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Centralised versus decentralised anti-corruption institutions

Query

Can you share some insights about what are the advantages and disadvantages of a centralised vs. decentralised approaches in combating corruption and building-up an effective integrity framework? Which approach is more promising?

Purpose

In South Africa many public offices have their own integrity infrastructure and several agencies (e.g. the Department for Public Service and Administration, the Special Investigation Unit) are involved in anti-corruption. We are wondering if this more or less decentralised approach is effective compared to countries where anti-corruption efforts are more concentrated and bundled in one agency.

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Summary

The institutional arrangements governing ACAs greatly varies across countries - including with regard to their level of specialisation and centralisation - based on the local governance context and the specific circumstances that brought them into existence. Some countries have established a separate and centralised institution exclusively dealing with corruption, while others have opted for strengthening the anti-corruption capacity of a set of existing institutions or for a combination of both approaches. Some have also created several specialised bodies with complementary and sometimes overlapping mandates.

There is no clear indication on which model is the most effective for combating corruption, and there is no blueprint for an effective anti-corruption infrastructure. Experience suggests that the level of centralisation/decentralisation of ACAs may not be the primary determinant of their effectiveness. Factors such as the institution(s)' independence, specialisation, integrity, capacity, and political back-up seem to influence their effectiveness to a greater extent. The

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legal and institutional environment also needs to be supportive, with a robust legal framework supporting effective investigation and prosecution of corruption related offences.

Irrespective of how centralised they are, they all rely on the cooperation of many other complementary bodies and their impact is strongly conditioned by their ability to interact and cooperate with those other institutions involved in anti-corruption related activities.

1 Overview of Anti-Corruption Agencies (ACAs) models

Overview

Anti-corruption institutions typically refer to independent publicly funded body(ies) with a specific mission to fight corruption by means of preventive and repressive strategies.

Based on the successful examples of Hong Kong, Singapore and New South Wales (Australia), such specialised anti-corruption bodies are often regarded as best practice and the ultimate institutional response to fight corruption. Consistent with this approach, most international instruments against corruption refer to the need to promote specialised and independent bodies and institutions in charge of fighting corruption. For example, Article 6 of the United Nations Convention Against Corruption (UNCAC) explicitly calls State parties to establish an independent body (or bodies) to prevent corruption and provide adequate training, material resources and specialised staff to ensure that it can fulfil its mandate effectively (Hussman, Hechler, and Penailillo, 2009). In line with these recommendations, many countries have established a centralised independent commission or agency charged with the overall responsibility of combating corruption.

Within this framework, the institutional arrangements governing ACAs greatly varies across countries, including with regard to their level of specialisation and centralisation. Some countries have established a separate and centralised institution exclusively dealing with corruption, while others have opted for strengthening the anti-corruption capacity of a set of existing institutions or for a combination of both approaches. Some have also created several specialised bodies with complementary and sometimes overlapping mandates.

There is no clear indication on which model is the most effective for combating corruption. Experience suggests that the level of centralisation/decentralisation of ACAs may not be the primary determinant of their effectiveness. Country examples indicate that the institutional set up as well as the way it functions in practice is strongly influenced by the local context, conditions and specific circumstances: ACAs are often created in response to context specific challenges and demands such as democratic change, external or internal pressure, crisis and scandals, which strongly influence the institutional infrastructure. In addition, each model has a number of legal, policy and resource implications and institutional arrangements should be decided on a case by case basis, based on the local conditions and the country's legal and institutional environment.

Specialisation of expertise, concentration of powers in a single-issue agency, and independence are among the key benefits specialised ACAs can bring to the fight against corruption. As an expression of political will, they also have a symbolic value, especially in countries where widespread corruption has undermined the credibility and legitimacy of law enforcement bodies. However, centralising anti-corruption functions in a single agency can also result in undermining instead of strengthening these institutions by diverting resources and capacity from them as well as creating redundancy and unproductive competition between the various institutions involved in anti-corruption activities. In countries where the justice system has the independence, integrity and capacity to effectively investigate and prosecute corruption cases, advantages such as specialisation of expertise, autonomy can be achieved by establishing dedicated units within existing law enforcement agencies and other institutions that have the mandate to handle corruption cases.

