



UNODC

United Nations Office on Drugs and Crime

Safeguarding against Corruption in Major Public Events

Facilitator's Guide

Contents

The structure of the five-day workshop at a glance.....	2
How to use this training package.....	6
Introduction	12
LESSON 1: Organizational vulnerability to corruption - the risk management solution ...	19
LESSON 2: Challenges associated with the organization of major events.....	22
LESSON 3: The United Nations Convention against Corruption.....	27
LESSON 4: Strategic planning to prevent corruption.....	34
LESSON 5: Risk assessment, the foundation of risk management.....	37
LESSON 6: Institutional capacity	42
LESSON 7: Governance, accountability and leadership.....	48
LESSON 8: Public reporting and transparency.....	52
LESSON 9: Mitigating the risk of corruption in the management of human resources	55
LESSON 10: Mitigating the risk of corruption in financial management.....	65
LESSON 11: Mitigating the risk of corruption in the procurement process.....	71
LESSON 12: Mitigating the risk of corruption in construction and infrastructure development projects	80
LESSON 13: Mitigating the risk of corruption associated with the security infrastructure and arrangements	86
LESSON 14: Involving the private sector in the corruption prevention strategy	90
LESSON 15: Detection of corruption and law enforcement.....	98
LESSON 16: Mitigating the risk of corruption in post-event activities	103
LESSON 17: Compliance monitoring.....	105
LESSON 18: Conclusion and feedback from participants	108

The structure of the five-day workshop at a glance

The training consists of a total of 20 sessions. Four sessions of 90 minutes are planned each day with a break between each session. With one exception, on day 3, one lesson is covered in each session. The Participant Manual contains a chapter for each lesson.

Day	Session	Lesson	Topics
1	1	Introduction	<ul style="list-style-type: none"> • Understanding and managing the risk of corruption in the organization of a major event • Corruption risk management • Key aspects of the organization of a major event • Presentation of the workshop and its objectives
1	2	LESSON 1: Organizational vulnerability to corruption: the risk management solution	<ul style="list-style-type: none"> • Definitions • Major events affected by corruption
1	3	LESSON 2: Challenges associated with the organization of a major event	<ul style="list-style-type: none"> • Some of the specific challenges associated with the organization of a major event
1	4	LESSON 3: The United Nations Convention against Corruption (UNCAC)	<ul style="list-style-type: none"> • Presentation of UNCAC and how it is relevant to the prevention of corruption in the organization of major events • Defining corruption • Different types of corruption • Prevention of corruption
2	1	LESSON 4: Strategic planning to prevent corruption	<ul style="list-style-type: none"> • Strategic approaches to the prevention of corruption • Examples of strategic planning to prevent corruption in the organization of a major event
2	2	LESSON 5: Risk assessment, the foundation of risk management	<ul style="list-style-type: none"> • The importance of a proper corruption risk assessment • Conducting an assessment • Introduction to the Corruption Prevention Checklist
2	3	LESSON 6: The institutional capacity of the Authority	<ul style="list-style-type: none"> • Organizational and accountability structure • Precautions to be taken concerning partners, agents, consultants, lobbyists, and politically exposed persons (PEPs)
2	4	LESSON 7: Governance, accountability and leadership	<ul style="list-style-type: none"> • Governance • Leadership and organizational structure • Policies and responsibilities for anti-corruption activities within the Authority
3	1	LESSON 8: Public reporting and transparency	<ul style="list-style-type: none"> • Public reporting • Transparency
3	2	LESSON 9: Mitigating the risk of corruption in the management of human resources	<ul style="list-style-type: none"> • Existing policies • Recruitment practices • Conflicts of interest

			<ul style="list-style-type: none"> • Codes of conduct
3	3	LESSON 9 - Continued	<ul style="list-style-type: none"> • Positions that are particularly vulnerable to corruption • Training of personnel in corruption prevention • Supervision • Reporting of incidents of corruption • Disciplinary action
3	4	LESSON 10: Mitigating the risk of corruption in financial management	<ul style="list-style-type: none"> • Costs overruns and corruption • Article 9 (2) and (3) of UNCAC • Putting in place a strong financial management accountability structure • Ensuring the integrity and efficiency of the budgeting and financial planning process • Adopting sound financial management policies and procedures • Putting in place strong and effective financial controls • Building a strong internal audit capacity • Adopting transparent and effective policies and procedures regarding external audits • Ensuring financial transparency and reporting publicly
4	1	LESSON 11: Mitigating the risk of corruption in the procurement process	<ul style="list-style-type: none"> • Procurement • Adopting effective procurement policies to achieve value for money and prevent corruption • Building the Authority's procurement capacity • Adopting effective procurement practices • Adopting and practicing sound contracting practices and procedures • Keeping complete, accurate and transparent records of procurement • Adopting measures to reduce corruption in the Authority's supply chain
4	2	LESSON 12: Mitigating the risk of corruption in construction and infrastructure development projects	<ul style="list-style-type: none"> • Procurement in relation to major construction and infrastructure development projects • Ensuring the effective supervision of all major construction and infrastructure development projects • Preventing the risk of corruption in relation to the legacy use of assets
4	3	LESSON 13: Mitigating the risk of corruption associated with the security infrastructure and arrangements	<ul style="list-style-type: none"> • Organizational and accountability structure • Protecting the integrity and efficiency of the procurement process for security services, infrastructure and equipment • Preventing corruption in relation to the legacy use of infrastructure and equipment procured in preparation for a major event • Arrangements with public and private agencies responsible for security
4	4	LESSON 14: Involving the private sector in the corruption prevention strategy	<ul style="list-style-type: none"> • Articles 12 of UNCAC • Cooperation with the private sector • Anti-corruption programmes in the private

			<p>sector</p> <ul style="list-style-type: none"> • Laws regarding the public sector's involvement with the private sector • Measures to be taken to prevent corruption in granting and receiving of sponsorships
5	1	LESSON 15: Detection of corruption and law enforcement	<ul style="list-style-type: none"> • Chapter III of UNCAC • Responsibility for compliance monitoring • Cooperation with law enforcement
5	2	LESSON 16: Mitigating the risk of corruption in post-event activities	<ul style="list-style-type: none"> • Disposal of assets • Rights of successors at the end of the Authority's mandate • Learning opportunities
5	3	LESSON 17: Compliance monitoring	<ul style="list-style-type: none"> • Responsibility for compliance monitoring • Testing of prevention measures
5	4	LESSON 18: Conclusion and feedback from participants	

Safeguarding against Corruption in Major Public Events

Facilitator's Guide

How to use this training package

How to use this training package

The training workshop is based on UNODC's Handbook on "The United Nations Convention against Corruption: A Strategy for Safeguarding against Corruption in Major Public Events".¹ This training package has been produced to assist in the delivery of UNODC's training workshops on safeguarding against corruption in major public events. It contains everything that a facilitator needs to conduct a five-day training workshop. The materials provided in this Guide can be modified and customized to meet the needs of the participants or fit the available time.

The package contains:

- The present module on how to use this training package
- A training workshop agenda
- Facilitator's Guide
- Participant Manual
- PowerPoint presentations
- Sample test questions for participants
- UNODC's Handbook on "The United Nations Convention against Corruption: A Strategy for Safeguarding against Corruption in Major Public Events", including the Corruption Prevention Checklist for the Organization of a Major Public Event
- The United Nations Convention against Corruption (UNCAC)

The training package can be used with various groups, but it has been developed with the idea of training groups of planners and organizers responsible for a major event.

1. Managing the risk of corruption

The United Nations Convention against Corruption (UNCAC) offers a comprehensive framework for designing and implementing anti-corruption safeguards in the high-risk environment created by the organization of a major public event. There is a high risk of corruption associated with the organization of major public events such as international sporting, cultural or high-level political events. This is largely because the organization of such events involves significant resources and large amounts of public funds as well as complex logistical arrangements to be made within very tight timeframes.

