

Comparing Anti-corruption Measures in Asian Countries: Lessons to be Learnt

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Introduction

IN RECENT YEARS, corruption is no longer a sensitive issue or taboo subject for research (Myrdal, 1968: 938-939), judging from the frequent reporting on corruption scandals around the world and the increasing amount of research on corruption in many countries (Heidenheimer *et al.*, 1989; Levi and Nelken, 1996; Little and Posada-Carbo, 1996; Elliott, 1997; Heywood, 1997; Robinson, 1998). According to Robert Leiken (1997: 58), a survey of the *Economist*, the *Financial Times*, and the *New York Times* showed that articles dealing with official corruption “quadrupled between 1984 and 1995.” Similarly, the Far Eastern Economic Review reported that corruption was the biggest story in 1996 as a great deal of “newsprint and television time was devoted to reports and discussions on corruption in government” (Ghosh, *et al.*, 1997: 18).

Corruption is a serious problem in many Asian countries according to the annual surveys conducted by the Hong Kong-based Political and Economic Risk Consultancy Ltd. (PERC) and the Berlin-based Transparency International (TI) in recent years. In 1996, PERC ranked Singapore as the third least corrupt country in the world and at the least corrupt of the 12 Asian countries in the study (*Straits Times* [Singapore], 1996: 3).¹ During the same year, Singapore’s seventh ranking on TI’s Corruption Perception Index (CPI) made it the least corrupt of the 13 Asian countries in the 54-nation study, with Pakistan (ranked 53rd) as the most corrupt Asian country (Transparency International, 1997: 65). Even though Singapore’s ranking on the 1997 CPI dropped to ninth position, it is still the least corrupt of the 13 Asian countries in the 52-nation survey, with Pakistan (ranked 48th) retaining its position as the most corrupt Asian country (Transparency International, 1998: 195). In the 1998 CPI, Singapore’s seventh ranking confirms its status as the least corrupt of the 13 Asian countries among the 85 countries surveyed, while Indonesia (ranked 80th) replaced Pakistan (ranked joint 71st) as the most corrupt country in Asia (Transparency International, 1998). Table 1 shows the average ranking of 12 Asian countries on the CPI from 1996-1998.²

If corruption is defined as “the misuse of public power, office or authority for private benefit-through bribery, extortion, influence peddling, nepotism, fraud, speed money or embezzlement” (UNDP, 1999: 7), why is corruption a fact of life in Singapore and Hong Kong on the one hand, and a way of life in Indonesia and Pakistan on the other hand (Caiden, 1981: 58-62)? How do we explain the different levels of corruption in Asian countries?

As the extent of corruption depends on the nature of the causes of corruption in these countries and the degree of effectiveness of the anti-corruption measures introduced by their governments, those governments which diagnose correctly the causes of corruption and take appropriate measures to minimize, if not eliminate these causes, will be more effective than

Table 1. Average Ranking of 12 Asian Countries

<i>Country</i>	<i>Ranking (from least to most corrupt)</i>
Singapore	1
Hong Kong	2
Japan	3
Malaysia	4
Taiwan	5
South Korea	6
Thailand	7
Philippines	8
China	9
India	10
Indonesia	11
Pakistan	12

Source: Transparency International, 1996-1998.

those governments which do not observe this logic of corruption control. In other words, those Asian countries like Singapore and Hong Kong which follow this logic of corruption control are more successful in combating corruption than Indonesia and Pakistan which do not.

To illustrate the above contention, it is necessary to first identify the major causes of corruption in Asian countries before comparing how their governments tackle the problem of corruption in the next two sections of the paper. The final section will identify the lessons to be learnt from the comparative analysis of the various anti-corruption measures employed in Asian countries.

Causes of Corruption

Under what conditions does corruption thrive? What are the factors which induce individuals to commit corrupt acts? Conversely, what prevents or discourages individuals from become corrupt? An individual is likely to commit a corrupt act if he or she (1) is paid a low salary; (2) is provided with the opportunities for corruption; and (3) perceives corruption to be low risk, high reward activity. In other words, corruption thrives when the individuals concerned receive meager salaries, have ample opportunities to be corrupt, and are unlikely to be caught and not severely punished even if they are caught.

In his comparative study of the control of bureaucratic corruption in Hong Kong, India and Indonesia, Leslie Palmier has identified the above factors as important causes of corruption: *opportunities* (which depended on the extent of involvement of civil servants in the administration or control of lucrative activities), *salaries* and *policing* (i.e., the probability of detection and punishment). Palmier contends that

bureaucratic corruption seems to depend not on any one of the [three] factors identified, but rather on the *balance* between them. At one extreme, *with few opportunities, good salaries, and effective policing, corruption will be minimal*; at the other, *with many opportunities, poor salaries, and weak policing, it will be considerable* (Palmier, 1985: 271-272) (emphasis added).

Thus, following Palmier's hypothesis, an effective anti-corruption strategy should reduce or remove the opportunities for corruption, raise the salaries of civil servants and political leaders, and ensure a high degree of policing.

Low Salaries

Palmier has identified low salaries as an important factor contributing to corruption. "If the official is not to be tempted into corruption and disaffection, clearly there is an obligation on the government to provide or at least allow such benefits as will ensure his loyalty; one might call it an implicit contract" (Palmier, 1985: 2). He concluded that "adequate pay" was "an essential ingredient in reform" (Palmier, 1985: 6). In the same vein, Mauro has argued that "when civil service pay is too low, civil servants may be obliged to use their positions to collect bribes as a way of making ends meet, particularly when the expected cost of being caught is low" (Mauro, 1997: 5).

