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Drafting a national anti-corruption strategy for Vietnam

Query:

What makes a good national anti-corruption strategy?

Purpose:

Vietnam is drafting its National Anti-corruption Strategy to 2020 and is seeking donors' comments.

Content:

1. **Key Features of Effective National Anti-Corruption Strategies**
2. **Challenges Involved in Implementing a National Anti-Corruption Strategy**
3. **Applying the Lessons Learnt to the Case of Vietnam**
4. **Further Reading**

Summary:

Lessons drawn from the experience of implementing National Anti-Corruption Strategies (NACS) worldwide indicate that key features for successful anti-corruption policy making include national ownership, knowledge base design, stakeholder participation, strategic priority setting and sequencing, effective coordination, and monitoring and evaluation. Factors affecting the performances of the NACS have mainly been found to be lack of ownership, unrealistic planning, inadequate prioritisation of reforms, insufficient involvement of non state actors, lack of coordination and monitoring and other implementation shortcomings. In the specific case of Vietnam, priority areas of intervention could include strengthening institutional coherence between the various agencies involved, increasing civil society participation and oversight, mainstreaming corruption into other areas of public administration reform as well as giving a greater focus on private sector corruption.

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Article 5 of the United Nations Convention against Corruption (UNCAC) stipulates that « *Each State party shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principle of the rule of law, proper management of public affairs and property, integrity, transparency and accountability*. » As a signatory of the Convention since December 2003, Vietnam has committed to put an effective and comprehensive anti-corruption policy framework in place to address the pressing challenges posed by corruption.

Part 1: Key features of Effective National Anti-Corruption Strategies

Like Vietnam, other governments have opted for broad and explicit national anti-corruption strategies (NACS) to tackle widespread corruption in many countries but experience shows that such approach has had mixed results in the past.

In a paper published by Global Integrity in 2008, Marianne Camerer argues that a number of conditions are required to make anti-corruption reform work. Key features of successful NACS include having the necessary data to inform strategy and policy; comprehensive legal and institutional safeguards to prevent and combat corruption; and, the most difficult to secure, the necessary political leadership and will to tackle corruption credibly and put in place long term reforms. (Please see: http://commons.globalintegrity.org/2008/08/what-makes-effective-anti-corruption.html)

Largely consistent with these views, a U4 report published in 2007 explores the experience of six countries (Georgia, Indonesia, Nicaragua, Pakistan, Tanzania and Zambia) in pursuing explicit NACS, analyses successes and shortcomings and draws lessons for the design and implementation of future NACS. The points developed below are mainly based on the lessons learned from these countries' case studies. (Please see: http://www.cmi.no/publications/file/?2914=anti-corruption-policy-making-in-practice)

The Process of Designing a National Anti-Corruption Strategy (NACS)

Like other areas of public policy making, effective anti-corruption policy development requires an endogenous and participatory design process that promotes national ownership of reforms, is based on an in-depth and holistic analysis of the local context and allows for strategic prioritisation and sequencing. These key features of effective public policy making provide an analytical framework against which Vietnam's NACS can be assessed.

Political Will and Local Ownership

As effective anti-corruption reforms can not be imposed from the outside, successful implementation of NACS relies on the buy-in of all state and non-state actors that have a stake in fighting corruption and implementing the strategy. In many countries, public discontent about corruption levels and scandals revealed by the media can exert pressure on governments to take action, while development partners may also play a role by providing incentives for anti-corruption reforms in the form of development assistance. In many case however, anti-corruption strategies that did not originate from a genuine high level commitment to reforms have lacked strong and sustained political backing and have been mainly adopted as cosmetic reforms to soothe the public and please the donors.

Thus, the first condition to ensure the successful implementation of a NACS is to build a credible and committed leadership that demonstrates sustained political and managerial will as well as a strong institutional commitment to anti-corruption policies within the country. This high level leadership and strategic commitment against corruption must further spread over to the various institutions and public agencies supposed to implement the strategy in order to anticipate and overcome potential resistance to change.

Stakeholder Participation

To develop local ownership of reforms and get buy-in of the various stakeholders, it is important to adopt a bottom up approach and ensure the broad participation of all political and social players, including civil society, in the design process of the anti-corruption strategy. The pro-active involvement of non state actors at all stages of the process determines the credibility and legitimacy of the process and is likely to contribute to the successful implementation of the strategy.