¹ United Nations Office on Drugs and Crime (2013). *The United Nations Convention against Corruption: A Strategy for Safeguarding against Corruption in Major Public Events*. New York: United Nations. http://www.unodc.org/documents/corruption/Publications/2013/13-84527_Ebook.pdf

A risk management approach is particularly well suited to prevention of corruption in the organization of a major event. The people and organization responsible for a major event must develop and implement an effective corruption risk mitigation strategy based on a systematic assessment of the risk of corruption related to every major aspect of the organization of the event.

The training workshop will help individuals with responsibilities for the organization of a major event acquire the knowledge and skills they need to assess the risk of corruption in that context and develop a suitable risk management strategy. For them, the workshop may constitute the starting point of a corruption risk management process.

The training workshop will complement the training often offered by international organizations and sporting federations responsible for major international events. In both instances, the intent is to benefit from the experience accumulated over the years in organizing such events. It is obviously very important to have in place processes and mechanisms for passing on knowledge, building on past successes and avoiding recurring problems and potential pitfalls.

2. Workshop agenda

A proposed agenda is proposed as part of the package to help with the planning of the training workshop. It offers suggestions about the duration of the sessions, the organization of the various lectures and the timing of breaks and lunches. The facilitator may wish to customise the agenda, depending on delivery dates and the time available for delivering the workshop.

The suggested utilization of time within each lesson is meant only as a guide. The facilitator may find it necessary to emphasize some components more than others or to allow participants to pursue a discussion that may be of particular interest to them. The recommended times for each of the discussions and activities can be adjusted to reflect the size of the group or the group's specific learning requirements. Time management remains the responsibility of the instructor.

3. Facilitator's Guide

The Facilitator's Guide contains information to be presented, instructions for conducting activities and facilitating discussions, supporting material and samples answers for activities.

The Facilitator's Guide describes each session in detail, including the proposed learning outcomes and suggested training techniques, and refers the instructor to the tools at his or her disposal and the relevant parts of UNODC's Handbook and the Participant Manual.

4. Content

The content is scripted in general terms, allowing the facilitator to communicate it in a manner that suits his or her own facilitation style and to emphasize, as necessary, the elements that seem particularly relevant to the concerns and interests of the participants.

5. Activities

Adult learners generally find that they learn more easily when given an opportunity to actively engage with the material presented, to exchange with colleagues and test their new understanding and skills during a simple but relevant problem-solving exercise. The training package offers several suggestions for activities and case studies that will engage participants more directly in their own learning.

Instructors can design alternative exercises if they wish to do so. Whenever possible, the exercises and case studies should use local material that will serve to emphasize the relevance of the proposed learning.

6. Participant Manual

The content delivered during the workshop is included in the Participant Manual with references to further in-depth reading in UNODC's Handbook on "The United Nations Convention against Corruption: A Strategy for Safeguarding against Corruption in Major Public Events". All participants should have their own copy of the Handbook as well as the Manual, be encouraged to use the Manual to note their own comments and observation, and allowed to keep the Manual after the training workshop. Participants are to be discouraged from reading this information during the workshop. When time allows, participants should be encouraged to read parts of the Manual and the Handbook in preparation for a session, perhaps the evening before. When the Manual includes materials that the participants must read in order to participate in a discussion or exercise, for example a case study, time should be allowed for them to read and absorb the material.

7. Corruption Prevention Checklist

The "Corruption Prevention Checklist for the Organization of a Major Public Event" is included as an appendix to UNODC's Handbook. It was prepared to assist those responsible for the organization of a major event in reviewing their own preparedness and capacity to prevent, detect and respond to corruption while ensuring the successful organization of the major event.

The Checklist is a self-administered process-based tool designed to facilitate the development of a comprehensive approach to corruption prevention with

respect to the organization and staging of the event. Any group or organization involved directly or indirectly in the organization of a major event or preparing a bid to host such an event can proceed with a review based on the Checklist. The workshop will make extensive use of the Checklist as a learning tool and as a structure for some of the learning.

The Corruption Prevention Checklist is one of the main tools supporting this training workshop. It contains a number of questions that responsible managers could ask to assess the preparedness of their own organization in terms of preventing corruption. You will note that, at the end of each lesson, participants are invited to consider these questions. As they do so, you may invite them to formulate additional questions. You should give them an opportunity, each time, to ask you for clarification. You can also draw the participants' attention to the red flags (🚩) included in the Checklist. A "red flag" warns about factors and observations that may signal an enhanced or specific risk or vulnerability in relation to corruption.

The training workshop will help participants understand this assessment tool and become familiar with how it can be used to develop a preliminary risk mitigation plan upon which they can build over time. The facilitator should be very familiar with the Checklist.

8. PowerPoint Presentations

PowerPoint presentations are provided for each session. In some situations, it may be advisable, even if the training is delivered in English, to have the presentations translated into a different language to help participants assimilate the material more easily.

A short lexicon is provided in Annex 1 to the Participant Manual. If some participants are expected to experience difficulties with the more technical terms used in the training workshop, it may be useful to arrange for the lexicon to be translated in the language they are most familiar with and to work with interpreters to ensure the consistent use of these terms throughout the workshop.

9. Symbols

Symbols	
	Participant Manual
	Example
	Case study
	Time
	Script
	Flip chart
	PowerPoint slide
	Additional information
	Facilitated discussion
	Group activity - discussion
	Resource and learning material

10. Testing retention of main concepts

You may elect to test the participants' retention and understanding of the key concepts and methods presented in this workshop. If so, you should inform participants that you intend to do so and assure them that the results will be kept confidential. The test should be presented as a means to help participants identify areas where their understanding may be incomplete and for which they might therefore benefit from further consulting the relevant sections of the Participant Manual and UNODC's Handbook.

11. Preparing yourself for the workshop

You will find it useful to prepare yourself to deliver the workshop by finding out and reviewing the following information in advance of the workshop:

- Corruption prevention legislation in the country in which the participants are working (including legislation pertaining to the protection of reporting persons – e.g., whistle-blowers);
- Procurement policies and legislation of the national Government;
- Whether the State represented by the participants is party to the Convention and, if so, since when;
- Information available from UNODC on the progress made to date by the State in implementing the Convention;
- Details about the country's anti-corruption body and its role and mandate;
- General information about the role of the Auditor General/Comptroller General in the participants' own country;
- Any experience the participants' country has had in recent years in holding a major event.

Participants in the workshop may come from more than one country and you may therefore have to familiarize yourself with the situation in more than one country.

12. Evaluation and feedback

To continuously improve this training package, UNODC is seeking feedback and suggestions for improvement from both participants and facilitators.

Participants are requested to complete evaluation forms at the end of the workshop. As a facilitator, you can also provide valuable feedback, including detailed comments on the timing, organization and value of the training workshop, the appropriateness and relevance of the content for the participants and whether the learning outcomes appeared to have been achieved, and suggested improvements. You are also encouraged to share with UNODC any additional exercise, case study, learning objects and teaching aids that you may have developed while customizing the training package.

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Introduction

Session outline

This 90 minute session is devoted to introducing the facilitator(s) and the participants to each other, introducing the general theme of the workshop, presenting the objectives of the workshop, inviting participants to express what they expect to learn during the workshop, and presenting the overall structure of the workshop.

- 📄 A PowerPoint presentation is available (PPT-Introduction).
- 🕒 Each of the three parts of this introductory session is expected to last for approximately 30 minutes.
- 📖 The Participant Manual has a short introductory section.