In Indonesia, corruption was a serious problem during the Dutch colonial period as the salaries of the Dutch East India Company's personnel were inadequate. Clive Day observed that these personnel "were underpaid and exposed to every temptation that was offered by the combination of a weak native organization, extraordinary opportunities in trade, and an almost complete absence of checks from home or in Java" (Day, 1966: 100-103). Corruption became endemic during President Sukarno's rule because his "disastrously inflationary budgets eroded civil service salaries to the point where people simply could not live on them and where financial accountability virtually collapsed because of administrative deterioration" (Mackie, 1970: 87-88).

In South Korea, Meredith Woo-Cummings (1995: 455-456) has recommended that civil service salaries which constitute only 70 percent of private sector wages, should be raised to reduce corruption. Similarly, Jun and Yoon have suggested that it is unrealistic to expect South Korean civil servants "to show dedication without providing adequate remuneration and changing the administrative culture" (Jun and Yoon, 1996: 107). In the case of Thailand, Kasem Suwanagul (1962: 79-80) found that the low salaries of civil servants during the post-war period contributed to more bureaucratic corruption as their low salaries were insufficient to meet inflation and below those offered in the private sector.

Corruption was introduced into the Philippines during the Spanish colonial period, when corruption prevailed as the civil servants were poorly paid and had many opportunities for corruption (Corpuz, 1957: 129). On the other hand, the bureaucracy was less corrupt during the American colonial period as “the bureaucrats received higher salaries and corrupt officials were promptly prosecuted” (Quah, 1983: 159). Finally, in his analysis of the consequences of low salaries on the Philippine Civil Service’s prestige, Padilla found that civil servants supplemented their low wages by vending within the office, holding a second job, teaching part-time, practicing their profession after office hours, engaging in research and consultancy projects, and resorting to petty corrupt practices (Padilla, 1995: 195-202, 206).

The most important factor responsible for police corruption in Singapore during the colonial period was the low salaries of the members of the Singapore Police Force (SPF), especially those in the lower ranks. This factor was also blamed for the SPF’s inefficiency and its inability to recruit suitably qualified personnel (Quah, 1979: 28). Given the poor salaries of the policemen, it was not surprising that the *Straits Times* made this comment: “It is at once evident that the native constables and the European police of the Inspector class are so underpaid that scandals are unavoidable” (*Straits Times* quoted in Quah, 1979: 29).

In short, “if bureaucrats are paid a high enough wage, even a small chance of losing their jobs would discourage them from being corrupt.” On the other hand, if the real salary of civil servants decreases drastically, “even the most rigidly honed bureaucrats will be tempted to go beyond the law to preserve their standard of living” (Banerjee, 1996: 110).

Ample Opportunities for Corruption

According to Gould and Amaro-Reyes (1983: 17), “the expanding role of government in development has placed the bureaucracy in a monopolistic position and has enhanced the opportunities for administrative discretion. Excessive regulations together with this increased bureaucratic discretion provide opportunities and incentives for corruption in that regulations governing access to goods and services can be exploited by civil servants in extracting ‘rents’ from groups vying for access to such goods and services.” For example, in Hong Kong, “the necessity for the government to regulate, control and prohibit certain activities” provided “ample opportunity for the corrupt in the areas of construction, import and export, health, hygiene, safety, prostitution, gambling, drugs, markets and stalls, immigration and emigration” (De Speville, 1997: 14).

In Indonesia, Donald P. Warwick referred to the distinction made by civil servants between “wet” and “dry” agencies thus:

“wet” agencies...are generous with honoraria, allowances, service on committees, boards, and development projects, and, recently, opportunities for foreign training. They are departments that deal in money, planning, banking, or public enterprises. “Dry” agencies are those doing traditional administrative work. Perceptions of unfairness about benefits not only reduce staff morale, but lead to the feeling that illegal compensation is a fair way to even out staff benefits across agencies (Warwick 1987: 43).

Thus, "wet" agencies like the police, customs, immigration and internal revenue will provide more opportunities for corruption than "dry" agencies like research and administrative departments which do not interact with the public.

In the case of the police, *The Knapp Commission Report on Police Corruption* found that three factors determined the opportunities for corrupt behavior among policemen in New York City. First, the branch of the department to which an officer is assigned is important as a plainclothesman will have more and different opportunities than a uniformed policeman. Second, the area to which an officer is assigned not only influences the opportunities for corrupt behavior but also the major sources of corruption payments. For example, in New York City, some precincts in Harlem provide more opportunities for corruption than Central Park. Finally, the officer's assignment determines the amount and type of graft available to him as an officer in a patrol car will have more opportunities to be corrupt than his counterpart on guard duty (*The Knapp Commission Report on Police Corruption 1972: 67-68*).

The Corruption Prevention Department (CPD) of Hong Kong's Independent Commission Against Corruption (ICAC) identified four "more pernicious and prevalent" factors which provided opportunities for corruption. The first factor is delay, which "provides both the opportunity to extort a bribe and the incentive to offer one, and is also an inevitable consequence of bureaucratic processes." Second, insufficient publicity "leads the public to believe that individual public servants have the authority to decide whether a particular law shall be enforced or who shall benefit from a public service, so creating a situation ripe for exploitation." The third factor providing opportunities for corruption is excessive discretion, which often results from "a well-intended delegation of authority in order to expedite business." The fourth and most important factor was the lack of supervision or accountability especially of junior officers who operate away from an office. As supervisors are usually preoccupied with other administrative duties which require their presence in their comfortable offices, they are reluctant to visit their junior officers in the field and resort to supervision through correspondence. To minimize the lack of supervision or accountability of junior officers, the CPD recommended that "all supervisory officers should spend sufficient time with their staff and in the field, to gain their own insight into the problems within their area of responsibility and conditions on the ground" (Palmier, 1985: 179-181).

