Corruption and Civil Rights Commission (ACRC) of South Korea conducted the integrity assessment of more than 700 public agencies to detect and improve corruption-prone areas. During the same year, the ACRC also initiated the integrity assessment of 6,400 senior officials in 156 public agencies.[49]

In Mongolia, the IAAC has conducted these surveys: (1) surveys on the corruption index of Mongolia in 2009 and 2011; (2) surveys on the evaluation of the integrity level of public organisations in 2008, 2010 and 2012; and (3) annual surveys on the corruption perception on political and law enforcement agencies since 2008.[50] Apart from the surveys conducted by the IAAC, the Asia Foundation and the Sant Maral Foundation have also conducted many benchmarking surveys since March 2006 to assess the actual incidence of corruption in various sectors and the public perceptions of the IAAC's effectiveness in curbing corruption.[51] An analysis of the public perceptions of the IAAC's performance in fighting corruption in eight surveys conducted between March 2010 and April 2015 shows that (1) the proportion of respondents with "good" or "very good" perceptions of the IAAC's performance has increased from 7.8 to 16.5 per cent during this period; (2) the percentage of respondents with a

negative evaluation of the IAAC's performance has declined from 62.4 to 45.5 per cent for the same period; and (3) an average of 72.9 per cent of respondents believed that the IAAC was not an impartial enforcement agency during the same period.[52]

ASSESSMENT METHODOLOGY

RESEARCH PROCESS

The participatory assessment follows a fairly standard research process and is expected to take between 3 and 5 months from the appointment of the Country Research Team (CRT) to the launch of the report.

The assessment comprises desk research, including review of reports, laws and media pieces, followed by semi-structured interviews and focus group discussions with key stakeholders, primarily within the government but also with non-state actors (more guidance below). A draft report outlining key findings and recommendations will be produced which is first reviewed by the ACA for accuracy and completeness, before being presented to relevant stakeholders for feedback through a consultation process. Finally, the report is professionally reviewed and edited before being launched publicly.

TASK	TIMEFRAME	DURATION
Appointment of Project Coordinator	Inception	
Appointment of Country Research Team	Start	
Training of Project Coordinator and Country Research Team	Month 1	3 days
Finalise research framework, request for documents and plan research	Month 1	5 days
Desk research	Month 1	5-10 days
Interviews and focus group discussions	Month 2	5-10 days
Analysis and write-up	Month 2	5 days
ACA review draft report	Month 3	5-10 days
Revise report based on feedback	Month 3	5 days
External consultations (presentations and discussions with key stakeholders)	Month 3	3-5 days
Revise report based on feedback	Month 3	5 days
ACA review revised report and sign-off on content	Month 4	5 days
External review and TI Bangladesh review	Month 4	5-10 days
Revise report based on feedback	Month 4	3-5 days
Libel check	Month 5	3-5 days
Copy-edit and final design	Month 5	3-5 days
Final report ready	Month 5	
Printing	Month 5	5 days
Public launch of report	Month 5	1 day
Action planning workshop for ACA	Month 5	1-2 days
Advocacy planning workshop for Chapter	Month 5	1-2 days
Advocacy, media and stakeholder dialogue ongoing	Month 6-18	

DATA COLLECTION: DESK RESEARCH

Most of the required information for the assessment and writing of the report, in particular Parts 1-2 will come from a thorough desk analysis. The CRT should gather all relevant documentation required to make the assessment which should be available either online or upon request. A list of reports and other information needed from the ACA's files should be sent to the ACA in advance of the research so they can share it with the team (we suggest to open a drop box/shared drive for this purpose). However it is first important to check whether these are available on their website both to save time but also to get a sense of the ACA's transparency and accessibility.

As a guide, the following literature (or versions thereof) can and should be used:

1. Central Intelligence Agency (CIA). *The World Factbook.* Washington, DC, available at https://www.cia.gov/library/publications/the-world-factbook/.

2. Economist. *Pocket World in Figures 2015 Edition.* London: Profile Books, 2014.

3. Freedom House. *Freedom of the Press 2015.* Washington, DC: 2015.

4. Kaufmann, Daniel, Kraay, Aart, and Mastruzzi, Massimo. "Governance Matters III: Governance Indicators for 1996-2002." Washington, DC: World Bank, April 5, 2004.

5. Kaufmann, Daniel, Kraay, Aaart, and Mastruzzi, Massimo. "Governance Matters VIII: Aggregate and Individual Governance Indicators for 1996-2008." Washington, DC: World Bank, June 2009.

6. Kaufmann, Daniel. "Governance Matters 2010: Worldwide Governance Indicators Highlight Governance Successes, Reversals, and Failures" September 24, 2010, available at http://www.brookings.edu/research/opinions/2010/09/24-wgi-kaufmann.

7. Schwab, Klaus (ed.) *The Global Competitiveness Report 2015-2016.* Geneva: World Economic Review, 2015.

8. Transparency International. *Global Corruption Barometer 2013.* Berlin: Transparency International, 2013.

9. Transparency International. "Corruption Perceptions Index 2014 Results." Berlin, available at http://www.transparency.org/cpi2014/results.

10. United Nations Office on Drugs and Crime (UNODC). Vienna, available at http://www.unodc.org.

11. United Nations Office of the High Commission for Human Rights (UNOHCHR). "Universal Periodic Review: Documentation by Country." New York, available at http://www.ohchr.org/EN/HRBodies/UPR/Pages/Documentation.aspx.

12. World Bank. *Doing Business 2014: Understanding Regulations for Small and Medium-Size Enterprises.* Washington, DC: World Bank, 2013.

13. World Bank. *Doing Business 2015: Going Beyond Efficiency.* Washington, DC: World Bank, 2014.

14. World Bank. *World Development Indicators 2014.* Washington, DC: World Bank, 2014.

15. World Bank Data available on http://data.worldbank.org for data on GDP per capita and population in 2013.

16. World Bank. "Worldwide Governance Indicators 2014." Washington, DC, available at http://info.worldbank.org/governance/wgi/index.aspx#reports (accessed on 28 September 2015).

17. *Norton Rose Fulbright Guide to Business Ethics and Anti-Corruption: Asia Pacific Laws.* Singapore: Norton Rose Fulbright (Asia), October 2014, available at http://www.nortonrosefulbright. com/files/business-ethics-and-anti-corruption-asia-pacific-laws-120953.pdf (accessed on 28 December 2014). This guide deals with the anti-corruption laws in these 19 Asia Pacific countries: Australia, Bangladesh, Brunei Darussalam, Cambodia, China, Hong Kong, India, Indonesia, Japan, Macau, Malaysia, Myanmar, New Zealand, Philippines, Singapore, South Korea, Taiwan, Thailand and Vietnam.

18. Clifford Chance, *A Guide to Anti-Corruption Legislation in Asia Pacific 2014.* Hong Kong: Clifford Chance Asia Pacific Group, November 2014, available at http://globalmandatoolkit.cliffordchance. com/downloads/Anti_corruption_Guide_nov_2014.pdf (accessed on 28 December 2014). This guide provides information on the anti-corruption laws in these 13 Asia Pacific countries: China, Hong Kong, Japan, Singapore, Australia, Thailand, South Korea, Indonesia, Vietnam, Malaysia, Taiwan, Philippines and India.

19. Herbert Smith, *Guide to Anti-Corruption Regulation in Asia 2012/2013.* Hong Kong: Herbert Smith LLP, 2012, available at http://www.herbertsmithfreehills.com/-/media/HS/HKBESHBAJS I21021214.pdf (accessed on 28 December 2014). This guide includes information on the anti-corruption laws in these 13 Asian countries: China, Hong Kong, India, Indonesia, Japan, South Korea, Macau, Malaysia, Philippines, Singapore, Taiwan, Thailand and Vietnam.

20. National budgets of Asia Pacific countries from the websites of their Ministries of Finance.

21. Media reports on the ACAs and corruption in the participating countries. Transparency International's *Daily Corruption News* is a valuable source.

22. Websites of the ACAs in these Asia Pacific countries:

1. Corrupt Practices Investigation Bureau (CPIB), Singapore, established in October 1952 https://www.cpib.gov.sg (History, Annual Report 2013, anti-corruption laws).
2. Independent Commission Against Corruption (ICAC), Hong Kong, established in February 1974, http://www.icac.org.hk/en/home/index.html (History, Annual Report 2013, anti-corruption laws, 2013 Annual Survey).
3. Independent Commission Against Corruption (ICAC), New South Wales, Australia, established in March 1989, http://www.icac.nsw.gov.au (History, Annual Report 2013-14, legislation).
4. Malaysian Anti-Corruption Commission (MACC), Malaysia, established in January 2009, http://www.sprm.gov.my/index.php (History, Annual Report 2012).
5. *Komisi Pemberantasan Korupsi* (KPK), Indonesia, established in December 2003, http://www.kpk.go.id (History, Annual Report 2013).
6. Anti-Corruption Bureau (ACB), Brunei Darussalam, established in January 1982 http://www.bmr.gov.bn/Theme/Home.aspx (no history or annual report).
7. National Anti-Corruption Commission (NACC), Thailand, established in July 2008 http://www.nacc.go.th/main.php?filename=index_en (History, law, no annual report).
8. Agency Against Corruption (AAC), Taiwan, established in July 2011, http://www.aac.moj. gov.tw/mp290 (History, laws, Annual Report 2012).
9. Office of the Ombudsman (OMB), Philippines, established in July 1979, reorganized in May 1988, http://ww.ombudsman.gov.ph (History, laws, Annual Report 2013).
10. Commission Against Corruption (CCAC), Macau Special Administrative Region, established in December 1999, http://www.ccac.org.mo (History, law, Annual Report 2013).

11.   Anti-Corruption and Civil Rights Commission (ACRC), South Korea, established in February 2008, http://www.acrc.go.kr (History, laws, Annual Report 2013).
12.   Independent Authority Against Corruption (IAAC), Mongolia, established in December 2006, http://www.iaac.mn (History, Annual Report 2012).
13.   National Accountability Bureau (NAB), Pakistan, established in November 1999, http://www.nab.gov.pk (History, law, Annual Report 2013). The five regional offices are located in Karachi, Lahore, Peshawar, Quetta and Rawalpindi.
14.   Central Bureau of Investigation (CBI), India, established in April 1963, http://cbi.nic.in (History, laws, Annual Report 2013).
15.   Anti-Corruption Commission (ACC), Bhutan, established in January 2006, http://www.anti-corruption_org.bt (History, laws, Annual Report 2013).
16.   Commission to Investigate Allegations of Bribery or Corruption (CIABOC), Sri Lanka, established in December 1994, http://www.ciaboc.gov.lk (History, laws, no annual report).
17.   Anti-Corruption Commission (ACC), Bangladesh, established in 2004, http://www.acc.org.bd (History, laws, Annual Report)
18.   Commission for the Investigation of Abuse of Authority (CIAA), Nepal, established in 1977, http://www.ciaa.gov.np (History, laws, Annual Report in Nepali).
19.   *Commissao Anti-Corrupcao* (CAC) or Commission Against Corruption, Timor-Leste, established in June 2009, http://cac.tl (History, laws, no annual report).
20.   Anti-Corruption Commission (ACC), Maldives, established in October 2008, http://www.acc.gov.mv (website is not available in English). It does not publish an annual report.

