Prevention – a key factor in fighting corruption

The role of a new training concept

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1. Definition of corruption

The following definition of corruption was identified in Germany:

Corruption is:
- the misuse of any public office, political mandate or function in trade and industry,
- gives advantage to another person,
- carried out with the intent to gain some benefit for an official or for another person,
- detrimental or causes damage to the public (in the case of a public or political figure) or for a company (in the case of an business function).

This definition is the basis for the following presentation and anti-corruption concept.

2. Introduction to the phenomenon of corruption

2.1 General

In many countries, corruption has become part of political-administrative everyday life. Bribery, embezzlement or other kinds of corruption have caused damage in economy, politics and society. This has prompted many countries to put a greater emphasis on controlling corruption. Whether in politics, administration or economy, one thing is certain: corruption is spreading like cancer. Corruption has become a pivotal obstacle to economic development.

Today the issue of corruption plays a totally different role in science and politics. Scandals in democracies supposedly free of corruption are the reason why the assumed causal relation between market economy and democracy, on the one hand, and integrity of civil servants, citizens and enterprises, on the other hand, are called into question. Corruption can survive for a surprisingly long time even in developed democracies and open markets and it can even develop anew. The phenomenon of corruption in western democracies has developed only recently. That is why this issue has inevitably gained importance in international circles over the last few years. The European Union as well has recognised that corruption causes severe damage and has declared a comprehensive campaign against it.

However, the fight against corruption seems to be like Hercules’s fight against the dreadful Hydra. As soon as one head is cut off, two new ones grow in its place. Public officials and civil servants are being bribed, managers misdirect enormous amounts into their own pockets, and politicians are being "oxygenated" – the insiders' euphemism for bribery.

2.2 Trends in fighting corruption

The new trend in the fight against corruption is putting an emphasis not only on efficiency but also on transparency and accountability of the public sector. The lack of transparency inherent to this sector is even intensified by such principles as official secrecy.

In places where the public administration has become even less transparent for its own administrative bodies, citizens often fight a losing battle. The conditions of accessing information alone often exert a very regulative influence. This determines the behaviour of officials as well as their clients. That is why many states have inverted the legal position to basically grant citizens access to all the information, while the state has to separately set necessary restrictions.

However, corruption is a system and corruption has a system. Therefore, it can only be combated with a system. Anti-corruption measures on the government-agency level must, therefore, be bundled together into a systematic concept of
prevention. A framework concept, which can be described as being "state of the art", should be understood as an aid to orientation and as an aid to formulate tailor-made anti-corruption strategies in government authorities. It is a way to prevent and combat corruption in government agencies in a systematic way.

3. Identifying corruption: indicators of corruption

Indicators are not evidence. Therefore, they mostly do not have any or only very little meaning, when considered alone. Only if they occur repeatedly, frequently or in certain combinations are they suitable for contributing towards the growth of a suspicion.

The handling of corruption-indicator grids assumes a particular sensitivity on the part of the user. If used excessively or thoughtlessly, they can lead to unjustified suspicions and inadmissible conclusions instead of making a positive contribution towards the fight against corruption. Under no circumstances should such a grid of indicators be used with the goal of initiating a "witch-hunt".

3.1. Neutral indicators

Neutral indicators are to be seen, as a rule, in connection with personal manners and behaviour. Not infrequently, they are socially accepted or even favourably interpreted by the viewer. Nevertheless, these are indicators which are found relatively frequently in corruption structures. Examples include:

- lavish lifestyle that cannot be explained by a person's income; presentation of status symbols,
- suddenly changing lifestyle,
- social and personal problems (dependency, addiction, indebtedness, bragging, etc.),
- outside employment that is critically close to one's official duties,
- acceptance of invitations (e.g. on the occasion of visits to trade shows or companies); paying for food and beverages for others in restaurants, bars, etc.,
- frequent private meetings with public contractors or bidders; participation in private or business events,
- granting unusual special terms for purchases (e.g. purchase price / discounts/ financing / reduction in the usual waiting periods),
- delivery of lavish "advertising" gifts (incl. to one's home address); unusual generosity on the part of contractors; offers to sponsor activities,
- presuming oneself to be indispensable; giving up one's free time, coming to work despite being ill (to avoid having others look into one's work),
- additional work assumed on one's own initiative (e.g. going to allegedly important meetings outside the office on days off),
- taking work (cases) home,
- inexplicable isolation; taciturnity towards colleagues and superiors,
- sudden, inexplicable changes of opinion (e.g. advocating a project which was previously rejected),
- inexplicable refusal to accept reassignments or promotions (in particular, if this means an improvement),
- unusually casual tone between employees and contractors or applicants,
- Absence of complaints or conflicts where they are customary or to be expected; impeccable processing of difficult cases where the employee does not have sufficient specialised knowledge / or expertise.

