CurbingCorruption

Constructive reforms and strategies, sector by sector

3. Developing an overall strategy

USING THIS GUIDANCE

Read the summary and the detailed guidance to developing an overall strategy below. Navigation is via the Contents list on the sidebar to the left. Or you can download this Guidance as a pdf. Or you can download a summary of the 5-step approach.

SUMMARY OF STEP 3

After you have reviewed the specific corruption types in your particular context and identified possible reform measures, you can develop an overall strategy. This is where judgement, political skill and sequencing are all important. Curbing corruption is about changing the status quo, so you need to be thinking about how to build support, how to spread the benefits, how to bring opponents on board or how to outflank them. You also need to think carefully as to which combination of measures and management is likely to result in the most impact within the limited resources and time available. We suggest that you develop an overall strategy – in collaboration with those who

can also own it with you – in the following

way:

1. Thinking through objectives and what impact you really want to achieve

2. Challenging yourselves by considering strategic opposites

3. Preparing yourselves for the plan to be wrong

4. Considering the people and the politics; where to build support, where to expect opposition

5. Setting up a sound implementation programme

6. Maximising supportive structures across government & stakeholders.

In this guidance section we also offer thoughts on developing an anti-corruption strategy in especially high corruption environments.

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INTRODUCTION

If ever there was a contest for the most over-used word in language, 'strategy' would be on the short list. The word came originally from the Greek word for leadership in a military context: how to conceive and craft a successful strategy against your enemy. It means, in brief, picking the right battles, ignoring lesser objectives and about simplicity: strong determination in carrying through a simple idea is seen as the route to success. (For more

about the military origins of strategy, see Freedman (2015) *Strategy – a history.*

However, since the idea of strategy entered the civilian world in the 1970s, it has become more sanitised. It tends now to mean the overall programme of activities to achieve a formal objective and may consist of little more than a wish-list of measures, without consideration of how to achieve them or how to overcome resistance. This is a pity, because the essence of the original meaning – how to achieve something that will be resisted – is important.

1. Thinking through objectives and desired impact

## Knowing clearly what you want to achieve; important and often not obvious

What do you want to achieve with your anti-corruption reforms? The answer might be obvious for a small project, like eliminating the unofficial payments to officials for services that should be free. But on any larger scale, the objective needs some thought and is often not obvious.

The key point is this: **Reducing corruption is usually not the main objective.** Many would assume this to be the core objective of an anti-corruption strategy. But, reducing corruption is more usually a means towards more widely desired policy objectives, rather than the desired end result in itself. At the ambitious end of the spectrum, the objective might be to raise the trust of the public in the system, or to improve access for all to services, or to ensure that all professionals and officials operate to high ethical standards, or to reduce costs. This is a really important point.

A recent analysis of national-level anti-corruption strategies from 41 countries ranked from 21st to 130th in TI's Corruption Perception Index reinforces this point. The authors identified the following objectives stated in their strategies: To improve service delivery; to improve national reputation, to improve the nation's ranking in the CPI, to strengthen democracy/transparency/integrity, to improve economic prosperity, to improve economic competitiveness, to strengthen national security, to be aligned with international anti-corruption standards, and to gain accession to the EU. Taken from Pyman et al (2017).

Example: UK national anti-corruption strategy. A good and recent example of high level vision and strategy objectives comes from the UK government's national anti-corruption strategy 2017-2022. They see the Anti-Corruption strategy as critical to help *ensure national security against insiders*, to help *build the prosperity of the UK*, through building up the UK's reputation as a partner for overseas trade, and to *strengthen the confidence of British citizens in UK institutions*.

As you see in this UK example, they then have six priorities, ranging from the key corruption threat (from insiders) to the importance of cooperation with other countries.
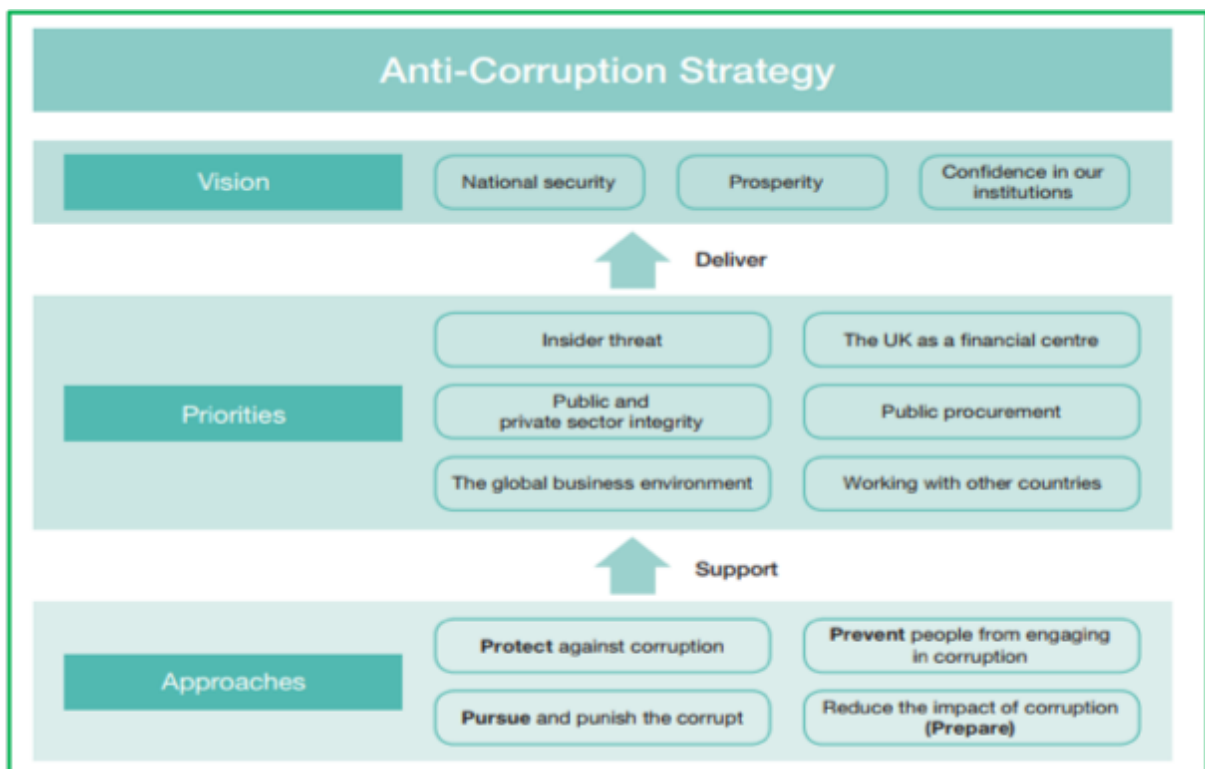
However, your objectives don't have to be 'grand' ones like these. You could alternatively have smaller, less tangible objectives. One such would be to 'Build confidence across the organisation that it is possible to make progress against corruption'. A similar one would be to build a culture where people feel free and empowered to try out many different ways of tackling corruption: you could call this 'improvisation as strategy'.