1. Introduction (🕒 30 minutes)

1.1 Welcome

- Welcome participants
- Introduce facilitator and his/her background (and any other resource persons involved in delivering the workshop)
- Make reference to the workshop's sponsor(s) and organizers
- Refer to the context, i.e., why is the workshop offered at the present time, to this particular group of participants

1.2 Introduction of participants (🕒 30 minutes)

- Invite all participants to introduce themselves to each other and to disclose how they might be involved or have been involved in the organization of a major event.
- 📄 PPT-Introduction: Slides 1 to 3

2. Presenting the workshop (🕒 30 minutes)

3.1 Objectives of the training workshop

The overall objective of the workshop is to equip participants with the concepts and tools they will require in order to identify their organization's vulnerability to corruption, assess the specific risks of corruption associated with the

organization of a specific major event, and design effective measures to mitigate these risks.

Participants will also learn to use a risk assessment tool designed to assess an organization's readiness to prevent corruption with respect to the various aspects of the organization of a major event.

- 🗣️ Present the objectives of the workshop and allow for questions and comments. If the workshop is being delivered in relation to the organization of a specific event, the objectives of the workshop can be formulated and explained accordingly.
- 📄 PPT-Introduction: slides 5-6
- 😊 Participants should be invited to ask any question they may have about the objectives of the workshop.
- 😊 If the group of participants is involved or is considering getting involved in the organization of a major event, encourage a brief discussion of the nature of the proposed event and the status of the preparations.

3.2 Expectations of participants

Participants may come to the workshop with varying expectations or may not have yet given much thought to what they can expect from the training. An exercise may help them acquire some clarity about their own expectation and help the facilitator understand the group's specific areas of interest.

- 📄 If participants form a particularly diverse group in terms of the agencies they represent, their respective responsibilities regarding a major event, or their individual background and level of expertise with respect to risk management, it may be a good idea to invite them to briefly reflect on and express what they expect of the workshop. The main expectations can be recorded on a flip chart. Alternatively, participants may be invited to write down their expectations before they share them with the rest of the group. The notes thus taken during this exercise (or the statements written by the participants) can be revisited again during the feedback session, at the end of the workshop, to invite participants to comment on whether their expectations of the workshop have been met.

- 📄 PPT-Introduction: slide 6

3.3. Structure of the workshop and learning tools available

- 🗨️ Present the general structure of the workshop, using either a printed copy of the chart provided here on the structure of the workshop or using a projector:
 - The number of sessions including the present one (19 sessions);
 - The average length of each session is about 90 minutes;
 - With the exception of lesson 9 (Mitigating the risk of corruption in the management of human resources) which runs for two consecutive sessions, each session is devoted to one lesson;
 - There are 18 individual lessons, each one corresponding to a chapter in Participant Manual;
 - There can be some flexibility in the use of time depending on the interest of participants or the questions or issues they may wish to explore;
 - The various lessons typically correspond to the main sections of the Corruption Prevention Checklist.

Allow a few minutes for participants to ask for any clarification or additional information about the structure of the workshop.

📄 PPT-Introduction: slides 7-8

- 🗨️ Briefly introduce and present the Participant Manual, the Handbook and its Corruption Prevention Checklist, the text of the Convention (UNCAC), and the lexicon that participants have at their disposal.

3. Corruption and major events (🕒 30 minutes)

This brief introduction to the general theme of the workshop serves to emphasize that the organization of a major public event introduces some significant risks of corruption and that the nature of these risks must be understood, properly assessed, and mitigated by various measures that will need to be carefully designed and implemented. Some participants may already be aware of the role they or their organization is expected to play in that process, but others may not be. This is a first opportunity to alert participants to the relevance of the United Nations Convention against Corruption (UNCAC) and let them know that the purpose and relevant provisions of the Convention will be reviewed in a later session.

2.1 Understanding and managing the risk of corruption in the organization of a major event

There is a high risk of corruption in the organization of major public events, such as international sporting, cultural or high-level political events. This is largely because such events involve significant resources and large amounts of funds as well as complex logistical arrangements within very tight timeframes. That risk may be heightened by insufficient anti-corruption policies and systems in place within the host country. Even when strong policies and systems exist, the organization of a major event creates new opportunities for corruption and requires targeted action to identify, assess and manage this additional risk.

The organization of a major event puts existing anti-corruption measures to the test. It also offers an opportunity to demonstrate the efficacy of key corruption prevention measures and to leave a positive legacy of integrity in large public sector projects.

The United Nations Convention against Corruption (UNCAC or the Convention) constitutes a comprehensive framework for designing and implementing anti-corruption safeguards in the high-risk environment created by the organization of a major public event. The Convention is therefore a centrepiece of this workshop. The workshop will refer to the relevant provisions of the Convention and identify some effective corruption prevention practices applicable to various aspects of the organization of a major event.

It is important for all those who are involved in an aspect of the organization or planning of a major event to gain an understanding of the risk of corruption associated with such an initiative and the need to design comprehensive strategies to manage that risk as effectively as possible.

☛ It is important to make the point that there is an elevated risk of corruption when a major event is being organized and that special measures will be required. A workshop such as this one can help the key individuals involved in the planning and organization of a major event to better understand the risk and help their organization deal with this particularly difficult aspect of the initiative.

🔗 PPT-Introduction: Slides 9 to 14

2.2 Corruption risk management

A risk management approach is particularly well suited to prevent corruption in the organization of a major public event. A strategic risk management approach to the prevention of corruption during the organization of a major

event is needed. Specific elements of such a risk mitigation approach will be reviewed during the workshop.

As will be explained, a systematic assessment of the risk of corruption related to every major aspect of the organization of the event is essential to support such an approach. The assessment provides the foundation for the development and implementation of a proper corruption risk mitigation strategy.

A corruption risk assessment process should be implemented by the various agencies, governments and other stakeholders involved in bidding for or organizing a major international event. As a starting point for such an exercise, a “checklist” was developed to assist stakeholders in reviewing their own preparedness and capacity to prevent, detect and respond to corruption while ensuring the successful organization of the event. The Checklist is appended to UNODC’s Handbook.

- ☛ Explain what a risk management approach might consist of and emphasize that it must be based on an assessment of the risk of corruption. This is a good time to briefly introduce one of the tools that will be used extensively during the workshop: the Corruption Prevention Checklist (Annex of UNODC’s Handbook).
- ☛ Explain that, as will be elaborated later, there are various organizational and governance models possible for organizing a major event which, for the sake of discussion, we will refer to “the Authority” to generically refer to the organization designated by law or otherwise to organize the major event or is responsible for the coordination of the organizational activities.

📄 PPT-Introduction: slides 14-15

2.3 Key aspects of the organization of a major event

The workshop will concentrate on key aspects of the organization of a major event. These include:

- Governance, accountability and leadership
- Human resources, including the recruitment, selection, training and management of personnel
- Financial management
- Public procurement
- Development of major infrastructure and construction
- Security infrastructure and arrangements
- Private sector involvement
- Post-event activities

Each of these aspects faces its own risks of corruption and requires specific measures in order to reduce the initiative's overall vulnerability to corruption. Risk mitigation strategies must be in place, compliance with these measures must be strictly monitored and incidents of corruption must be detected and met with a prompt and effective response.

- ☛ Present the key aspects of the organization of a major event in general terms. Before you do so, you may wish to invite participants to try to identify these main aspects, based on their own experience. Participants may also be invited to identify which ones of these main aspects they expect themselves or their organization to be more directly involved in (e.g., procurement, financial planning, security, etc.).
- ☛ You may also wish to draw the attention of participants to the fact that there are other risks of corruption also associated with major international events. For example, there are significant risks of fraud and corruption (bribery, influence peddling, abuse of position) related to the application or bidding process for the right to hold the event, and to the decision making process by the international organization responsible for these events.² There is also a significant risk of fraud and corruption during major sporting events, and in particular in relation to “match fixing”.³ These two other significant vulnerabilities to corruption of major events, however, will not be addressed in the present workshop.