Overall, the literature tends to indicate that the institutional arrangements are not primary determinants of the effectiveness of anti-corruption institutions, and such as the institution(s)' independence, specialisation, integrity, capacity, and political back-up seem to influence their effectiveness to a greater extent than their level of centralisation/decentralisation. Irrespective of how centralised they are, they all rely on the cooperation of many other complementary bodies and their impact is strongly conditioned by their ability to interact and cooperate with those other institutions involved in anti-corruption related activities.

Typology of specialised ACAs

Specialisation implies the availability of specialised staff with special skills and a specific mandate for fighting corruption (OECD, 2007). Forms of specialisation may differ from country to country, with anti-corruption skills either centralised in a separate body or built across existing institutions. According to the OECD, specialisation tends to be ensured at the level of existing public agencies and law enforcement bodies in OECD countries. On the other hand, transition, emerging and developing countries often establish separate specialised anti-corruption bodies due to the high level of corruption in other agencies as well as in response to donor pressure (OECD, 2007).

The level of centralisation of ACAs can also greatly vary across countries depending on their specialisation in terms of scope, mandate, powers, regional focus, and there are many differences across countries in terms of operations, resources, accountability and oversight mechanisms.

Some, such as the New South Wales' Independent Commission Against Corruption or the Miami-Dade County Commission on Ethics and Public Trust, have the mandate to deal with corruption at the sub-national level and are intended to deal with corruption at certain levels of government (central, regional, municipal, local) only (Jennet, 2007).

Others can be specialised in terms of their specific expertise. Some ACAs are mandated to deal exclusively with **certain types of corruption related offences and crimes**, such as private sector corruption, public sector corruption, administrative corruption, political corruption, economic crimes, money laundering, etc. Typically, ACAs focus on public sector corruption, but some, such as Hong Kong's Independent Commission Against Corruption or Singapore's Corrupt Practice Investigation Bureau have a broader focus and are also concerned with fighting corruption in the private sector. In India, the mandate of the Central Bureau of Investigation has been extended to cover several types of offences, including economic crimes and organised crime in addition to corruption cases. In some countries such as Zambia, monitoring the assets, liabilities and lifestyles of senior officials does not always fall within the remit of the ACAs. Some countries also limit the jurisdiction of ACAs to high profile corruption cases, while others create highly specialised bodies such as financial intelligence units to investigate complex financial transactions such as money laundering or other financial crimes.

ACAs can also be specialised in terms of their competence. While some countries just give them a preventive, educational and informative role, most ACAs have a three pronged approach to fighting corruption (prevention, investigation, prosecution) and are endowed with broad investigative and repressive powers. However, not all ACAs have prosecution powers, which can also fall within the responsibility of the Judiciary. After investigation, the matter is then referred to the general prosecutor, who exercises discretion on whether or not to bring criminal proceedings based on evidence provided.

The OECD has developed a typology of the various existing models for ACA and distinguishes three major types of institutions (OECD, 2007):

1. **Multi-purpose bodies** such as Hong Kong, Singapore and New South Wales ACAs are specialised institutions with multiple competences which concentrate both preventive and repressive powers and are responsible for a broad spectrum of activities (such as education, prevention and awareness raising) that go beyond criminal investigation. Very often, the power to prosecute is an external function.
2. **Law enforcement bodies** take the form of specialised unit/departments within the police forces or the prosecutor's office. The Romanian National Anti-corruption Directorate, the Central Office for the Repression of Corruption in Belgium or the Central Investigation Directorate on Corruption and Economic and Financial Crimes of the Portuguese police are examples of this approach.
3. **Preventive bodies** are institutions with exclusively preventive functions like the French "Service Central de la Prevention de la Corruption" or the Albanian Anti-Corruption Monitoring Group.