23. Anti-Corruption Authorities website at http://www.acauthorities.org provides profiles of the ACAs in these 13 Asian countries: Afghanistan, Bangladesh, Bhutan, Hong Kong SAR, Indonesia, Maldives, Mongolia, Nepal, Pakistan, Philippines, Singapore, South Korea and Sri Lanka. These profiles are based on a survey conducted by Francesca Recanatini and Arsema Tamyalew of the World Bank in 2010 with recent updates in some cases. Email: frecanatini@worldbank.org and arsemat@gmail.com.

DATA COLLECTION: INTERVIEWS

To supplement the data collected from the literature and desk reviews, and the data to be provided by the ACAs on their performance indicators, the CRT should conduct interviews and/or facilitate focus group discussions (FGD) with people from a variety of sectors and backgrounds.

The decision whether to gather information from these people via an interview or an FGD is that of the CRT, and dependent on the complementarity of the group, perception of whether participants will speak more openly in a mixed group or alone, and time considerations (ideally not at the expense of a better quality interaction).

It is important to ensure that persons engaged through this process have been in the position for enough time to provide full answers and represent the views of the institution accurately.

The following is a potential list of people to engage through this process, to be tailored to the national context:

1. ACA Commissioners and Heads of the ACA Departments;

2. Chairperson and Members of the ACA oversight committees or citizen advisory bodies if these exist;

3. Chairperson, Public Service Commission or Civil Service Commission;

4. Auditor-General or Commissioner of Audit;

5. Attorney-General and prosecutors dealing with corruption cases;

6. Executive Director and selected officials of Chapters in the participating countries;

7. Representatives of relevant donor agencies such as the Asian Development Bank, Asia Foundation, United Nations Development Programme, World Bank and others in the participating countries;

8. Representatives of other CSOs concerned with anti-corruption activities;

9. Selected Members of Parliament, including members of opposition political parties;

10. Scholars who have done research on corruption in the participating countries;

11. Selected journalists covering corruption cases in the participating countries;

12. Individuals who have been investigated and interrogated by the ACA if they can be identified and are willing to be interviewed by the researchers; and

13. Other individuals recommended for interview by the above persons.

All interviewees should be asked for their consent to include their names as sources in the published report. If necessary, sources can be anonymous and instead their seniority/position and sector can be stated, again upon their approval.

DATA COLLECTION: PUBLIC PERCEPTION SURVEY

Indicators under Dimension 7 rely on perceptions survey data as the main source. In some countries it will be possible to identify an existing survey, likely to be commissioned by the ACA themselves, which will provide this data. For example, Hong Kong's ICAC and Singapore's CPIB have conducted public perception surveys, which include several questions on the respondents' views on the effectiveness and public image of both ACAs. As it is expensive and time-consuming to conduct a public perception survey with a representative sample of 1,000 respondents, the CRT can rely on the findings of the ICAC's and the CPIB's most recent surveys to complete the section on the public perceptions of these two ACAs' performance.

For those Asia Pacific countries which have not conducted any public perceptions survey, CRTs should consider conducting their own survey by designing a common questionnaire to facilitate comparative analysis of the survey findings.

If funding is not available for CRTs to conduct a national public survey, the CRT can conduct focus group discussions (FGDs) with a selected group of individuals who have had contact with the ACA and are familiar with its activities. The FGD participants should also include these six groups: university students, businesspersons, anti-corruption experts, CSO leaders, representatives of donor agencies, and journalists. The perceptions of the ACA's performance by these participants in the FGDs should be interpreted cautiously as their views only and not those of the population at large.

ASSESSMENT PART 1: POLICY CONTEXT AND CORRUPTION PERCEPTIONS

In order to contextualise the assessment and furnish the reader with relevant background information, the final report should provide a clear and up-to-date picture of the situation in a given country. In the report, this is broken into two parts:

Policy Context

The report should begin by outlining key attributes of the political, economic and social context relevant to governance of the country. This section provides a brief description of the policy context of the jurisdiction of the ACA (usually, a national jurisdiction, but also potentially subnational or sectoral jurisdiction). It looks at land area, population, GDP per capita in US$, type of government, and its total percentile rank on the World Bank's five governance indicators on voice and accountability, political stability and absence of violence, government effectiveness, rule of law, and regulatory quality in 2014. The CRT should identify those factors which promote or hinder the ACA's effectiveness and its implementation of the anti-corruption laws in the country. For example, those norms, values and practices which encourage corruption and hinder the implementation of the anti-corruption laws and the detection and investigation of corruption cases should be highlighted. The extent of freedom of the press and the human rights situation should also be noted.

Perceptions of Corruption

The report should then compile key data on corruption and governance in the country using national and international data sources. As the ACA's performance in a country depends on the perceived extent of corruption, this section provides information on the country's performance on these three international indicators: (1) Transparency International's CPI for 2014; (2) World Bank's Control of Corruption for 2014; and (4) Global Competitiveness Report's Irregular Payments and Bribes for 2014. A consistently high level of perceived corruption on these three international indicators may be one indication of the ACA's limited effectiveness.

ASSESSMENT PART 2: ACA PROFILE AND INSTITUTIONAL BACKGROUND

The report should then provide an overview of the ACA's history, organisational structure and operational functions, its mission, legal mandate and jurisdiction. This provides the important background information on the selected ACA to supplement the analysis of the 50 indicators on the factors influencing its performance, its accountability and oversight, and the public perceptions of its performance. The profile should begin with the origins of the ACA and the reasons for its formation. The important role of the political leadership in the ACA's creation and their continued support for its effective performance should be highlighted.

Information should also be provided on the anti-corruption laws regulating the ACA's establishment, its functions, its organizational structure, the number of its personnel (including their salary scales and benefits) and its accountability mechanisms. If the ACA conducts research on corruption issues and monitors its performance, these important functions must be highlighted. The ACA's relations with the Attorney-General's Office must be analysed if the ACA

is not responsible for prosecuting corruption cases. The ACA's relations with the Auditor-General's Office, Police and other integrity agencies must also be noted. The ACA's interaction with civil society organizations and donor agencies, if applicable, should be described.

In order to map out the mandate and jurisdiction of the ACA, **the table provided in Annex 2 should be used.** This will aid both the researcher when conducting the assessment and provide readers with a visual to facilitate understanding of the assessment.

The ACA's profile should be compiled by the research analysts in the CRTs using the ACA's annual report, website, publications, and other information provided from the interviews with the ACA's personnel and other persons familiar with the ACA's operations and performance.

ASSESSMENT PART 3: KEY FINDINGS AND SCORING

Part 3 of the report should present the main findings of the assessment based on a set of 50 indicators. These indicators are designed to assess the capacity and effectiveness of the ACA, and to identify gaps and areas of opportunity.

The indicators are divided into seven different dimensions:

DIMENSIONS OF ASSESSMENT	NUMBER OF INDICATORS
1. ACA's Legal Independence and Status	7
2. ACA's Financial and Human Resources	9
3. ACA's Detection and Investigation Function	9
4. ACA's Prevention, Education and Outreach Functions	9
5. ACA's Cooperation with other Organizations	5
6. ACA's Accountability and Oversight	4
7. Public Perceptions of the ACA's Performance	7
Total	50

Evidence must be gathered in order to provide a narrative assessment and score for each indicator. Annex 4 presents a detailed description of the indicator framework, including the name of each indicator, the suggested data sources, the scoring criteria and detailed guidance for interviewers.

Each indicator is assigned one of three possible scores – **high (3), moderate (2) and low (1).** This scale is preferred over using a (2), (1), (0) scale because researchers are inherently less likely to give a low score if it is a (0) than if it is a (1), thus creating bias. In order to score each indicator the CRT identifies the specific source of information, conducts a desk review to compile and analyse this data, then further substantiates each score with in-depth interviews, where appropriate. A clear justification for each score should be provided along with the sources of evidence in the table in Annex 4.

If it is not possible to score an indicator, because adequate, reliable and verifiable sources of data do not exist, or if the indicator is not applicable, it should be omitted. Researchers should however be careful not to remove indicators for reasons to do with mandate, capacity or scope. If for example, an ACA is not mandated to investigate corruption, it would be better to give low scores for indicators relating to investigation rather than removing the indicator. An explanation of why an indicator is omitted should be given in the justification. Any indicator which is omitted will not be scored.

Once the indicators have been scored and a narrative justification for each score provided, the results should be transferred from the table in Annex 4 and presented in a number of ways, as follows:

1. **Assessment summary: Indicators by dimension:** The indicator ratings should be presented in a summary table, divided by dimension, whereby indicators rated high (3) are coloured green, indicators rated medium (2) are coloured yellow, and indicators rated low (1) are coloured red. Unscored indicators should be coloured grey. The following example is taken from the pilot assessment report from Bhutan. This table should be accompanied by a brief narrative summary of the key strengths and weaknesses of the ACA as a whole, as identified in the assessment. It should be presented as part of the key findings of the assessment (see report template).

DIMENSION								INDICATORS
LEGAL BASIS, INDEPENDENCE AND MANDATE (7)	Independence	Mandate	Legal powers	Appointment of commissioners	Removal of commissioners	Operational autonomy	Political use of powers	
FINANCIAL AND HUMAN RESOURCES (9)	Budget proportion	Budget sufficiency	Budget stability	Staff salary	Staff selection	Staff expertise (investigation)	Staff expertise (prevention)	Staff training	Staff stability
DETECTION AND INVESTIGATION (9)	Accessibility	Responsiveness	Willingness to investigate	Cases investigated	Efficiency	Conviction rate	Investigation of influential persons	Restitution and asset recovery	Complainants by gender
PREVENTION, EDUCATION AND OUTREACH (9)	Budget	Prevention initiatives	System/ agency reviews	Prevention recommend-ations	Outreach and education plans	Stakeholder engagement	Research	Campaigns	Website and social media
STATE SUPPORT, INTERAGENCY COOPERATION (6)	Government support	Cooperation with agencies	Cooperation with civil society and private sector	International participation	Cooperation with other countries' ACAs	Public confidence in state endowed ACA with powers and resources for curbing corruption		
OVERSIGHT AND ACCOUNTABILITY (7)	Annual report	Oversight mechanisms	Internal complaints procedure	Staff disciplinary	Treatment of persons under investigation	Impartiality and fairness	Impartiality and fairness, among users	
PERCEPTIONS OF EFFECTIVENESS (3)	Effectiveness in corruption control	Effectiveness in corruption control among users	Effectiveness in corruption control among female users					

Scoring Key:

HIGH SCORE	3	Green
MODERATE SCORE	2	Yellow
LOW SCORE	1	Red

|		
Scoring Not Possible	No score	Grey

2. **Detailed Indicator Scores, with Sources and Comments:** The indicator ratings should also be presented in a more detailed table which includes the narrative justification of each of the indicator scores. The following example for a small selection of indicators is taken from the

pilot assessment report from Bhutan. This table should be preceded by a more detailed narrative summary of the key strengths and weaknesses of each of the dimensions of the ACA as identified in the assessment. It should also be presented as part of the key findings of the report (see report template).