2. Challenging yourselves by considering strategic opposites

Considering opposites to clarify what reforms and approaches to prioritise

After you have identified your main objectives and have a range of possible reform measures that you have identified, how do you connect the two, navigating as best as possible among the stakeholders, those with power and with the resources at your disposal? As we said in the introduction in respect of military strategy; *this is where you pick the right battles, ignoring lesser objectives*. Part of the answer is entirely local to you – every situation is unique and different. But we can help you in identifying the general choices that you have.

We do this in a dialectic form, offering you contradictory choices which you then choose between, knowing your own situation. We take you through ten dialectical choices, so you can firm up your ideas on how to set out a good strategy for your own situation;

2.1 Incremental progress or large-scale change?

It is well-known that most corruption problems are more complex to solve than you expect, involving as they do a range of stakeholders and often some political choices. It also may be sensible for other reasons: to see how one reform measure turns out before you move on to the next, or as a way for you and your team to learn the mechanics of implementing corruption reforms with an 'easy' first few tasks before taking on larger challenges. Another good reason is that if you are within a ministry and there is no major political angle to the changes, then the corruption reforms will probably best happen the same way that most improvement reforms happen inside large organisations – slowly and steadily. Multilateral organisations usually advise that you should choose incremental change. Here for example is the EU, in their toolbox for practitioners engaged in public administration reform: *'An incremental approach, with provision for feedback and adjustment along the way, may reduce uncertainty and thus opposition. This process of continual change tallies with the concept of 'obliquity', which recognises that goals are often achieved indirectly, not as intended. Senior public servants, either elected or appointed, set out the reform objectives as the overall direction of travel, the administration makes steps towards the desired destination, and takes the*

most appropriate paths on the way, learning from experience: there is no precise road map to the future' (EU 2017 p211).

But there are also some powerful arguments for the alternative approach. When there is a political dimension to the corruption issues and a political opening happens, you may have that one chance to make a significant change. This is especially the case when there are large changes such as an election, or the disgrace of a major political figure, or a national disaster aggravated by corruption. Such openings will not stay that open for long. In the same vein, if your anti-corruption messages are part of the reason for being in power, you have to show rapid change – even if not on fundamental issues – before the electorate becomes too disappointed. Equally, even without any disruptive event, if you have strong alignment between key groups of stakeholders on particular corruption issues, you may be able to make rapid major change that will melt away as the alignment fades or some other priority takes centre stage.

There are also arguments for large-scale change when there is no major political angle. Staff in large organisations can become expert at subverting change initiatives, whether in a top-flight first world commercial organisation or in an Afghan ministry. They know how the changes are supposed to work and they know how to seem to cooperate, how to delay, how to bud internal dissent, how to ensure the first few steps fail, and other ways to kill the initiative. I have personally seen major change initiatives fail in similar ways in both such types of organisations. So, making a large, sudden step-change can be a smart way to avoid such subversion. This could be on a micro scale, such as secret planning to remove the chief corruption perpetrator inside a directorate, or on a larger scale such as cutting off large pieces of a Ministry so that each can be tackled as smaller fiefdoms. The successful national-level corruption reforms in Georgia and Estonia were both through large-scale, rapid change.

There is also an in-between strategy: to start with small changes so as to build momentum and credibility, moving on to larger change projects if the first smaller ones go well and/or if opportunities emerge for a sudden larger change. Academic research has identified this approach as the more common route to success: '*change will occur gradually and punctuated equilibria will be the rule'* (Mungiu-Pippidi and Johnston 2017, p76).

2.2 Preventive strategy or disciplining strategy?

The quick answer to this choice is that a preventive strategy is better, easier and cheaper. A good example would be e-procurement, which is showing huge results in reducing corruption in multiple sectors. There are also no situations where a purely disciplining strategy has been seen to be successful. That said, you have to have discipline options available, and these require some thought. First, prosecutions: this is less of a choice than it looks when working within a sector, for the simple reason that you have little control over the way the country's investigative and prosecution process operates. You probably have one big lever – to recommend staff, contractors or others for investigation and prosecution when this has not been the habit of the organisation in the past – but that's about it. Second, sanctions and dismissal of staff: This is a crucial area for you to examine, because such discipline measures have often become less and less used. There are different possible reasons for this – the procedures are slow and cumbersome, or they are biased in favour of certain groups, or they have been marginalised with insufficient, poor quality staff, and so on – but you should plan so that some of your reform measures address how they can be strengthened or used more effectively. Another example would be implementing a robust disciplinary code, with a clear outlawing of corrupt actions, that all within a sector agree to abide by (e.g. doctors or teachers).