Low Risk of Detection and Punishment

As corruption is an illegal activity in all countries, individuals found guilty of corrupt offenses should be punished accordingly. However, in reality, the probability of detection and punishment of corrupt offenses varies in the different Asian countries. Corruption thrives in those Asian countries where the public perceives it to be a "low risk, high reward" activity as corrupt offenders are unlikely to be detected and punished. In contrast, corruption is not a serious problem in those Asian countries where corruption is perceived as a "high risk, low reward" activity as those involved in corrupt behavior are likely to be caught and severely punished.

An important cause of the pervasive corruption in the Soviet Union before its collapse was the lack of fear of punishment among the corrupt officials. According to Syed Hussein Alatas:

Cases of high-level corruption are rarely truly punished. The regime has always been permissive towards its ruling elite. Corruption has developed to the extent that offices can be bought, as newspaper accounts reveal. Involvement of the highest leadership in turn causes permissiveness towards corruption. This is the greatest cause of its perpetuation (Alatas, 1991: 121).

Similarly, even though bribery exceeding 100,000 yuan (US\$12,000) is a capital offense in the People's Republic of China (PRC), the death penalty has not been imposed on senior party officials found guilty of accepting bribes exceeding this amount. For example, on 31 July 1998, the former Beijing party chief, Chen Xitong, became the highest-ranking Chinese Communist Party member to be jailed for corruption when he was sentenced to 16 years for graft of 555,000 yuan and dereliction of duty. Indeed, Chen's sentence is lenient as more junior party cadres have been given life imprisonment or the death penalty for corruption involving smaller sums of over 100,000 yuan (*Strait Times*, 1998: 14). In other words, senior party officials in the PRC can "short-circuit corruption investigations by appealing to their protectors in the party hierarchy" (Root, 1996: 752).

In Bangladesh, corruption is a dominant component of its bureaucratic culture as corruption has been institutionalized in the public service during the last 25 years (Khan, 1998: 35). Mohammad Mohabbat Khan has attributed the high level of corruption in Bangladesh to the following four factors:

First, bureaucrats involved in corrupt practices in most cases do not lose their jobs. Very rarely they are dismissed from service on charges pertaining to corruption. Still rarely they are sent to prison for misusing public funds. They have never been compelled to return to the state their ill-gotten wealth. Second, the law-enforcing officials including police personnel are extremely corrupt. They are happy to share their booty with other corrupt bureaucrats. Third, the people have a tendency not only to tolerate corruption but to show respect to those bureaucrats who made fortune through dubious means. . . . Fourth, it is easier for a citizen to get quick service because he has already "paid" the bureaucrat rather than wait for his turn (Khan, 1998: 36).

In order for the population in a country to perceive corruption as a "high risk, low reward" activity, the incumbent government must publicize through the mass media the detection of corrupt behavior among civil servants and politicians and their punishment according to the law if they are found guilty. In this connection, Leslie Palmier has stressed the crucial role of the communications media, which reduces corruption by exposing it as corruption "thrives in secrecy, and withers in the light" (Palmier, 1985: 279). If the media emphasizes the harmful effects of corruption and publicizes the punishment of public officials for their corrupt offenses, such negative publicity can serve as an effective deterrent against corruption. Indeed, according to Singapore's former prime minister, Lee Kuan Yew, "The strongest deterrent is in a public opinion which censures and condemns corrupt persons, in other words, in attitudes which make corruption so unacceptable that the stigma of corruption cannot be washed away by serving a prison sentence" (*Straits Times*, 1987: 11 quoted in Quah, 1988: 93). Conversely, those governments which "shackle the media" as in the case of Indonesia under President Suharto or India during the Emergency of the 1970s, "are in effect encouraging the corrupt" (Palmier, 1985: 279).

In sum, corruption thrives in those Asian countries which (1) pay civil servants and politicians low salaries; (2) expose them to many opportunities for corruption; and (3) are unlikely to detect and punish those public officials involved in corrupt behavior.

Anti-Corruption Measures in Asian Countries

What are the anti-corruption measures employed by the governments in Asian countries? C.V. Narasimhan, a former Director of the Central Bureau of Investigation (CBI) in India mentions three types of anti-corruption measures: preventive, punitive and promotional. Preventive measures refer to those electoral and administrative reforms concerned with making all government transactions "more transparent and accountable to the people." Punitive measures include the "laws, rules and the mechanism for effective investigation, court trial, departmental disciplinary action and other means to deter the corrupt functionaries." Finally, promotional measures focus on the "encouragement of value-based politics, inculcation of moral and ethical principles among the younger generation in schools and colleges and the build-up of a kind of social ostracisation of corrupt people by the society" (Narasimhan, 1997: 251-252).

While preventive and promotional measures are also important, our analysis will focus on those punitive measures employed by the governments in Hong Kong, India, Mongolia, Philippines and Singapore to curb corruption as these measures are designed to reduce the opportunities for corruption as well as increase the risk of detecting and punishing corrupt behavior.³ These five countries exhibit three patterns in controlling corruption.

