



*Empowered lives.
Resilient nations.*

Developed with the support of Siemens Integrity Initiative

COLLECTIVE ACTION Against Corruption

Plenary Activity 1



Let's do a round of introductions!

INTRODUCTION TO THE WORKSHOP ON COLLECTIVE ACTION AGAINST CORRUPTION

*“If corruption were an industry, it would be the world’s third largest, worth more than \$3 trillion and 5% of global GDP.”**

** The Pearl Initiative*

❖ **Workshop objectives:**

By the end of this workshop, participants should understand:

- ❖ That the private sector has a significant role in anti-corruption efforts
- ❖ The concept of *Collective Action Against Corruption* and its added value, AND
- ❖ The practical issues pertinent to the implementation of *Collective Action Against Corruption*.

TRAINING WORKSHOP OVERVIEW

- Module 1: What is Corruption?
- Module 2: What Role for the Private Sector?
- Module 3: Practical Implementation of Collective Action Against Corruption
- Module 4: Collective Action Against Corruption in Practice

Module 1-A

What is Corruption?

Plenary Activity 1



What Is your understanding of the term “Corruption”?

CORRUPTION : Three Key Criteria

(1) Abuse of (2) entrusted authority for (3) private gain.

- **Entrusted:** appointed, elected, inherited, OR granted through a contract (as in a trust, a service or agent contract).
- A position of **authority:** public sector, private sector, OR civil society; local, national OR international.
- A **private gain:**
 - benefit to the person abusing the entrusted authority, OR benefit to a third party, e.g. a friend, a member of the family, the community, the confession, the tribe, the town, or the political party;
 - financial, political, OR social
 - immediate OR deferred
 - at the expense of the **public interest** (breaches the law, undermines equality before the law, and undermines the proper management of public resources and public affairs)

Plenary Activity 2

Scenario	Is this Corruption?	
The teenage son of a wealthy politician, driving a Ferrari in a hurry to get to a party, runs through a red light.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
A famous musician smuggles illegal drugs through airport security into the country.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The CEO of a major private company is having an affair with one of his / her employees.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Two friends studying at the same university access the students record and falsified it to change their grades	<input type="checkbox"/> Yes	<input type="checkbox"/> No
A famous drug dealer was driving down the street and entered into a fight over the right of passage with another person who took out his gun and shot him dead.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The five bidders for a government contract agreed to submit their bids such that price submitted by Company A is the lowest but still overpriced compared to market value.	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Plenary Activity 3

Scenario	How Might These Scenarios Be Linked to Corruption?
The teenage son of a wealthy politician, driving a Ferrari in a hurry to get to a party, runs through a red light.	He bribes the police officer who pulls him over so as not to give him a ticket.
A famous musician smuggles illegal drugs through airport security into the country.	To do so, large bribes were paid to high-ranking security officers.
The CEO of a major private company is having an affair with one of his / her employees.	As a result, the employee receives the promotion instead of another more qualified co-worker.
Two friends studying at the same university access the students' records and falsified them to change their grades.	The students bribed the employee working in the Students' Records office to falsify the grades for them.
A famous drug dealer was driving down the street and entered into a fight over the right of passage with another person who took out his gun and shot the drug dealer dead.	As a member of the police force, the shooter used his connections to destroy all evidence against him.
The five bidders for a government contract agreed to submit their bids such that price submitted by Company A is the lowest but still overpriced compared to market value.	The bidders collectively bribed the public officer to somehow ensure that only their bids would actually be submitted [ex. the submission window is very short, and the announcement is made only shortly before].

CORRUPTION under the UNCAC

- UNCAC: no definition; a list of corruption offences
 - Corruption offences
 - Bribery
 - Embezzlement, misappropriation or other diversion of property
 - Trading in Influence
 - Abuse of Function
 - Illicit enrichment
 - Related offences
 - Laundering the proceeds of crime
 - Concealment
 - Obstruction of Justice

Bribery

- Is when any person exchanges (actively or passively) **anything** (money, service, etc.) **with a person who enjoys an entrusted authority** (public/private; local/national/international) **in return for an *undue advantage*.**



- Active bribery: promised, offered, given
- Passive bribery: solicited, accepted
- Public (national, foreign, and international) and private

- **EXTORTION** is a form of soliciting a bribe, albeit through force or the threat thereof.