INDICATOR	INDICATOR VALUES			JUSTIFICATION OF SCORES AND DATA SOURCES
	HIGH	MODERATE	LOW	
1. LEGAL BASIS, INDEPENDENCE AND MANDATE				
a) ACA legal independence	Independent institution outside the government	Separate agency located outside a ministry	Within the police or a ministry	The ACC is fully independent according to the Constitution (art. 27) and the ACC (especially art. 6 ff). Its full independence has been questioned due to the nature of its relationship with the RCSC and the fact that ACC staff have to be hired through the RCSC (see comments and recommendations below, sections 4 and 5), but in legal terms, the ACC is fully independent.
b) ACA broad mandate	Focus on investigation, education and prevention (and prosecution if applicable)	Primary focus on investigation	Education and prevention without investigation	The Constitution sets up a broad mandate and the Anti-Corruption Act establishes broad goals and lays out a wide range of functions, including investigation, prevention, education, research and integrity advice for mainstreaming good practices in the work of government agencies. *Source*: art. 25 of the Anti-Corruption Act.
c) ACA legal powers	Extensive powers[35]	Some powers	No powers	The powers of the ACC are laid out in articles 24, 81–88 and 94–111 of the Anti-Corruption Act, and include subpoena and suspension. In addition to this very exhaustive list, other (special) powers are considered in the act, and seizure of assets can be made, subject to due process provisions through work with the Central Bank's Financial Intelligence Unit and the Judiciary.

3. **The aggregate scores (quantitative) for each of the seven dimensions should be presented as a spider chart.** In order to arrive at the aggregate score for each dimension, the scores have to first be converted from the 1-3 scale to a 0-2 scale. Thus, all (1) scores become (0), all (2) scores become (1) and all (3) scores become (2). This needs to be done because when aggregating the scores and converting them to percentages the bottom of the scale must always be 0. If we were to use the 1-3 scale then the lowest possible score for any dimension would be 33% (i.e. 1/3).

Once the scores have been converted from the 1-3 scale to the 0-2 scale, add up the final indicator scores for that dimension, divide by the maximum total possible score for all indicators under that dimension and multiply by 100. In the case of Bhutan for example, the sum of the indicators under the first dimension (Legal basis, independence and mandate) was 13 (6 indicators received the maximum score of 2 and 1 indicator received a score of 1). The maximum total possible score for that dimension is 14 (i.e. 7 indicators X the maximum possible score of 2 for each). Thus the final aggregate score (percentage) for that dimension was: 13/14 X 100 = 93%. (Note that scores should be rounded to the nearest whole number). The following example is taken from the pilot assessment report from Bhutan. This spider chart should be presented as part of the executive summary of the report (see report template).

Indicators by Dimension - Bhutan ACC Assessment
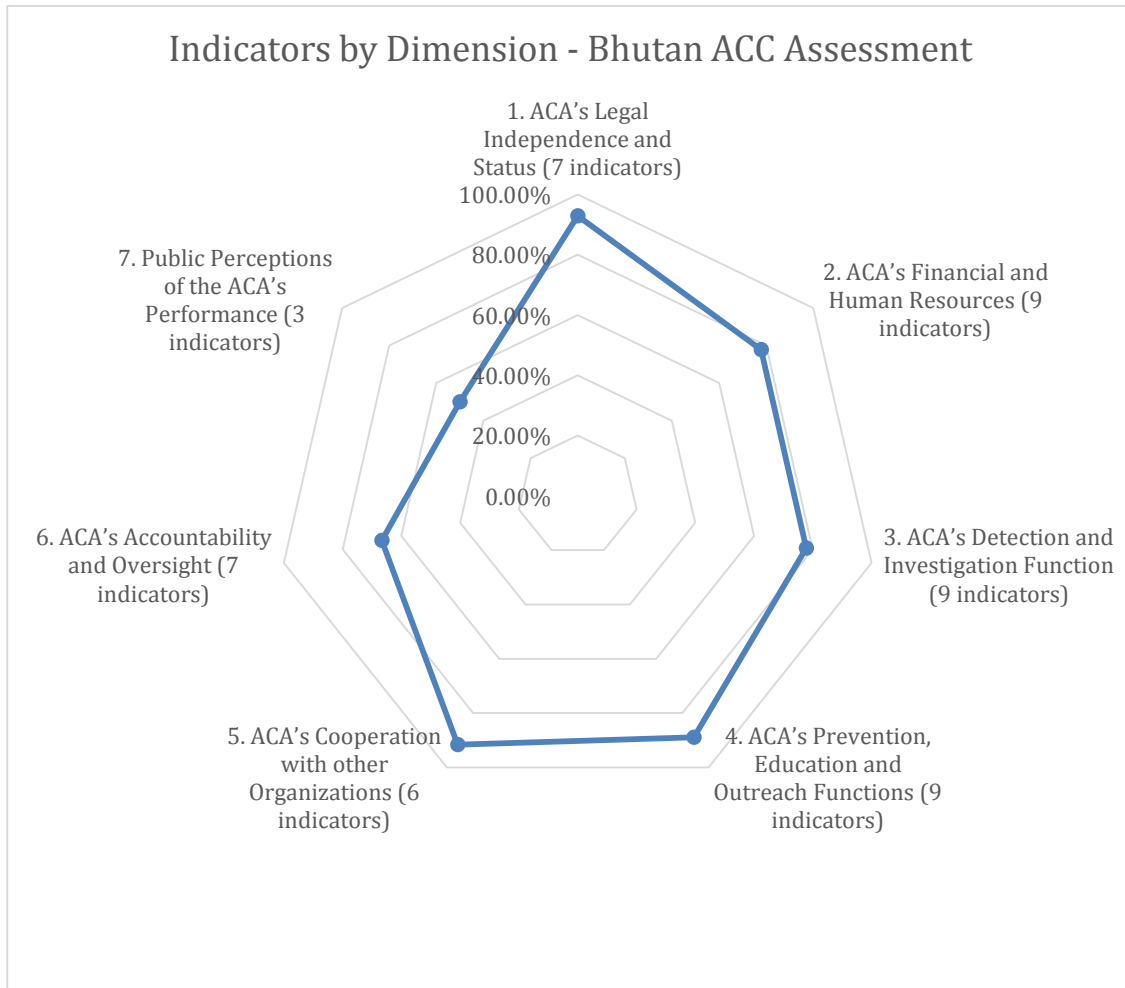
Note: The above example is taken from the methodology used at the time of the Bhutan assessment. Thus the number of indicators per dimension is different to the final methodology.

4. In order to facilitate the targeting of recommendations, in addition to the categorisation of indicators by dimension, **each indicator is also categorised according to whether it relates to a set of enabling factors *beyond* the control of the ACA, or to the performance of the ACA *within* control of the ACA.** There are a total of 50 indicators, 17 of which relate to the enabling factors and 33 relate to the performance of the ACA (see Annex 3). In order to arrive at the aggregate score (percentage) for each of these two categories, the same approach is taken as for the dimensions above. In other words, add up the final scores for all the indicators under the enabling factors category, divide by the maximum total possible score for all indicators under that category, and multiply by 100. Then repeat for the ACA performance category. This can then be mapped on a chart with the score for Enabling Factors mapped along the x axis and the score for Performance mapped along the y axis. These scores can then easily be compared with other ACAs or the same ACA over time, as shown in this example from Bhutan. This chart should be presented alongside the recommendations in the report (see report template).

Use the Excel Tool provided to enter your scores and produce these two graphics automatically.
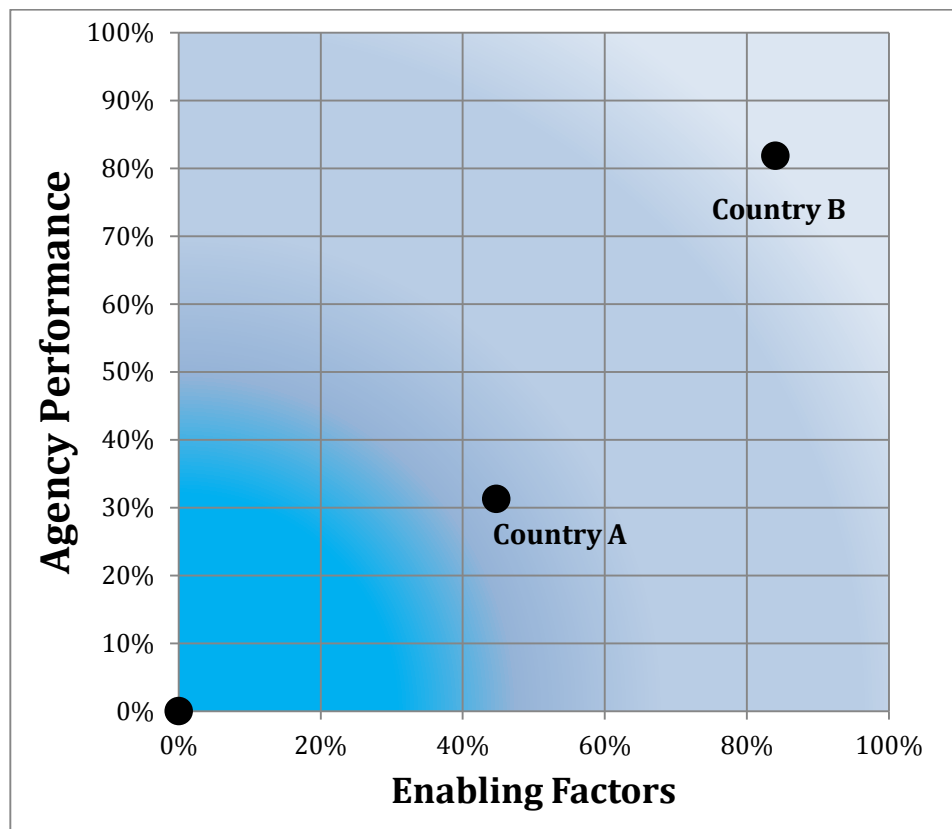
Note: The scores are purely fictional and only used as an example.