Pattern 1. Anti-Corruption Legislation with no Independent Agency

Mongolia follows the first pattern as it has anti-corruption legislation like the Law on Anti-Corruption (LAC) enacted in April 1996 and provisions restricting bribery in the Criminal Code, but it does not have an independent anti-corruption agency (ACA). Instead, the task of controlling corruption in Mongolia is shared between the police, the General Prosecutor's Office, and the courts.⁴

Apart from identifying the six categories of civil servants under its jurisdiction, the LAC requires all public officials in Mongolia to declare their incomes and assets and those of their families within 30 days of assuming their positions and thereafter to submit their annual declarations during 1-15 February of each year. Those officials who fail to submit their declarations of incomes and assets will be fined between 5,000 and 25,000 togrogs (US\$5.90 to US\$29.40). Furthermore, those officials who do not perform their duty of monitoring the declarations must pay fines between 20,000 to 30,000 togrogs (US\$23.50 to US\$35.30). The penalty for those officials failing to declare gifts or their foreign bank accounts is higher as they are required to pay between 30,000 to 40,000 togrogs (US\$35.30 to US\$47.05) in fines. Finally, officials found guilty of corruption will be discharged or displaced according to the procedure provided in the law (Quah, 1999: 19-22).

Articles 195-197 of the Criminal Code focus on bribery. Article 195 states that an official who receives bribes directly or through a mediator can be suspended from his position

or sentenced to six years of imprisonment without suspension of power. The penalty is increased to suspension from his position and imprisonment of between 10 to 25 years if the official is a repeat offender, senior civil servant, if he accepts a large bribe, or if bribery is committed by an organized group. Article 196 punishes bribe-givers with imprisonment of up to four years or performing public work for 18 months. Recalcitrant bribe-givers can be jailed from three to ten years. Finally, Article 197 stipulates that those who mediate in bribetaking and giving will be punished by imprisonment of up to four years or performing 18 months of public work (Quah, 1999: 21).

Reports of crime, including corruption offenses, are received by the Criminal Police Department (CPD), which investigates these reports and refers them to the Investigation Department (ID) for the next stage of the investigation, which can last from two to 26 months (Quah, 1999: 22). The CPD and ID investigate complaints of corruption against public officials and if there is evidence to verify these complaints, the cases will be handed over to the General Prosecutor's Office (GPO), which supervises "inquiries by the police in both criminal and civil cases" and represents "the state in both civil and criminal proceedings" (McPhail, 1995: 49-50). From the GPO, the cases are processed by the *aimag* courts and the Capital City Court (for serious crimes where the amount exceeds 10 million togrogs or US\$22,000) and the Supreme Court (for those cases outside the jurisdiction of other courts and appeals from decisions of the *aimag* courts and the Capital City Court) (McPhail, 1995: 38).

Pattern 2: Anti-corruption legislation with several agencies

The second pattern of combating corruption combines anti-corruption legislation with several agencies, as is the case in India and the Philippines. In India, the Prevention of Corruption Act (POCA) is implemented by the Central Bureau of Investigation (CBI), the Central Vigilance Commission (CVC), the anti-corruption bureaus and vigilance commissions at the state level. Similarly, in the Philippines, the anti-graft laws and policies are supplemented by the *Sandiganbayan* (special anti-corruption court), the Ombudsman, and the Presidential Commission Against Graft and Corruption (PCAGC), the latest presidential anti-graft agency created by President Ramos in 1994.

ANTI-CORRUPTION MEASURES IN INDIA

The fight against corruption in India began in 1941, when the colonial government created the Delhi Special Police Establishment (DSPE) to "investigate cases of bribery and corruption in transactions" involving the War and Supply Departments. In 1943, the government issued Ordinance no. XXII which empowered the DSPE's officers to investigate corruption cases involving central government departments in India. This Ordinance lapsed on 30 September 1946 and was replaced by the DSPE Act, 1946, which transferred control of the DSPE to the Home Department (now known as the Ministry of Home Affairs) (Palmier, 1985: 30).

In March 1947, the POCA incorporated relevant sections of the Indian Penal Code and became law. In 1949, the government formed a Committee chaired by Baksi Tek Chand to

review *interalia*, the operation of the POCA, 1947 and to assess the DSPE's effectiveness in combating corruption. In 1952, the Chand Committee recommended that the DSPE's activities should be expanded. Accordingly, an Enforcement Wing was added to the DSPE in 1953 to handle offenses involving violation of import and export regulations at Bombay, Calcutta and Madras. In 1955, an Administrative Vigilance Division (AVD) was formed within the Ministry of Home Affairs (MHA) to coordinate anti-corruption measures within the central government (Palmier 1985: 13 and 31).

In June 1962, a Committee on the Prevention of Corruption was appointed and chaired by K. Santhanam. The purpose of the Santhanam Committee was "to review the existing instruments for checking corruption in the Central Services" and to provide advice on the "practical steps that should be taken to make anti-corruption measures more effective" (Palmier 1985: 14). The Santhanam Report had far-reaching consequences as it first recommended the formation of a CVC, which has the power to "investigate any complaint or suspicion of improper behavior" against a civil servant. Secondly, a Chief Vigilance Officer (CVO) was appointed in each ministry or department to supervise its vigilance staff. Finally, the Santhanam Report recommended the amendment of the POCA of 1947 to include the provision that "the possession by a public servant of assets disproportionate to income, and for which a satisfactory explanation could not be made, was itself criminal misconduct" (Palmier 1985: 14).