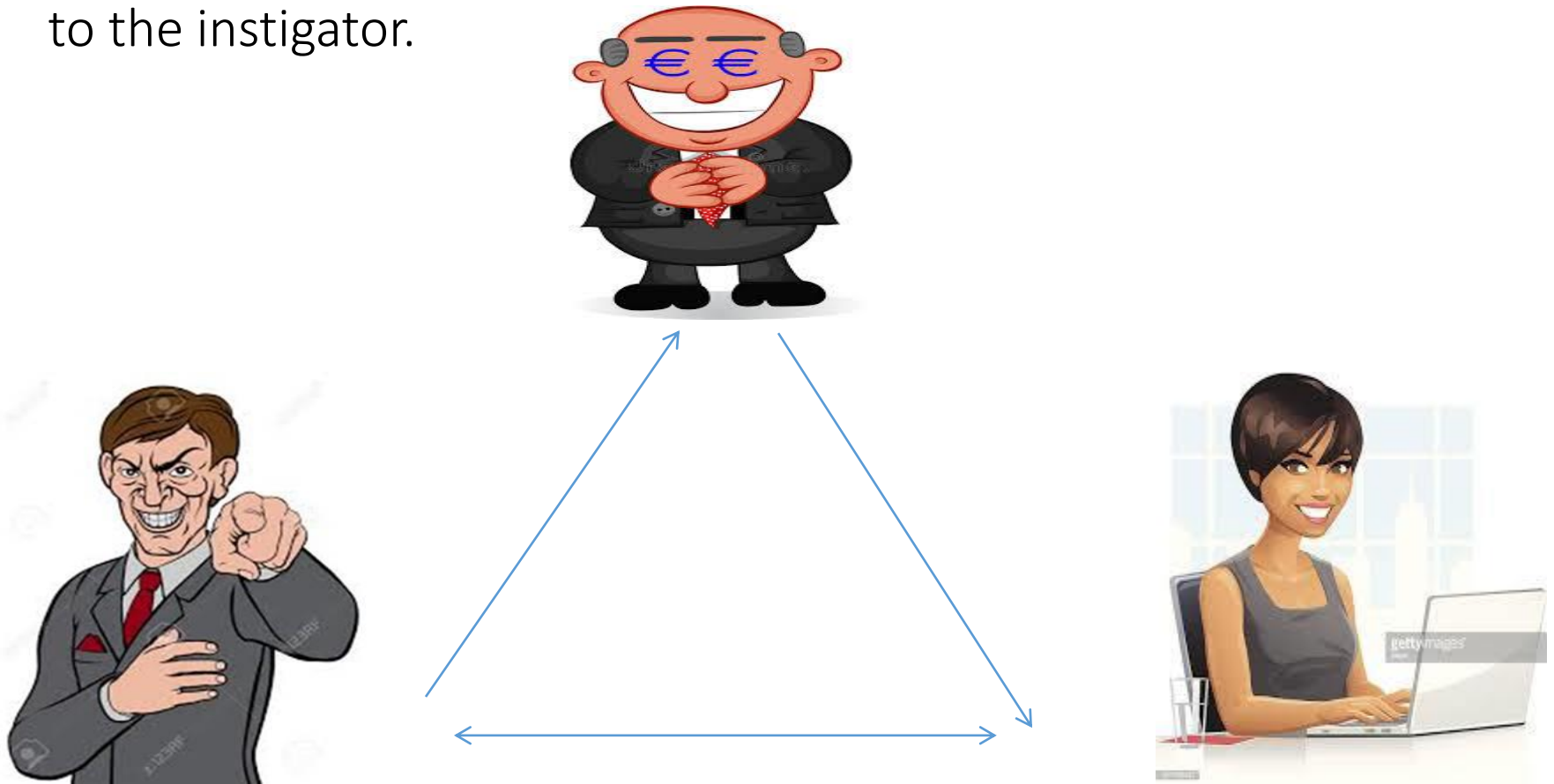
Embezzlement



- Is when a person who has control over money by virtue of his/her entrusted authority uses it for personal benefit.
- Other similar term, misappropriation

Trade in influence

- Is when a person (instigator) gets another person with influence (influencer) over a public official to use that influence so that the public official gives an undue advantage to the instigator.



Abuse of function / position

- Is when a public official abuses his/her entrusted authority to breach the law for his/her benefit or that of any other person.

Illicit Enrichment

- When a public official significantly (standards vary depending on law) enriches without a reasonable explanation given his/her income or declared wealth.

Individual / Group Exercise



With your team members, develop a short story describing a corruption situation / scenario relevant to your industry / sector and or country. Be ready to present the scenario to the plenary for discussion.

Module 1-B

What is Corruption?

MODULE 1B

DEFINING CORRUPTION

Corruption:

- No global consensus on an exact definition;
- Transparency International: **Abuse of entrusted authority for private gain.**
- UNCAC: no definition; a list of corruption offences
 - **Corruption offences**
 - Bribery
 - Embezzlement, misappropriation or other diversion of property
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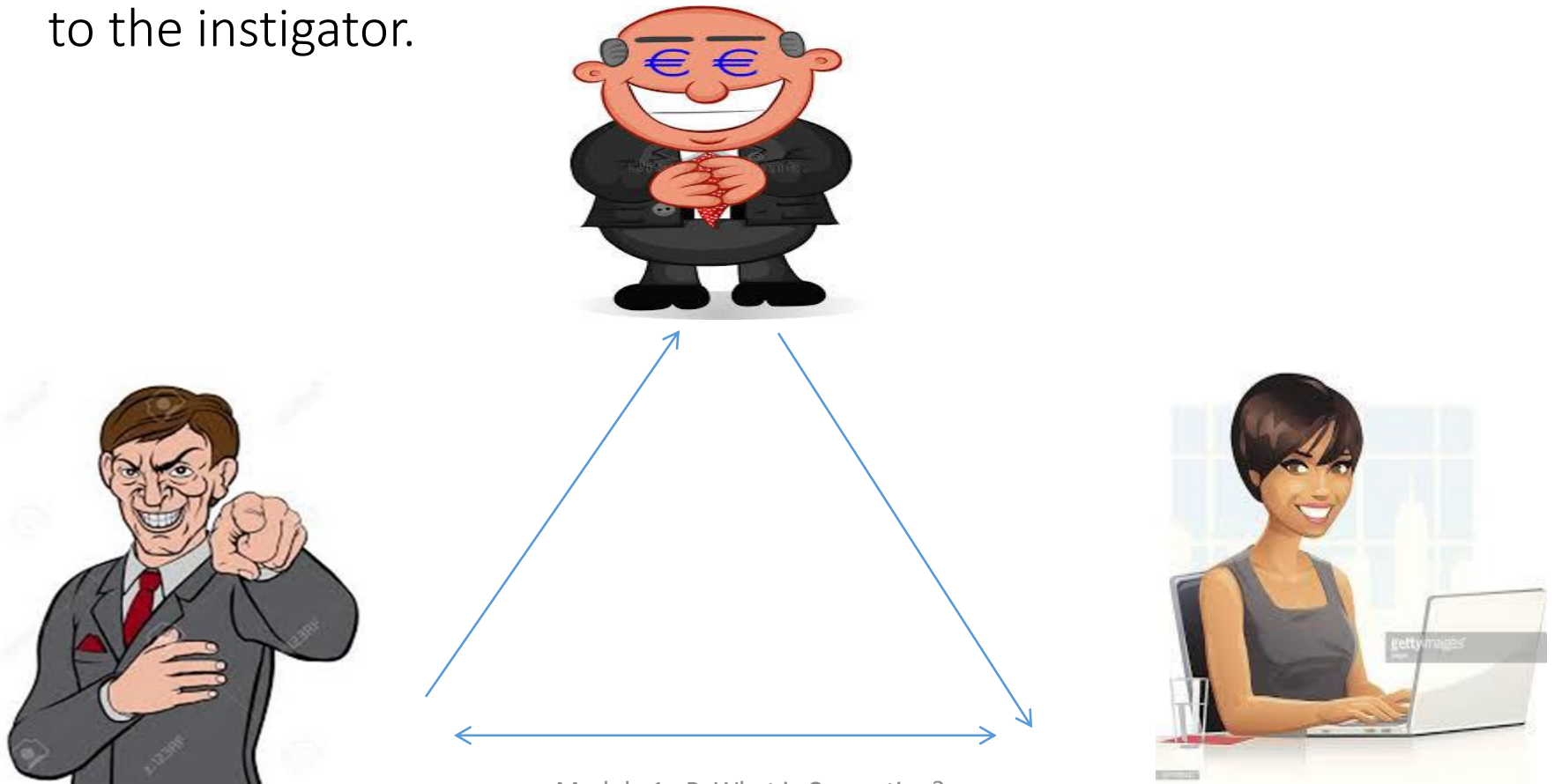
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Module 1-C

What is Corruption?