3.2. Specific indicators

In contrast to the indicators that are neutral with respect to corruption, corruption-specific indicators are to be assessed as warning signals or signs, which - in particular in cases of repeated or simultaneous occurrence - should lead to the suspicion of existing irregularities. Examples of this include the following:
3. Specific anti-corruption measures

- Inexplicable decisions which should not have been made in this fashion,
- Different assessment or processing of cases having the same or very similar facts,
- Abuse, unilateral interpretation or overuse of one's discretionary powers,
- Waiver of controls or audits, even though there is reasonable cause,
- Manipulating the handling of a case by other departments or employees within an agency or police authority,
- Deliberately bypassing decision-makers or superiors in critical cases,
- Repeated exercise of outside appointments without any plausible explanation of their relation to work,
- Inadmissible expansion of the powers delegated,
- Entering into an agreement with unfavourable terms which bind an agency for a long period of time
- Repeated preference for or support of certain bidders or contractors during the procedure for awarding contracts ("purveyors to the court"),
- Noticeable indulgence during contract negotiations,
- Missing receipt or stamp with date and time on correspondence with bidders and contractors,
- Guideline made by a superior that a critical case be processed "favourably" without any additional reviews,
- Inexplicable acceleration of a case,
- Neglecting doubts as to the lawfulness of an act, bypassing regulations (e.g. waiving the imposition of special conditions or duties, ignoring the principle of thrift),
- Sealing off individual departments or employees or allowing them to become independent, supposed uncontrollability,
- Bypassing public tenders; lack of variety in offers,
- Splitting/reducing the volume of an order in order to enable a discretionary award,
- Procurement of unnecessary or technologically obsolete logistics systems,
- Purchases at excessive prices that are not in line with market conditions,
- Splitting or duplicating remittances of invoice amounts,
- Frequent subsequent amendments to and supposed arithmetic errors in bidding documents,
- Noticeable discrepancy between invoice and offer amounts,
- Missing or superficial records of decisions, meetings, local inspections, etc.,
- Disappearance of important bidding or contract documents,
- Superficial processing of work; missing or deficient records,
- Playing out of assumed positions of power by contractors,
- Constant visits by contractors to certain employees or visits only when certain employees are present,
- Repeated official trips to certain companies without any plausible work reason (in particular, when not really necessary overnight stays occur),
- Complaints by contractors or administrative customers who were bypassed in competitions or disadvantaged when their applications were reviewed,
- Ambiguous statements / references by employees to incorrect procedures, rumors within a certain environment.

4. General anti-corruption measures

General measures and recommendations to prevent corruption are independent of any particular task or department. They are directed towards the abstract threats and risks to which the entire organisation or the staff in general are exposed. They are aimed at the heads of the government agency, or the organisation as a whole, and at employees. During their implementation, managers have a special responsibility, due to their duties of administrative and work supervision as well as to their function as a role model.
4.1 Formulation of a code of conduct

The purpose of a code of conduct for public servants is threefold:

▪ it is a statement of the ethical climate that prevails in the public service;
▪ it spells out the standards of ethical conduct expected of public servants;
▪ it tells members of the public what to expect of public servants in conduct and attitude when dealing with them.

Furthermore, as a well-drafted code of conduct describes in a coherent way the main elements of a corruption prevention strategy, it could be used as the ‘charter’ or the starting point for the elaboration of a prevention strategy or plan.

The code of conduct or code of ethics for public servants recommended by the United Nations essentially comprises standards which employees should also adopt.

Employees . . .