In its paper "Strengthening World Bank Group Engagement on Governance and Anti-corruption", the World Bank states that many programmes that have a track record of success focus on increasing transparency of decision making and involving beneficiaries in policy making and oversight. (Please see:
http://www.worldbank.org/html/extdr/comments/governancefeedback/gacpaper.pdf).

This does not always happen in practice. In most of the six countries reviewed by the U4, for example, NACS were developed by government officials, consultant and academics, often supported by international experts. In addition, the design process was mainly driven by mid-level government officials with little political leverage and insufficient participation of the ministries supposed to implement the plan. The participation of civil society organisations in the policy design phase is often weak to non existent.

Sound Knowledge Base

Experience also shows that there is no blueprint for NACS. They must be fitted to the specific conditions of the country, anchored in the political, economic and institutional environment of the country and reflect the particular challenges and forms of corruption present in a given country. Effective anti-corruption policy making should be based on a comprehensive analysis of the local situation and a solid understanding of the underlying causes of corruption. It is often recommended to start with a comprehensive diagnostic exercise, preferably conducted in a participatory manner.

In practice however, this does not happen systematically. In Vietnam, a national integrity country study has been published in 2006, which provides a detailed and nuanced assessment of the strengths and weaknesses of the country's anti-corruption system. This study can inform anti-corruption policy making and help prioritise envisaged anti-corruption measures. (http://transparency.org/policy_research/nis/regional/asia_pacific).

Strategic Priority Setting and Sequencing

Anti-Corruption reforms can be politically costly and take time to yield results. Apparent lack of progress may be frustrating, erode government's political capital and commitment against corruption as well as undermine domestic support for reform. Although there is no generic formula for sequencing anti-corruption reforms, realistic objectives should be set in consultation with the various stakeholders to identify opportunities, potential obstacles and strategic entry points for reform. Support for reform can be sustained by implementing measures where tangible results can be achieved within a reasonable time frame to sustain support for reform. Priority setting should be based on the country's context, local capacity, available resources and overall feasibility. (Please see the U4 expert answers on creating an embassy wide anti-corruption strategy, which has dealt more specifically with the sequencing of anti-corruption policies: http://www.u4.no/helpdesk/helpdesk/queries/query106.cfm).

For example, the Pakistan Implementation Action Plan contained close to 400 measures, with a number of these labelled "quick wins" while others were to be implemented within a year and still others within a 1 to 5 year time frame.

The Content of a National Anti-Corruption Strategy

The ultimate goal of NACS is to reduce opportunities for corruption as well as increase the probability for detection and punishment. This can be achieved through mainstreaming anti-corruption measures throughout a country's governance and integrity system.

Focus of the NACS

Anti-corruption strategies can include a wide range of interventions aimed at reducing discretion and monopoly of power of government officials, improving law enforcement, reforming the civil service, increasing transparency and access to information, improving citizen oversight, etc. A common feature of successful NACS is that they should be fitted to the local context and based on an in-depth diagnostic of corruption challenges, risks and underlying causes in the country.

There are many examples of NACS, which vary in scope and nature according to the local circumstances. For example, the Georgian strategy approved in 2005 focuses on technical governance and legislative reform issues, including preventive measures, the creation of a competitive business environment, institutional reform of law enforcement bodies, cooperation with

international organisation and engagement of the public. The Hong Kong anti-corruption strategy is often referred to as good practice with a three pronged approach focusing on prevention, deterrence and education and its well known and established Independent Commission Against Corruption in charge of implementing the NACS. (Please see: http://www.unafei.or.jp/english/pdf/PDF_rms/no69/16_P 196-201.pdf).

Although there are no universally applicable formulas for NACS, the UNCAC offers a reference framework for the fight against corruption which is both holistic and universal. As such, it provides useful guidance for comprehensive national anti-corruption strategies that could inform the drafting of Vietnam's anti-corruption strategy.