Plenary Activity 1



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Individual / Group Exercise 1



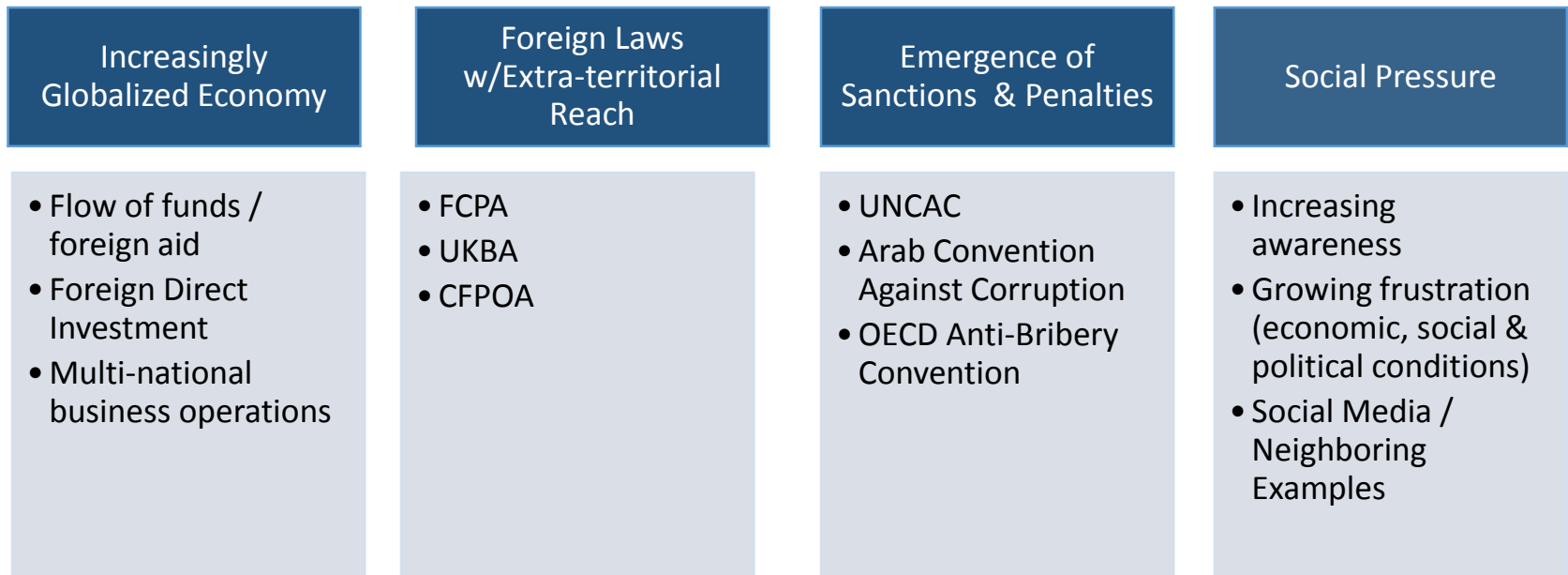
Develop a short story describing a corruption situation / scenario relevant to your industry / sector and or country. Be ready to present the scenario to the plenary for discussion.

Module 2

What Role for the Private Sector?

MODULE 2

THE PRESSURE FOR ANTI-CORRUPTION EFFORTS



Individual / Group Exercise 2



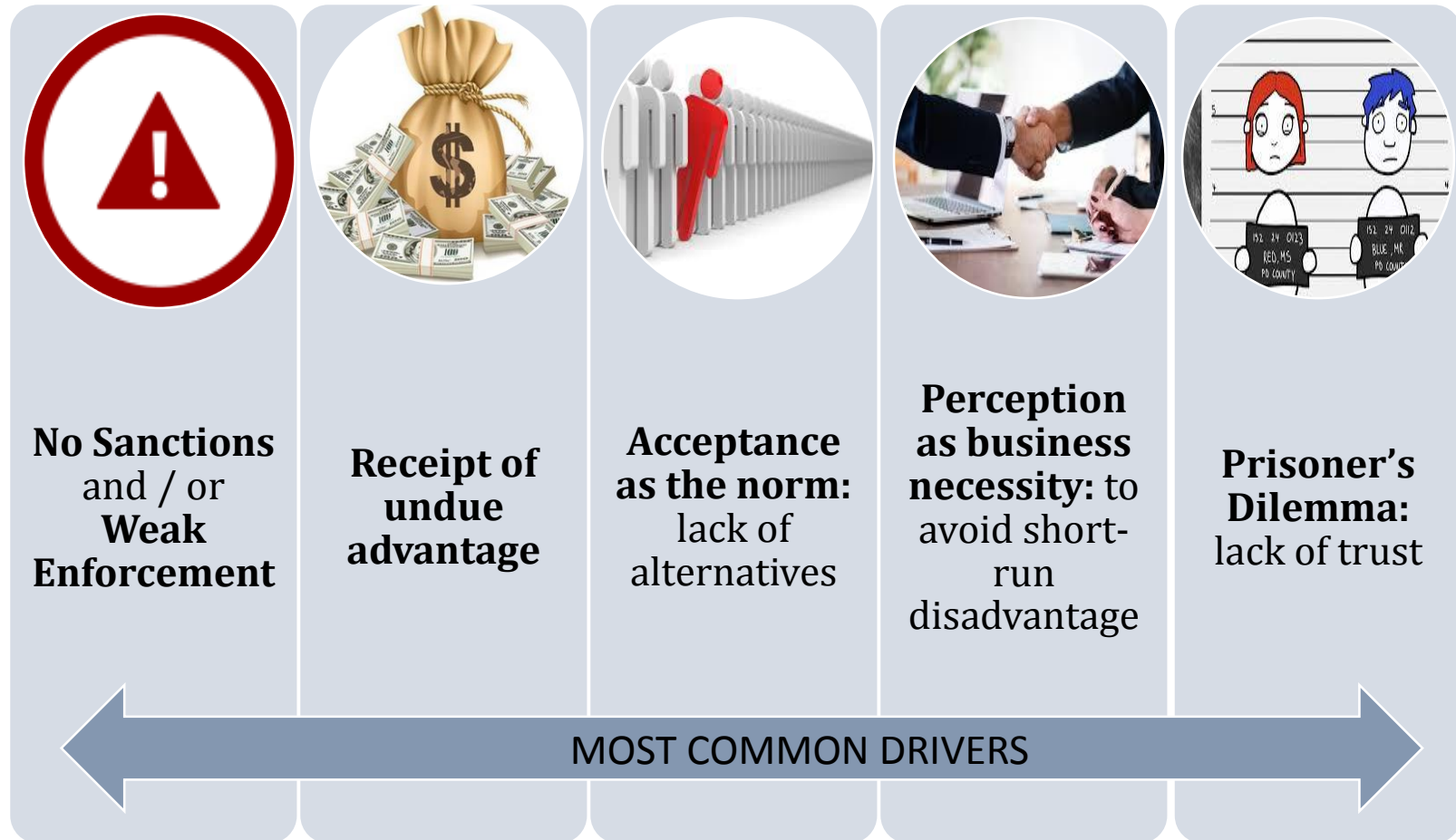
Who are supposed to be the actors tackling corruption and what actions should they be taking?