. . . must recognise without any reservations that their official function is a position of trust which obliges them to act in the interests of the general public.
. . . must exercise their office with integrity and loyalty to their employer and perform the tasks assigned to them lawfully and conscientiously.
. . . must perform their tasks with fairness and impartiality. They may not unjustly favour or prejudice anyone or misuse the official powers transferred to them in any way.
. . . may not use their public office or official powers to promote their own interests. They may not undertake actions, or aim for positions or offices or pursue financial, economic or other comparable interests, which are or could be incompatible with their official functions.
. . . must ensure that they lead settled lives whose economic and social circumstances are orderly and they must ensure that their private lives do not give rise to any impairment of their official duties.
. . . may not directly or indirectly demand, accept promises for or accept any gifts or other benefits related to their official function or to the fulfilment of their official duties or which could affect their judgments.
. . . must report all (part-time) employment outside the agency to their employers. Such outside employment may not adversely affect the public's trust in the impartial performance of their official duties.
. . . are obliged to preserve official secrets and to treat all of the information acquired in connection with their duties confidentially, unless they are explicitly released from this obligation.

4.2 Establishment of an internal auditing unit

A risk analysis is not a one-time event but a continuous process. The implementation and effectiveness of measures resulting from a risk analysis should be monitored on a continuous basis. Therefore the management of a service or administration may want to establish an internal control mechanism, for example, in the form of an internal audit unit.

Internal auditing is an instrument of management. It supports the duties of administrative and work supervision and the monitoring of the organisational structure and the processing of operations in the form of the implementation of auditing activities. Another focal task of internal auditing is the internal prevention of corruption. Internal auditing conducts risks analyses, initiates general and specific anti-corruption measures within the agency and supports their implementation.
4.3 Performance of risk analyses

As a constant task, the Internal Auditing Unit (or the Corruption Commissioner) will examine the organisational structure and the operating processes of the government authority for areas of risk as well as susceptibilities and weak spots, which can induce or favour corruption.

Increased susceptibility can exist, in particular, wherever there are outside contacts (e.g. police presence in the public, conduct of investigations, exercise of local inspections) and/or decisions are made or prepared, which could favor or disadvantage third parties (e.g. awards of public orders). Even dealings with sensitive data (e.g. search data) are to be designated as such an area of risk.

On the basis of the risk analysis, target-group-oriented concepts to prevent corruption can be developed and adequate counter-measures or other preventive measures and control mechanisms can be installed as needed.

4.4 Monitoring outside employment

Outside employment can not only have a negative impact on the deploy ability and motivation of employees, but also can represent possible "docking areas" and gateways to corruption. Here the need for information by businesses or by the media (e.g. prospects for access to data) can play a significant role.

Due to their basic importance in the prevention of corruption, taking stock of and auditing sidelines is a major prerequisite for a realistic assessment of the potential for risk. This measure is thus an important component of risk analysis.

4.5 Accepting rewards and gifts

Regulations pertaining to the acceptance of rewards and gifts - as provided in Germany for all public employees - are a major orientation aid with respect to preventing corruption when delineating the permitted scope of action for actions with a criminal intent. These regulations must be emphatically communicated to all employees.

4.6 Regulating sponsorship

Strict regulation is also necessary when third parties are prepared to support the task of the government agency. The sponsorship policy should be clearly regulated.

4.7 Reviewing service regulations

Service regulations frequently contain regulations which collide with the interests of preventing corruption, or even counteract them in specific cases (e.g. recommendations on the subject of "lean government", standards on simplifying and accelerating procedures, expansion discretionary powers for individual judgments, delegation of decision-making powers, etc.)

4.8 Task-specific or department-specific anti-corruption measures

Special anti-corruption measures are to be individually tailored to different departments, units, areas of tasks and functions for which increased susceptibility may be supposed due to their respective jurisdiction or the description of the tasks to be performed and related contacts with outsiders.

Special anti-corruption measures do not stand alone, but are always understood to be in combination with or as a supplement to general measures. Thus there are
recommendations which are equally implementable in several target areas and also those which are very specific and thus can only be applied in restricted areas.

In all areas which have proved to be particularly at risk as a result of a risk analysis, special measures suitable for reducing the risk of corruption are to be reviewed and implemented. Possible actions include the following:

- regular sensitisation of the employees assigned to areas susceptible to corruption,
- strict selection of personnel (technical, social and moral suitability of candidates),
- Staff rotations; rotations of susceptible employees at intervals suitable for the tasks to be performed; if necessary repeated changes (shuttles) between two organisational units; avoidance of single rooms for employees with contacts with outsiders; fluctuations while performing the same tasks (e.g. changing rooms and responsibilities of the employees in charge),
- separation of functions: Splitting complex task areas and process or decision-making processes; avoidance of the concentration of competencies in one person,
- standardisation of recurring work or case processes,
- maintenance of the four- or more-eye-principle in contacts with outsiders and in team-building,
- internal and external checks of files and invoices (superiors, internal auditing, General Accounting Office),
- assisting in the recognition of corruption; elaboration of a grid, which provides information about function-specific indicators.