📄 PPT-Introduction: slides 16 to 19

- ☺ Participants may be invited to reflect on the reasons why a country or an organization typically undertakes to hold a major event: e.g., prestige, long-term economic benefits, legacy, etc. There are many potential benefits associated with a major international event. Corruption may rob every one of these benefits and jeopardize the success of the event.

	Questions for discussion
	<ul style="list-style-type: none">✓ Why does a country or an organization typically undertake to hold a major event?✓ There are many potential benefits associated with a major international event.

² For example, see: Zakus, D. and J. Skinner (2008). Modeling Organizational Change in the International Olympic Committee. *European Sports Management Quarterly*, 421-442. The article describes alleged corruption within the IOC and explains how the IOC changed in policies and practices. The authors also discuss the challenges involved in changing an organization such as the IOC.

³ See also: UNODC (2013). *Criminalization Approaches to Combat Match-fixing*. Vienna: UNODC.
http://www.unodc.org/documents/corruption/Publications/2013/Criminalization_approaches_to_combat_match-fixing.pdf

Is it not true that corruption can effectively rob every one of these benefits and jeopardize the success of the events?

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LESSON 1: Organizational vulnerability to corruption - the risk management solution

1. Introduction

Organizations are vulnerable in different ways to various risk factors. Corruption is one of these risks and with it come other associated legal, financial, reputational risks. Modern organizations use strategic approaches to develop a readiness to deal with unexpected emergencies or events and to mitigate the various risks that their operations are facing. Risk management refers to methods and process used for forecasting and evaluating financial and other risks, for identifying policies, procedures and controls to avoid or minimize their impact, and for implementing and monitoring these various risk mitigation measures.

As will be explained and illustrated throughout the workshop, a risk-based approach underpins every element of an organization's anti-corruption strategy.

2. Objectives

This lesson is meant to introduce participants to some of the basic principles and concepts of risk management as they apply to the prevention of corruption and associated fraudulent activities.

3. Learning outcomes

At the end of the session participants will:

- Understand what risk management and risk mitigation generally involve
- Be able to give a few examples of corruption risk management

📎 PPT-Lesson 1: slides 1 to 4

4. Lesson outline (🕒 90 minutes)

- List the objectives and learning outcomes of this lesson and explain if necessary. Allow participants to ask questions about the outcomes if necessary. (🕒 5 minutes)
- Risk management – a cycle (🕒 5 minutes)
- Terminology (🕒 5 minutes)
- Case study – participants to read (🕒 15 minutes)

- Group work (🕒 25 minutes)
- Report from groups (🕒 15 minutes)
- Summation and questions (🕒 20 minutes)

5. The risk management process

📄 PPT-Lesson 1: slides 5 and 6

- 🗣️ The process of risk management, whether applied to the risk of corruption or any other risk faced by an organization, is a continuous one, a cycle.

6. Terminology

📄 PPT-Lesson 1: slide 7

- 🗣️ Introduce the concept of risk management, the idea that the task of risk management can be conceptualized as a cycle, and the following terms:

Risk management: Methods and process, governed by operational policies, used for forecasting and evaluating financial and other risks and assessing an organization's exposure to them, for identifying procedures and controls to avoid or minimize their impact (risk mitigation measures), and for implementing and monitoring these various risk mitigation measures.

Risk identification: Determining what risks exist or are anticipated, their characteristics, source, remoteness in time, and possible impact.

Risk mitigation: A systematic reduction in the extent of exposure to a risk and/or the likelihood of its occurrence. Also called risk reduction.

Risk mitigation plan: A plan, based on a proper risk assessment, to systematically reduce the extent of exposure to a risk and/or the likelihood of its occurrence (vulnerability of the organization to that risk).

Integrity testing (also: integrity assessment): A form of audit in which the risk mitigation strategies and the control process that have been put in place are tested to ascertain that they are actually applied and, if so, with what results.

- 😊 Invite participants to relate these concepts to any risk mitigation strategy they may be familiar with in their professional experience. Be prepared to give one example of such a strategy (not involving corruption, but another form of risk).

7. Part 1 – Major events affected by corruption (🕒 55 minutes)

📄 PPT-Lesson 1: slides 8 to 10



Case study: The Organization of the Commonwealth Games in India
(see: Participant Manual, page 6)

- Review of excerpts from the Comptroller and Auditor General of India
- Review of newspaper report



Group work: After reviewing the materials contained in the case study participants, working in small groups, are asked to:

- Identify what went wrong in terms of corruption and fraud prevention;
- Comment on whether, in their view, these problems could have been anticipated and prevented;
- Identify the main lessons that can be drawn from that experience.

8. Key points to remember (⌚10 minutes)

- ☐ Invite participants to identify key points they retained from the discussion.
List the various points on a flip chart for future reference.
- 🗂 PPT-Lesson 1: slides 11 and 12

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LESSON 2: Challenges associated with the organization of major events

1. Introduction

The organization of a major international event creates some major challenges for all those involved. Throughout the complex planning and preparation process, opportunities for corruption abound and can threaten the very success of the whole event. As was already seen, major public events therefore require targeted action to identify, assess and manage this risk. This said, it is also important to recognize that hosting a major event is also an opportunity to demonstrate the efficacy of key corruption prevention measures and to leave a very positive legacy of integrity in large public sector projects.

This second lesson will link some of the main organizational, management and leadership challenges that come with the organization of a major public event and show how some of these challenges can create certain organizational and structural vulnerabilities to fraud and corruption.

2. Objectives

The main objective of this lesson is to offer participants an opportunity to reflect on the reasons why the organization of a major international event is likely to offer unprecedented opportunities for corruption and fraud.

A second objective of the lesson is to demonstrate to participants, with specific examples, that the organization of a major event can also be an opportunity to significantly improve corruption prevention measures in the public sector.

3. Learning outcomes

At the end of this lesson, participants will:

- Understand why major international events hold a very high risk of corruption;
- Understand that the organization of a major event is also a very significant opportunity to demonstrate the efficacy of key corruption prevention measures and to leave a very positive legacy of integrity in large public sector projects;
- Identify the major challenges associated with the organization of major events and their implications for the prevention of corruption.

4. Lesson outline (🕒 90 minutes)

- 🗣️ Introduce the idea that the organization of major international events comes with some very specific challenges resulting from some of the typical characteristics of these events. (🕒 5 minutes)
- 📅 Ask the group to reflect on what it is about major international events that make them a unique opportunity for corruption. The characteristics identified are to be noted on flip charts. (🕒 20 minutes)
- 📖 Invite participants to read the short case study on the rapid escalation of the costs of holding a major public event (at page 13 of the Participant Manual). (🕒 10 minutes)
- 😊 Discussion of case study (🕒 15 minutes)
- 🗣️ Short presentation on what renders these large initiatives particularly vulnerable to corruption and fraud (🕒 15 minutes)
- 😊 Discussion (🕒 15 minutes)
- 📅 Key points to remember (🕒 10 minutes)

5. Part 1 - Case study

Some of the typical characteristics of a major public event may increase the risks of corruption during its organization and delivery. The Authority responsible for the event may become particularly vulnerable to corruption, given the number and potential magnitude of the risk factors at play. Some of these risk factors may simply result from the unique opportunities created by the organization of such events – the significant sums of money and often huge resources involved, the large number of contracts to be issued, or the special sources of revenue, such as royalties, sponsorship contracts, branding and marketing opportunities, and broadcasting rights. Other risk factors may result from the “unique character” of major events and the fact that their organization faces an imperative to complete all the necessary preparations under difficult conditions, unusual constraints and pressing time lines.