2.3 Prioritise fighting corruption or building integrity?

There has long been discussion over whether active anti-corruption measures – such as controls and sanctions – are more or less effective than measures that promote and incentivise good behaviour by individuals. The simplest and most common answer is that both are necessary, which we agree with, and this means that the question becomes one of striking the right balance between them. This will vary between cultures.

Being explicit about corruption has advantages. In some countries the word 'corruption' is easily used in public, discussed and argued over. But in other countries the word corruption has only the most negative connotations, of possible personal involvement and therefore likely punishment and disgrace, and few leaderships would want to lead an 'anti-corruption'. In other countries it is not only a sensitive topic, but one that is also personally dangerous.

Building integrity therefore sounds like a better choice. Integrity is an attractive personal attribute, and much more motivating than the negatively-loaded 'reducing corruption'. Behavioural research also shows that people respond well to appeals to their integrity. This can be an inconspicuous message, such as "thank you for your honesty". Such moral appeal has been shown to be even more effective than a reminder of the threat imposed by a punishment. These findings are in line with the understanding, that most people view themselves as moral individuals. '*When reminded of moral standards, actions are adjusted accordingly to reduce the dissonance between self-concept and behaviour*' (OECD Colombia report 2017, p70).

However, there are also disadvantages to an integrity-focused approach. Using nice words like 'Improved governance' and 'Integrity' when you really mean tackling corruption can demonstrate immediately a lack of political energy to tackle the real problem, or a justification for more technical reforms such as process improvement, rather than tackling the tougher sides of the problems. Integrity measures tend to be less direct, slower reform measures – capacity building, training, codes of behaviour and so forth – which can look insubstantial and where it can be hard to demonstrate impact. Sometimes, the word 'integrity' does not always translate well: there is no equivalent word for integrity in Slavic languages, for example

So there are two distinct issues here. One is the balance you choose between the two approaches. The other is how you want to 'brand' the initiative. Is it best to be seen as 'tough', with an anti-corruption message, even though there may be plenty of integrity focused measures? Or do you want to show that the initiative is a positive, motivating one? There is no right answer. In the defence sector, for example, NATO chose a message of 'Building Integrity', as did the Defence Ministry of Saudi Arabia, whilst the Ukraine and Afghan Defence Ministries chose messages of Anti-Corruption (Pyman 2017).

This same choice exists for strategies at the national level. Out of 41 national anti-corruption strategies reviewed recently more than half have an approach of preventing corruption only. Eleven plans referred in some significant capacity to both preventing corruption and building integrity as a dual-approach to anti-corruption. Only one country strategy, Taiwan, had a tone that almost entirely focused on integrity. The other balance of note was a combination of preventing corruption and 'promoting transparency' in Estonia, Lithuania and Turkey (Pyman et al 2017).

2.4 Focus on daily corruption or high-level corruption?

In developed countries there is usually little daily corruption, so this choice has an easy answer. In developing countries, however, both are prevalent, and often the two are linked because the corrupt high-level groups control hierarchies of bribery that go all the way down the levels of the organisation to extracting money from citizens. This is a big and tricky strategic question. If your answer is 'both', then you risk having such a range of objectives as to be unlikely to succeed at any. However, there can be a more nuanced answer. A strategy can have a number of public-facing elements which are easier to achieve, whilst at the same time having some lower profile, slower reforms that will have a longer-term impact. An example is given in the health sector, where a public-facing reform is to reduce corruption in surgery waiting lists, and a substantive reform is to put in place a proper stock management system of medicines.

2.5 Engage the public immediately, or keep public expectations low? Engage closely with the media, or keep them at arm's length?

This is a critical topic that can make or break the initiative. For example, an analysis of 471 NGO anti-corruption projects showed that the most significant indicator of success or failure was whether the media were integrally engaged in the project from the start or not. In a government context it is a complex question with a whole 'communications plan' of its own, depends greatly on the nature of the media in the country, as well as on the nature of the reform objective and plans. It is an area to ask for the assistance of any communication professionals that you have in your organisation.

2.6 Narrow focus, such as on a single reform, or broad?

As with the choice between corruption and integrity, there are two distinct issues here. One is the balance you choose between a narrow initiative and a broad one, and the important aspect of not having too many priorities.

[caption id="attachment_1290" align="alignright"

width="300"] Number of requests from officials, recorded by ships' captains, however small. Maersk, 2018[/caption]

Example: Private sector narrow priority. There is a nice example in the private sector, where the shipping giant Maersk wanted to stop its ships' captains paying bribes as their container ship entered ports. They took many actions, but the most prominent was to install an IT system that was used on every ship and into which the captains recorded all bribes paid. The graph of progress (the number of bribes paid, aggregated across all ships, plotted against time) was a stunning, convincing way to demonstrate the reform (See the slide used by Maersk to show progress).