It must be kept in mind that not all of the recommendations listed can actually be implemented in all of the organisational units and work areas susceptible to corruption. Some proposals, such as staff rotation, can not be implemented at all or only with great difficulty in some areas, due to the special circumstances and possible consequences (risk of the loss of expert knowledge).

4.9 Additional measures with respect to the awarding of public orders

Public orders are issued by government authorities, for example, with respect to
- procurements,
- construction and services,
- research and development projects, and
- the preparation of expert opinions.

Basically it must be kept in mind that larger orders requiring a public tender should not be split up, in order to enable the discretionary award of such orders due to the reduction of the order amount.

Attributes given contractors such as "reliable" or "reasonably priced" should not lead to competitors being ruled out or for preferring individual contractors over a long period of time without any plausible reason. This applies in particular to open-ended service agreements.

5. Prevention

EU Member States have formulated a number of recommendations for adoption and implementation of codes of conduct and ethics for public officials, obligations for public officials to report suspicions, analyses of risks and improvements in administrative, financial and procurement procedures to reduce risks, transparency in decision making, enhanced management of personnel (including career planning, training, mobility and salaries), audit and control systems, setting up of systems of disciplinary sanctions, provisions for the financial disclosure of assets of
public officials, and creation of self-monitoring mechanisms within institutions at risk.

Corruption prevention comprises a wide range of actors and activities. Many of these are closely interrelated. Conceptually, however, the following types of prevention may be distinguished:

- Prevention A: integrity and cooperation
- Prevention B: transparency and accountability
- Prevention C: reducing risks and opportunities
- Prevention D: control

5.1 Prevention A: integrity and cooperation

The objective is to promote integrity and cooperation against corruption within society on the whole. Tools include awareness-raising, educational measures, information activities, surveys and publications on corruption, measures to strengthen independent media and investigative journalism as well as civil society institutions, implementation of integrity workshops, public/private partnerships, measures to encourage cooperation with the criminal justice system, the process of elaborating anti-corruption plans and codes of conduct or ethics.

Target groups are all sectors of society, including civil society in general, the media, educational institutions, NGOs, the business community, politicians and political parties, parliaments, governmental institutions, local governments, public administration, judicial and law enforcement institutions.

5.2 Prevention B: transparency and accountability

The objective is to strengthen transparency and accountability within public administration, the business sector and civil society institutions which could be vulnerable to corruption.

Tools include measures to strengthen good governance in public administration and corporate governance in the private sector, application of codes of conduct, regulations on the financing of political parties and on lobbying and pressure groups, monitoring of service delivery by citizens, involvement of civil society in decision-making, access to information, public procurement rules, compatibility and conflict of interest rules, registers/databases on public contracts, investigative journalism, clear rules on the acceptance of gifts.

Target groups include institutions and individuals who could be vulnerable to corruption from the business community, public administration, parliaments, politicians and political parties, parliaments, governmental institutions, local governments, public administration, judicial and law enforcement institutions, public notaries, interest and pressure groups and lobbyists.

5.3 Prevention C: reducing risks and opportunities

The objective is to reduce risks and opportunities for corruption within institutions and procedures vulnerable to corruption.

Tools include risk analyses, corruption prevention plans, anti-fraud mechanisms within companies, declaration of assets by public officials and politicians, rules on public procurement, rules on the documentation of decisions, blacklisting of companies, investigating journalism, four-eyes principle, and job rotation.

Target groups include institutions and individuals who are vulnerable to corruption, including police and other law enforcement services, customs, the judiciary and criminal justice institutions, public administration and officials involved in public
procurement, institutions and officials providing services or licenses and permissions, politicians and political parties, local government, and public enterprises.

5.4 Prevention D: control

The objective is to control compliance with rules, in particular within institutions and procedures highly vulnerable to corruption.