Individual / Group Exercise 2 (continued)

Who Are the Stakeholders?	What Actions Do You Expect from Them?	Are These Expected Actions Being Carried Out	Why or Why Not?

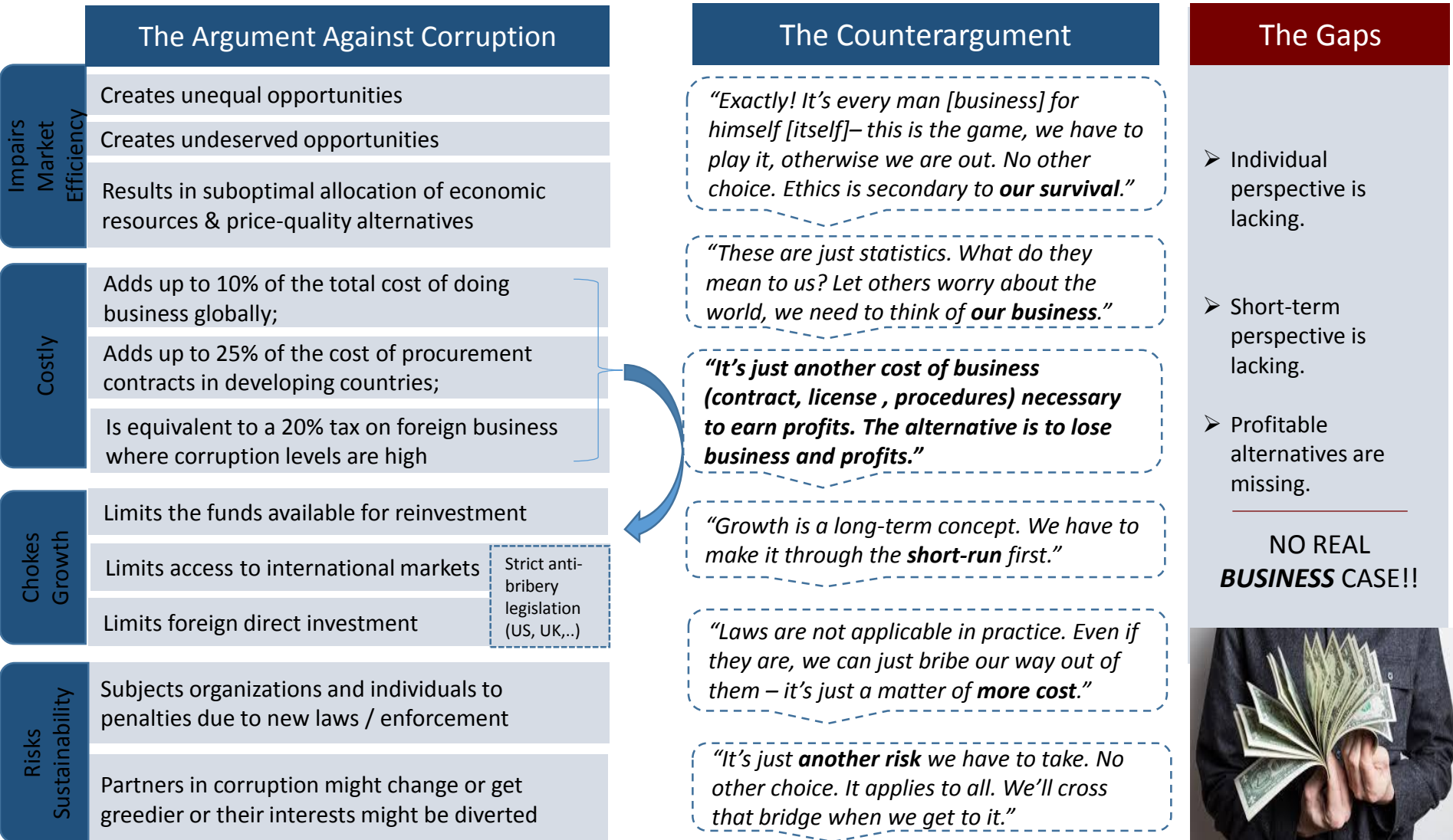
MODULE 2

ZOOM IN: THE PRIVATE SECTOR



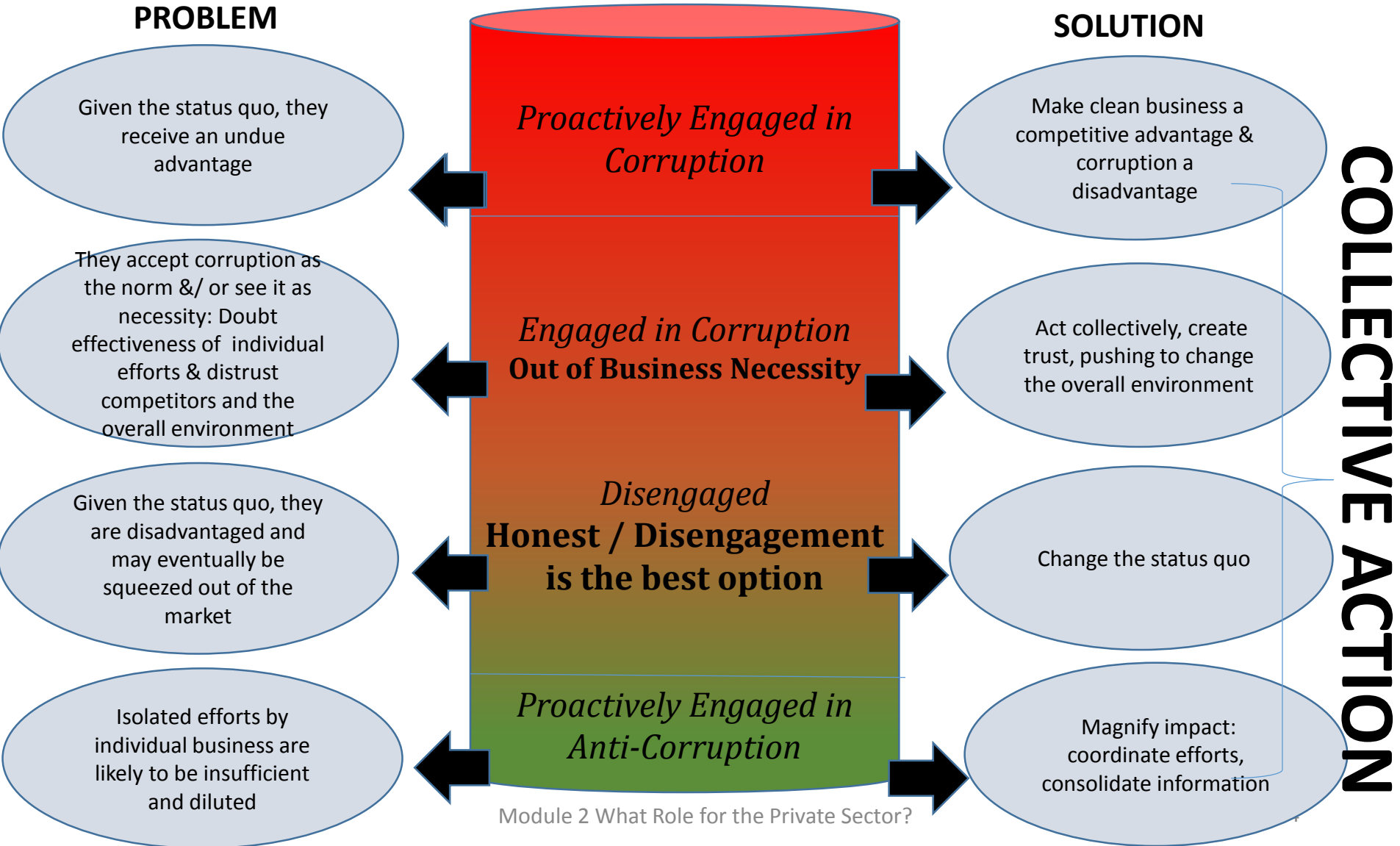
MODULE 2

ZOOM IN: THE PRIVATE SECTOR



MODULE 2

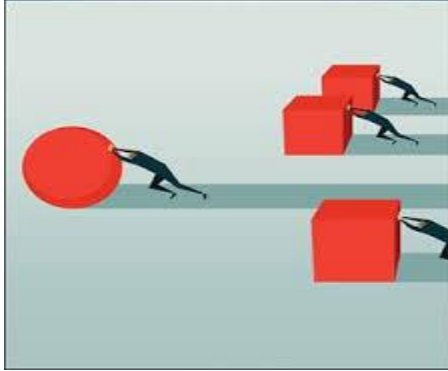
ZOOM IN: THE PRIVATE SECTOR



MODULE 2

ROLE OF THE PRIVATE SECTOR

To Do What?



AGREE TO UPHOLD HIGH ETHICAL
STANDARDS & GOOD / CLEAN
BUSINESS PRACTICES

By Whom?



Losers of the Status Quo, Together

How?

Align Interests

Build Trust

COLLECTIVE ACTION FOR INTEGRITY

MODULE 2

TRANSFORMING CLEAN BUSINESS INTO COMPETITIVE ADVANTAGE



+



=

Enhanced Firm Value

Less Cost: actual (illicit payments) and potential (penalties, legal costs, ...)

Positive reputation: Attracts ethically oriented customers, investors, employees, suppliers, partners,...

Increased Revenues

A FAIR market driven by INNOVATION, QUALITY & EFFICIENCY

Access to international markets

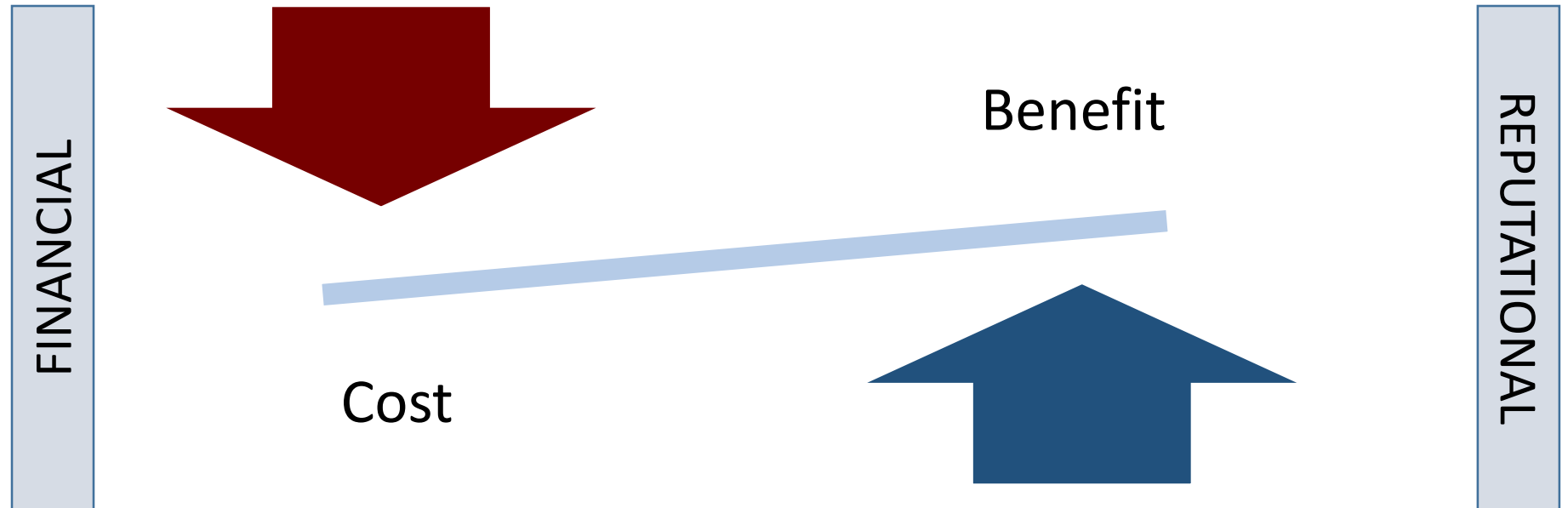
Enhanced growth potential

Protection from legal liability

MODULE 2

TRANSFORMING CLEAN BUSINESS INTO COMPETITIVE ADVANTAGE

Change the Corruption Equation