In many countries anti-corruption strategies have primarily focused on strengthening public institutions, reviewing laws and regulations and simplifying procedures, with little attention given to proactively improving transparency and democratic processes. This focus on reforming norms and institutions often ignores the political dimension of anti-corruption reforms that may ultimately hinder successful implementation of NACS. Effective anti-corruption policy making should not only focus on laws and institutions but on how to make them work in practice. In many cases, the adoption of new legislation or creation of new institutions is privileged over improving/ensuring their performance, results and outcome. Another major shortcoming of this approach is that it tends to overlook the role of non state actors and the legislature in providing oversight and monitoring progress.

Realistic Targets versus Comprehensive Approaches

There is often a gap between limited institutional and technical capacity and over ambitious objectives resulting in a tension between adopting comprehensive versus targeted approaches. In their attempt to be comprehensive, many NACS have failed to yield the expected results because of undertaking too many reforms at the same time, regardless of resources and capacity related issues. As already mentioned, one of the major factors contributing to the effectiveness of a NACS includes setting priorities and realistic targets and sequencing reforms strategically.

NACS should therefore include detailed work plans with specific and measurable goals and a set of meaningful indicators to be updated on a regular basis in order to track progress and impact, adopt necessary corrective measures and sustain support for reforms. Roles and responsibilities for implementing, coordinating and monitoring the strategy should also be clearly identified in the strategy.

Linkages with other Areas of Core Governance

Anti-corruption is a complex issue that cut across many public policies and is carried out under the auspices of different ministries and public agencies. A strategic anti-corruption dimension could potentially be integrated in all relevant areas of core governance reform such as Public Finance Management, financial accountability, administrative and civil reform, tax and revenue reforms, parliamentary reforms, etc.

Furthermore, explicit anti-corruption strategies resulting in the creation of an anti-corruption agency specifically in charge of implementing it - the Hong Kong model- are not always the only or more desirable option for anti-corruption reforms. An alternative or complementary approach consists in embedding anti-corruption efforts into broader coordinated policies instead of conducting them in isolation from other governance and public sector reforms.

Since the corruption agenda is so closely intertwined with that of promoting good governance, anti-corruption strategies, whether explicit or implicit, should all strive to strengthen the links between anti-corruption and other core areas of governance reforms, as recommended by the U4. (Please see: http://www.cmi.no/publications/file/?2915=anti-corruption-policy-making-in-practice).

Part 2: Challenges Involved in Implementing a National Anti-Corruption Strategy

Coordination of Roles and Responsibilities

Integration with other core governance policies and reform should not take place only on paper but in practice as well, with an adequate coordination mechanism allocated to the process. Since anti-corruption interventions are often carried out through a series of policies cutting across various public

agencies, they involve multiple actors with conflicting interests who may be resistant to reforms. In most countries, roles and responsibilities for coordinating anti-corruption strategies are set out in the overall anti-corruption documents. In practice, coordination does not receive sufficient political and operational attention and related provisions face major implementation challenges, with weak and irregular coordination. In many cases, the coordinating agency does not have sufficient resources and capacity to coordinate the implementation process effectively.

In addition, the institutions in charge of coordinating the implementation of the NACS often lack authority, political backing and capacity to compel powerful line ministries to implement the strategy. In some cases, the overall responsibility has been assigned to the Office of the President or a State Minister with the view to providing sufficient political leverage to subordinate line ministries and public agencies.

Resources and Capacity

The agency in charge of should have sufficient financial, human and institutional resources and capacity to coordinate and monitor the overall implementation of the NACS. In some countries, there is often a gap between limited capacity as well as insufficient resources and expertise and overly ambitious objectives. In Zambia for example, the Anti-Corruption Commission is responsible for the implementation of most of the envisaged measures as well as coordination, with a risk of overburdening its capacities.

There is a need to invest sufficient resources in capacity building to ensure effective implementation. Public agencies should have access to adequate technical assistance, training and mentoring. In countries like Georgia, the NACS establishes that each ministry responsible for implementing anti-corruption measures under its mandate has to recruit and train the necessary staff to do so. Since anti-corruption interventions often involve long term processes, funding should be predictable, adequate and dependable.