Example: Using the 'fix-rate as a single indicator of success. is an anti-corruption metric developed by the NGO Integrity Action, working with local communities in developing countries. The Fix-Rate measures the extent to which anti-corruption, transparency and accountability tools and laws are used to resolve a problem to the satisfaction of key stakeholders. The focus is on measuring deliverables to citizens (outputs) and to assess whether remedial action helped to achieve a specific fix. The Fix-Rate is the percentage of identified problems that are resolved. For example, if community monitors identify problems in ten projects and resolve six of them, they have achieved a 60% Fix-Rate. If they resolve only two problems, their Fix-Rate is 20%. Integrity Action, working with local councils, have tested the fix-rate metric in Afghanistan, Kenya, Kyrgyzstan, Kenya, Nepal, Palestine and Timor Leste.

The second issue is how you want to 'brand' the initiative. Is it best to be seen as focusing on a single key issue – promising to solve it – or do you want to show that you are addressing the corruption problems 'thoroughly', covering all the worst issues? Again, there is no 'right' answer. For example, in the

same study of 41 country strategies already referred to, 33 of the strategies were broad in scope and 8 were narrow in scope.

2.7 Substantive reforms or giving people hope?

This is a choice because officials are often drawn to substantive reforms, but they have a nasty habit of turning out to be expensive, slow and not delivering what was hoped for. Similarly, reformers in other countries that have been slower getting their reforms underway, despite having a strong mandate against corruption, have lost momentum. The Bulgarian government of 2009-2013 was one such example (Pyman and Tzvetkova 2013). Therefore, going for simpler reforms, often unkindly called 'cherry-picking' can be a better choice, because they give people hope that corruption reduction is actually possible. Especially in countries and sectors where the government is very bureaucratic and rule-bound the chance of a technocratic change being successful is rather low and people know this.

2.8 Substantive reforms or improving monitoring?

This is a slightly different choice: the drawbacks of substantive reforms are similar to the above case, but the alternative is instead to focus on strengthening ways of monitoring and responding to cases. People are realistic, and they know when a system is inflexible, so they may respond more positively if it becomes clear that individual grievances and abuses of the system are being flagged up and perhaps more actively addressed. This could be as simple as the CEO of the organisation and his leadership team being available for one whole day every week to hear the complaints citizens.

2.9 Improving service delivery or on saving money?

Citizens may say they want both, but above all they are likely to want service delivery. Yet, for example in health, there are often huge sums of money to be saved for reuse in the national health system by reducing corruption in procurement, in medicine pricing, in reducing unnecessary operations, in illicit resale of products and drugs, in health insurance scams. Establishing an anti-corruption programme involves recognising this complexity.

2.10 Controlled execution of the plan or permit multiple paths to reform?

Most formal plans set out a range of actions and/or projects, all to be carried out in some specified way. However, such formality conceals the fact that this is usually not how change actually happens: people will interpret and react to the changes in many different ways and it may be a better strategy to allow and indeed encourage such variation. For example, you might set some fixed policies at central level, then allow extensive variation and improvisation across the organisation. This approach, sometimes called a 'complexity approach', has been in vogue in large corporations for some time, but is also relevant in societal change. For example, allow separate teams to choose how they carry out the project in their area: or implement different reforms in different cities or provinces. On a larger scale, recent research suggests that encouraging such variation and diversity may be one of the reasons why China has been able to develop so quickly (Ang 2017).

Another approach to encouraging variation and thereby to increase political momentum is to have a strategy focused on networks, utilising them to create space for reform. You focus less on specific reforms and the political dynamics of effecting those reforms and instead focus on creating more flexibility and more space so that there are more possibilities that can emerge from however the political dynamics evolve. The way that the political dynamics evolve – or are encouraged to evolve – is through networks, especially by working with those who act as the connecting nodes within networks. See, for example, Andrews 2008 *Creating space for political engagement in development*.

3. Preparing yourselves for the plan to be wrong

Military generals are very eloquent on the limits of planning. Almost two hundred years ago, the German war thinker Carl von Clausewitz said, in words that could equally apply to anti-corruption: "War is the realm of uncertainty: there quarters of the factors on which actions in war are based are wrapped in a fog of uncertainty. A sensitive and discriminating judgement is called for, a skilled intelligence to accent out the truth."

This quote is a useful reminder that your strategy should not be big, should not be overly complex and, crucially, is capable of being changed substantially when circumstances change. You must know of many plans and strategies

that have not worked. So how do you best prepare yourself for the unexpected?

As with the analysis of context (See Step 1, Section 1.7), there is no 'procedure' that will resolve this for you. But here is our best guidance on what we suggest you do:

1. Work hard at defining a few robust 'objectives', as discussed in 1. above. You want your core objectives to be memorable, easily communicable to be people, and likely to remain unchanged even if lots of circumstances change.

2. Don't be afraid to have a 'simple' core strategy.

3. Conversely, avoid as much as possible having a monster strategy in which you plan to change everything. Government bureaucracies and development agencies are both very prone to these sorts of horrors, because officials feel there is safety in covering 'everything'. Do not do this!

4. Improvisiaton is part of strategy, not a denial of it. There is good theory behind this seemingly stupid statement. An alternative view of strategy is that a formal strategic plan can be a threat, because it reduces the chance of learning when key assumptions are no longer working. This does not mean anarchy, it simply means that the amount of order is deliberately under-specified. People easily miss the point that a little bit of order can go a long way. For example, a clear statement of purpose in a commercial organisation is a powerful symbol that that may give sufficient sense of direction to all the senior executives in the organisation. The same can be true of anti-corruption strategies that have a single very strong sense of direction, such as happened in Georgia or Estonia. This line of thinking about strategy has become more common in the last few decades and is sometimes called 'Emergent strategy'. For some of the original thinking about this approach, see Weick (2001)p350ff, and for a more recent critique see Freedman 2013, p555ff.