CREATING THE **BUSINESS** CASE FOR INTEGRITY

MODULE 3

PRACTICAL IMPLEMENTATION OF Collective Action Against Corruption

MODULE 3

WHAT CAN THE PRIVATE SECTOR OFFER?

- ✓ Refrain from corruption
- ✓ Adopt/implement effective compliance programs to prevent / detect corruption
- ✓ Self-reporting of violations
- ✓ Cooperation in case of investigation of corrupt activity
- ✓ Remedial action in case of corrupt activity to sanction culprits, compensate victims, and improve compliance program
- ✓ Share information
- ✓ Encourage other private sector actors to counter corruption

INCENTIVES

- Preferred standing: procurement transactions
- Fast tracked procedures
- Reduced costs/ interest rates
- Access to finance / Enhanced credit facilities
- Partnership and revenue opportunities
- Access to international markets
- Expanded network / distribution channels
- Positive publicity
- Capacity-building assistance

DISINCENTIVES

- Suspension of business operations
- Contractual penalties / compensatory damages due in case of anti-corruption clause violations
- Increased cost of capital
- Difficulties to penetrate the market (anywhere across the supply chain)
- Negative publicity

LEGAL, COMMERCIAL, and REPUTATIONAL

MODULE 3

What Can The Public Sector Offer?