📁 See description of case study at page 10 of the Participant Manual.

📎 PPT-Lesson2: slides 4 to 8

📖 Questions for discussions after reading the case study:

- Are cost-overruns in the organization of a major event necessarily a sign of corruption?
- Can costs escalation be attributed in certain cases to corruption?

- In your view, could the cost escalations described in the case study have been anticipated and prevented?

6. Part 2 - Specific challenges

☞ See PPT-Lesson 2: slides 9 to 11

Main points to be covered during the presentation:

- The stakes involved in organizing a highly-publicized and internationally anticipated major public event can be very high. Any failure is potentially rife with financial, economic, and political consequences for the responsible agency, sponsors and the country involved.
- The political nature or the politicization of such events – including the close relationships between organizers, politicians, the private sector, sponsors and the media – can create a high-risk environment for corruption.
- The exceptional nature of these events increases the likelihood that regulations and standard procedures might be relaxed or set aside during the special situation as many different actors are involved.
- The shortness of time may make it difficult for existing monitoring, auditing and accountability mechanisms to effectively perform their functions and have the desired impact. As a result, the necessary independent oversight of activities might be lacking and the allocation of public funds may not be transparent or subject to adequate controls.
- The organization of a major event is often delegated to a special, dedicated team or agency that does not always fit squarely within existing public management structures and processes. This may create governance issues and potential weaknesses in efficiency, transparency and accountability.
- A team's relative inexperience with respect to the organization of such a large-scale event adds to the risk of corruption as excessive responsibility, power and money may be given to event organizers who may not necessarily have the required managerial and organizational skills. As a result, the decision-making, implementation and monitoring processes that are relied upon to manage the organization of a major event are not always grounded in good practices and may stray from normally accepted procedures.
- The fact that major events usually require the recruitment, hiring, training and supervision of a large staff, directly or indirectly, is another

source of vulnerability, particularly if the human resources management infrastructure that is relied upon is new, untested, or even improvised.

- Major events require the procurement of goods, infrastructure and services on a very large scale, usually with significant time constraints. This can test the limits and efficiency of existing procurement practices, procedures and regulations and potentially lead an organization to circumvent established procurement procedures and bidding processes.
- The complexity of the numerous contracting and sub-contracting arrangements involved in the organization of major events, either with private companies or public sector agencies, often on an international scale, is another source of challenges for event organizers. These complexities create major opportunities for corruption, most notably in the form of influence peddling and the bribing of decision-makers at all levels of the planning and operational stages.
- Within the government or the specially created agency responsible for the organization of a major event, the measures in place to protect individuals who may report incidents of corruption, fraud and intimidation (often referred to as whistle-blowers) are often insufficient and untested. There may also be limited capacity to respond to such reports within the short timelines under which the major event is being organized.
- The fact that the news and entertainment media may be closely connected with event organizers (or even dependent upon them through sponsorship arrangements, the sale of broadcasting rights or other such arrangements or promise of such arrangements) may limit the independence and impartiality of journalists and their ability to expose corruption.
- In particular, with respect to large-scale sports competitions, the low level of accountability and transparency within the huge international sporting industry presents a high risk for corruption. Transparency International notes how the close-knit relationship among sporting officials, politicians, business people, sponsors and the media can create a high-risk context for corruption to occur⁴. The low levels of managerial, organizational, financial and marketing skills create an environment in which risks and abuses are more likely. These problems are most apparent when it comes to how the industry deals with match-fixing, the influence of organized crime, governance, infrastructure construction, sponsorships, and the media.

⁴ Transparency International (2009). *Corruption and Sport: Building Integrity and Preventing Abuses*. Berlin: Transparency International, p. 1.

7. Key points to remember (🕒10 minutes)

📋 Invite participants to identify the key points they retained from the discussion. List the various points on a flip chart for future reference.

📁 See PPT-Lesson 2: slides 12 and 13

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LESSON 3: The United Nations Convention against Corruption

1. Introduction

Preventing corruption is a pre-requisite to the success of the organization of a major public event. The various vulnerabilities and risks of corruption we have identified so far can be addressed within the framework provided by the United Nations Convention against Corruption (the Convention or UNCAC), in particular under Chapter II, which requires States parties to introduce effective policies for the prevention of corruption.

2. Objectives

The main objective of this lesson is to explain and illustrate how the Convention provides a useful framework for the prevention of corruption in the organization of major events.

3. Learning outcomes

At the end of the session, participants will:

- Be generally familiar with UNCAC and aware of its purpose;
- Understand that UNCAC, once ratified and implemented, provides a strong framework for designing and implementing broad anti-corruption measures to address the risk of corruption associated with the organization of major events.

4. Lesson outline (🕒 90 minutes)

- 🗣️ Brief presentation of UNCAC (🕒 20 minutes)
- 😊 Questions about UNCAC (🕒 10 minutes)
- 😊 Whether UNCAC has been ratified by State(s) represented by participants and, if so, when. Verify against ratification list (Appendix 1) (🕒 5 minutes)
- 😊 Ask participants whether the public (in their country) is concerned about corruption. What is the form that this concern takes in the participants' country (or countries)? Is this concern related in any way to the organization of a major international event (past or future)? (🕒 15 minutes)

- 🗣️ Brief presentation on what is corruption (🕒 10 minutes)
- 🗣️ Brief presentation on types of corruption defined in UNCAC (🕒 10 minutes)
- 😊 Questions about what is corruption (🕒 10 minutes)
- 🗣️ Importance of prevention in UNCAC (🕒 5 minutes)
- 📅 Identify key points to remember (🕒 5 minutes).

5. Part 1 – Presentation of the Convention (🕒 50 minutes)

📁 Text of UNCAC

📎 PPT-Lesson3: slides 1 to 17

The United Nations Convention against Corruption was adopted by the General Assembly in October 2003 and has been widely ratified⁵. It is the only legally binding universal anti-corruption instrument. The Convention's far-reaching approach and the mandatory character of many of its provisions make it a unique tool for developing a comprehensive response to a global problem. UNCAC covers five main areas: prevention, criminalization and law enforcement measures, international cooperation, asset recovery, and technical assistance and information exchange.

The purpose of the Convention is to:

- Promote and strengthen measures to prevent and combat corruption more efficiently and effectively;
- Promote, facilitate, and support international cooperation and technical assistance in the prevention of and fight against corruption, including in asset recovery;
- Promote integrity, accountability and proper management of public affairs and public property.

Under UNCAC, a State party is required to introduce policies and programmes to prevent and control corruption. The Convention requires a number of measures relating to both the public and private sectors. The Convention stresses the importance of preventing corruption before it occurs. It also requires the criminalization of a number of specific conducts such as bribery, illicit enrichment, abuse of functions, trading in influence, embezzlement, or misappropriation or other diversion of property by a public official.

⁵ 172 Parties as of 31 October 2014.

<http://www.unodc.org/unodc/en/treaties/CAC/signatories.html>

UNCAC also requires the criminalization of other activities in support of corruption, such as obstruction of justice, the concealment or laundering of the proceeds of corruption. This is necessary in order to facilitate the effective detection and prosecution of corruption.

Very importantly, UNCAC provides a strong framework for international cooperation in fighting corruption, particularly with respect to asset tracing, freezing and seizure, as well as asset recovery and anti-money laundering measures. It encourages cooperation between national anti-corruption agencies and other law enforcement agencies involved in the fight against organized crime and corruption.