5. Convene a small group of people to be your strategic thinking group, with whom you routinely discuss how the overall strategy is going. This would usually not be part of the formal governance structures that are monitoring progress, but something less formal, more able to see the overall picture.

4. People, politics and skill

'In the long history of humankind those who learned to collaborate and improvise most effectively have prevailed'
Charles Darwin 1859

In curbing corruption, you are changing the status quo. Some groups will lose a benefit to which they have become accustomed, and you can reasonably expect them to take steps to stop, disrupt or postpone your reforms. Or they might take other more overt steps, such as discrediting you and your supporters, or removing you from your job. You are also likely to be asking people to work in a different way and people tend not to like change, so your efforts are again likely to be resisted regardless of any corruption aspects.

Yet, most of these people, including many whom who may regard as corrupt, or at the least 'spoilers', may also be prepared to work with you and to accept the reforms. For your changes to be successful, you therefore have to be thinking about more than just the 'mechanics' of implementing improvement projects. For your strategy, you need also to be thinking about what is feasible, how to enable people to see the benefits of the change, how to spread the benefits, how to bring opponents on board, or how to outflank them, how to change the nature of the conversation. Nowadays this is called 'political skill', but, as the Charles Darwin quote above suggested, we all possess these basic skills of influencing people, collaborating with them and persuading them to go along with our good cause.

In this step we describe the building a common purpose that many people will feel encouraged to support, key helpers who can assist you, the questions of political skill to mobilise support and develop coalition of stakeholders, political will and key helpers.

4.1 Building a common sense of purpose

You want people to feel energised to contribute towards a common purpose. Building support and gaining the collaboration of people who might be resistant to your reforms is much easier if your purpose is one that people can directly relate to. It may be helpful to tap into the emotions that led to the development of this initiative. Is it public anger at poor services or lack of access to services? Is it unaffordability or strained budgets? Is it an election commitment? Is it a corruption scandal, or scandalous abuse of power by a
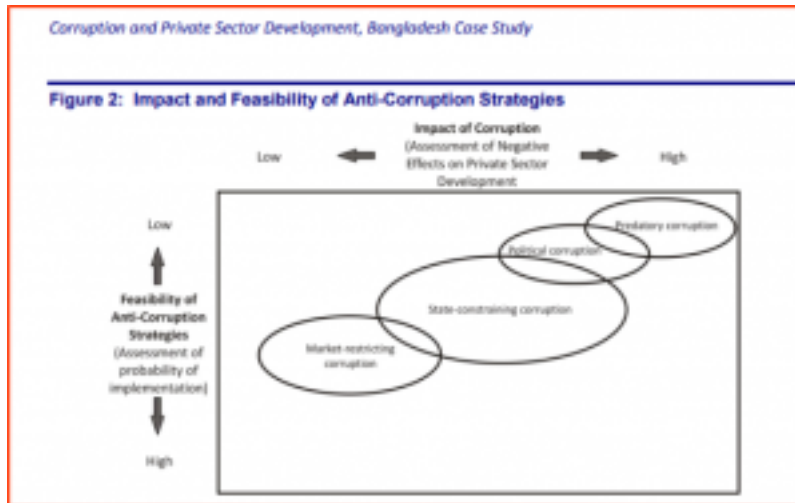
politically powerful figure? Or is it driven by the commitment of you and your team to build a better service, Ministry or organisation?

You usually arrive at possible statements of common purpose through discussions among stakeholders – understanding and voicing what is most important and urgent to people affected by the corruption. You may hold such discussions yourselves, or you can get others to facilitate such discussions.

4.2 Utilising political skills and influencing skills

Besides convincing people to support your reforms because of your common purpose and because your ideas are the right ones, you are also seeking to achieve your reforms by the judicious use of power. Power helps individuals, organisations and coalitions to shape their environment. It is a positive and productive force, not negative and controlling. Taking power seriously means you should take time to recognise its different forms. Analysing power means identifying the powerful individuals who get to decide at key decision-making points – so-called *visible* power. Second, it can mean identifying who or what sets the decision-making agenda. For example, *hidden* power can determine what issues are taken off the agenda behind closed doors and never openly debated or voted on. Or third, the most structural and 'insidious' form of power is that which shapes people's desires, values and ideological beliefs in the first place. *Invisible* power like this can influence people without them even realising it. For example, the acceptance of gender roles such as authority to speak in public meetings, by both men and women, is a deeply ingrained and unquestioned form of power in many societies. Part of the input to your strategy is therefore some sort of analysis of the powers supporting and opposing your reforms.

Doing a political analysis. There are various guides to doing an analysis of power in corruption situations, usually called a 'Political economy analysis'. There is a simple one called *Everyday political analysis* by Hudson et al (2016), which is a good place to start. There are many other guides, and you could also look at *The beginners guide to political economy analysis* (Whaites 2017), or *Tools for political economy analysis* from the EU(2008). Or, for more corrupt environments, you can read the analysis by Khan et al (2016) already mentioned. He has a useful diagram classifying which sorts of reform measure might work in different political environments (opposite).

Corruption and Private Sector Development, Bangladesh Case Study

Figure 2: Impact and Feasibility of Anti-Corruption Strategies

4.3 Political will

'Political will' is a phrase usually heard as in 'the absence of political will'. This often happens when anti-corruption strategies have been put together without regard to the political feasibility of the reform measures, and without regard to how political support for any particular measure might be generated. A major part of any strategy is exactly about this; how you can generate sufficient political enthusiasm for your reforms, as we have already been discussing above. Sometimes there are special situations, notably in high corruption environments, where all forms of political will are problematic. See the later discussion below for more consideration of how to make progress in such environments (here). Another useful perspective comes from anti-corruption reformer in Poland; when you have high political support, go for the reforms that are most fundamental and hardest to undo (Wnuk).