ASSESSMENT PART 4: CONCLUSIONS AND RECOMMENDATIONS

In the final section of the report, the CRT will draw conclusions about the assessment highlighting the main strengths, weaknesses, challenges and opportunities identified, presented within the policy context. The CRT, in consultation with the ACA, the Chapter and relevant stakeholders, should formulate clear and concrete recommendations for action. These recommendations will be targeted at different groups depending on who is responsible, i.e. the ACA or another actor. Where possible, recommendations should be as specific as possible outlining: *who should do what by when.* The 'when' part is optional, however it should be clear whether the action is achievable in the short, medium or long term. This will facilitate the action planning process and dialogue on way forward.

Three examples of recommendations are:

- Parliamentary oversight committees should create mechanisms for effective monitoring and follow-up

- The ACC should work to develop a broader and more nuanced communication strategy that facilitates access to and familiarity with ACC materials, campaigns and procedures from the perspective of citizens

- The ACC should develop a user satisfaction survey to collect detailed information from claimants and citizens filing complaints

ACTION PLANNING AND ADVOCACY

The purpose of the ACA assessment is to benchmark the performance of ACAs and their operating environment to stimulate an internal drive for improvement so that all ACAs can compare and learn from the best practices of other ACAs. However, the results of the benchmarking exercise must be interpreted carefully in the proper perspective because the ACA constitutes only one of the pillars of the country's National Integrity System. The assessment forms part of a wider initiative whereby TI's Chapters work constructively with the ACA and other relevant stakeholders to create short- and long-term change. For this it is important to identify and articulate what the stakeholders – the participating ACAs, TI-S and Chapters – should do in terms of follow-up activities after the publication of the assessment report.

First, the participating ACAs, which are the primary beneficiaries, should analyse carefully their performance by identifying both their strengths and those areas which require improvement. The Chapter should facilitate this process by organising an **Action Planning Workshop** with the relevant ACA staff, including senior leadership. This will broadly comprise the following steps:

- Discuss the findings of the report in depth, reflecting on the proposed solutions and recommendations
- Select the recommendations to take forward in light of the ACA's priorities and capacities
- Define SMART (Specific, Measurable, Achievable, Relevant, Time-bound) objectives in relation to each recommendation.
- Identify suitable activities and actions needed to achieve these objectives
- Define indicators of success and develop a plan to monitor progress at set intervals
- Identify technical, facilitative and other assistance needed to achieve objectives
- Assign roles, budget and deadlines

With a clear action plan in place and roles and responsibilities defined, the Chapter will play a role in providing technical assistance (or facilitating technical assistance from others) and monitoring the implementation of the plan. The ACA and Chapter should agree on suitable milestones or intervals for consulting with each other to review the implementation of the plan, discuss challenges and solutions and identify next steps. The implementation of this plan will also form an important part of the next assessment.

As more and more assessments are conducted, the ACAs will be able to compare their performance with the performance of other ACAs, facilitating further exploration of the reasons for poor

performance or other weaknesses and adopt the relevant best practices of other ACAs, after taking into account contextual differences and the country's circumstances. If necessary, the ACA Commissioner and his senior colleagues could visit other ACAs to exchange their views on the adoption of best practices. For example, the UNDP Asia-Pacific Regional Centre in Bangkok supported the study tour by the delegations of the Anti-Corruption Commission (ACC) in the Maldives and the Commission Against Corruption (CAC) in Timor-Leste to Thimphu from July 11-14, 2011 to learn how the ACC in Bhutan has curbed corruption since its establishment in January 2006. The purpose of this "South-South Exchange on Effective Anti-Corruption Agencies" was to enable the participants from the three ACAs to share their experiences and identify best practices in the investigation of corruption cases, corruption prevention, and public education on corruption, which could be replicated in their respective countries. At the end of the four-day study tour, the Commissioners of the three ACAs unanimously concluded that the "South-South Exchange" was very useful and successful as its objectives were achieved.[53]

TI-S with the assistance of the relevant Chapters should encourage the ACAs to share their experiences and provide technical assistance, if requested, to those ACAs requesting it. For example, TI-S could organise regional workshops for the personnel of the participating ACAs to learn from each other's experiences in combating corruption. Alternatively, arrangements could be facilitated by TI-S or the Chapters between the ACAs of two or more Asia Pacific countries to enhance knowledge transfer and promote regional cooperation in combating corruption.

In addition to supporting and pushing the ACA to reform its policies and process, the Chapter takes it upon themselves to push for reform in the wider context. Here they will take on board all the findings and recommendations relating to the policy context and enabling factors to develop an appropriate advocacy strategy. In doing so the Chapter will also have to map out stakeholders, opportunities and threats in order to identify the most appropriate strategy for change.

ANNEX 1: REPORT CONTENTS PAGE

We recommend that the report is between 50 and 100 pages long, with 15,000 to 50,000 words, and that endnotes are used rather than footnotes. Please refer to TI's Writing Style Guide for more information on formatting and referencing.

The following contents should be included in the standard report:

- Abbreviations
- Executive Summary
- Introduction
- **PART 1: Policy Context and Perceptions of Corruption**
    - o Economy
    - o Politics and Society
    - o Levels of Corruption
- **PART 2: Institutional Background and Profile of the ACA**
- **PART 3: Key Findings**
- **PART 4: Conclusions and Recommendations**
    - o Recommendations to The ACA
    - o Recommendations to Other Actors
    - o Conclusion
- Annex 1: Background to the Project
- Annex 2: Interviewees
- Annex 3: Stakeholders Consulted
- Annex 4: References

ANNEX 2: ACA PROFILE TABLE TEMPLATE

Jurisdiction	Public sector				Non-government			
Functions/ mandate/ powers	Legislators	Judiciary	Police, military etc.	Other public service	Govt-owned corps	Public contractors	Charities / NGOs	All business / some business
1. Research, intelligence, risk assessment & detection	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
2. Corruption investigation – in response to complaints	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
3. Corruption investigation – own motion powers	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
4. Prosecution powers	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
5. Asset recovery / confiscation / restitution powers	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
6. Prevention powers	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
7. Education and outreach powers	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N

Please select either Y or N to indicate whether the ACA has these functions and jurisdiction. The completed table should be inserted into the ACA Profile section of the report.

ANNEX 3: CLASSIFICATION OF INDICATORS

The classification of indicators has been done based on a standardized context. Research teams can adjust the classification of selected indicators (in particular those marked with *) if they believe them to be different in their country contexts. Reasons for changes should be approved by all involved in advance.

	Indicator	Relating to:	
		Enabling Factors	**ACA Performance**
1	ACA's legal independence	Yes	No
2	ACA's mandate	Yes	No
3	ACA's legal powers	Yes	No
4	Appointment of ACA Commissioner(s)	Yes	No
5	ACA Commissioner(s)' term of office and removal	Yes	No
6	ACA's operational autonomy and impartiality	Yes	No
7	Government's reliance on ACA to use corruption as a weapon against political opponents	Yes	No
8	Average proportion of ACA's budget to total government budget for past 3 years	Yes	No
9	Sufficiency of ACA's budget for performing its functions	Yes	No
10	Security and stability of ACA's budget during past 3 years	Yes	No
11	ACA personnel's salary and benefits	Yes	No
12	ACA's selection criteria for personnel	Yes	No
13	Expertise of ACA's personnel in corruption investigation	No	Yes
14	Expertise of ACA's personnel in corruption prevention and education	No	Yes
15	Training of ACA's personnel	No	Yes
16*	Stability of ACA's personnel	No	Yes
17	ACA's accessibility to corruption complainants/informants, including public and whistle-blowers during past 3 years	No	Yes
18	ACA's responsiveness to corruption complaints during past 3 years	No	Yes
19*	ACA's willingness to initiate corruption investigations during past 3 years	No	Yes
20	Average number of cases investigated by ACA personnel during past 3 years	No	Yes

21	Efficiency and professionalism of corruption investigations by ACA during past 3 years	No	Yes
22*	Average conviction rate of corruption cases investigated by ACA in past 3 years	Yes	No
23	ACA's willingness to investigate influential persons for corruption without fear or favour during past 3 years	No	Yes
24	ACA's role in restitution, asset recovery, freezing and confiscation during past 3 years	No	Yes
25	Does the ACA identify gender in compiling corruption complaints and monitoring corruption trends?	No	Yes
26*	Average proportion of ACA's operating expenditure allocated to public outreach and prevention during past 3 years	Yes	No
27	ACA's corruption prevention initiatives during past 3 years	No	Yes
28	Number of reviews of organizational procedures, systems & capabilities conducted by ACA to prevent corruption during past 3 years	No	Yes
29	Frequency of including corruption prevention recommendations in ACA's investigation reports during past 3 years	No	Yes
30	ACA's plan for prevention, education and outreach and its implementation	No	Yes
31	ACA's collaboration with other stakeholders in prevention, education and outreach activities	No	Yes
32	ACA's research and exploration of corruption risks, context and conditions	No	Yes
33	ACA's dissemination of corruption prevention information and use of campaigns	No	Yes
34	ACA's use of its website and social media for disseminating information on corruption prevention	No	Yes
35	Government support (e.g. Attorney-General's Office, Director of Public Prosecutions) to ACA for prosecution of corruption cases	Yes	No
36	Cooperation between ACA and other integrity agencies (including other ACAs if there are multiple ACAs in country)	No	Yes
37	Cooperation between ACA and non-government organizations including CSOs and private companies	No	Yes
38	ACA's participation in international networks	No	Yes
39	ACA's cooperation with ACAs in other countries	No	Yes
40	Information provided in and accessibility of ACA's annual report and website	No	Yes
41	ACA's oversight mechanisms	Yes	No
42	ACA's procedure for dealing with complaints against ACA personnel	No	Yes
43	Outcomes of complaints against ACA or its personnel in past 3 years	No	Yes
44	Public confidence that government has given ACA the required powers and resources for curbing corruption	Yes	No

45	Public confidence in ACA's adherence to due process, impartiality, and fairness in using its powers	No	Yes
46	Confidence in ACA's adherence to due process, impartiality, and fairness in using its powers among persons who had direct contact with ACA	No	Yes
47	Confidence in ACA's dignified and respectful treatment of persons under investigation	No	Yes
48	Public perception of ACA's effectiveness in corruption control	No	Yes
49	Perception of ACA's effectiveness in corruption control among persons with direct contact with ACA	No	Yes
50	Perception of ACA's effectiveness in dealing with complaints among female citizens who had direct contact with ACA	No	Yes

ANNEX 4: DETAILED INDICATOR FRAMEWORK

General Note: For most indicators the review period is the last 3 years. It is fine to use evidence from before 3 years if it is available and relevant to the assessment of a specific indicator. If evidence beyond 3 years is used, it should be stated in the sources and justified. If there are certain events in the past which led to the establishment of the ACA or its effectiveness, these events should be highlighted in the ACA's profile. For example, the opium hijacking scandal in October 1951 in Singapore led to the formation of the CPIB in October 1952.