- ☺ Ask participants whether UNCAC has been ratified by their respective country, and if so when. Verify against ratification list (Appendix at the end of this chapter). (🕒 5 minutes)
- ☺ Ask participants whether the public (in their country) is concerned about corruption. What is the form that this concern takes in the participants' country (or countries)? Is this concern related in any way to the organization of a major international event (past or future)? (🕒 15 minutes)

6. Part 2 – Definition of corruption? (🕒 10 minutes)

📁 Text of UNCAC

🗨️ PPT-Lesson3: slide 18

UNCAC does not provide a definition of corruption. Corruption may encompass a variety of illegal acts, making it challenging to establish a universally acceptable and understandable definition. During the negotiations of UNCAC, United Nations Member States carefully considered whether to develop a legal definition of corruption. It was concluded that any attempt at a comprehensive definition would inevitably fail to address some forms of corruption. As a consequence, the international community reached consensus on certain manifestations of corruption while leaving each State free to go beyond the minimum standards set forth in UNCAC.

Put simply, corruption is the abuse of entrusted power for private gain. For a public official, it involves giving or obtaining an advantage through illegitimate means or through means inconsistent with his/her duties.

7. Part 3 – Types of corruption (🕒 25 minutes)

📁 Text of UNCAC

🔗 PPT-Lesson3: slides 19 to 27

UNCAC lists offences that States parties must establish as crimes (mandatory criminalization) as well as offences that States parties are required to consider establishing. UNCAC introduces minimum standards, but States parties are free to go beyond them. States may criminalize or have already criminalized conduct other than the offences listed in this chapter as corrupt conduct.⁶ The types of corruption listed in UNCAC are:

- Bribery in the public sector
- Bribery in the private sector
- Embezzlement, misappropriation or other diversion of property by a public official
- Trading in influence
- Abuse of functions
- Illicit enrichment

As will be seen, any of these forms of corruption can be linked in one way or another to various aspects of the organization of a major event.

Bribery

Bribery is the act of conferring a benefit in order to improperly influence an action or decision. It can be initiated by an official who asks for a bribe, or by a person who offers to pay one (see articles 15 and 17 of UNCAC).

A distinction is often made between “**active bribery**” and “**passive bribery**”. “Active bribery” usually refers to the act of offering or paying a bribe, while “passive bribery” refers to the requesting or receiving of a bribe. A corrupt transaction may be initiated under either rubric: by a person who offers a bribe or by an official who requests or demands one.

A “bribe” can also describe a payment extracted by a public official from a member of the public as precondition to receiving the service to which he or she is entitled. Strictly speaking, such a transaction is a form of “extortion”.

UNCAC requires that both active and passive bribes be treated as serious crimes whether they involve public officials (article 15), foreign officials (article 16), or the private sector (article 21).

⁶ See: United Nations Office on Drugs and Crime (2006). *Legislative Guide for the Implementation of the United Nations Convention against Corruption*. New York: United Nations.

Common Characteristics of Bribery

- The "benefit" conferred by a "bribe" can take a variety of forms: cash, luxury items, mobile phone credits, drugs, inside information, sexual or other favours, entertainment, employment or the mere promise of a benefit in the future (such as a post-retirement job).
- The benefit of a bribe can pass directly to the person bribed, or indirectly to a third party such as a friend, a relative, or an associate of the official.
- An official may receive bribes from other officials who are in collusion with corrupt individuals and criminals.
- A bribe can be paid "according to the rule" (to obtain something the official is withholding but is under a public duty to provide, such as a permit or licence); or it can be "against the rule" (a payment to encourage an official to ignore the rules in favour of or at the request of the person offering the bribe).
- Bribes can be paid individually, on a case-by-case basis, or as part of a continuing relationship in which officials receive regular benefits in exchange for regular favours.
- Once bribery has occurred, it can lead to other forms of corruption. By accepting a bribe, an official is compromised and is then vulnerable to being blackmailed and coerced into further, and more serious, derelictions of his or her duties.

Embezzlement, misappropriation or other diversion of property by a public official

Embezzlement, theft and fraud all involve stealing by an individual exploiting his or her position of employment in either the public service or the private sector and constitute corruption. In the case of embezzlement, property is taken by someone to whom it has been entrusted. The property may belong to people with whom an official is dealing in his or her official capacity. In some cases, it may resemble extortion (see articles 17 and 22 of UNCAC).

Trading in influence

Trading in influence involves the promise, offering or giving to a public official or any other person, directly or indirectly, of an undue advantage to get that person to abuse his or her influence (real or supposed) in exchange for an undue advantage for oneself. It may also involve the solicitation or acceptance of such an undue advantage by a public official or any other person (see article 18 of UNCAC).

Abuse of function

An abuse of functions or position is the performance of or failure to perform an act, in violation of laws, by a public official in the discharge of his or her

functions, for the purpose of obtaining an undue advantage for himself or herself or for another person or entity (see article 19 of UNCAC).

In some cases, corruption involves the abuse of function or discretion. Such abuses are often associated with bureaucracies in which there are broad individual discretions and inadequate oversight and accountability structures. They also flourish where decision-making rules are so complex that they neutralize the effectiveness of any accountability mechanisms that do exist.

Illicit enrichment

The criminalization of illicit enrichment is something to be considered by States parties to the Convention (article 20 of UNCAC), which defines it as the “significant increase in the assets of a public official that he or she cannot reasonably explain in relation to his or her lawful income.” Illicit enrichment is also prescribed as an offence in the Inter-American Convention against Corruption (IACAC) and the African Union Convention on Preventing and Combating Corruption (AUCPCC) under comparable definitions. Illicit enrichment specifically targets public officials. National illicit enrichment laws typically identify public officials as the persons of interest—the individuals who may be prosecuted for the crime. They sometimes also limit the period of time over which a person is considered a person of interest.

📁 The Participant Manual, at page 20, contains more information about the criminalization of illicit enrichment. An additional resource you may wish to consult on this topic is: Lindy Muzila, L., Morales, M., Mathias, M. and T. Berger (2012). *On the Take Criminalizing Illicit Enrichment to Fight Corruption*. New York: The World Bank and UNODC.

http://www.unodc.org/documents/corruption/Publications/2012/On_the_Take-_Criminalizing_Illicit_Enrichment_to_Fight_Corruption.pdf

☺ Invite participants to provide a few example of corruption that have attracted the attention of the public. Ask: “Would these incidents constitute corruption under the terms of the Convention?”

8. Part 4 – Emphasis of the prevention of corruption (🕒 5 minutes)

📁 Text of UNCAC

📄 PPT-Lesson3: slide 28

UNCAC foresees an entire system to prevent corruption which is set out in the prevention chapter. This includes model preventive policies, such as the establishment of anti-corruption bodies and enhanced transparency in the financing of election campaigns and political parties. States must endeavour to

ensure that their public services are subject to safeguards that promote efficiency, transparency and recruitment based on merit. Once recruited, public servants should be subject to codes of conduct, requirements for financial and other disclosures, and appropriate disciplinary measures. Transparency and accountability in matters of public finance must also be promoted, and specific requirements are established for the prevention of corruption, in the particularly critical areas of the public sector, such as the judiciary and public procurement.

Preventing public corruption also requires an effort from all members of society at large. For these reasons, UNCAC (article 13) calls on States parties to promote actively the involvement of non-governmental and community-based organizations, as well as other elements of civil society, and to raise public awareness of corruption and what can be done about it. Article 5 of UNCAC enjoins each State party to establish and promote effective practices aimed at the prevention of corruption.

With respect to the organization of major public events, this could include enacting temporary or permanent special legislation or regulations to support the organization of a major event, establish new agencies, define the respective mandates of the relevant public authorities or specify the division of tasks and responsibilities amongst public and private partners.

9. Key points to remember (🕒 10 minutes)

☐ Invite participants to identify key points they retained from the discussion. List the various points on a flip chart for future reference.