On his side, John Heilbrunn also refers to a "**multi-agency model**" which includes a number of offices that are individually distinct but together form a web of agencies to fight corruption (Heilbrunn, 2004). For example, the United States Office of Government Ethics with its preventive approach complements the Justice Department's investigative and prosecutorial powers.

In all cases, clear rules of engagement need to be designed for the ACA(s) to effectively interact and cooperate with other agencies and institutions involved in anti-corruption related activities.

2 Pros and cons of centralised specialised ACAs

Pros and cons of centralised ACAs

There are many expected benefits to the creation of centralised anti-corruption bodies, and, although they can't be considered a silver bullet, they are largely perceived as having the potential to promote more effective coordination of domestic anti-corruption activities by concentrating powers in a single agency and to bring specialisation, independence and autonomy to the fight against corruption. In particular, some authors consider that such interventions - among other advantages - can result in: 1) enhanced public profile; 2) concentration of expertise and; 3) reduced uncertainty over jurisdictions by avoiding duplication of powers (Quah, 2009).

However, centralising anti-corruption functions in a single agency also entails the risk of marginalisation of anti-corruption activities, dilution of resources, duplication of efforts and creating unproductive rivalries and competition between the various institutions involved in anti-corruption activities.

Enhanced public profile

The creation of a centralised anti-corruption body has an important symbolic value by giving a strong signal of high level political commitment to the fight against corruption. ACAs are often born out of emerging corruption related scandals or precipitating crisis that trigger broad-based demand for reform and help build domestic consensus around anti-corruption reforms (Heilbrunn, 2004). In this sense, they represent an attractive institutional response to corruption challenges as they focus the attention of both the political elite and the public and enjoy both constitutional and popular legitimacy. However, to be credible, this commitment also needs to translate into sufficient powers and independence granted to the institution as well as adequate human and financial resources (Quah, 2009).

The high profile given to anti-corruption through the creation of a specialised body can also backfire by putting the agency under great pressure to demonstrate results in the short term, while operating in a broader context of under-performing/dysfunctional governance system. As the focus of public attention for corruption related matters, they can be easily blamed for setbacks or lack of apparent success and act as scapegoats for perceived failure. The negative assessments of their

performance tend to overlook that they need to act as institutional interface between various stakeholders in a number of domains and processes they don't have full control over. This includes mediating between decision makers' goals and citizens' expectations, facilitating inter-institutional cooperation and communication, centralising information from different government departments, and promoting strategic alliances with other public bodies and civil society entities (De Souza, 2009).

Specialisation/concentration of anti-corruption expertise

The sophistication of corruption implies that conventional law enforcement agencies do not always have the technical expertise and capacity to detect, investigate and prosecute complex corruption cases (UNDP, 2005). One of the major arguments supporting the creation of specialised anti-corruption bodies is that the growing complexity of corruption cases and related financial transactions require a high level of expertise and a specialisation of knowledge that can be best achieved through recruitment, training and centralisation of expertise in a single-issue agency.

However, other authors argue that it may be difficult for a single agency to embrace all fields of knowledge and special attention should be given to avoid compartmentalising fields of specialisation to the detriment of the desirable multi-disciplinary approach to fighting corruption that should govern the agency's work (De Souza, 2008 and 2009). In countries where resources are scarce (including qualified human resources), there is also a danger of ACAs skimming the "best and the brightest" from other core agencies such as the prosecutor, attracting qualified staff with higher salaries and prestige, while marginalising other offices that would need to be strengthened.

In addition, the creation of a centralised single-issue body can also generate competing political pressures from other groups seeking similar priority for other crime-related initiatives.