In April 1963, the government established the CBI by incorporating the DSPE as one of its six divisions *viz.*, the Investigation and Anti-Corruption Division. As the CBI's role is to investigate crimes handled by the DSPE, the DSPE Act, 1946 remains in force and provides the legal sanction and authority for investigations by the CBI, which does not have any statutory basis itself. Thus, the MHA through its AVD assumed control of the CBI's work and provided for its budget. Arising from the recommendations of the Administrative Reforms Commission of 1966, the CBI and AVD were transferred from the MHA to the new Department of Personnel, Cabinet Secretariat in 1970 (Palmier 1985: 31-32).

The CBI derives its investigating powers from the DSPE Act, 1946, and section 5 of the latter indicates that the central government can empower the CBI to investigate the notified offenses in any state, but such empowerment is only possible with the consent of the government of that state. According to Narasimhan, the CBI did not encounter any difficulty within the states during the post-independent period when the Congress Party was in power in the states and in the center. However, the situation changed when different political parties assumed power in the states because some state governments withdrew the consent given by their predecessors "whenever they felt that an investigation taken up by the CBI was politically embarrassing or uncomfortable for them." In short, the CBI's status as an investigating agency in a state is "unstable and dependent" on that state government's mercy (Narasimhan, 1997: 255-256).

The states have their own anti-corruption bureaus (ACBs) for dealing with vigilance and anti-corruption work, but these ACBs derive their powers of investigation from the Police Act as they are regular police units. If there is public pressure for an inquiry into the misconduct of a minister, the central or state government will form a commission to inquire into the specific allegations against the minister. The Commission of Inquiry will present its

report on the facts ascertained during the inquiry to the government concerned, which will refer the matter to the CBI or state ACB for investigation if a person is to be prosecuted. However, the investigation process and the ensuing trial is time-consuming and does not result in quickly awarding a severe punishment to the guilty person. Indeed, no CBI case involving ministers has resulted in a firm court conviction during the last 40 years (Narasimhan, 1997: 257-258).

The CVC was established in February 1964 to perform four functions: (1) investigate any transaction in which a public servant is alleged to act for an improper purpose; (2) examine (a) any complaint that a public servant had exercised his powers for improper or corrupt purposes; and (b) any complaint of corruption, misconduct, lack of integrity or other malpractice by a public servant, including members of the All India Services; (3) request reports from ministries, departments and public enterprises to enable it to check and supervise their vigilance and anti-corruption work; and (4) request the CBI to investigate a case, or to entrust the complaint, information or case for inquiry to the CBI or the ministry, department or public enterprise concerned (Narasimhan, 1997: 264-265).

The CVC is headed by a Commissioner, who is appointed by the President for six years. The CVOs in ministries and departments are appointed in consultation with the Commissioner, who assesses their performance. The CVC submits an annual report on its activities to the MHA. Apart from receiving complaints from individuals, the CVC collects and collates data on corruption and malpractices from such sources as press reports, parliamentary speeches, audit objections, reports of parliamentary committees, and CBI reports (Palmier, 1985: 52). The Commissioner advises the departments on the action to be taken on CBI reports on gazetted officers. He also reviews the preventive work of the CVOs and Vigilance Officers in different departments and provides them with the necessary directions (Narasimhan, 1997: 266).

ANTI-CORRUPTION MEASURES IN THE PHILIPPINES

The Philippines is the Asian country with the most number of anti-corruption measures. More specifically, it has relied on seven laws and 13 anti-graft agencies since its battle against corruption began in the 1950s. The first anti-corruption law was the Forfeiture Law of 1955, which authorized “the state to forfeit in its favor any property found to have been unlawfully acquired by any public officer or employee” (Alfiler, 1979: 324-325). This law was ineffective as there were no conviction even after four years of its passage. The Republic Act (R.A.) 3019, entitled the Anti-Graft and Corrupt Practices Act, was the second law and it was passed in April 1960.⁵ R.A. 3019 identified eleven types of corrupt acts among public officials and required them to file every two years a detailed and sworn statement of their assets and liabilities. The third anti-corruption law—R.A. 6028—which provided for the formation of the Office of the Citizen’s Counsellor, was passed in August 1969, but was not implemented.

The other laws were the four Presidential Decrees (P.D.) issued by President Marcos after the establishment of martial law in September 1972. P.D. No. 6 identified 29 administrative offenses and empowered heads of departments to dismiss guilty officials

immediately. This resulted in the sacking of nearly 8,000 public officials. Two months later, P.D. No. 46 prevented public officials from receiving and private individuals from giving gifts on any occasion including Christmas. Finally, P.D. No. 677 and P.D. No. 749 are amendments to R.A. 3019, requiring all government employees to submit statements of their assets and liabilities every year, instead of every other year; and providing immunity from prosecution for those willing to testify against public officials or citizens accused of corruption (Alfiler, 1979: 326-327).

The high number of anti-graft agencies in the Philippines can be attributed to the frequent changes in political leadership as such agencies are either created or abolished by the President. Between May 1950 and January 1966, five anti-corruption agencies were formed and dissolved as there were five changes in political leadership during that period. Similarly, President Marcos created another five anti-graft agencies during his last two decades in power because the first three agencies were ineffective and lasted between eight months and two years (Quah, 1983: 168-169). Indeed, according to Varela, "graft and corruption reached its all time high during the martial law regime under Marcos" as corruption "had permeated almost all aspects of bureaucratic life and institutions which saw the start of the systematic plunder of the country" (Varela, 1995: 174).