Communication and Awareness Raising

Cross cutting reforms are dependent on good communication between all implementing agencies and the public at large. Various stakeholders need to be informed about the policy and fully understand its

implications with the view to strengthening support for change and building the capacity and commitment within the public agencies involved in the implementation of the strategy. Public officials also need to be given clear guidelines and practical guidance for implementation. Last but not least, weak communication and poor access to anti-corruption policy documents may result in insufficient awareness of the anti-corruption drive among key stakeholders such as public agencies, officials and the public at large and is likely to undermine long term political commitment and public support for reforms.

Awareness raising activities targeting both the public and the various stakeholders is therefore an important aspect of successful implementation of NACS. A dynamic communication strategy targeting key actors such as political leaders, implementing agencies, the media and key civil society actors may sustain the political debate on corruption related issues, create demand for change and build the momentum for reform.

Monitoring and Evaluation

Monitoring and evaluation are key dimensions of anti-corruption interventions. They require precise and fact based data on corruption as well as appropriate data collection mechanisms. An effective monitoring mechanism should go beyond ticking a check box of measures envisaged at the design stage of the process, while remaining simple and manageable by public institutions with weak data collection and processing capacity. It should also allow for civil society's input and participation. A previous U4 Expert Answer has more specifically dealt with public sector monitoring systems and indicators. (Please see: http://www.u4.no/helpdesk/helpdesk/query.cfm?id=168) .

Provisions for monitoring should be an integral component of NACS and envisaged from the early stage of strategy development. In practice however, monitoring provisions are often lacking or a neglected dimension of existing NACS. Even when NACS include relevant provisions for monitoring, they often consist in a vague self-assessment conducted by institutions that are often resistant to change in the first place. In addition, monitoring mechanisms face a number of operational and practical challenges including in the areas of data collection, analysis and interpretation, since it is often difficult in developing countries to

access relevant information and overcome the poor quality of accessible data.

Furthermore, monitoring activities do not systematically include public awareness raising activities, civil society participation or publication of monitoring reports. The lack of involvement of external actors such as members of civil society, research institutes, parliaments, etc, has been a major weakness of many review mechanisms in place. In some countries, there are some recent attempts to address these concerns. Armenia for example is currently pioneering an anti-corruption participatory monitoring methodology for the health care and education sectors that involves active participation of the media but the Helpdesk has not found any reference yet to how effective it has been in practice. (Please see: http://europeandcis.undp.org/governance/parac/show/A 4CC9DE6-F203-1EE9-B3E49BEEBD395085).

Experience with monitoring anti-corruption conventions indicate that effective monitoring should involve to some degree a combination of monitoring methods, including self assessments, expert reviews, peer reviews, field visits, and the publication of a report with recommendations for improvements as well as follow up. (Please see: http://www.u4.no/helpdesk/helpdesk/query.cfm?id=163)

Part 3: Applying the Lessons Learnt to the Case of Vietnam

Although the legal framework for curbing corruption is well developed, there seems to be a major implementation gap to overcome in Vietnam. TI's 2006 NIS on Vietnam establishes that anti-corruption mechanisms are both poorly enforced and monitored, due to politisation of mechanisms and institutions, overlapping mandates and institutions, widespread nepotism, the lack of whistle blower protection, etc. Global Integrity scores also point to enforcement as the major problem in the country, as Vietnam generally scores well on anti-corruption laws but poorly on enforcement and implementation. (http://www.globalintegrity.org/reports/2006/vietnam/index.cfm).

Conditions of Effectiveness in the Context of Vietnam

Credible leadership

Successful implementation relies primarily on a strong, sustained and credible high level commitment against corruption. Reforms also need to be implemented by leaders that comply with the highest ethical standards. Vietnam has experienced an increase in corruption-related cases against high party officials in recent years. This could indicate a stronger government stance against corruption and reflect the fact that corruption has moved up on the political agenda.

However, some critics also view this as an attempt by the political centre to reassert control and discipline over lower levels of the party, in a climate of increased decentralisation. There have also been allegations in the past that public officials from the Government Inspectorate (GI), one of the major anti-corruption institutions, have received bribes in order to prevent cases from being pursued further. Such occurrences are likely to undermine credibility of the leadership's commitment as well as public confidence in government's efforts against corruption. (Please see: http://www.business-anti-corruption.dk/normal.asp?pageid=148).