1. ACA's Legal Independence and Status (7 indicators)

No.	Indicator	Data Sources	Range of Scores			Score
			High (3)	**Medium (2)**	**Low (1)**	
1.	ACA's legal independence	Anti-corruption law; ACA's annual report and website;; and interviews with ACA senior personnel and legal experts	Independent agency	Separate agency outside ministry	Within police or ministry	
2.	ACA's mandate	Anti-corruption law; ACA's annual report and website; and interviews with ACA senior personnel	Focus on investigation, education and prevention (and prosecution if applicable)	Primary focus on investigation	Education and prevention without investigation	
3.	ACA's legal powers	Anti-corruption law and interviews with ACA senior personnel and legal experts	Extensive powers (e.g., arrest and search of arrested persons; examining suspect's bank accounts, safe-deposit boxes, income tax records and property; search and entry of premises, etc.)	Some powers	Few or none	

			Independent committee using objective criteria and procedure is transparent	Ministerial committee using objective criteria but procedure is not transparent	Prime Minister/ President/ Head of State makes the decision and the procedure is not transparent	
4.	Appointment of ACA Commissioner(s)	Anti-corruption law; ACA's annual report and website; and interviews with ACA Commissioners	Independent committee using objective criteria and procedure is transparent	Ministerial committee using objective criteria but procedure is not transparent	Prime Minister/ President/ Head of State makes the decision and the procedure is not transparent	
5.	ACA Commissioner(s)' term of office and removal	Anti-corruption law and interviews with ACA Commissioners	Fixed term with tenure (difficult to remove Commissioners without cause, e.g. incompetence or proven misconduct)	Fixed term without tenure but not difficult to remove Commissioners	No fixed term and Commissioners can be replaced easily	
6.	ACA's operational autonomy and impartiality	Interviews with ACA Commissioners, senior personnel, media and CSOs	High (no political interference)	Limited (some political interference)	Low (high level of political interference)	
7.	Government's reliance on ACA to use corruption as a weapon against political opponents	Media coverage on opposition leaders investigated by ACA, and interviews with ACA senior personnel, opposition leaders, CSO leaders and anti-corruption experts	Government has not used ACA as a weapon against political opponents	Evidence of limited use of ACA by government as a weapon against political opponents	Evidence of widespread use of ACA by government as a weapon against political opponents	
		Sub-total for ACA's Independence and Legal Status Score				

Notes for interviewers:

1. For indicator no. 1, the scores reflect the extent of the ACA's independence from the government, ranging from being an independent agency outside the government to being a unit within the police or a ministry.
2. Indicator no. 2 focuses on the ACA's functions, with a high score given when the ACA performs the functions of investigation, education and prevention, and if applicable, prosecution, in both the public and private sectors. The medium score is given when the ACA focuses primarily on investigation of public sector corruption. The ACA gets a low score if it does not investigate corruption cases and focuses only on education and prevention in the public sector.
3. For indicator no. 3, the interviewer should describe all the ACA's legal powers specified in the relevant provisions of the anti-corruption law for determining the score. The ACA should be given a medium score if it has only one or two of the powers specified for the high score.
4. Indicator no. 4 describes the process for appointing the ACA Commissioners, including the composition of the committee or those persons responsible for the appointment and the selection criteria used, and whether these criteria are publicised.
5. Indicator no. 5 provides details of the term of office of the ACA Commissioners, including the conditions for removing or replacing them.

6. Indicator no. 6 ascertains the ACA's operational autonomy as reflected in the extent of the government's interference in its daily operations. If the ACA encounters political interference in its daily operations from the government, the number and details of these cases should be provided. This is distinct to indicator 7 which focuses on whether the ACA is used by the government as a weapon against political opponents.
7. For indicator no. 7, if the government uses corruption as a weapon against political opponents, details of the opposition political leaders investigated by the ACA and the results of the investigation should be provided. The interviewer should rely on media coverage of these corruption cases and interviews with these political leaders (if possible) and the ACA Commissioners, other opposition leaders, CSO leaders, and anti-corruption experts. If the media reports and interviews result in different assessments, the interviewer should identify the reasons for these assessments from the interviewees.
8. For indicators 6 and 7: It is important the researcher can provide concrete evidence, i.e. the relevant cases, examples and data to substantiate if the government has interfered in the ACA's daily operations and its use of the ACA against political opponents, since these are serious claims.

2. ACA's Financial and Human Resources (9 indicators)

No.	Indicator	Data Sources	Range of Scores			Score
			High (3)	**Medium (2)**	**Low (1)**	
8.	Average proportion of ACA's budget to total government budget for past 3 years	Ministry of Finance's website; ACA's annual report and website; and interviews with ACA's senior personnel	Above 0.20%	Between 0.10% to 0.20%	Below 0.10%	
9.	Sufficiency of ACA's budget for performing its functions	Interviews with ACA's Commissioners and senior personnel, CSO leaders, and representatives of donor agencies	More than adequate (80% to 100% of budget request is approved)	Adequate (66% to 79% of budget request is approved)	Inadequate (less than 66% of budget request is approved) and relies on funding by CSOs and donor agencies	
10.	Security and stability of ACA's budget during past 3 years	Ministry of Finance's website; ACA's annual report and website; and interviews with ACA's senior personnel, CSO leaders, and representatives of donor agencies	ACA budget is guaranteed based on previous year's allocation and has not been reduced	ACA budget has not been reduced during past 3 years	ACA budget has been reduced during past three years	

11.	ACA personnel's salary and benefits	ACA's annual report and website for the ACA's salary scales and benefits; and interviews with ACA's senior personnel and CSO leaders, and media reports if relevant	Competitive salary and benefits	Adequate salary and benefits	Low salary and limited benefits	
12.	ACA's selection criteria for personnel	ACA's annual report and website, interviews with ACA's senior personnel, and relevant personnel or service rules	Meritocratic and transparent procedures	Limited meritocratic or transparent procedures	Patronage and non-transparent procedures	
13.	Expertise of ACA's personnel in corruption investigation	ACA's annual report and website, interviews with ACA's senior personnel, CSO leaders, anti-corruption experts, and representatives of donor agencies	High level of expertise	Lacking expertise in some areas	Lacking expertise in many areas	
14.	Expertise of ACA's personnel in corruption prevention and education	ACA's annual report and website, interviews with ACA's senior personnel, CSO leaders, anti-corruption experts, and representatives of donor agencies	High level of expertise	Lacking expertise in some areas	Lacking expertise in many areas	
15.	Training of ACA's personnel	ACA's annual report and website, interviews with ACA's senior personnel, CSO leaders and representatives of donor agencies	Well-trained personnel with many training opportunities	Some trained personnel with limited training opportunities	Training is unimportant and neglected	
16.	Stability of ACA's personnel	ACA's annual report and website, interviews with ACA's senior personnel, CSO leaders and human resource management experts. If possible, ACA personnel who had resigned recently should be interviewed	Low turnover and resignation rate (0% to 5% per year)	Moderate turnover and resignation rate (more than 5% to 10% per year)	High turnover and resignation rate (more than 10% per year)	

		Sub-total for ACA's Financial and Human Resources Score	

Notes for interviewers:

1. For indicator no. 8, if the ACA performs both corruption and non-corruption related functions, only the budget for corruption functions (if this information is available) is calculated as a proportion of the total government budget for the past three years. If there is more than one ACA, the proportion of their budgets for corruption functions to the total government budget is calculated for each ACA.

2. For indicator no. 9, if the ACA also relies on donor agencies for funding to supplement its budget, interviews should be conducted with the representatives of the relevant donor agencies and CSOs to obtain details of the funding provided for the past three years.

3. Indicator no. 10 ascertains whether the ACA has encountered problems in getting approval for its annual budget request from the interviews with the ACA's Commissioners and senior personnel. If there are significant changes in the ACA's budget during the past three years, the reasons for these changes should be ascertained by the interviewer. This indicator does not look at whether the budget is high or low in the first place but specifically the change over time. However it can be worth mentioning in the narrative if the level is notable.

4. For indicator no. 11, details of the salary scales and benefits of the ACA's personnel should be provided in the ACA's profile in Part 2. Any significant changes in these salaries and benefits during the past three years should be highlighted and explained. The usual comparison to assess whether salaries are competitive is with the private sector, which usually pays better than the public sector. However, it is also worth looking at how the salaries of the ACA staff compares to salaries of other civil servants. Sometime ACA staff are paid better salaries than other public sector bodies in order to attract qualified candidates to join and remain within the ACA.

5. Indicator no. 12 focuses on the criteria used for selecting the ACA's personnel and the extent to which the selection procedure is transparent. Are the selection criteria based on merit and educational qualifications or on patronage? The interviewer should request from the ACA senior personnel a copy of the relevant personnel rules governing the selection of its personnel. In some cases, procedures may be meritocratic but not transparent, or vice versa. In those instances a moderate score can be given based on an assessment of the implications of the procedure and a clear justification should be given.

6. For indicators nos. 13 and 14, the evaluation of the level of expertise of the ACA's personnel in corruption investigation, education and prevention is based on the information provided on the educational qualifications and training of its personnel and interviews with the ACA's senior personnel, CSO leaders, representatives of donor agencies, and anti-corruption experts.

7. For indicator no. 15, details of the number and type of training courses attended by the ACA's personnel as well as the training courses available to them during the past three years should be provided. Details of the budget allocated by the ACA to training during the past three years should be provided if available.

8. For indicator no. 16, if the turnover of the ACA's personnel is high, the reasons for the ACA's inability to retain its staff should be ascertained in the interviews with the ACA's senior personnel and those personnel who had resigned recently if possible. Turnover refers to the movement of personnel resulting from the recruitment and resignation of staff. If personnel are seconded or transferred to the ACA from other government agencies or vice versa, details of such secondment or transfers should be recorded too.