In July 1979, President Marcos created the *Sandiganbayan* (Special Anti-Graft Court) and the *Tanodbayan* (Ombudsman) by issuing P.D. No. 1606 and P.D. No. 1630 respectively. Section 4 of P.D. No. 1606 states that the *Sandiganbayan* has jurisdiction over violations of R.A. No. 3019 (the Anti-Graft and Corrupt Practices Act) and R.A. No. 1379; and crimes committed by public officers and employees (*PJPA*, 1979: 387-388). Section 10 of P.D. No. 1630 describes the various powers of the *Tanodbayan*, and as far as corruption is concerned, "he may file and prosecute civil and administrative cases involving graft and corrupt practices and such other offenses committed by public officers and employees" (*PJPA*, 1979: 402).

When President Corazon Aquino assumed office in February 1986, "there was high expectation that the end of the culture of graft and corruption was near" (Varela, 1995: 174). She formed the Presidential Commission on Good Government (PCGG) to identify and retrieve the money stolen by the Marcos family and their cronies. Unfortunately, Aquino's "avowed anti-graft and corruption" stance was viewed with cynicism by the public as two of her Cabinet members and her relatives (referred to derisively as "rela-thieves") were accused of corruption. The PCGG was also a target for charges of corruption, favoritism and incompetence, and by June 1988, five of its agents faced graft charges and thirteen more were under investigation. In May 1987, Aquino created the Presidential Committee on Public Ethics and Accountability (PCPEA) to respond to increasing public criticism. However, PCPEA lacked staff and funds (Timberman, 1991: 233-234). Thus, as indicated by Cariño, Aquino's "honesty has not been matched by the political will to punish the corrupt" (Cariño quoted in Timberman, 1991: 235).

The *Tanodbayan* or Office of the Ombudsman was "reborn" in 1988 during Aquino's term of office. However, according to Cecile C.A. Balgos, "during the first seven years after its rebirth in 1988, the Office of the Ombudsman failed to attract much public scrutiny, the limelight hogged by the more high-profile *Sandiganbayan*" (Balgos, 1998: 247). However,

instead of “inspiring confidence in the judicial system,” the Ombudsman has elicited “only disappointment—if not contempt—among many of those seeking redress for the wrong done them by public officials.” Indeed, the Ombudsman has a notorious reputation for taking a long time in processing the complaints received by it (Balgos, 1998: 248). A more serious weakness was caused by the quota system introduced by Conrado Vasquez, who was appointed as Ombudsman in 1988. Vasquez’s quota system encouraged inefficiency as investigators “finished the easier cases first to fulfill their quota” and left the more complex ones “untouched for months, or even years.” Consequently, by December 1994, the Ombudsman had accumulated a backlog of 14,652 cases, or 65 percent of its total workload. Indeed, in August 1997, the Ombudsman still had pending cases dating back to 1979. It should be noted here that the *Sandiganbayan* has a poorer record than the Ombudsman as the former completed only 13 percent of its total caseload in 1996 (Balgos, 1998: 250-251).

In 1994, President Ramos appointed Eufemio Domingo to head the Presidential Commission Against Graft and Corruption (PCAGC). Three years later, Domingo concluded that “the system is not working. We are not making it work.” According to him:

We have all the laws, rules and regulations and especially institutions not only to curb, but to eliminate corruption. The problem is that these laws, rules and regulations are not being faithfully implemented.... I am afraid that many people are accepting (corruption) as another part of our way of life. Big-time grafters are lionized in society. They are invited to all sorts of social events, elected and re-elected to government offices. It is considered an honor—in fact a social distinction—to have them as guests in family and community affairs (Balgos, 1998: 267-268).

Pattern 3: Anti-corruption legislation with an independent agency

The third and most effective pattern of fighting corruption is the combination of comprehensive anti-corruption legislation which is impartially implemented by an independent anti-corruption agency. Singapore and Hong Kong employ this effective combination to curb corruption and it is not surprising that they are both perceived to be the two least corrupt countries in Asia.

ANTI-CORRUPTION MEASURES IN SINGAPORE

Corruption was a way of life in Singapore during the colonial period as it was perceived by the public as a low risk, high reward activity as corrupt officials were seldom caught, and even if they were caught, they were not severely punished. Singapore’s fight against corruption began in 1871, when it was made illegal with the enactment of the Penal Code of the Straits Settlements. However, nothing was done until December 1937, when the first anti-corruption law was introduced with the enactment of the Prevention of Corruption Ordinance (POCO) (Quah 1995: 393).

The Japanese Occupation (February 1942-August 1945) aggravated the problem of corruption as civil servants could not make ends meet on their low salaries because of the rampant inflation. Conditions deteriorated during the post-war period as the low salaries and inflation increased the need for civil servants to be corrupt on the one hand, while their poor supervision by their superior officers provided them with many opportunities for corrupt

behavior with minimal risk of being caught, on the other hand (Quah, 1983: 161-162). Thus, it was not surprising that the Commissioner of Police, J.P. Pennefather-Evans, reported in 1950 that graft was rife in many government departments. This assessment was confirmed a few days later by the Chief of the Anti-Corruption Branch (ACB) of the Criminal Investigation Department (CID), which was responsible for dealing with corruption, when he indicated that the problem of corruption had deteriorated.

The ACB was ineffective because it was inadequately staffed with only 17 members and had to compete with other sections of CID for limited manpower and resources. Its Achilles' heel was its inability to deal impartially with the police. A team appointed to investigate the theft of S\$400,000 of opium in October 1951 found that there was widespread police corruption and that not all senior officers involved in protection rackets were prosecuted and some had even escaped punishment because of insufficient evidence. The opium hijacking case highlighted the ACB's ineffectiveness in fighting corruption and made the British colonial government realize the importance and value of establishing an independent anti-corruption agency that was autonomous of the police. Consequently, the ACB was dissolved and replaced by an independent agency known as the Corrupt Practice Investigation Bureau (CPIB) in 1952 (Quah, 1995: 393-394).