Research base

Targeting anti-corruption interventions supposes a sound understanding of the extent, forms, risks and underlying causes of corruption in Vietnam. Most sources of information agree that corruption is widespread and systemic. The Corruption Perceptions Index (CPI) 2008 places Vietnam at the 121st rank of the 180 countries surveyed with a score of 2.7, while the Vietnamese government's 2005 Report of the Survey on Corruption reveals that 60 % of respondents admitted to having paid a bribe for public services and that more than 30 % of public officials said they would accept a bribe if offered.

Public procurement, the judiciary, tax and customs, construction permits and export/import licenses authorities are frequently cited as the sectors most vulnerable to corruption[1].

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[1] Recent sources of corruption related data on Vietnam include the above the KPMG and the Economist Intelligence Unit 2007, the USAID Vietnam Provincial Competitiveness Report 2007, the 2006 Global Integrity Country Report, the above mentioned NIS (2006), the World Bank/IFC Enterprise survey (2005), the Vietnamese government's 2005 Report of the Survey on Corruption, etc, all accessible through the Business Anti-Corruption Portal Country Profile on Vietnam,

In spite of a relatively broad spectrum of existing sources of information on the country[2], there is still much that is unknown about types of corruption and impact of reforms and, according to the NIS, more research would be needed to fully understand the specific context of Vietnam, map corruption risks as well as identify factors influencing success or failure of reforms.

Participatory NACS development process

The political dimension of the fight against corruption should be recognised and translated into the active involvement of all segments of Vietnam's society at all stages of the process. In terms of strategy development process, the effective participation of all stakeholders including civil society is of especially great importance to get buy in from all actors and ensure legitimacy and credibility of the process.

However, the organisation of consultative processes is not per se a guarantee of effective public participation. There may be practical challenges to overcome for successful participation such as poor organisation and lack of resources. Experience has also shown that public participation can be hijacked and manipulated by governments or the local elite and used to legitimise decisions already taken at higher level. (Please see: http://www.gsdrc.org/go/topic-guides/service-delivery/user-involvement-and-accountability).

Therefore, attention should be paid in Vietnam to set up participatory processes that are truly inclusive and allow broad consultation of all sectors of society. Power dynamics present in the Vietnam's society need to be taken into account to ensure that participatory mechanisms in place are truly inclusive, and do not mirror or exacerbate already existing social or political divisions.

Monitoring

Coordinating efforts and monitoring progress is a critical dimension of successful implementation of the NACS, especially in Vietnam's context of a multiple agency approach in combating corruption. An effective monitoring mechanism should be developed at the design stage of the strategy, with a set of simple but manageable indicators.

Priority Focus of the NACS

As a result of the implementation gap and shortcomings identified in Vietnam, setting strategic priorities and sequencing anti-corruption interventions appear to be a very important step of the NACS drafting process. With this in mind, areas requiring special attention signalled by the NIS may help identify opportunities and priority reforms to be undertaken[3]:

International Treaties and Anti-Corruption Frameworks

Vietnam's commitment to international anti-corruption treaties and initiatives provides a catalyst for anti-corruption reforms. Vietnam signed the UNCAC in December 2003 but has not yet ratified the convention and endorsed the Anti-corruption action plan for Asia and the Pacific in July 2004. Vietnam has also signed but not yet ratified the UN Convention against Transnational Organised Crime.

These various instruments provide useful entry points to streamline the anti-corruption agenda in the country and the NACS should be consistent with these frameworks. It would also be advisable to sustain and intensify ongoing efforts towards swift ratification of both UN conventions.

Institutional coherence

The NIS has identified a problem of overlap between the various institutions charged with tackling corruption in Vietnam. The Anti-Corruption Law makes provisions

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(Please see: http://www.business-anti-corruption.dk/normal.asp?pageid=148).

[2] Ibid

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[3] The recommendations highlighted here are mainly drawn from the priorities identified in the NIS as well as the information compiled on the Business Anti-Corruption Portal (http://transparency.org/policy_research/nis/regional/asia_pacific and http://www.business-anti-corruption.dk/normal.asp?pageid=148)

for the establishment of an Anti-Corruption Steering Committee headed by the Prime Minister, with the mandate to coordinate and supervise the fight against corruption. This body is meant to be a higher body in charge of coordinating anti-corruption efforts and address institutional coherence. Roles and responsibilities of the various anti-corruption bodies should be clarified, especially with regard to the National Anti-Corruption Steering Committee's relations with other agencies.