AS A LEGISLATOR, A LAW ENFORCER, and A MAJOR BUYER GOODS & SERVICES

INCENTIVES

- Preferred standing: procurement transactions
- Fast tracked procedures
- Reduced sanctions / fines
- Lower tariffs / duties
- Tax credits / exemptions
- Positive publicity
- Access to subsidies
- Faster payment

DISINCENTIVES

- Disqualification
- Confiscation of goods
- Suspension of business operations
- Heavy fines
- Imprisonment
- Negative publicity
- Loss of subsidies

LEGAL, COMMERCIAL, and REPUTATIONAL

MODULE 3

WHY ANTI-CORRUPTION AGENCIES?



ZOOM IN: ANTI-CORRUPTION AGENCIES

CHARACTERISTICS

A stand-alone institution

An anti-corruption mandate

IMPLICATIONS

- ✓ Greater autonomy
 - ✓ Better insulation from undue influence
 - ✓ **Enhanced credibility**
-
- ✓ Specialization and expertise in anti-corruption
 - ✓ Value added to the CA initiative
 - ✓ Enhanced effectiveness of the ACA

MODULE 3

WHY ANTI-CORRUPTION AGENCIES? *



✓ Corruption prevention

- Policy / strategy: implementation, development, advice to other institutions
- Institutional reviews and inspections
- Codes of conduct and ethics
- Asset disclosure and conflict-of-interest systems
- Access to information
- Legislative drafting
- Regulatory quality
- Receipt and processing of complaints and reports on corruption cases
- Promotion of societal participation in anti-corruption efforts
- Research and information gathering
- Assessments and diagnostics
- Skill development and training

✓ Corruption awareness

- Awareness-raising on corruption issues and anti-corruption efforts
- Advice to public and private entities on development and implementation of awareness material and activities

✓ Anti-corruption law enforcement

- Investigation
- Prosecution
- Asset recovery
- Protection of witnesses, victims, experts, collaborators-of-justice, whistle-blowers and reporting persons, as well as related persons.

✓ Cross-cutting coordination

- National and international coordination and cooperation on anti-corruption policy / strategy:
 - development
 - implementation
- National and international coordination and cooperation on issues of:
 - Prevention
 - Awareness
 - Law enforcement
- Coordination of sector-specific policies and programs
- Dissemination of consolidated information on progress of anti-corruption efforts

*Adapted from: *“Anti-Corruption Agencies: Reflections on International Standards & Experiences and Considerations for Arab Countries”* (2012), UNDP

MODULE 3

What Can Civil Society Offer?

CHARACTERISTICS

Credibility

Neutrality

Expertise

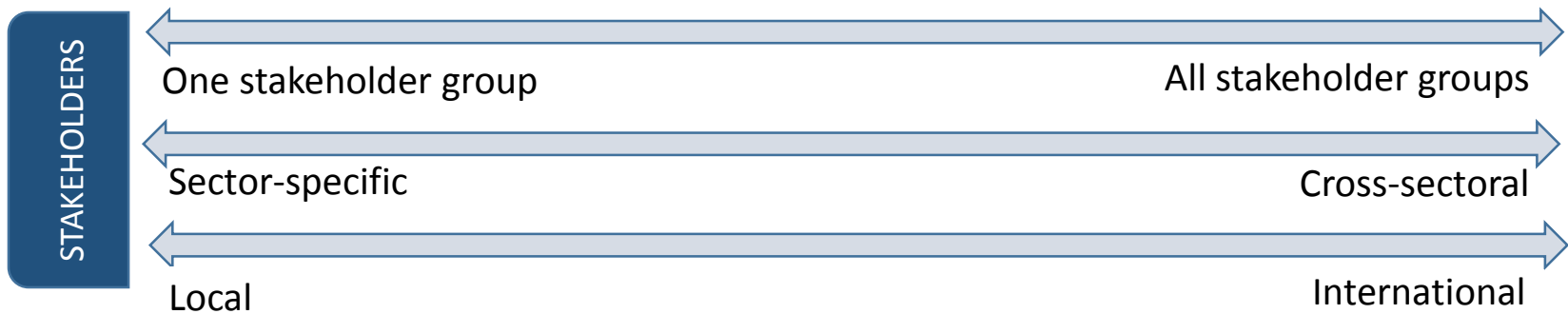
Network



IMPLICATIONS FOR POTENTIAL ROLE

- ✓ Convene stakeholders that otherwise do not know and / or trust each other
- ✓ Carry out or assist in monitoring and assessment activities
 - *Participate in public tenders*
 - *Monitor and assess compliance with CA provisions*
 - *Monitor and assess implementation of sanctions*
- ✓ Advocate for anti-corruption efforts by public and private sector stakeholders:
 - *Regulatory changes*
 - *Compliance programs*
- ✓ Communicate information
- ✓ Contribute resources and expertise to the CA initiative: information, staff, compliance training, etc...
- ✓ Carry out awareness-raising and capacity-building activities
- ✓ Enhance **reputational incentives and disincentives**:
 - *Publicize ethical behavior (reinforce peer pressure)*
 - *Publicize corrupt activity*