Nonetheless, bureaucracies and officials sometimes have a lethargy and an aversion to taking any risks that just seems impossible to shift, despite all the best efforts of you and your colleagues and any amounts of political will. In such cases, you need to re-look at the reform ideas and the reform strategy. Maybe you need to be less ambitious. Or to focus on just one thing. Or to encourage outside groups, like civic groups or civil society to try to develop the reform momentum instead of you. In extremis, there may be nothing else to do but to wait for some more promising circumstances. This is actually a common way for progress to happen: people wait for more auspicious circumstances and when they arrive they recognise the chance and are quick

to act: the academics call such moments 'punctuated equilibrium' or 'critical junctures'.

There is a good recent report from the Developmental Leadership Program (2018) on understanding politics and political will as the process of making change, called '*Inside the black box of political will*'.

4.4 Finding key helpers

If you are developing a sizeable initiative, you should give thought to how you might bring in expertise from people who are familiar with how to build support and pull together coalitions. They might exist within your own organisation or ministry, but there are also many people who have specialised in this sort of role. For example, in the health example of trying to pass the 'Sin tax' in the Philippines, a sophisticated coalition was put together involving parliamentarians and companies and the ministry and civil society. This campaign attracted people who were almost professionals at building such coalitions (For more on that example, see here).

5. Implementation

Managing the overall initiative, maintaining support, measuring progress

When engineers have a large task, such as building a ship or a power station, they plan the work into many small projects, each of which is individually managed. In the context of anti-corruption work, these projects are the 'reform measures' that we have already discussed in some detail. The engineers then manage the totality of these projects as a single 'programme', with one master plan of how all the individual projects fit together, depend on one another, and so on. Each separate project might be managed in quite different ways: for example, a project to implement technical changes to IT systems will be managed quite differently from a project to strengthen the values of the organisation. This is 'Programme management'. Managing a multitude of small projects in a coordinated way is a formal skill in its own right, so do approach this with respect as many programmes fail due to poor execution. There is plenty of guidance available on how to run a good programme, which we summarise only briefly in this section.

A programme management approach can also be used for managing large organisational change programmes in government; but with one very big difference. With each move away from the status quo, the combination of objectives, supporters, and feasible measures will change. Compared with engineering programmes, you need to be more attuned to a step-by step progression, re-evaluating as you go along. Nonetheless, the core components of programme management disciplines such as tracking progress in detail, regular progress meetings and so on are unchanged.

5.1 Managing an anti-corruption programme

A clear definition of the purpose, value and scope of the programme: We have already described much of this in the sections above on developing the strategy. It is important! With a clear overall direction and purpose, you can better keep a wide range of people on a common path and can more easily re-centre the programme as time goes on and as unexpected things happen. In some programme management guides for public sector projects, you will see this referred to as the 'business case'

Full-time personnel: Often the most important element for a successful programme is to have a full-time programme manager and a small project

management unit. This is a large investment, but it is necessary: it can be very hard to run a programme with part time inputs and coordination. This small team then monitors, coordinates and chases up all the individual actions and projects.

Programme management and control: This is the principal task of the core personnel. They should be working to a detailed project plan, updated every week and pay attention to all the rather mundane bits like weekly task lists, cross-programme coordination, liaison with external stakeholders, project schedules, organising steering committees, and so on.

Governance: There should be a steering committee that reviews progress and direction. Depending on the size of the programme, this could be at two levels: for example, one a committee of high-level officials plus others that meets quarterly, the second a committee involving external stakeholders and politicians that meets twice per year.

Programme ownership: It is good practice for a 'Senior Responsible Owner' to be appointed who is the top-level person who can be considered to own the programme. He/she would normally be the Chair of the senior steering committee. He/she might be a senior politician, or the national 'anti-corruption champion', or a top public official

Engaging with stakeholders: There will be a multitude of different groups with an interest in the programme; meeting them regularly, communicating with them regularly, involving them at appropriate stages: all these are the task of the project management unit. For each corruption issue you should map out those who would probably object to reform, as well as those who would lose out financially or lose out in respect of services that they might be denied. Then talk with those involved in each corruption issue. It might be easy to overcome the reluctance to change. Then build collaborations and coalitions to enable those involved to cooperate. Many people are only reluctantly caught up in endemic corruption and are ready to cooperate to find a way out if they think it is safe and credible. A good example is corruption in ports, where the port authorities and the police and the customs are involved as well as the shipping companies. If all are brought together to work out how to eliminate the corruption, then it proves to be possible (see *here*).

For the larger-scale corruption issues, you should build an understanding of who is receiving the corrupt revenue flows. It is rarely one person but a

hierarchy or a network. You can get others to assist you in doing analyses of such networks.

Tracking the results and benefits: Tracking the results and benefits is obvious, essential, and routinely not done. This task needs to be established from the beginning, either for the project management unit or, better, by another group that can view the results more independently. Using an NGO group is one possibility.

Tools: Programme management guidance from the UK. Expand +Governments in some countries have formal units and guides on how to set up and structure good quality programmes. The UK, for example, has an agency of the Cabinet Office called the "Infrastructure and Projects Authority', whose purpose is 'to provide independent assurance on major projects (see here). It also supports colleagues across departments to build skills and improve the way we manage and deliver projects'. Their predecessor organisation developed a formal qualification in project management called 'PRINCE2' – for all sorts of projects from IT and construction projects at one extreme to social change projects at the other – that is used extensively across the UK government (see here).