Independence and integrity

One of the greatest added values of creating an independent anti-corruption body is its necessary high degree of autonomy which ensures that it is both: 1) protected from political interference and other undue influence and; 2) separated from the departments and institutions it has the mandate to investigate. The features that guarantee the independence of the institution may vary from country to country, based on a

context-specific analysis, but the literature usually recommends the creation of such bodies in countries where law enforcement agencies are perceived as highly corrupt, lacking the credibility and legitimacy to meaningfully engage in anti-corruption reforms (UNDP, 2005). In such countries, corruption is so widespread that existing institutions can not be adapted to develop and implement reforms and a dedicated independent institution maybe the only body with sufficient independence to bring the matter to court and ensure successful prosecution.

Conditions of effectiveness

In spite of their potential, many studies have demonstrated that ACAs are not a panacea to combat corruption. For example, UNDP considers that there are actually very few examples of successful independent ACAs (UNDP, 2005). These findings are further corroborated by a U4 report on the performances of ACAs in five African countries (Doig, and Williams, 2005). There is also a wide consensus in the literature that successful experiences such as the Hong Kong or Singapore examples are not necessarily replicable as they benefited from a unique convergence of favourable conditions that few developing countries enjoy, including (Chêne, 2009):

- Sufficient resources, both in terms of funding and human resources;
- A strong mandate that goes beyond law enforcement and integrate preventive and educative functions;
- Strong political support;
- Enforcement approach supported by pre-existing body of laws;
- An independent and effective court system.

Political will

Experience shows that effective ACAs have been established to respond to demands for reform emanating from a broad base of domestic constituents (Heilbrunn, 2004). While precipitating crisis and corruption related scandals can trigger momentum for reform, there is also a risk of creating ACAs as window-dressing interventions to respond to short term event-driven crisis and external pressure from donors, without genuine political will and a supporting broad-based political consensus for reform. Successful ACAs typically enjoy high level of public and political support

which translates into sufficient allocation of resources, broad investigative powers, capacity, adequate research abilities, etc.

Resources and capacity

Such interventions are typically staff and resource intensive and providing adequate human, financial and technical resources are important pre-requisites for the effectiveness of ACAs. In practice, ACAs often face issues of under-funding, human resources shortage, lack of specialised expertise and high staff turnover. There is often a discrepancy between the agency's human and financial resources and its broad mandate and competences which undermines the long term sustainability of the institution. For example, the Uganda Inspectorate of Government suffered from inexperienced staff, lack of cross-department cooperation, and high staff turnover (20%) (Doig, Watt, and Williams, 2007). ACAs need regular funding, adequate staffing and continuous political support to ensure their viability overtime, with level of funding depending on the scope of their mandate, the country's level of wages and other organisational considerations (De Souza, 2009).

Adequate powers

ACAs also need to be granted wide competences and special powers to effectively fulfil their mandate. They typically tend to have broader powers than more conventional enforcement bodies, including special powers to investigate and collect evidence. At the same time, it is necessary to counter-balance this concentration of powers with the need to provide for procedural guarantees and constitutional freedoms. In practice, ACAs are not always given the adequate powers to investigate and prosecute effectively while they face high expectations to deliver, and are expected to successfully address corruption from the start at senior level.

Independence with appropriate checks and balance

The independence of the agency is a fundamental requirement for its effectiveness, and broadly refers to the ability of the institutions to carry its mission without interference from powerful individuals or the political elite (UNDP, 2005). The concept of independence can be understood in terms of organisational, financial and functional independence and the institutional set up for ensuring independence needs to be context-specific (Hussman, Hechler, and Penailillo, 2009). Issues to consider for ensuring the institutions' independence

include establishing transparent rules and processes for appointments and removal of the governing body, budgeting, financial and human resources management, reporting rules, etc.

Ensuring independence does not imply operating in the absence of external controls. It is also essential to introduce adequate checks and balance and ensure scrutiny by various other oversight mechanisms to make sure that ACAs are not in a position to abuse their autonomy and that they operate in an unbiased manner. For example, the Hong Kong ICAC has four advisory steering committees that regularly meet to review ICAC activities. Sometimes ACAs are accountable to Parliament, or have multiple reporting lines. For example, the Indonesian KPK reports on its activities to the President, the National assembly and the State Auditor.