3. ACA's Detection and Investigation Function (9 indicators)

No.	Indicator	Data Sources	Range of Scores	Score

			High (3)	Medium (2)	Low (1)	
17.	ACA's accessibility to corruption complainants/informants, including public and whistle-blowers during past 3 years	ACA's annual report and website, data on complaints received by the ACA, and interviews with ACA's senior personnel, CSO leaders, donor agencies, and media reports	ACA is highly accessible as reflected in the high proportion of corruption complaints received relative to population and perceived level of corruption, and proportion of complainants confident to identify themselves	ACA is accessible as reflected in the moderate proportion of corruption complaints received relative to population and perceived level of corruption, and proportion of complainants confident to identify themselves	ACA is inaccessible as reflected in low proportion of corruption complaints received relative to population and perceived level of corruption, and proportion of complainants confident to identify themselves	
18.	ACA's responsiveness to corruption complaints during past 3 years	ACA's annual report and website, data on complaints received by the ACA, and interviews with ACA's senior personnel, CSO leaders, donor agencies, and media reports	ACA is highly responsive as reflected in the high proportion of corruption complaints investigated and investigation cases completed during past 3 years	ACA is responsive as reflected in the moderate proportion of corruption complaints investigated and investigation cases completed during past 3 years	ACA is not responsive as reflected in the low proportion of corruption complaints investigated and investigation cases completed during past 3 years	
19.	ACA's willingness to initiate corruption investigations during past 3 years	ACA's annual report and website, data on complaints received by the ACA, and interviews with ACA's senior personnel, CSO leaders, donor agencies, and media reports	High number of corruption investigations initiated by ACA	Moderate number of corruption investigations initiated by ACA	Low number of corruption investigations initiated by ACA	
20.	Average number of cases investigated by the ACA per year during past 3 years	ACA's annual report and website, data on corruption cases investigated by the ACA, and interviews with ACA's senior personnel and anti-corruption experts	More than 1,000 corruption cases investigated by the ACA per year during the past three years	Between 300 to 999 corruption cases investigated by the ACA per year during the past three years	Less than 300 corruption cases investigated by the ACA per year during the past three years	

21.	Efficiency and professionalism of corruption investigations by ACA during past 3 years	ACA's annual report and website, data on corruption cases investigated by the ACA, and interviews with ACA's senior personnel and anti-corruption experts	Highly efficient and professional investigation of corruption cases	Efficient and professional investigation of corruption cases	Inefficient and unprofessional investigation of corruption cases	
22.	Average conviction rate of corruption cases investigated by ACA in past 3 years	ACA's annual report and website, interviews with ACA's senior personnel, personnel of Attorney-General's Office if the ACA is not responsible for prosecuting corruption cases, and media reports	Above 75%	Between 50% to 75%	Below 50%	
23.	ACA's willingness to investigate influential persons for corruption without fear or favour during past 3 years	ACA's annual report and website, case records, interviews with ACA's senior personnel, CSO leaders, anti-corruption experts and media reports	Considerable evidence of investigation of influential persons for corruption	Some evidence of investigation of influential persons for corruption	No evidence of investigation of influential persons for corruption	
24.	ACA's role in restitution, asset recovery, freezing and confiscation during past 3 years	ACA's annual report and website, interviews with ACA's senior personnel, CSO leaders, anti-corruption experts and media reports	Very active role by ACA	Moderately active role by ACA	Inactive role by ACA	
25.	Does the ACA identify gender in compiling corruption complaints and monitoring corruption trends?	ACA's annual report and website, and interviews with ACA's senior personnel	The ACA has gender sensitive demographic information that allows it to monitor how corruption and its services affect women differently	The ACA has gender sensitive demographic information that could allow it to monitor how corruption and its services affect women differently, but it does not actively monitor these differences.	The ACA does not collect gender sensitive demographic information.	
		Sub-total for ACA's Detection and Investigation Function Score				

Notes for interviewers:

1. For indicator no. 17, data on corruption related complaints received by the ACA, including the number of signed complaints during the past three years should be provided. The scoring for this indicator should be done after comparing these data with the country's population and perceived extent of corruption. If available, the interviewer should request from the ACA the profile of those persons who have provided information or submitted complaints. Analysis of the profile of the complainants according to their age, gender and education, will indicate how representative they are of the general population. If the ACA provides protection for whistle-blowers, details of such protection should be described.
2. For indicator no. 18, the interviewer can refer to the ACA's annual report for data on the number of complaints received by the ACA, the proportion of these complaints which are corruption-related, and the number of corruption complaints which are investigated. The average number of corruption complaints investigated and the average number of corruption cases completed during the past three years should be calculated by the interviewer.
3. For indicator no. 19, data on the number of corruption investigations initiated by the ACA during the past three years are collected by the interviewer. This indicator only looks at the actual number of cases investigated and assesses whether this is high or low.
4. For indicator no. 20, data on the number of corruption cases investigated by the ACA during the past three years are collected by the interviewer and the average number of cases investigated per year is calculated. The criteria have been set based on the average number of cases investigated of eight different ACAs in Asia Pacific in 2012, 2013 or 2014.
5. For indicator no. 21, the interviewer collects data on the average time taken by the ACA to complete the investigation of a corruption case during the past three years to assess its level of efficiency in corruption investigation. The ACA's professionalism in investigating corruption cases is reflected in the number of successful cases prosecuted, the number of persons convicted during the past three years, and the assessment of the anti-corruption experts interviewed. It is fine to include cases which go beyond the past 3 years, however the reasons for including them should be stated. The reasons for the length of these cases should be explained if there are special circumstances. What is more important is the average length of time taken by the ACA to complete the investigation of corruption cases.
6. For indicator no. 22, the extent of cooperation and support between the ACA and prosecuting agency should be ascertained in the interviews. If there is lack of cooperation and support between these agencies, the interviewer should find out why. The ACA's personnel should be asked to explain the average conviction rate during the past three years for corruption cases investigated by them. If the average conviction rate is low, the interviewer should ascertain whether this was due to factors beyond the ACA's control (cross check with evidence gathered under indicator 7). If the ACA is not responsible for prosecuting corruption cases, the extent of cooperation and support provided by the prosecuting agency to the ACA should also be analysed, including the problems encountered.
7. For indicator no. 23, the interviewer should provide details of the number and names of those influential persons investigated by the ACA during the past three years. Relevant details of these cases should be provided, including the outcomes of the investigations and the punishment imposed. Influential persons refer to political leaders, leaders of political parties, senior civil servants, business leaders, and prominent citizens.
8. For indicator no. 24, the interviewer should provide information on the number of cases and the amounts and details of assets recovered, frozen or confiscated by the ACA during the past three years.
9. For indicator no. 25, the interviewer has to obtain the data on the corruption complaints received according to gender from the ACA's senior personnel if such information is not published in the ACA's annual report or website. This indicator is included to understand whether the

ACA is aware about the different needs of its citizens and the different ways in which people experience and report corruption. The indicator looks specifically at women as a marginalised group. In future this could be expanded to include other marginalised groups such as disabled people or ethnic minorities. Ultimately, having disaggregated data will enable the ACA to be more inclusive, accessible and effective in reaching all parts of society.

4. ACA's Prevention, Education and Outreach Functions (9 indicators)

No.	Indicator	Data Sources	Range of Scores			Score
			High (3)	**Medium (2)**	**Low (1)**	
26.	Average proportion of ACA's operating expenditure allocated to public outreach and prevention during past 3 years	ACA's annual report and website, Ministry of Finance website, and interviews with the ACA's senior personnel	Above 1% of ACA's operating expenditure	Between 0.5% and 1% of ACA's operating expenditure	Below 0.5% of ACA's operating expenditure	
27.	ACA's corruption prevention initiatives during past 3 years	ACA's annual report and website, and interviews with the ACA's senior personnel and CSO leaders and donor agencies	Many corruption prevention initiatives (average of 3 or more per year)	Some corruption prevention initiatives (average of 1-2 per year)	ACA initiated few or no corruption prevention initiatives	
28.	Number of reviews of organizational procedures, systems & capabilities conducted by ACA to prevent corruption during past 3 years	ACA's annual report and website, and interviews with the ACA's senior personnel and personnel of those agencies reviewed by the ACA	Many reviews were conducted (relative to no. of organisations in jurisdiction)	A substantial number of reviews were conducted (relative to no. of organisations in jurisdiction)	Few or no reviews were conducted (relative to no. of organisations in jurisdiction)	
29.	Frequency of including corruption prevention recommendations in ACA's investigation reports during past 3 years	ACA's annual report and website, and interviews with the ACA's senior personnel	Frequently	Sometimes	Not at all	
30.	ACA's plan for prevention, education	ACA's annual report and website, and interviews with the ACA's senior personnel	Comprehensive and clear plan which is	The plan for prevention, education and outreach exists	There is no or a weak plan for prevention,	

	and outreach and its implementation	and representatives of target groups	implemented and accessible	but not implemented fully	education and outreach activities	
31.	ACA's collaboration with other stakeholders in prevention, education and outreach activities	ACA's annual report and website, and interviews with the ACA's senior personnel and CSO leaders, and media reports	High degree of collaboration with three or more joint projects	Some degree of collaboration with one or two joint projects	Little or no collaboration with other stakeholders	
32.	ACA's research and exploration of corruption risks, context and conditions	ACA's annual report and website, and interviews with the ACA's senior personnel, CSO leaders and anti-corruption experts	Extensive use of research, to develop risk assessments and sectoral corruption profiles	Some degree of research to develop risk assessments and sectoral corruption profiles	Little or no discernible independent research carried out by the ACA	
33.	ACA's dissemination of corruption prevention information and use of campaigns	ACA's annual report and website, and interviews with the ACA's senior personnel and CSO leaders, and media reports	Extensive dissemination of corruption prevention and reliance on campaigns	Limited dissemination of corruption prevention information and reliance on campaigns	Does not disseminate corruption prevention information or rely on campaigns	
34.	ACA's use of its website and social media for disseminating information on corruption prevention	ACA's annual report and website, and interviews with the ACA's senior personnel and CSO leaders, and media reports	Extensive use of its website and social media to spread corruption prevention information	Limited use of its website and social media to spread corruption prevention information	ACA does not have a website and does not rely on social media to spread corruption prevention information	
		Sub-total for ACA's Prevention, Education and Outreach Functions Score				

Notes for interviewers:

1. For indicator no. 26, the interviewer collects data on the ACA's expenditure on public outreach and prevention and calculates the average proportion of this expenditure of the ACA's total operating expenditure for the past three years.
2. For indicator no. 27, details of the ACA's corruption prevention initiatives during the past three years should be provided, including the number of persons attending the ACA's talks and seminars as well as the number of citizens and foreign delegates visiting the ACA.
3. For indicator no. 28, information on the number of reviews of organizational procedures conducted by the ACA should be provided, including details of the organizations involved and whether the ACA had initiated the reviews or was requested to do so. This can include review of private sector organizations if the ACA's jurisdiction covers both the public and private sectors. Given the increasing number of corruption cases in the private sector, it is important for the ACA to conduct these reviews when corruption cases are uncovered in the private sector.