Strengthening existing Institutions

There is an array of institutions taking part in the fight against corruption in Vietnam as part of the national integrity system. The challenge is less to set up new structures than to make existing institutions work in practice. The National Steering Committee is mostly composed of full time officials of other public agencies, which may compromise its impartiality, while various investigating agencies such as the People's Procuracy are also suspected to be frequent targets of corruption to prevent cases from going to court, as prosecutions of corrupt public servants are almost always successful.

Priority focus should therefore be given to strengthening existing institutions to make them work effectively and independently rather than create new norms and institutions. Capacity building and strengthening efforts should especially target institutions such as the Government Inspectorate, the State Audit, the People's Procuracy, the Central Inspection Commission of the Communist Party of Vietnam and the National Anti-Corruption Steering Committee.

Public sector reform

As above mentioned, formulating an explicit stand alone anti-corruption strategy is not the only option for effective anti-corruption interventions. The other option consist in integrating an anti-corruption dimension into other relevant areas of core governance reforms such as administrative and civil service reform, financial accountability, tax and revenue functions, etc. As such, public sector reform remains an important component of national anti-corruption efforts, with a need to address problems of overlapping responsibilities and dual subordination that plague the system. Measures such as the establishment of an effective asset declaration system and protection for whistle blowers are important measures to envisage in order to

strengthen public ethics across the Vietnamese public sector.

Civil society and the media

The oversight role of non state actors such as civil society and the media should be strengthened through increased transparency and greater participation and involvement in anti-corruption activities. Attention should be paid to make the watchdog role of civil society, which is emphasised in the anti-corruption law , a reality in practice, including with measures aimed at protecting citizens and more generally, whistleblowers. This also implies giving civil society the space to operate effectively in the country.

Private sector corruption

In 2005, the ruling Communist Party of Vietnam passed a long awaited Anti-Corruption Law and a Law on Thrift Practices and Anti-Wastefulness. According to TI's 2006 NIS, a major drawback of this law is the narrow focus on state and public sector corruption, with little attention paid to private sector corruption.

The NACS could correct this trend by promoting the development of codes of conduct and specific anti-bribery provisions, with the support of domestic and foreign business groups, banks and chambers of commerce.

Part 4: Further Reading

Anti-Corruption Making in Practice: What can be learned for implementing Article 5 of UNCAC? (2007)
This study analyses the experience of six countries (Georgia, Indonesia, Nicaragua, Pakistan, Tanzania and Zambia) with the design and implementation of explicit NACS. It argues that such approaches are not necessarily the most suitable and not the only way to implement coordinated anti-corruption policies.
http://www.cmi.no/publications/file/?2914=anti-corruption-policy-making-in-practice

What makes effective anti-corruption systems? (2008)

This Global Integrity paper published in 2008, highlights a number of conditions required to ensure effective, sustainable anti-corruption reforms. Key features of

successful NACS include knowledge based strategies, comprehensive legal and institutional safeguards, political leadership and will. NIS also requires more than a single agency approach. (Please see: http://commons.globalintegrity.org/2008/08/what-makes-effective-anti-corruption.html)

Corruption in Fast-Growing Markets: Lessons from Russia and Vietnam (2008)

This recent U4 expert answer on corruption in fast growing markets has specifically used Vietnam as a case study and analysed the specific corruption challenges associated with emerging markets. (Please see: http://www.u4.no/helpdesk/helpdesk/query.cfm?id=166.

Vietnam's National Integrity Systems Country Study Report (2006)

This country study assesses Vietnam's National Integrity System both in theory and practice and signals areas requiring priority actions.
http://transparency.org/policy_research/nis/regional/asia_pacific

National Strategies for Combating Corruption: The Ghana Experience (2003)

This paper seeks to asses the Ghana experience through a review of the evolution of the Ghana Anti-Corruption Coalition an-d the action plan it developed. This is a central piece which highlights the challenges that have been faced and contains a section on lessons learnt for planning and implementing action plans.
http://www.u4.no/helpdesk/helpdesk/queries/queryattach/q42NatStratGhanaExperience.pdf