MODULE 3: MODELLING THE CA INITIATIVE

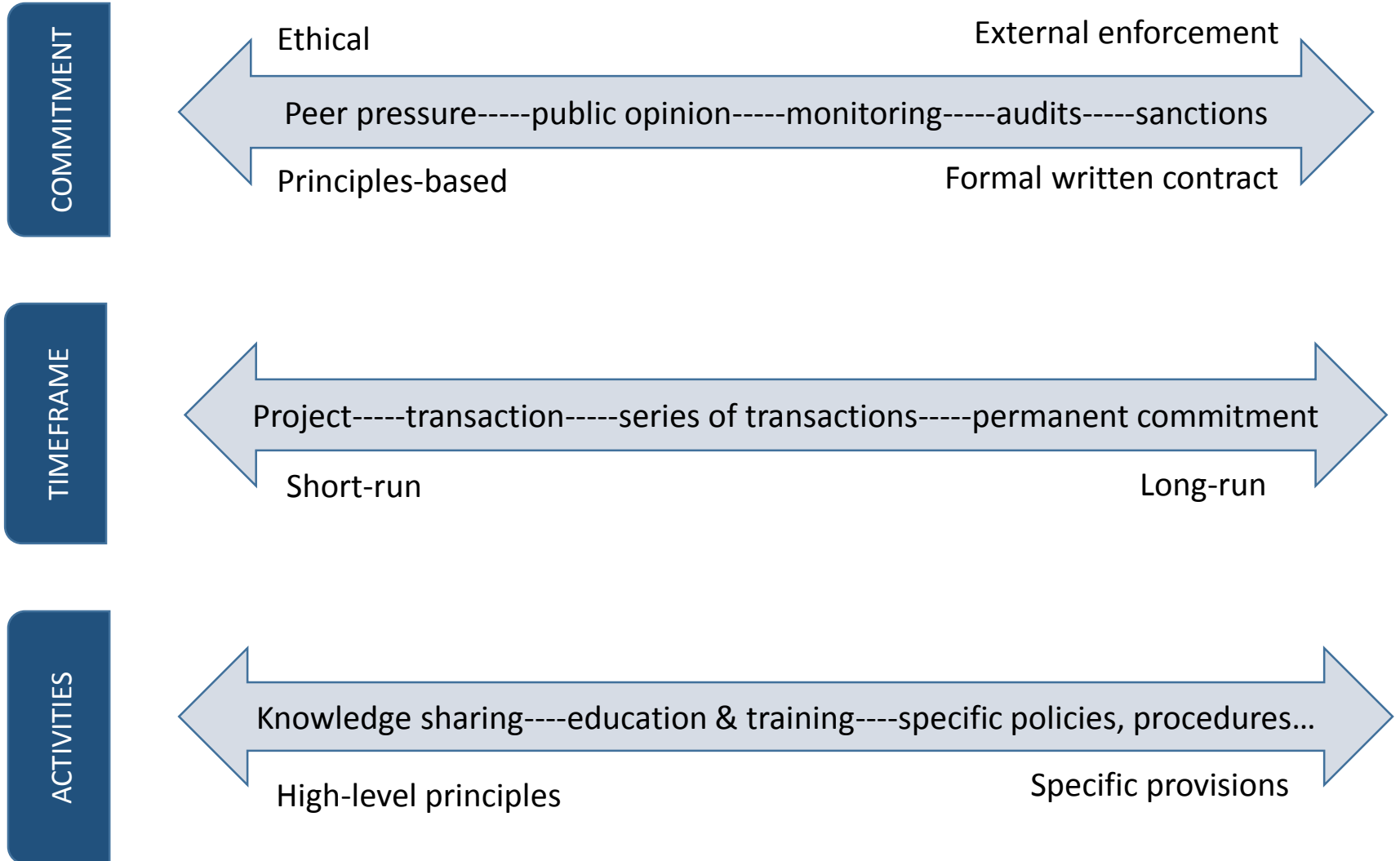


STAKEHOLDERS' ROLES

INITIATOR	FACILITATOR	PARTICIPANT	MONITOR
<ul style="list-style-type: none"> • Identify the main issue(s) • Draft the course of the CA initiative • Identify and convene other actors • Manage the initiative 	<ul style="list-style-type: none"> • Convene other actors in a neutral context • Assist other actors in the application of measures: Simplify, expedite, support, empower, etc... • Mediate between different actors & / or competitors, as a neutral 3rd party • Manage the process 	<ul style="list-style-type: none"> • Commit to and abide by the provisions of the CA initiative 	<ul style="list-style-type: none"> • Assess, as a neutral 3rd party, compliance with provisions • Assess progress • Identify areas of improvement

MODULE 3

MODELLING THE CA INITIATIVE



MODULE 3

IMPORTANT CONSIDERATIONS

Initiating Factor

Company Composition

- Size, ownership
- Homogeneity vs. heterogeneity
- Level of understanding, ability /willingness to learn
- Approach to the problem
- Power Balance

Governance & Project Management

- Planning (clearly defined objectives)
- Organization
- Implementation
- Monitoring and Evaluation
- Communication

Trust & Enforcement

SUSTAINABILITY and REPUTATION

MODULE 4

Collective Action Against Corruption **IN PRACTICE**

MODULE 4

The Case of *THE NIGERIAN PORT SECTOR*



MACN
Maritime Anti-Corruption Network

Capitalizing on an already available international initiative

Date	Founded 2012-2013; Ongoing
Country	Nigeria
Industry	Maritime
Participants	Private Sector: MACN; Multi-lateral Organization: UNDP; Anti-Corruption Agencies: Independent Corrupt Practices Commission (ICPC), the Technical Unit on Governance and Anti-Corruption Reforms (TUGAR), the Bureau for Public Procurement (BPP); the Economic and Financial Crimes Commission; Public Sector: the Nigerian Port Sector; Civil Society
Type of CA Initiative	Commitment and joint activities toward the vision of a maritime industry free of corruption
Initiation/Motivation	MACN initiated collaboration with UNDP and UNODC for a pilot project to address corruption at ports. Selection of Nigeria as the pilot project based on: (1) survey of the MACN membership to identify particular challenging ports, (2) Nigerian government's and local authorities' willingness to engage/ conducive policy environment: [port sector reform in 2004 +newly adopted national development strategy focused on improving the competitiveness of the port sector , (3) the availability of local resources and capacity to participate, (4) capacity of the local UNDP office: UNDP secured official government commitment.
Members' Commitment	Risk assessment across six Nigerian ports + recommendations for the short and long terms.
Activities	<ul style="list-style-type: none"> ●Training and certifying 70 local corruption risk assessors drawn from the public sector (federal and state), anti-corruption agencies, and civil society to conduct on-site assessments in private sector entities, government agencies, and other public sector organizations. ●Corruption risk mapping and identification of significant governance issues (by aforementioned risk assessors). ●Multi-stakeholder engagement to recommend risk mitigation and prevention measures. TUGAR and the national authorities developed a “risk reduction plan.” MACN developed an action plan to promote the implementation of these measures.
Outcomes	<ul style="list-style-type: none"> ● Improvement of members’ internal anti-corruption management programs and practices and aligned operational procedures to support more consistent practices when calling at ports in Nigeria. ●Reduced corruption; enhanced public-private dialogue; enhanced trust in / legitimacy of local government
Initiator /Facilitator	MACN and UNDP
External Monitoring	N/A

MODULE 4

The Case of *THE BERLIN-BRANDENBURG INTERANTIONAL AIRPORT*



Date	Founded 2004
Country	Germany
Industry / Project	Construction /public works
Participants	Private Sector: Bidding companies and FBS (Flughafen Berlin-Schönefeld GmbH (FBS) – a limited company owned by the Public Sector [Federal Republic of Germany, the State of Berlin, and the State of Brandenburg]; Industrial Chamber of Commerce; Civil Society: TI-Germany (TI-D);
Type of CA Initiative	Integrity Pact
Initiation/Motivation	Initial approach by TI-D; Allegations of corruption surrounding the project; Instructions from the Mayor of Berlin to address corruption risks.
Members' Commitment	Mandatory signed contracts: between FBS and the bidder who wishes to participate and its subcontractors
Activities	<ul style="list-style-type: none"> ● TI-D and FBS: Developed the Integrity Pact (tailored to German laws); designing bidding processes, service packages such that the procurement plan involves a larger number of smaller tendering packages [allowing medium-sized firms to bid] ● The Industrial Chamber of Commerce: capacity-building and assistance to medium-sized participants in the tender process. ● Parties to contract accept and abide by mutual obligations throughout all phases of the project and accept the role of the monitor.
Outcomes	Over 1000 bidders; Only 7 complaints; 4 won by FBS; 1 lost; 1 withdrawn; 1 settled out of court.
Initiator /Facilitator	FBS and TI-D
External Monitoring	Independent experts. Team leader: a retired procurement official (City State of Berlin); spotless track record; became a member of TI-D prior to taking on the task.
Sanctions	Monetary damages: 3% of contract value + exclusion from the bidding process