4. For indicator no. 29, the interviewer collects data on the number of investigation reports completed by the ACA during the past three years and identifies the number of corruption prevention recommendations in these reports so that the frequency of such recommendations can be determined.
5. For indicator no. 30, details of the ACA's plan for outreach and prevention should be provided, including the sectors covered and the extent of its implementation. If the ACA does not have a plan for its outreach and prevention activities, the interviewer should ascertain the reasons for this from the ACA's senior personnel. A comprehensive plan should cover all three areas - prevention, education and outreach.
6. For indicator no. 31, the stakeholders collaborating with the ACA in outreach and prevention activities should be identified and their joint programmes should be described. This could include other government agencies, civil society organizations and donor agencies which are collaborating with the ACA in its outreach activities.
7. For indicator no. 32, the interviewer should provide information on the research projects conducted by the ACA's personnel and other scholars on corruption in the country if available or applicable. Research included here should be initiated and coordinated by the ACA.
8. For indicator no. 33, the type of corruption prevention information disseminated by the ACA should be described and the interviewer should also indicate whether the ACA relies on campaigns to spread the corruption prevention message.
9. For indicator no. 34, the ACA's website should be analysed to identify the amount and type of information provided on its activities. The ACA's use of social media to reach out to the public should also be ascertained. Cross reference with evidence under public perceptions indicators to see whether this correlates.

5. ACA's Cooperation with other Organizations (5 indicators)

No.	Indicator	Data Sources	Range of Scores			Score
			High (3)	Medium (2)	Low (1)	
35.	Government support (e.g. Attorney-General's Office, Director of Public Prosecutions) to ACA for prosecution of corruption cases	ACA's annual report and website, and interviews with the ACA's senior personnel and the AGO's prosecutors	High level of support as reflected in absence of interference and average prosecution rate of above 75%	Moderate level of support as reflected in some interference and average prosecution rate of 50% to 75%	Low level of support as reflected in substantial interference and average prosecution rate of below 50%	
36.	Cooperation between ACA and other integrity agencies (including other ACAs if there are multiple ACAs in country)	ACA's annual report and website, and interviews with the ACA's senior personnel and personnel of other integrity agencies	High degree of cooperation between ACAs or between ACA and other integrity agencies	Limited cooperation between ACAs or between ACA and other integrity agencies	Conflict and/or lack of cooperation between ACAs or between ACA and other integrity agencies	

37.	Cooperation between ACA and non-government organizations including CSOs and private companies	ACA's annual report and website, and interviews with the ACA's senior personnel, CSO leaders and personnel of private companies	High degree of cooperation between ACA and other organizations including CSOs and private companies	Limited cooperation between ACA and other organizations	Conflict and/or lack of cooperation between ACA and other organizations	
38.	ACA's participation in international networks	ACA's annual report and website, interviews with the ACA's senior personnel, CSO leaders, and representatives of donor agencies	Very active with ACA participating in 3 or more networks	Active with ACA participating in 1 or 2 networks	ACA does not participate in any network	
39.	ACA's cooperation with ACAs in other countries	Annual reports and websites of the ACA and those ACAs which it cooperates with, and interviews with the ACA's senior personnel	High degree of cooperation with joint projects and technical assistance with several ACAs in other countries	Limited cooperation in some areas with one or two ACAs in other countries	No cooperation between ACA and ACAs in other countries	
			Sub-total for ACA's Cooperation with other Organizations Score			

Notes for interviewers:

1. For indicator no. 35, details of the support given by the AGO to the ACA for the prosecution of corruption cases are provided if the ACA is not responsible for this function.
2. For indicator no. 36, the relationship between the ACA and the other integrity agencies (auditor-general, ombudsman, public prosecutor, etc.) in the country is described. If there are multiple ACAs in the country, the relationship between the ACA and the other ACAs should be analysed too. If there is lack of cooperation or coordination between the ACAs, the interviewer should ask those interviewed the reasons for this.
3. For indicator no. 37, details of the cooperation between the ACA and other organizations in the country, including CSOs, donors private companies and state-owned enterprises should be analysed.
4. For indicator no. 38, the international networks which the ACA belongs to are identified, including the extent of its involvement. This may include the ADB, OECD or the UNCAC Coalition. If the ACA does not participate in any international network, the interviewer should ask the ACA's Commissioners and senior personnel to explain why this is the case.
5. For indicator no. 39, if the ACA cooperates with ACAs in other countries, the details and extent of such cooperation are described, including joint projects and the technical assistance provided. If the ACA does not cooperate with the ACAs in other countries, the reasons for this lack of cooperation should be identified.

6. ACA's Accountability and Oversight (4 indicators)

No.	Indicator	Data Sources	Range of Scores			Score
			High (3)	**Medium (2)**	**Low (1)**	
40.	Information provided in and accessibility of ACA's annual report and website	ACA's annual report and website, and interviews with the ACA's senior personnel, CSO leaders, journalists and anti-corruption experts	Comprehensive information on ACA is provided in annual report and website; submitted to Parliament and easily accessible to the public	Limited information on ACA is provided in annual report and website; submitted to Parliament but not easily accessible to the public	Submits annual report to government but is not available to the public	
41.	ACA's oversight mechanisms	ACA's annual report and website, and interviews with the ACA's senior personnel, personnel of other integrity agencies, CSO leaders and media reports	Oversight committees with active participation by Members of Parliament, senior civil servants and prominent citizens	Oversight committees with Members of Parliament and/or senior civil servants as members	Accountable to Executive without any oversight committee	
42.	ACA's procedure for dealing with complaints against ACA personnel	ACA's annual report and website, and interviews with the ACA's senior personnel, CSO leaders, anti-corruption experts and media reports	Complaints against ACA personnel are investigated by another public agency to avoid conflict of interest and results of investigation and punishment imposed are publicised	Complaints against ACA personnel are investigated by its internal control unit but results of investigation and punishment are not publicised	Complaints against ACA personnel are ignored and/or not investigated without any explanation	
43.	Outcomes of complaints against ACA or its personnel in past 3 years	ACA's annual report and website, and interviews with the ACA's senior personnel, CSO leaders, anti-corruption experts and media reports	All valid complaints against ACA personnel result in punishment or other remedies, and outcomeis publicized	Some valid complaints against ACA personnel result in punishment or other remedies, and outcome is publicized	Complaints involving ACA personnel are ignored and not investigated at all	
		Sub-total for ACA's Accountability and Oversight Score				

Notes for interviewers:

1. For indicator no. 40, the information provided in the ACA's annual report and website is analysed to assess its comprehensiveness and accessibility to the public.

2. For indicator no. 41, the number and composition of the ACA's oversight committees are provided to assess the extent of public representation and participation in these committees. If the ACA does not have an oversight committee, the ACA's Commissioners and senior personnel should be asked to explain why this is the case.
3. For indicator no. 42, the procedure for dealing with complaints against the ACA's personnel is described and its effectiveness is ascertained, including the publication of the results of the investigation and the punishment imposed. If available, the profile of the complainants including their gender, age, occupation and educational qualifications should be obtained from the ACA. If the ACA is subject to review by the Supreme Audit Institution, the number and details of adverse audit memoranda or observations during the past three years should also be provided.
4. For indicator no. 43, the number of valid complaints against the ACA's personnel for misconduct should be provided together with details of the punishment imposed and whether the punishment imposed is publicised. If only some valid complaints result in the imposition of punishment or if the complaints are ignored by the ACA, the interviewer should seek an explanation from the ACA's senior personnel.

7. Public Perceptions of the ACA's Performance (7 indicators)

No.	Indicator	Data Sources	Range of Scores			Score
			High (3)	**Medium (2)**	**Low (1)**	
44.	Public confidence that government has given ACA the required powers and resources for curbing corruption	ACA's public perceptions survey (if available), media reports, and interviews with the ACA's senior personnel, CSO leaders, anti-corruption experts, and journalists	High level of confidence as reflected in survey finding (above 75%) and views of ACA senior personnel, CSO leaders, anti-corruption experts and journalists	Moderate level of confidence as reflected in survey finding (50%-75%) and views of ACA senior personnel, CSO leaders, anti-corruption experts and journalists	Low level of confidence as reflected in survey finding (below 50%) and views of ACA senior personnel, CSO leaders, anti-corruption experts and journalists	
45.	Public confidence in ACA's adherence to due process, impartiality, and fairness in using its powers	ACA's public perceptions survey (if available), media reports, and interviews with the ACA's senior personnel, CSO leaders, anti-corruption experts, and journalists	High level of confidence as reflected in survey finding (above 75%) and views of ACA senior personnel, CSO leaders, anti-corruption experts and journalists	Moderate level of confidence as reflected in survey finding (50%-75%) and views of ACA senior personnel, CSO leaders, anti-corruption experts and journalists	Low level of confidence as reflected in survey finding (below 50%) and views of ACA senior personnel, CSO leaders, anti-corruption experts and journalists	
46.	Confidence in ACA's adherence to due process, impartiality, and fairness in using	ACA's public perceptions survey (if available), media reports, and interviews with the ACA's senior personnel,	High level of confidence as reflected in survey finding (above 75%) and views	Moderate level of confidence as reflected in survey finding (50%-75%) and views of ACA	Low level of confidence as reflected in survey finding (below 50%)	

	its powers, among persons who had direct contact with ACA	CSO leaders, anti-corruption experts, journalists and, if possible, persons with direct contact with ACA	of ACA senior personnel, CSO leaders, journalists and, if possible, persons with direct contact with ACA	senior personnel, CSO leaders, journalists and, if possible, persons with direct contact with ACA	and views of ACA senior personnel, CSO leaders, journalists and, if possible, persons with direct contact with ACA	
47.	Confidence in ACA's dignified and respectful treatment of persons under investigation	Media reports, and interviews with the ACA's senior personnel, CSO leaders, anti-corruption experts, and media reports. Interviews should also be conducted with persons who have been subject to investigation by the ACA, if possible	High level of confidence as reflected in the views of ACA senior personnel, CSO leaders, journalists and persons subject to investigation, if possible	Moderate level of confidence as reflected in views of ACA senior personnel, CSO leaders, journalists and persons subject to investigation, if possible	Low level of confidence as reflected in views of ACA senior personnel, CSO leaders, journalists and persons subject to investigation, if possible	
48.	Public perception of ACA's effectiveness in corruption control	ACA's public perceptions survey (if available), media reports, and interviews with the ACA's senior personnel, CSO leaders, anti-corruption experts and journalists	High level of effectiveness as reflected in survey finding (above 75%) and views of CSO leaders, anti-corruption experts and journalists	Moderate level of effectiveness as reflected in survey finding (50%-75%) and views of CSO leaders, anti-corruption experts and journalists	Low level of effectiveness as reflected in survey finding (below 50%) and views of CSO leaders, anti-corruption experts and journalists	
49.	Perception of ACA's effectiveness in corruption control among persons with direct contact with ACA	ACA's public perceptions survey (if available), media reports, and interviews with the ACA's senior personnel, CSO leaders, anti-corruption experts, journalists and persons with direct contact with ACA, if possible	High level of effectiveness as reflected in survey finding (above 75%) and views of CSO leaders, anti-corruption experts, journalists and persons with direct contact with ACA, if possible	Moderate level of effectiveness as reflected in survey finding (50%-75%) and views of CSO leaders, anti-corruption experts, journalists and persons with direct contact with ACA, if possible	Low level of effectiveness as reflected in survey finding (below 50%) and views of CSO leaders, anti-corruption experts, journalists and persons with direct contact with ACA, if possible	
50.	Perception of ACA's effectiveness in dealing with complaints among	ACA's public perceptions survey (if available), media reports, and interviews with the ACA's senior personnel,	High level of effectiveness as reflected in survey finding (above 75%)	Moderate level of effectiveness as reflected in survey finding (50%-75%) and	Low level of effectiveness as reflected in survey finding (below 50%)	

female citizens who had direct contact with ACA	CSO leaders, anti-corruption experts, journalists and females with direct contact with ACA if possible	and views of CSO leaders, anti-corruption experts, journalists and females with direct contact with ACA if possible	views of CSO leaders, anti-corruption experts, journalists and females with direct contact with ACA, if possible	and views of CSO leaders, anti-corruption experts, journalists and females with direct contact with ACA, if possible	
Sub-total for Public Perceptions of ACA's Performance Score					