Enabling environment

As already mentioned, ACAs do not exist in a vacuum and their effectiveness is greatly determined by the overall governance environment in which they operate. When the country's governance system is weak and dysfunctional, the establishment of a centralised ACA is likely to achieve little more than just adding an additional layer of (ineffective) bureaucracy in the enforcement sector (Chene, 2009).

ACAs also need to benefit from an enabling legal and institutional environment, including a solid and comprehensive legal framework that criminalises a wide range of corruption offences and provides for adequate and effective sanctions. They also need to be integrated in a coherent and holistic strategy, that, beyond investigations and enforcement, also focuses on prevention, education and awareness raising.

Further important features of a supporting environment include factors such as functioning courts, the existence of freedom of information laws, effective complaints mechanisms and whistleblower protection, international treaties providing for cross border exchange of information and resources as well as a free and active media and a vibrant civil society.

Effective coordination and institutional clarity

As part of the broader national integrity system, ACAs are not created in a vacuum. Yet, experience indicates that law enforcement agencies are often poorly integrated and face challenges of institutional confusion, overlapping mandates, competing agendas,

lack of coordination and fierce competition over scarce resources. It is therefore important to consider potential jurisdictional conflicts with other agencies involved in the fight against corruption, provide institutional clarity, and make sure that the establishment of the specialised agency does not undermine other existing structures. This is especially important when several specialised anti-corruption bodies are created to deal with specific corruption crimes.

Related to the above, coordination issues need to be considered from the design stage of the anti-corruption institutional arrangements and sufficient resources need to be allocated to related activities (Hussmann and Hechler, 2007). In the absence of effective coordination mechanisms and institutional clarity that promote inter-agency cooperation, the creation of an ACA can lead to redundancy, duplication of efforts and waste of resources, especially in countries with scarce resources, less mature political systems and powerful patronage networks.

3 Decentralised institutional arrangements

Countries without specialised ACAs

Not all countries have a specialised ACA and some countries like Mongolia, Nicaragua or Columbia have, for example, built the anti-corruption expertise within existing institutions in the form of specialised units the Public Prosecutor office. Countries like South Africa, Bulgaria or Germany have also opted for strengthening existing institutions rather than creating a separate body.

In such set-up, the prosecutor needs to have the capacity and legitimacy to undertake activities such as prevention, coordination and interaction with the media and the education systems. This is often the approach recommended for countries where law enforcement institutions operate (relatively) effectively. In such countries, creating specialised bodies could implicitly undermine the credibility of other existing ac mechanisms, especially when such bodies are created established to bypass existing corrupt or dysfunctional police or prosecutorial services (Doig and Williams, 2005).

If the established judicial system is able to handle the problem, the disadvantage of creating a specialised institution is likely to outweigh the advantages, while

many of the advantages such as specialisation and autonomy can be achieved by establishing dedicated units within existing law enforcement agencies (UNDP, 2005). In such countries, coordination appears to be one of the major challenges, and may require special institutional solutions.

South Africa, for example, opted for incremental improvement for existing agencies and the anti-corruption mandate has been divided between various institutions, including among others the South African Police Service (SAPS), the National Prosecuting Authority (NPA), the Auditor General, the South African Revenue Services, the Special Investigating Unit (SIU), the Auditor-General, the Public Protector, and the Public Service Commission. All these agencies have core functions aimed at strengthening employee integrity, financial management and the quality of administration within the public service (UNDP, 2005).