MODULE 4

The Case of *CoST HONDURAS*



Capitalizing on an already available international initiative

Date	2014 and ongoing
Country	Honduras
Industry	National public infrastructure
Participants	Civil Society: Association for a More Just Society (ASJ), Regional Area of the West (EROCC) and Democracy without Borders Foundation (FDsF), TI-Honduras; Private Sector: Honduran Chamber of the Construction Industry (CHICO), College of Civil Engineers of Honduras (CHIC) and Honduran Association of Coffee Producers (AHPROCAFE); Public Sector: Sectorial Cabinet of Productive Infrastructure (GSIP), Presidential Office of Transaction and Modernization of the State (DPTME) and Institute of Access to Public Information (IAIP); International MSG: CoST National Secretariat supported by International Secretariat
Type of CA Initiative	Integrity Pacts
Initiation/Motivation	Supported by the Government's Presidential Director of Transparency and led by the Minister of Infrastructure and Public Utilities.
Members' Commitment	<ul style="list-style-type: none"> • Disclosure of information pertaining to all phases of public infrastructure as per legislation • Assurance: evaluating disclosed information • Social accountability: Giving citizens, the media and academia access to the results to inform their actions
Activities	CoST Honduras: <ul style="list-style-type: none"> • improving and enhancing the user-friendliness of the online platform where procurement information is posted + support the design of a new website / platform for public-private partnership (PPP) projects in accordance with the CoST Infrastructure Data Standard, the World Bank PPP Framework and the Open Contracting Data Standard. • Building capacities of MSGs (citizens, the media and academia) and supporting them in validating and interpreting information and demanding accountability.
Outcomes	<ul style="list-style-type: none"> • Compliance with disclosure requirements increased from 27% to 84% (2015) and 97% (2016). • Development (by 2015 and with support from the World Bank) of a national e-procurement portal (SISOCS) for online disclosure of project information (> 450 projects to date). • Issuance of CoST Honduras Assurance Reports for 2015 (13 projects) and 2016 (19 projects). • CoST Honduras received 3rd prize by the Open Government Partnership in 2016 for its efforts to include civil society actors in its initiative.
Initiator /Facilitator	CoST Honduras
External Monitoring	CoST Honduras + Civil Society

MODULE 4

The Case of *THE INTEGRITY NETWORK INITIATIVE*



Starting an initiative from scratch

Date	Founded 2015
Country	Egypt
Industry	Multi-sector
Participants	Multi-lateral organization: United Nations Global Compact; Private sector: Egyptian Junior Business Association (EJB); Corporates/MNEs; SMEs; Civil Society
Type of CA Initiative	Education, training, and establishing a multi-stakeholder business-led integrity network towards the vision of a corporate anti-corruption ecosystem in Egypt.
Initiation/Motivation	EJB's CSR efforts [alignment with EJB mission] + Availability of UNGC funding for such an Initiative. SMEs: receive tangible business advantages; Corporates/MNEs: reduced risk of operations in the Egyptian market
Members' Commitment	<ul style="list-style-type: none"> • SMEs commit to (1) their senior managers attending a 3-hour, in-person anti-corruption training, (2) appointing an Ethics & Compliance Manager, (3) developing a detailed AC policy, and (4) finally signing an Integrity Pledge in front of representatives from the private and public sectors, civil society, academia and the media in a public ceremony. • Corporates / multinationals (1) provide support to SMEs: platform, network, knowledge-sharing, tangible business advantages and incentives [access to business opportunities, preferred commercial conditions, access to finance, publicity, etc.] (2) demonstrate ethical leadership.
Activities	<ul style="list-style-type: none"> • Establish a tailored anti-corruption standard / integrity pledge and capacity building program for SMEs. • Build a surrounding network of partners that provides a joint platform and support to SMEs and motivates them to join the fight against corruption by: (a) providing them w/tangible business advantages and incentives (b) demonstrating ethical leadership. • Engage in collective action efforts to raise awareness, engage in policy dialogues with public sector entities, and advocate for policy recommendations / anti-corruption efforts.
Outcomes	<ul style="list-style-type: none"> • Over 100 members; around 65 SMEs who have adopted the Integrity Pledge. • Improved awareness wrt the importance of AC and ways to fight it; behavioral changes. • Development of Guidance Materials based on multi-stakeholder discussions and inputs: (1) Guidance Manual for SMEs in Egypt: Implementing the EJB Integrity Pledge". (2) "Commercial Incentives: What large companies can do to motivate SMEs to commit to an anti-corruption standards • A training course for senior management was developed; a series of workshops was carried out.
Initiator /Facilitator	Egyptian Junior Business Association (EJB): NGO / premium business association w/over 400 prominent business persons
External Monitoring	An independent assessment process will also be developed for participating SMEs - that volunteer to undergo the evaluation - to assess their performance in connection w/ AC programs.

MODULE 4

The Case of *BUSINESS INTEGRITY COUNTRY AGENDA (BICA) PROJECT IN MOZAMBIQUE*



Using an already established tool

Date	2015
Country	Mozambique
Industry	Multi-sector
Participants	Civil Society: the Centro de Integridade Poeblica (CIP) (TI Mozambique); Public Sector: Ministry of Industry and Commerce; Private Sector: business associations, and legal, tax and auditing institutions, as well as three European donors.
Type of CA Initiative	Research and information gathering
Initiation/Motivation	TI Mozambique set up the National Group for the Promotion of Business Integrity (GRUPBI) of representatives from the public and private sectors.
Members' Commitment	Integrity reforms over 2 stages: Assessment and Collective Action
Activities	(1) Carry out research to generate evidence on the state of business integrity based on which a reform agenda is developed. (2) Implement the recommendations through Collective Action [which the CSO may initiate or monitor].
Outcomes	<ul style="list-style-type: none"> ● dissemination of findings through a series of workshops. ● The planning of the CA phase is underway by TI-Mozambique including an oil sector-specific initiative involving local and multinational companies.
Initiator /Facilitator	TI-Mozambique

Individual / Group Exercise 3



Identify a potential collective action initiative against corruption (needs, constraints, resources, parties) for your country? Consider potential elements of such an initiative. How do you see your role in this initiative?