Notes for interviewers:

1. For indicators nos. 44 to 46 and indicators nos. 48 to 50, the scoring is based on the survey findings for these questions and the interviews with the ACA's senior personnel, CSO leaders, representatives of donor agencies, anti-corruption experts, and journalists. The profile of the survey respondents in terms of their age, gender, occupation and educational qualifications should be provided. If the ACA has conducted or commissioned public perceptions surveys, the CRT should request for the reports of these surveys from the ACA's Commissioners and senior personnel.
2. However, if the ACA does not conduct public perceptions surveys, the CRT should organise focused group discussions (FGDs) with these six groups: university students, businesspersons, anti-corruption experts, CSO leaders, journalists and representatives of donor agencies to ascertain their views on the six questions except for indicator no. 47 on the ACA's treatment of persons interrogated by it. If possible, the FGDs should also include those persons who had made complaints to the ACA. A high score should be given for these six indicators if more than 75% of the FGD participants have a positive view of the ACA's effectiveness. A medium score is given if between 50% and 75% of the FGD participants believe that the ACA is effective. A low score is given when less than 50% of them believe that the ACA is effective. Given the limited time and other practical considerations, the CRT should enlist the assistance of the TI Chapter to invite two participants each from the six groups mentioned above, making a total of 12 FGD participants.

ANNEX 5: NOTES

[1] UNDP, *Practitioners' Guide: Capacity Assessment of Anti-Corruption Agencies* (New York: UNDP, 2011), p. 27.

[2] Anwar Shah, "Tailoring the Fight against Corruption to Country Circumstances," in Anwar Shah (ed.), *Performance Accountability and Combating Corruption* (Washington, DC: World Bank, 2007), p. 236.

[3] Leslie Gielow Jacobs and Benjamin B. Wagner, "Limits to the Independent Anti-Corruption Commission Model of Corruption Reform: Lessons from Indonesia," *Pacific McGeorge Global Business and Development Law Journal, 20* (2) (2007): 328.

[4] Karen Hussmann and Martin Tisne with Harold Mathisen, *Integrity in Statebuilding: Anti-Corruption with a Statebuilding Lens* (Paris: OECD, August 2009), p. 7.

[5] Jon S.T. Quah*, Curbing Corruption in Asian Countries: An Impossible Dream?* (Bingley, UK: Emerald Group Publishing, 2011), pp. 30-31.

[6] Mark Findlay, "Corruption in Small States: Case Studies in Compromise," in Barry Rider (ed.), *Corruption: The Enemy Within* (The Hague: Kluwer Law International, 1997), p. 60.

[7] Daniel Treisman, *The Causes of Corruption: A Cross-National Study* (Los Angeles: Department of Political Science, University of California at Los Angeles, 2000), pp. 40-41.

[8] Asparisim Ghosh, "Corruption: Reform's Dark Side," *Far Eastern Economic Review,* March 20, 1997, p. 20.

[9] Susan Rose-Ackerman, "Democracy and 'Grand' Corruption," *International Social Science Journal, 149* (1996): 376.

[10] Treisman, *The Causes of Corruption*, pp. 31-32 and 46.

[11] Quah, *Curbing Corruption in Asian Countries,* pp. 202 and 240.

[12] Sarah Dix and Nihal Jayawickrama, *Fighting Corruption in Post-Conflict and Recovery Situations: Learning from the Past* (New York: UNDP, June 2010), pp. x-xi.

[13] Daniel Kaufmann, Aart Kraay and Massimo Mastruzzi, "Governance Matters III: Governance Indicators for 1996-2002," (Washington, DC.: World Bank, April 5, 2004), pp. 3-4.

[14] Table 1 is compiled from these sources: Economist, *Pocket World in Figures 2015 Edition* (London: Profile Books, 2014); Klaus Schwab (ed.), *The Global Competitiveness Report 2014-2015* (Geneva: World Economic Forum, 2014), pp. 401-402; and World Bank, *Doing Business 2014* (Washington, DC: World Bank, 2013).

[15] See Kilkon Ko and Ananya Samajdar, "Evaluation of International Corruption Indexes: Should we believe them or not?" *Social Science Journal, 47* (2010): 508-540, and Fredrik Galtung, "Measuring the Immeasurable: Boundaries and Functions of (Macro) Corruption Indices," in Charles Sampford *et al.* (eds.), *Measuring Corruption* (Aldershot: Ashgate, 2006), Chapter 6, pp. 101-130.

[16] Transparency International's CPI for 2014 provides information on the perceived extent of corruption in 175 countries based on 3 to 12 sources. See http://www.transparency.org/cpi2014/results.

[17] This indicator is defined as "perceptions of corruption, conventionally defined as the exercise of public power for private gain," Kaufman, Kraay and Mastruzzi, "Governance Matters III," p. 4.

[18] For this indicator, the respondents were asked this question: "In your country, how common is it for firms to make undocumented extra payments or bribes connected with (a) imports and exports; (b) public utilities; (c) annual tax payments; (d) awarding of public contracts and licenses; (e) obtaining favourable judicial decisions?" The score ranges from 1 (very common) to 7 (never

occurs). This indicator covers 144 countries, including 25 Asia Pacific countries. See Schwab (ed.), *The Global Competitiveness Report 2014-2015,* p. 410. This indicator is used instead of the Political and Economic Risk Consultancy (PERC) 2014 survey on corruption, which includes only 16 countries.

[19] Table 2 is compiled from these sources: http://info.worldbank.org/governance/wgi/index.aspx#reports; http://www.transparency.org/cpi2014/results; and Schwab (ed.), *The Global Competitiveness Report 2014-2015*, p. 410.

[20] Patrick Meagher and Caryn Voland, *Anti-Corruption Agencies (ACAs): Office of Democracy and Governance Anti-Corruption Program Brief* (Washington, DC: United States Agency for International Development, June 2006), pp. 8-14.

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[22] Jeremy Pope and Frank Vogl, "Making Anti-Corruption Agencies More Effective," *Finance and Development,* 37 (2) (June 2000): 2.

[23] Quah, *Curbing Corruption in Asian Countries,* p. 220.

[24] Ibid*.,* p. 429.

[25] Jon S.T. Quah, "Benchmarking the Performance of Anti-Corruption Agencies in the Asia-Pacific Countries," in Anuradha K. Rajivan and Ramesh Gampart (eds.), *Perspectives on Corruption and Human Development,* Vol. 2 (Delhi: Macmillan Publishers India, 2009), p. 786.

[26] Meagher and Voland, *Anti-Corruption Agencies,* p. 6.

[27] Robert Klitgaard, *Controlling Corruption* (Berkeley, CA: University of California Press, 1988), p. 203.

[28] Gorana Klemencic, Janez Stusek and Inese Gaika, *Specialised Anti-Corruption Institutions* (Paris: Organisation for Economic Cooperation and Development, 2008), p. 10.

[29] Ibid., p. 549.

[30] Arsema Tamyalew, *A Review of the Effectiveness of the Anti-Corruption and Civil Rights Commission of the Republic of Korea* (Washington, D.C.: World Bank, 2014), p. 46.

[31] The source for Table 4 is Office of the Ombudsman, Annual Report 2012 (Diliman: OMB, 2013), p. 28.

[32] UNDP, *Practitioners' Guide*, p. 14.

[33] Ibid., p. 16.

[34] Klemencic, Stusek and Gaika, *Specialised Anti-Corruption Institutions,* p. 10.

[35] Francesca Recanantini, "Anti-corruption Authorities: An Effective Tool to Curb Corruption?" in Susan Rose-Ackerman and Tina Soreide (eds.), *International Handbook on the Economics of Corruption,* Vol. 2 (Cheltenham: Edward Elgar, 2011), p. 549.

[36] Meagher and Voland, *Anti-Corruption Agencies,* pp. 7-8.

[37] Jon S.T. Quah, "Accountability and Anti-Corruption Agencies in the Asia-Pacific Region," in *Combating Corruption in Asian and Pacific Economies* (Manila: Asian Development Bank, 1999), p. 111.

[38] ICAC, *Annual Report 2013* (Hong Kong: ICAC, 2014), p. 22. Details of the composition of the four ICAC advisory committees are provided in Appendix 2, pp. 78-80.

[39] Ibid., pp. 43-44.

[40] Quah, "Accountability and Anti-Corruption Agencies in the Asia-Pacific Region," pp. 113-114.

[41] Transparency International, *Global Corruption Barometer 2013* (Berlin: Transparency International, 2013), p. 18.

[42] Ian Scott, "Engaging the Public: Hong Kong's Independent Commission Against Corruption's Community Relations Strategy," in Jon S.T. Quah (ed.), *Different Paths to Curbing Corruption: Lessons from Denmark, Finland, Hong Kong, New Zealand and Singapore* (Bingley: Emerald Group Publishing, 2013), p. 83.

[43] Ibid., p. 87.

[44] Ibid., p. 91.

[45] ICAC, *Annual Report 2013,* p. 69.

[46] Quah, "Benchmarking the Performance of Anti-Corruption Agencies in the Asia-Pacific Countries," pp. 782-783.

[47] ICAC New South Wales, *Annual Report 2013-14* (Sydney: ICAC, 2014), p. 36.

[48] ACC Bhutan, *National Integrity Assessment Report 2012* (Thimphu: ACC, 2013), p. 1, which is available at http://www.anti-corruption_org.bt.

[49] ACRC, *The Anti-Corruption Policy of Korea and Efforts to Enhance Integrity* (Seoul: ACRC, 2012), p. 8.

[50] OECD, *Anti-Corruption Reforms in Mongolia: Assessment and Recommendations Report* (Paris: OECD, April 2014), p. 15, available at http://www.oecd.org/corruption/acn/MONGOLIA-MonitoringReport-EN.pdf.

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[52] Asia Foundation and Sant Maral Foundation, *Survey on Perceptions and Knowledge of Corruption: Strengthening Transparency in Mongolia Project* (Ulaan Bataar, April 2015), pp. 24-25.

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