When the People's Action Party (PAP) government assumed office in June 1959, corruption was rampant in Singapore and perceived by many to be a low risk, high reward activity. Accordingly, its immediate tasks were to minimize corruption and to change the public perception to a high risk, low reward activity. The PAP leaders initiated a comprehensive anti-corruption strategy in 1960 by enacting the Prevention of Corruption Act (POCA) and strengthening the CPIB. This new strategy is based on the following logic of corruption: as corruption is caused by both the incentives and opportunities to be corrupt, "attempts to eradicate corruption must be designed to minimize or remove the conditions of both the incentives and opportunities that make individual corrupt behavior irresistible" (Quah, 1989: 842)

Singapore was a poor country then as its Gross National Product (GNP) per capita in 1960 was S\$1,330 or US\$443 (Republic of Singapore 1986: ix). As such, the PAP government could not afford to raise the salaries of civil servants, it was left with the alternative of strengthening the existing anti-corruption legislation to reduce the opportunities for corruption and to increase the penalty for corrupt behavior. The POCA of 1960 had five features to remove the POCO's deficiencies and to empower the CPIB in performing its duties. First, the POCA's scope was increased as it had 32 sections⁶ compared to the POCO's 12 sections. Second, corruption was clearly defined in section 2, which also identified for the first time the CPIB and its Director. Third, the penalty for corruption was increased to five years' imprisonment and/or fine of S\$10,000⁷ to enhance the POCA's deterrent effect (section 5). Fourth, a person found guilty of accepting an illegal gratification had to pay the amount he had taken as a bribe in addition to any other punishment imposed by a court (section 13).

The fifth and most significant feature of the POCA was that it gave the CPIB more powers and a new lease of life. For example, section 15 provided CPIB officers with powers

of arrest and search of arrested persons. Section 17 empowered the Public Prosecutor to authorize the CPIB's Director and his senior staff to investigate "any bank account, share account or purchaser account" of any one suspected of having committed an offense against the POCA. Section 18 enabled the CPIB officers to inspect a civil servant's banker's book and those of his wife, child or agent, if necessary. To enhance the POCA's effectiveness, the PAP government has amended the POCA whenever necessary or introduced new legislation to deal with unanticipated problems (Quah, 1995: 395-396).

The CPIB is the anti-corruption agency responsible for enforcing the POCA's provisions. It has grown by nine times from eight officers in 1960 to its current establishment of 71 officers, comprising 49 investigators and 22 clerical and support staff. Its functions are threefold: (1) to receive and investigate complaints concerning corruption in the public and private sectors; (2) to investigate malpractices and misconduct by public officers; and (3) to examine the practices and procedures in the public service to minimize opportunities for corrupt practices (Republic of Singapore, 1990: 2). Unlike Hong Kong's ICAC, the CPIB is much smaller in size and does not need a large staff even though it has a heavy workload, as its location within the Prime Minister's Office (PMO) and its legal powers enable the CPIB to obtain the required cooperation from both public and private organizations.

ANTI-CORRUPTION MEASURES IN HONG KONG

When the British acquired Hong Kong in 1841, corruption was already a way of life as its Chinese population was "accustomed to a system where most of an official's income depended on what he was able to extort from the public" (Palmier, 1985: 123). Indeed, corruption "prospered at all levels of government" and the police was the most corrupt public agency (Palmier, 1985: 123). The fight against corruption began in 1898, when the first local law against corruption, the Misdemeanors Punishment Ordinance (MPO) was enacted. However, nothing was done for the next five decades until 1948, when the Prevention of Corruption Ordinance (POCO) was introduced.

The POCO's scope was broader than the MPO as the conduct made punishable by the former was extended to include legislators and employees of public agencies and private firms. Second, corruption was defined in a more comprehensive and elaborate way in the POCO as a distinction was made between corruption in office involving public officials and corrupt transactions with agents, which included civil servants and private sector employees (Kuan, 1981: 20). Thirdly, the POCO increased the maximum penalty for corruption to five years' imprisonment, a fine of HK\$10,000 and a "possible forfeiture of the bribe to be paid to the public body or to the agent's principal" (Kuan, 1981: 23).

As was the case in Singapore, an ACB was formed in Hong Kong in 1948 as a special unit within the CID of the Royal Hong Kong Police Force (RHKPF) to handle the investigation and prosecution of corruption cases (Kuan in Lee 1981: 24). The ACB was separated from the CID in 1952, but it kept its title and remained within the RHKPF (Lethbridge, 1985: 87). In 1968, the ACB reviewed the POCO and recommended a scrutiny of the anti-corruption legislation of Singapore and Ceylon (now Sri Lanka). Accordingly, a study team visited the two countries during 1968 to examine how their anti-corruption laws worked in practice.