Tools: Implementation guidance from UNODC. The United Nations Office on Drugs and Crime has produced a document entitled *National Anti-Corruption Strategies: A Practical Guide for Development and Implementation.* This is a detailed report about the process of strategy-making and implementation. It covers assigning responsibility for drafting the strategy to a small, semi-autonomous group; ensuring the continued support and involvement of senior political leaders; consulting regularly with all government agencies that will be affected by the strategy; soliciting the views of the political opposition whenever possible; engaging all sectors of society in the drafting process; emphasizing communication, transparency and outreach throughout the drafting process; allocating sufficient time and resources to drafting the strategy; and taking advantage of other countries' expertise (UNODC 2015).

5.2 Some cautions: being explicit, timing, common errors

6. Maximising supportive structures

Strengthening the initiative using formal mechanisms in government and among stakeholders

You have worked so far on the inner elements of an anti-corruption strategy: being clear about the objectives, pulling together and prioritising feasible reform measures, mobilising support for the initiative and addressing the more political challenges of harnessing adequate support. This next step is about the more formal and external aspects of an official ministry or government sector strategy. It does not really apply to smaller initiatives within a ministry. At this point the strategy has authority as an official document of government, an authority that can be useful in building more support: official plans and strategies act as a common point of reference across all the different Ministries, agencies and related organisations. You should be able to use this authority in persuading other parts of the ministry and other parts of government to support it

In this section we discuss how best to align with other arms of government, the need for a cross government coordination unit, alignment with major government policies and alignment with other major stakeholders such as Parliament or companies.

First, decide whether cross-government alignment is a worthwhile effort

Nevertheless, there is a prior decision to consider: you may not want to focus on cross-government alignment, but to operate this plan within your ministry and independent of the rest of your government. This might be the best way to proceed, if for example your ministry is doing much more than other ministries, or if the rest of government has other priorities. It is also possible that the rest of government does not yet have a strategy or is taking its time. In this case, we suggest that you go ahead regardless. There is also the risk that in of working together with the rest of government will mean ceding some control of the programme to the central unit, and that your own efforts may be diluted or lost. I and others working in anti-corruption have seen this happen several times.

On the other hand, countries have shown they can make progress via a more coordinated effort of sector strategies across ministries. For example, Poland is one country that has made significant progress against corruption in the period 2005-2013 (see diagram); one of the Ministries that led these efforts was the defence ministry.

Second, take advantage of any central cross-government coordination unit

Governments are always limited in personnel, and they often look to set up anti-corruption strategies without any champion and without any coordinating or monitoring unit. Our belief is that this is a guarantee of failure of the strategy. If there is a champion and a full-time unit, they may or may not be effective, but at least there is a chance. If your government has such a unit, then do ensure that your ministry team engages with them. If it is all being done without dedicated personnel, probably better to press ahead on your own. Some countries have set up active coordinating mechanisms and staff for coordinating their anti-corruption actions across government ministries. For example, the UK (see here), Bulgaria in the period 2009-2013 (see here) and Afghanistan (see here and a UN evaluation here).
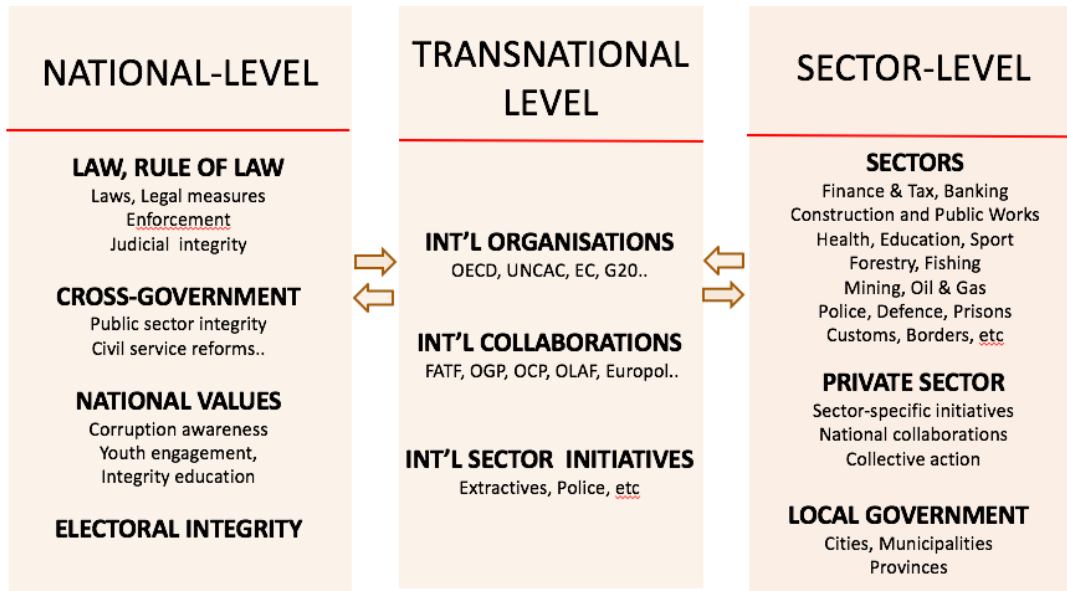

Alignment strengthening

6.1 Strengthen alignment across government

Apart from the caution above, you will normally expect to have a greater chance of success and more sustainability if your efforts are aligned to the wider government effort. This is especially the case if the government has got a broader anti-corruption plan running and is pursuing progress on it across multiple sectors.

A comprehensive government-wide anti-corruption strategy would embrace national, sub-national and sector strategies, as per the diagram opposite. Ideally your sector strategy would fit cleanly into an overall structure along these lines.