Tools include supervisory accountability, systematic audits (for example, of public procurement), monitoring compliance with codes of conduct and other relevant guidelines and rules, monitoring conflicts of interest, internal compliance systems within companies, investigative journalism, obligation to report corruption-related problems, creation of internal affairs/investigation units or corruption commissioners or contact points within institutions, reporting of suspicious financial transactions (prevention of money laundering), control of tax evasion and fraud.

Target groups include, as in “prevention C”, institutions and individuals vulnerable to corruption, in particular those involved in processes and procedures particularly exposed to risks and offering opportunities for corruption.

6. Successful anti-corruption strategies

Experience shows that there is a need for the following components for a successful anti-corruption concept:

6.1 Political commitment and leadership

Governments and political leaders need to exercise leadership in the anti-corruption effort, e.g. by pushing for the adoption of the necessary legislation and the ratification of international agreements, making the necessary resources available to law enforcement agencies and the criminal justice system, providing access to information and transparent governance, establishing control mechanisms within the Government, providing for transparent and accountable party financing, and, most importantly, living up themselves to the highest ethical standards. In democratic societies, the failure of governments to deal with corruption is increasingly reflected in election results. Where political leaders fail, prosecutors and judges or civil society organisations take the lead against corruption.

6.2 Legislation

Societies must have a common understanding as to what they want to control, prevent or fight. In the absence of a generally accepted definition of corruption, they need to clearly define offences which they consider corrupt behaviour in their criminal, civil and administrative law. Traditionally, these offences include bribery. However, European standards in this respect are becoming broader and more comprehensive.1

6.3 Enforcement

Laws against corruption need to be enforced and those responsible for enforcement need to be given the necessary resources and authority to investigate and prosecute corruption-related offences. One could argue that a criminal law approach is very narrow as it only targets individual offenders and does not improve structures and reduce opportunities, and as it risks stigmatising and excluding rather than integrating institutions, individuals and the private sector.

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1 As reflected in the Council of Europe’s Criminal Law Convention on Corruption which requires countries to criminalise a wide range of offences.
On the other hand, corruption is a “control offence”: without investigation and prosecution, corruption may not become visible and societies may perceive themselves to be free of corruption. Also, and perhaps most importantly, justice and the rule of law in themselves are primary goals of any society. Finally, law enforcement has an important preventive effect: it may even be considered a prerequisite for prevention, in that it points at specific corruption problems, thus helping create the necessary awareness. Successful law enforcement can generate a momentum and mobilise society against corruption. Without the prosecution of high-level corruption, the chances of success of specific prevention measures may be fairly slim.

6.4 Prevention

The prevention of corruption is about preventing corrupt behaviour and corruption-related offences, including active and passive bribery, trading in influence and related accounting offences, fraud, embezzlement, breach of trust, abuses of office or function, or other offences either in the private or public sector. Stated positively, the prevention of corruption is about promoting integrity and ethics, good governance, justice and the rule of law. Prevention includes a large range of measures and seeks to involve a large number of actors.

There are of course many other elements which help contain corruption, including an independent and efficient judiciary, a fully functioning democracy, and economic and social development in general. The question is not what comes first; specific anti-corruption strategies and general reform measures go hand in hand and reinforce each other.

7. Role of training on anti-corruption measures

Officials need to be trained in the application of the codes of conduct and the prevention measures which are to be implemented in a given institution. Training events also serve the purpose of raising awareness and of promoting cooperation against corruption.

The elaboration of training concepts within institutions is recommended. Training should be target group-specific. Particular emphasis should be given to the training of senior managers to serve as an example and to exercise supervisory accountability. Corruption commissioners and members of internal audit units may also need specific training, for example in the implementation of risk analyses.

It may also be useful to accompany training and awareness activities with the preparation of publications and other materials.

Codes of conduct or guidelines and corruption prevention plans should be elaborated by those who are subsequently responsible for their implementation. This process, if carried out in a participatory manner, will also have a training effect.
Finally, training activities should be repeated regularly as a tool to maintain the momentum of the anti-corruption effort.

7.1 Training and interagency cooperation

Corruption is not a phenomenon limited to a particular administration or institution or sector. Successful approaches to the prevention of corruption thus require cooperation between agencies, services, institutions and administrations, in order to:

- exchange experience on the effectiveness of corruption prevention measures,
exchange information on emerging corruption problems and trends, as well as on specific cases,
reach agreement on concerted action against corruption, and
share skills and resources required for example, for risk analyses, training, information materials and publications.