The study team was impressed with the independence of the anti-corruption agencies in these countries and attributed Singapore's success in minimizing corruption to the CPIB's independence from the police (Wong, 1981: 47). The knowledge gained from the study tour contributed to the enactment of the Prevention of Bribery Ordinance (POBO) on 15 May 1971.⁸

The introduction of the POBO in May 1971 led to the upgrading of the ACB into an Anti-Corruption Office (ACO). The escape of a corruption suspect, Chief Superintendent P.F. Godber, on 8 June 1973 to England angered the public and undermined the ACO's credibility. The government responded by appointing a Commission of Inquiry chaired by Sir Alastair Blair-Kerr to investigate the circumstances which enabled Godber to leave Hong Kong and to evaluate the POBO's effectiveness (Kuan, 1981: 39). In his second report, Sir Alastair dealt with the issue of whether the anti-corruption agency should be independent of the RHKPF by stating that the arguments for keeping the ACO within the RHKPF are "largely organizational" and the arguments for removing it are "largely political and psychological." The Governor, Sir Murray MacLehose, accepted Sir Alastair's advice of considering public opinion and decided (for political and psychological reasons) to establish a new anti-corruption agency that was independent of the RHKPF (Kuan, 1981: 40-41 and Quah, 1995: 402)

Accordingly, on 15 February 1974, the ICAC was formed with the enactment of the ICAC Ordinance and was entrusted with two tasks: "to root out corruption and to restore public confidence in the Government" (Wong, 1981: 45). It is independent in terms of structure, personnel, finance and power. Before the handover of Hong Kong to China in July 1997, the ICAC was directly responsible to the Governor, and its Commissioner reported directly to the Chief Executive of Hong Kong Special Administrative Region and is directly responsible to him.

Conclusion: Lessons to be Learnt

What lessons can be learnt from the comparative analysis of the anti-corruption efforts of Mongolia, India, the Philippines, Singapore and Hong Kong. Of the three patterns exhibited by these countries, the third pattern of anti-corruption legislation with an independent agency is the most effective as Singapore and Hong Kong have been more successful than other three countries in minimizing corruption. Since low salaries, ample opportunities for corruption, and low risk of detection and punishment are the major causes of corrupt behavior, an effective anti-corruption strategy must reduce opportunities for corruption, increase the risk of detection and punishment, and improve salaries only when the country concerned can afford to do so.

Six lessons can be learnt from the experiences of the five Asian countries discussed earlier.

Lesson 1: Commitment of the Political Leadership is crucial

The political leaders must be sincerely committed to the elimination of corruption. They must show exemplary conduct and adopt a modest life-style and should not be involved in corrupt practices themselves. Anyone found guilty of corruption must be punished, regardless of his position or status in society. If the “big fish” (rich and famous) are protected from prosecution for corruption, and only the “small fry” (ordinary people) are caught, the anti-corruption agency lacks credibility and will fail. For example, in China and Vietnam, corruption is a capital offense but only junior officials have been executed, while senior officials are imprisoned or not even punished.

Lesson 2: Comprehensive strategy is more effective

It is futile to combat corruption using incremental measures as comprehensive anti-corruption measures are needed to minimize corrupt behavior among civil servants and the population. More specifically, the anti-corruption legislation must be comprehensive to prevent loopholes and must be periodically reviewed to introduce relevant amendments whenever required. Singapore’s POCA was amended several times to enhance its effectiveness.

Lesson 3: The Anti-Corruption Agency must itself be incorruptible

This seems obvious because if the members of the anti-corruption agency are corrupt themselves, it will be ineffective in curbing corruption. To ensure the integrity of its staff, the agency must be controlled or supervised by a political leader who himself is honest and incorrupt. The agency must also be staffed by honest and competent personnel. Any member found guilty of corruption must be punished and dismissed from the civil service.

Lesson 4: The Anti-Corruption Agency must be removed from police control

The anti-corruption agency must be removed from the police as soon as possible as its location within the police prevents it from functioning effectively, especially when the police forces are corrupt. This can be seen in the case of Singapore and Hong Kong which became more effective in fighting corruption after the ACB and ACO was removed from the police forces in both countries. In Mongolia and India, the fight against corruption has been made more difficult and less effective before of the police’s involvement in anti-corruption activities.

Lesson 5: Reduce opportunities for corruption in vulnerable agencies

It is necessary to reduce or minimize the opportunities for corruption, especially in those government departments which are usually vulnerable to corrupt activities, such as customs, immigration, internal revenue, and police. These agencies should review their procedures periodically in order to reduce the opportunities for corruption. Both the CPIB in Singapore and the ICAC in Hong Kong conduct studies and provide corruption prevention advice to public and private agencies. Those civil servants found guilty of corruption should be promptly and severely punished to act as deterrent for others bent on such behavior.

Lesson 6: Reduce corruption by raising salaries if country can afford to do so

Finally, it is important to reduce the incentive for corruption among public officials by ensuring that their salaries and fringe benefits are competitive with the private sector. Other things being equal, a civil servant or political leader will be more vulnerable to corruption if his salary is low, or not commensurate with his position and responsibilities. However, governments might not be able to raise salaries unless there are economic growth and adequate financial resources.

NOTES

- 1 The 12 Asian countries are ranked as follows, from the least corrupt to the most corrupt: Singapore, Japan, Hong Kong, Malaysia, South Korea, Taiwan, Thailand, India, Philippines, Indonesia, Vietnam and China.
- 2 Bangladesh and Vietnam are omitted as the former was excluded from the 1997 and 1998 CPI and the latter was not included in the 1996 CPI.
- 3 I have chosen these five countries because of my knowledge of their anti-corruption measures and the availability of information.
- 4 This analysis of Mongolia's anti-corruption strategy is based on Quah, 1999: 19-22.
- 5 For an account of how this law was passed, see Iglesias, 1963: 17-68.
- 6 The POCA has now 37 sections as a result of subsequent amendments. See also Republic of Singapore, 1993.
- 7 The fine was increased by 10 times to S\$100,000 in 1989. See Republic of Singapore, 1993.
- 8 For details of the POBO, see Quah 1995: 401.

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