10. Appendix

A list of signatories and parties to UNCAC and date of ratification is available at: <http://www.unodc.org/unodc/en/treaties/CAC/signatories.html>

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LESSON 4: Strategic planning to prevent corruption

1. Introduction

The goal of preventing corruption during the organization of a major event should be communicated clearly by the authorities and at the highest level possible. Once the goal holding a “corruption-free” event has been formally adopted and declared, that commitment needs to be reflected in effective strategies to assess the risk of fraud and corruption, to devise and implement appropriate risk mitigation measures, and to monitor their impact. The prevention of corruption needs to be integrated into a broader risk management strategy for the whole of the initiative. It must also involve the active participation of all major stakeholders.

2. Objectives

The main objectives of the lesson are to:

- Situate the strategic planning required to prevent corruption within the broader context of risk management;
- Distinguish between preventive and reactive strategies;
- Emphasize the need to link prevention strategies to the existing legal framework.

3. Learning outcomes

At the end of this lesson, participants will:

- Understand the importance of comprehensive and strategic prevention plans to mitigate the risk of corruption in the organization of a major event;
- Understand that corruption prevention plans must be revisited, updated and improved constantly;
- Be familiar with the main aspects of the anti-corruption legal framework of their country;
- Understand that there can be a role for a specific legal framework to support such strategic planning;
- Be familiar with examples of comprehensive corruption prevention strategies adopted in some instances to mitigate the risk of corruption in the organization of a major event.

4. Lesson outline (🕒 90 minutes)

- 🗣️ Presentation on strategic approaches to corruption prevention and questions (🕒 25 minutes)
- 😊 Group discussion on the anti-corruption legal framework of the country and how it may support the planning of a corruption-free event. (🕒 30 minutes)
- 📖 Examination of several examples (🕒 20 minutes)
- 📄 Summary of main points coming out of the discussion (🕒 10 minutes)
- 😊 Key points to remember (5 minutes)

5. Part 1 – Strategic approaches (🕒 55 minutes)

🗣️ PPT-Lesson4: slides 1 to 11

Without exception, discussions of anti-corruption strategies must include both preventive and reactive strategies which can complement each other. Efforts to prevent corruption in policing, for example, typically emphasize some basic strategies, including: adoption of a code of conduct; careful vetting of new recruits; integrity training; strengthening internal accountability measures, thereby restricting the inclination and ability of supervisors to claim ignorance and resist demands for collective and individual accountability; increasing attention to a ‘nipping it in the bud’ orientation through more engaged supervisory practices; and, abandoning policies and practices that permit and arguably even encourage corruption.

Anti-corruption legal framework

An effective legislative basis for anti-corruption strategies may or may not exist in a country hosting or bidding to host a major event. If the laws are not already in place, the major event may offer a unique opportunity to proceed with the necessary legislative reforms.

International conventions, such as UNCAC, or other regional or sectoral treaties to which your country may be a party need to be implemented through changes in domestic laws and policies. Each country may be at a different stage of achieving compliance with the requirements of these international instruments. National criminal laws, tax laws, or laws concerning the corruption of foreign officials or bribery in international commercial transactions may still require attention in order to achieve full compliance with the State’s international anti-corruption commitments. Participants should

become generally familiar with their country's own anti-corruption legal framework.

☺ Try to encourage an informed discussion on the anti-corruption legal framework of the country and how it may support the planning of a corruption-free event. If possible, invite a local resource person for example, from an anti-corruption agency or the Ministry of Justice or other substantive expert, to briefly present the existing legal framework. (🕒 30 minutes)

There are also frequent references in the literature to the need for specific laws and policies that address the dynamics of corruption in relation to major sporting events. Recent legislative initiatives seem to be motivated by a number of factors including: the lack of public scrutiny of the operations of major sporting federations; the enhanced role of private citizens through contracts in the planning and execution of major events; and, the significant toll that many believe is being levied on the reputation of several major international sporting events due to high-profile cases of match fixing and corruption.

A risk management approach

A strategic approach to risk management implies that the risks of corruption are identified, understood and effectively managed. There are examples of specific corruption prevention strategies developed to manage the risks associated with the organization of a major public event. Ex-post facto analyses of the risks of corruption and how they were mitigated are still rare, but have the potential to provide some important insights into the kind of vulnerabilities that are not easily avoided.

6. Part 2 – Examples of strategic planning (🕒 30 minutes)

📖 See Participant Manual, page 25, for examples of strategic planning exercises.

☺ Facilitated discussion: What do these strategies have in common?

7. Questions for an assessment

📁 Refer to section 1.6 of the Corruption Prevention Checklist

8. Key points to remember (🕒 10 minutes)

📋 Invite participants to identify key points they retained from the discussion. List the various points on a flip chart for future reference.

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LESSON 5: Risk assessment, the foundation of risk management

1. Introduction

An Authority that is serious about preventing corruption in the organization and delivery of a major public event should be prepared to conduct, as early as at the bid stage, a basic assessment of the risk of corruption and review its own ability to address that risk. It is absolutely crucial for the Authority responsible for a major event to proceed as soon as possible, and regularly thereafter, with a proper assessment of the risk of corruption it faces. Every Authority faces a variety of risks from external and internal sources. It is exposed to these risks in different ways and to different levels. A risk assessment involves a dynamic process through which the Authority can identify and assess the risks to the achievement of its objectives, including the risk of corruption and fraud, as well as its own level of exposure to these risks.

2. Objectives

The main objective of this lesson is to ensure that participants fully understand the importance of a proper corruption risk assessment process as a basis for a risk prevention strategy.

The lesson also presents the Corruption Prevention Checklist developed by UNODC.

3. Learning outcomes

At the end of this lesson, participants will:

- Understand the importance of conducting a corruption risk assessment exercise as a basis for corruption prevention planning;
- Understand how such assessments should ideally be conducted, involving all major stakeholders;
- Be generally familiar with UNODC's Corruption Prevention Checklist.

4. Lesson outline (🕒 90 minutes)

- 🕒 Part 1 - the importance of a proper risk assessment exercise (🕒20 minutes)
- 🕒 Part 2 - conducting a risk assessment (🕒20 minutes)
- 🕒 Part 3 - the Corruption Prevention Checklist (🕒20 minutes)

- ☺ Discussion and questions about the Checklist (⌚20 minutes)
- ☺ Review of key points to be remembered (⌚10 minutes)

5. Part 1 – The importance of a proper risk assessment (⌚ 20 minutes)

📎 PPT-Lesson5: slides 1 to 5

🗨️ The main points to be covered during this initial presentation are:

- A corruption risk assessment is what forms the basis for identifying the various corruption risks to which an organization is exposed, evaluating the nature and extent of the organization's potential exposure to them, and determining how risks will be mitigated and managed.
- An assessment is the foundation of a risk mitigation strategy or risk management plan.
- In assessing the risk of corruption and determining what level of risk may be acceptable, the Authority must understand not only the chances that corruption may occur, but also the cost of corruption if it does occur.
- Risk assessments should be periodically updated to identify any persisting, unmitigated or emerging risks.
- A responsible and collaborative approach to assessing and mitigating the risk of corruption should be favoured.
- There may be a natural tendency of all parties involved in the organization of a major event or some part of it to try to shift any risk to other parties. In some instances, this may include a desire to shift the risk of corruption. There needs to be a process in place to ensure that all relevant stakeholders understand the risks associated with corruption, are prepared to share the responsibility for mitigating them, agree on who amongst them is best placed to control or mitigate those risks, and are aware of their respective responsibilities.
- International organizations responsible for major events usually require the groups or organizations bidding to host an event to present a risk assessment and a risk mitigation strategy. These should include the measures that are being proposed to mitigate the risk of corruption in the organization of the event.
- It is generally useful to subject a newly formed Authority to a corruption prevention readiness review exercise using a systematic process supported by, for example, the Corruption Prevention Checklist provided in the appendix to UNODC's Handbook. The review should

be conducted regularly thereafter. The prompt and effective implementation of the recommendations of such a review can be assisted by follow-up exercises directly involving the management of the organization and documenting the progress made in implementing more robust prevention measures.