Three levels of anti-corruption strategies

NATIONAL-LEVEL	TRANSNATIONAL LEVEL	SECTOR-LEVEL
LAW, RULE OF LAW Laws, Legal measures Enforcement Judicial integrity	**INT'L ORGANISATIONS** OECD, UNCAC, EC, G20..	**SECTORS** Finance & Tax, Banking Construction and Public Works Health, Education, Sport Forestry, Fishing Mining, Oil & Gas Police, Defence, Prisons Customs, Borders, etc
CROSS-GOVERNMENT Public sector integrity Civil service reforms..	**INT'L COLLABORATIONS** FATF, OGP, OCP, OLAF, Europol..	**PRIVATE SECTOR** Sector-specific initiatives National collaborations Collective action
NATIONAL VALUES Corruption awareness Youth engagement, Integrity education	**INT'L SECTOR INITIATIVES** Extractives, Police, etc	**LOCAL GOVERNMENT** Cities, Municipalities Provinces
ELECTORAL INTEGRITY		

But on the whole, government anti-corruption efforts across ministries are not well aligned. In such cases you could also consider setting up an informal coordinating forum across Ministries.

6.2 Strengthen alignment with major government policies

There is also a policy aspect. Corruption types differ in how much they distort the policies necessary for achieving important policy goals of the Ministry and the government. Policy goals such as poverty reduction, increasing tax collection or improving national reputation can be largely subverted by modest levels of corruption: examples include building permit corruption and nepotism in the appointment of teachers. This is a good reason for strong coordination at policy level between ministry anti-corruption initiatives and policy makers. For more analysis of policy distortion, see Khan et al (2016); *Anti-corruption in adverse contexts: a strategic approach.*

6.3 Strengthen alignment with other stakeholders

Your plans may also involve close working with politicians, with Parliament, with companies, with international organisations, with civil society and others. These all take effort to engage with, but it is a core part of building support and coalitions. This is where key helpers, with deep experience of working with such groups, may be able to help you, as discussed in the section above.

7. Strategic choices in high corruption environments

Most of the material and guidance in this website assumes that you have some reasonable degree of freedom to initiate reforms. But, how does this change when you believe that your own leadership cadre – above you or at the same level as you – are largely corrupt? There is much experience and plenty of reports about how difficult it is to address corruption in high-corruption environments, but much less on how to address it. Whilst some of the strategic choices may be similar to those above, there are other choices that are more specific to high corruption environments. What sort of strategy do you devise when the corruption is so endemic and so all embracing that there seem to be no avenues for hope at all? We lay out some thoughts and experience for you to consider about making at least some progress against corruption within individual sectors in this environment.

High corruption environments: Six thoughts on ways to progress

1. **Passive opposition still allows some reforms**. Most of the leadership cadre may be corrupt, but this does NOT mean that they will actively oppose you. because anti-corruption is known to be a 'good' thing, and so they may just stay quiet, let the reforms take their course, and just act to delay them. That's OK for you: it is still possible to get some reforms underway, and you can then work on strengthening support from others.

2. **Many corrupt leaders don't like the situation they are in**. They have been forced to be corrupt because of the system they work in. So, whilst they will not actively support you, they may be ready to quietly support, or at least not to oppose you, depending on the rest of the group. They may be a good source of advice on what sort of measures could be put in place without precipitating opposition.

3. **There are <u>always </u>some reformers, even in the most corrupt environments.** I have personally been involved in anti-corruption efforts for over a decade in Afghanistan – perhaps one of the hardest countries on earth to make progress against corruption. But I am constantly astonished at how much substantive progress they have made in the last few years. Some of the best developments in anti-corruption are coming out of Kabul. See, for example, Pyman and Sohail (2017) on the Afghan National public Procurement

Authority and the establishment of the Afghan Anti-Corruption Justice Centre (eg Brooks and Trebilcock 2017).

4. **Choose 'insubstantial' reforms**. Some anti-corruption reforms are seen as being of low importance, low risk and therefore not a threat by a corrupt leadership. The main examples are capacity building and training. So, you may have scope for extensive training and capacity building, which could be much more powerful than it was expected to be.

   Example: Anti-corruption training for Ukraine security services before the revolution. Here is an example from Ukraine, in an anti-corruption effort in the security services: The principal policy lesson from Ukraine is how to make progress when there is no political will for reform, as was the case here from 2008 to 2014. The Ukrainian security and defence leaders were smart: they had a highly developed sense of what reforms they could implement without making their political masters nervous, and which others would get them fired, or in deeper danger. Their chosen tools were mass (anti-corruption) training—training is very low-profile politically—leadership days, and secondments (to anti-corruption organisations). See Pyman (2017).

- **Push for a Commission of Enquiry, but only expect just a little**. Commissions can be 'acceptable' to corrupt leadership, because they know they have the means to subvert the Commission or control the findings. Whilst this may be regrettable, it does open up room for the topics to be aired and for the public to see and hear the corruption in an open forum. This in turn can allow modest amounts of change to start. There is a realistic analysis of this approach, as employed in Uganda, by Kirya (2011).

- **Build up capacity to operate with integrity whilst hoping for circumstances to change.** Unexpected events can quickly change the political dynamics, as in the Ukraine example above. If you have a nascent reform programme, even if it is going very slowly, it can be rejuvenated or expanded in such a situation; this helps people to be seen as responding to the unexpected event. You could choose to deliberately make the programme small, picking just a few reforms that will be seen as unthreatening, whilst using it to expose as many people as possible to how a non-corrupt working environment may be possible and comprehensible. You will be thinking and hoping that these starter reforms might generate supportive momentum that the more corrupt leaders will then go along with.

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