Cooperation could be institutionalised by establishing an interagency round table or working group.

7.2 Anti-corruption training at the dbb akademie

As a response to the subject of anti corruption, the dbb akademie in Bonn, Germany, has been successfully delivering anti-corruption training in Germany and several Eastern European countries over the past few years. Within the framework of European projects and seminars, the dbb akademie has stressed the importance of awareness-raising and a concerted effort in the fight against corruption.

Each seminar is adapted to the particular needs and areas of concern of the administration in question. Generally, the participants will receive training in the following areas:

- the definitions of corruption
- areas at risk
- awareness-raising using the dilemma situation game
- the causes of corruption
- the consequences of corruption
- legal aspects of the fight against corruption
- corruption indicators
- prevention strategies, ways to curb corruption
- behaviour when corruption is suspected or identified
- repressive measures (administrative and labour law instruments)
- special areas of concern

7.2.1 Presentation of the training concept

The concept of the dbb akademie is to ensure that all the institutions involved in the training of officials providing public services develop an understanding of the nature and sources of corruption as well as the competence to deal with them effectively.

Four modules were elaborated for all target groups in order to convey basic information on corruption as well as to build an appropriate attitude, i.e. a personal readiness to participate in the fight against corruption. Therefore, the training measures contain both cognitive and affective elements.

On a cognitive level, it is important for members of all target groups to become aware of the causes and phenomenology of corruption as well as of the harmful effects of corruption on the State and society as a whole, social status, the credibility of the administration, and the economy.

Therefore, the first module entitled "Definitions, causes and effects of corruption" includes such aspects as various definitions and types of corruption, causes of corruption as well as the effects and consequences for the government and society. The emphasis lies on an active dialogue with participants.

The second module, "Legal aspects of fighting corruption", focuses on the relevant legal measures to be followed in cases of corruption. This training module covers the applicable anti-corruption law, relevant norms on disciplinary violations and sanctions as well as relevant portions of the criminal code.
The third module, "Organisational aspects of fighting corruption", covers forms of detecting corruption, e.g. defining risk areas in public administrations and recognising "alarm signals", which indicate a high probability that a particular civil servant or a group of civil servants are corrupt, and generally applicable methods of preventing corruption through organisational, intra-administrative measures like job rotation in sensitive areas, and the introduction of the "four-eye principle" in all sensitive transactions.

On an affective level, it is important for members of all target groups to put into practice the overall accepted ethics and standards for civil servants in their daily work.

Therefore, the fourth module concentrates on how to deal with the possible "Conflicts of Interest" and the development and implementation of "Codes of Conduct" in public administrations. A particular emphasis of this module is placed on developing problem-solving skills, especially on the basis of a game entitled "Dilemma Situations".

7.2.2 Pedagogical approach

The pedagogical approach of all the training activities follow the idea that learning can only happen, when the participants have an active role in the seminar. The idea is that someone will only learn if she or he can apply the information learned to their daily work. Thus, the participants should be involved in the training process.

The three-day compact course for all employees of the public administration is set up as follows:

**Clear objectives:** For each module specific objectives are formulated, which indicate clearly whether or not they deal with cognitive or affective objectives and the level of achievement at which they are aimed. (e.g. to become acquainted with different definitions of corruption = the lowest level; to be able to formulate a definition applicable to one's own area of work = highest level).

**Topics of discussion:** Specific questions are formulated for each module, which should aid the trainers in initiating a discussion. Possible results and analyses were also anticipated.

**Background reading:** Each of the four modules contains background reading adapted to the specific needs of the target group in question.

**Participant exercises:** Specific exercises have been prepared for each module that range from simple multiple-choice tests on analysis and problem-solving tasks for group work to more ambitious role plays. A key exercise is the "Dilemma Situations" game, which allows the participants to review possible areas of conflict and their solutions.

**Transparencies:** A complete set of transparencies is provided for each module, which facilitate the structuring of the trainer's information and presentation style as well as the visualisation of content.

7.2.3 Objectives of the four modules

The specific objectives of the four modules are listed below.