Due to the federal nature of the State, **Germany** also opted for strengthening the anti-corruption capacity of existing institutions rather than create a separate centralised anti-corruption body. The establishment of such an institution would have faced major obstacles, created overlapping responsibilities or would have required far-reaching legislative. The recently produced National Integrity System (NIS) country report considers that such an approach would even have been counter-productive, creating additional layers of bureaucratic structures. According to the report, the political commitment to fight corruption is perceived to have a greater impact on corruption than the nature of the institutional arrangements (Transparency International Germany, 2011)

Countries with several specialised ACAs

Other countries have created a set of specialised anti-corruption institutions, each of them with a very specific mandate. A number of challenges are associated with such approaches (Chêne, M., 2009):

- The oversupply of institutions with conflicting or overlapping mandate creates institutional confusion over their respective role;
- Coordination is often weak or nonexistent;
- In the absence of an effective coordination mechanism that promote interagency cooperation, the creation of

an ACC can duplication, redundancy and waste of resources;

- In countries where resources are scarce, establishing centralised bodies can fuel inter-agency competition for resources and leadership instead of cooperation.

In **Zambia** for example, a set of agencies has been created dealing respectively with corruption in the public sector and private sector, Politically Exposed Persons, while another institution is in charge of keeping records of assets declaration of public officials. In addition, a Task Force on Economic Plunder was created in 2002 which implicitly undermined the credibility of the ACC and affected public trust in the institution (Doig and Williams, 2005). Zambia also illustrates how the oversupply of institutions with conflicting or overlapping mandate can create jurisdictional confusion and uncertainty, ultimately undermining their effectiveness and sometimes leading to serious implementation gaps: for example, the Police, the ACC and the Electoral commission all deny that they are responsible for the implementation of the electoral law (Chêne, 2009).

While the multiplicity of actors is largely perceived to undermine the effectiveness of the overall anti-corruption architecture, this does not seem to be the case in **the UK**. The recently published UK NIS study refers to a "patchwork quilt" of anti-corruption and fraud bodies, with a myriad of institutions and units with the investigative capacity to deal with corruption. There are law enforcement agencies (regional police forces; Serious Organised Crime Agency (SOCA); MoD Police; HM Revenue and Customs; UK Border Agency); government departments with internal investigative capacity (DWP; NHS; HM Prison Service; MoD; DEFRA); and other non-departmental public bodies (the Charity Commission; Standards for England), the Overseas Anti-Corruption Unit (OACU) and the Serious Fraud Office (SFO) which has the mandate to investigate and prosecute cases of serious or complex fraud in England, Wales and Northern Ireland. While the multiplicity of actors is recognised to be a problem, the NIS report concludes that factors like political will, full independence and a robust legislation are factors more likely to influence their effectiveness than their level of centralisation (Transparency International UK, 2011).

4 The common challenge of coordination

Whether centralised or decentralised, all institutions that are mandated to fight corruption need to interact with other governance institutions and their effectiveness is conditioned by effective coordination with other institutions involved in corruption. The weaknesses of the anti-corruption infrastructure often become visible at the interface between investigations (by ACAs) and prosecution by the judiciary. There are a number of institutions ACAs need to cooperate/coordinate with, irrespective of their degree of specialisation and level of decentralisation. These include (UNDP, 2005):

- The **Auditor General** who has an important role in detecting misuse of public resources;
- The **Public Service Reform Agency** or Public Service Commission. ACAs should work closely with institutions in charge of reforming public service as part of their prevention mandate. Streamlining cumbersome administrative procedures, management of public sector wages, recruitment, promotions and removals belong to corruption prevention activities.
- The **Ombudsman** office which protects citizens from abuse by the public administration also has an important role to play in Anti-corruption.
- The courts. If the **judiciary** is weak and unpredictable, efforts to provide remedies through the court will be less than effective. (Some countries such as Indonesia have even established specialised courts to judge corruption cases).

Yet, experience worldwide indicates that in most countries, coordination remains weak or nonexistent. Coordination is often overlooked at the design stage of the institutional arrangements, resulting in inadequate or nonexistent coordination mechanisms, lacking resources, capacity authority, leadership and political backing (Hussman and Hechler, 2007). Experience suggests that successful ACAs such as the Hong Kong ICAC operate in contexts where stringent cooperation duties are imposed upon the various agencies involved in anti-corruption work.

A previous U4 expert answer has dealt more specifically with coordination mechanisms of anti-corruption mechanisms (Chêne, 2009).

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