**Module 1: Definitions, causes and effects of corruption**
The participants should:

- become familiar with the various definitions of corruption from the political, economic and legal points of view;
- become familiar with and be able to discuss the current EU/international standard definition of corruption;
- be in a position to formulate their own definitions of corruption;
- be able to indicate causes and effects of corruption on the State and society as well as be able to analyse them;
- be able to name the particular causes of corruption and be able to debate;
- be able to name, analyse and debate the current effects of corruption.

Module 2: Legal aspects of fighting corruption

The participants should:

- be made aware of the role of law in everyday life and its meaning for the fight against corruption;
- be able to obtain an overview of the applicable legal norms (prevention norms, i.e. administrative law and guidelines, Anti-Corruption Law, sanctioning norms – criminal law and procedural issues) and their areas of application;
- be able to recognise that the occurrence of corruption is related to the risk of being caught and punished;
- become acquainted with the problems of different methods of investigation (e.g. hidden cameras, undercover agents);
- be able to describe the legal situation on the basis of various case study descriptions with the corresponding formulation of questions and (in individual cases) be able to apply the valid legal norms.

Module 3: Organisational aspects of fighting corruption

The participants should:

- be able to indicate and analyse the weak points and the risk areas in the public administration, which favour corruption;
- be able to describe the various kinds of indicators ("alarm signals"), that point to corruption in different areas of the public administration;
- be encouraged to develop guidelines for corruption risk assessment and risk management;
- become familiar with international examples of corruption prevention;
- be able to develop regulations and measures of corruption prevention for their own areas of work;
- become familiar with the organisational, intra-administrative measures of corruption prevention;
- be able to develop suggestions for the implementation of corruption prevention plans and measures for their own areas of work.

Module 4: Conflict of interests/code of conduct

The participants should:

- become familiar with examples of conflicts of interest in the area of public administration;
- be encouraged to identify and explain possible conflicts of interest from their own areas of work;
- be in a position to recognise the relationship between conflicts of interest and (possible) corruption;
- be able to develop different ways/measures to deal with conflicts of interest;
• become familiar with international rules for the development and implementation of codes of conduct;
• be able to name the most important aspects, that need to be included in a Code of Conduct;
• be able to develop suggestions for promotion strategies for Codes of Conduct;
• practice ethical behaviour in the role-play entitled "Dilemma Situations".

7.2.4 Example of a group activity

The contents of these seminars focus not only on the legal and organisational aspects of the fight against corruption. The participants are also encouraged to take part in simulation games, in which they are confronted with dilemma situations and then asked to describe and substantiate their responses to delicate situations. The examples used stem directly from the administration, thereby making it easier to identify with possible situations which may very well arise as well as creating a conflict situation among the participants. Moreover, the participants are actively involved and learn that the fight against corruption is their individual duty and not just the duty of the administration as a whole.

Here is an example of a group exercise:

As an employee of an administrative unit, you learn by chance that the wife of the colleague responsible for placing orders is employed by a supplier that was awarded the last large contract. What will you undertake?

a. I will speak to this employee about this situation and ask for more background information.
b. I will not to take any actions and assume that this only happened by coincidence. Thus, I give the colleague the benefit of the doubt.
c. I will bring up this point with my immediate supervisor and leave the decision to him or her to take appropriate action.
d. I make an inquiry at the company if there is an employment possibility for my unemployed partner.

At the end of the small group discussions, the participants are asked to present their decisions to the entire group. In turn these decisions are judged by the other small groups. A certain type of “competition” emerges to see which group will have the best and most effective solution for fighting corruption. Thus, the participants are constantly encouraged to critically examine their own behaviour as well as the behaviour of the other groups.

8. Conclusion: the challenge

The prevention of corruption requires a continuous and long-term effort. One-time activities and a incoherent mix of activities will not produce the desired results. The challenge is to develop a coherent approach or strategy or plan. This could involve the following steps:

a. adoption of a general code of conduct (or anti-corruption guidelines) for public officials on the whole, or for specific categories of public officials, and the judiciary,
b. elaboration or adaptation of specific codes or guidelines by an individual administration or institution,
c. continuous training and integration in training policy,
d. risk analysis within the institution or administrations,
e. establishment of an internal control mechanism (e.g., an internal audit unit),
f. identification of specific measures to be undertaken on the basis of the code of conduct and the risk analysis,
g. identification of further training needs,
h. preparation and implementation of the prevention plan, and cooperation with other institutions.