6. Part 2 – Conducting an assessment (🕒 20 minutes)

📁 PPT-Lesson5: slides 6 and 7

🗨️ The main points to be covered during this second presentation are:

- Given the particular objectives and focus of a corruption risk assessment, it can be beneficial to conduct such as assessment as a stand-alone exercise.
- Nonetheless, it may be efficient or expedient to conduct a corruption risk assessment as part of a broader risk assessment and mitigation exercise, including for example the risk of various liabilities, uncontrolled cost escalation, fraud, and delays in delivering the infrastructure or equipment needed for the event. Integrated and comprehensive risk management strategies and processes can be very efficient.
- An integrated risk assessment exercise can help identify how corruption may itself render other aspects of the major event more vulnerable. For example, corruption in the procurement of security services may render some security arrangements inoperable and corruption in the procurement process may lead to the procurement of below-standard or even dangerous equipment or facilities.
- Refer to the Corruption Prevention Checklist, section 1.5

7. Part 3 – The Corruption Prevention Checklist (🕒 20 minutes)

📁 The *Corruption Prevention Checklist* is going to be used extensively during the workshop. The facilitator should be thoroughly familiar with it. This particular tool warrants a more specific introduction.

📁 PPT-Lesson5: slides 8 to 10

🗨️ Explain that:

- The *Corruption Prevention Checklist* has been prepared to assist those who are responsible for the organization of a major event in reviewing their and their organization's preparedness and capacity to prevent, detect and respond to corruption while ensuring the successful organization of the major event.

- It is a self-administered process-based tool designed to assist an Authority (or a government) and other stakeholders in developing a comprehensive approach to corruption prevention with respect to the organization and staging of the event.
- Any group or organization involved directly or indirectly in the organization of a major event or preparing a bid to host such an event can use the Checklist to conduct a review.
- This type of summary review supported by the Checklist is not a substitute for a comprehensive and systematic corruption risk assessment.
- By the end of the workshop every participant will be expected to be familiar with the tool in question and able to use it to perform a review.

8. Discussion and questions about the Checklist (🕒 20 minutes)

🗨️ Ask participants to have a look at their copy of the Checklist and explain that:

- The Checklist is divided into nine main sections:
 1. General corruption prevention measures
 2. Personnel and human resources management
 3. Financial management
 4. Public procurement
 5. Major infrastructure and construction
 6. Security infrastructure and arrangements
 7. Private sector involvement
 8. Detection of corruption and enforcement
 9. Post-event activities
- Each section is subdivided into a number of key areas and, for each one of these, a number of specific assessment questions are listed and suggestions are offered concerning relevant good practices.
- In the Checklist, when appropriate, a “red flag” (🚩) warns about factors and observations that may signal an enhanced or specific risk of or vulnerability to corruption.
- The following lessons generally follow the structure of the Checklist.
- Throughout the workshop, at the end of each session, participants will be asked to review the relevant questions of the Checklist.

😊 Discussion and questions about the Checklist (🕒20 minutes)

9. Key points to remember (🕒 10 minutes)

📅 Invite participants to identify key points they retained from the discussion.
List the various points on a flip chart for future reference.

📎 PPT-Lesson5: slide 11

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LESSON 6: Institutional capacity

1. Introduction

The organization of a major event typically requires the establishment of a dedicated agency (an Authority) with a clear, legally established mandate. While some countries have chosen a different approach, it is usually preferable to have a singular Authority with overall responsibility for the organization of the event and a leadership role in coordinating the activities of the numerous stakeholders involved in the process. There is a great deal of evidence of the serious difficulties which tend to occur when this model is not used.

This Authority may be a government body or an independent entity subject to all governmental management and accountability standards and policies. While multiple and inclusive committees are critical to informed planning and operational readiness, the absence of centralized governance, management and accountability structures may heighten the risk of corruption.

The Authority must have a clear and appropriate legal mandate and an effective, transparent, and accountable governance structure. There must be, within the Authority, an institutional capacity to manage the whole process of organizing and staging a major event and to manage the flow and expenditure of public funds, as well as an oversight capacity to monitor progress in the preparations for the event and the development of the necessary infrastructures.

If the responsibility for any of the various oversight functions is assigned to existing government departments or agencies, it is important to clearly define the respective roles of each institution/agency, to ensure that they have the necessary expertise and resources at their disposal and that adequate coordination and cooperation mechanisms exist.

The organization of a major event necessarily involves entering into various forms of collaboration and partnership agreements. Potential conflicts of interest must be identified and addressed. The Authority must also identify politically exposed persons (PEPs), as part of its risk assessment process, and take appropriate risk mitigating measures.

2. Objectives

The main objective of this lesson is to draw the attention of participants to the advantage of establishing a single authority responsible for the organization of the major event, with a clear and appropriate legal mandate and an effective, transparent, and accountable governance structure. The lesson also refers to the

need for an Authority to take a number of specific precautions concerning partners, agents, consultants, lobbyists, and politically exposed persons (PEPs).

3. Learning outcomes

At the end of this session, participants will:

- Be familiar with several models for establishing a single Authority responsible for the organization of a major event;
- Understand the importance of clear and accountable governance, organizational and accountability structures;
- Understand the concept of politically exposed persons (PEPs) and be able to give some examples of such persons in a given organization;
- Be familiar with some of the general precautions to be taken concerning partners, agents, consultants, lobbyists, and PEPs.

4. Lesson outline (🕒 90 minutes)

- 🗣️ Part 1: Presentation on governance, organizational and accountability structures (🕒 15 minutes)
- 📖 Examples of legislation (🕒 10 minutes)
- 📖 Examples of governance structure (🕒 20 minutes)
- 🗣️ Part 2: Presentation on the precautions concerning partners, agents, consultants, lobbyists, and politically exposed persons (🕒 20 minutes)
- 😊 Facilitated discussion during which participants are asked to provide examples of PEPs they think might typically be involved in the organization of a major event (🕒 5 minutes)
- 📖 Review of assessment questions section 1.1, 1.9. and 1.10 of the Checklist (🕒 15 minutes)
- 😊 Review of key points to remember (🕒 5 minutes)

5. Part 1 – Organizational and accountability structures (🕒 45 minutes)

📎 PPT-Lesson6: slides 1 to 7

🗣️ Main points to be covered:

- There needs to be an institutional capacity to manage the whole process of preparing for and holding the major event.

- A country should consider and may decide to set a specific legislative framework for the governance of the Authority and the project as a whole.
 - Specific oversight mechanisms must be established to monitor the flow and expenditure of public funds, to monitor the effectiveness of preparatory work and the development of the necessary infrastructure, and to review all major decisions made by or on behalf of the Authority.
 - The organization of major events is sometimes delegated to a special, dedicated team or agency that does not necessarily fit squarely within existing government structures and procedures. This can create governance issues and potential weaknesses in transparency and accountability mechanisms that must be addressed.
 - The relative inexperience of event organizers with respect to the complexity of organizing such large scale events may sometimes add to the risk of corruption – excessive responsibility, power and money may be entrusted to given individuals who may not necessarily have the required managerial and organizational skills.
 - Given the often political nature of the Authority and its often “spontaneous” and “temporary” character, the selection and appointment of those who are responsible for leading it must be meticulous and above reproach.
 - The responsibilities, authority and reporting obligations of the leaders of the Authority must be clearly delineated. These leaders must have the capacity and a commitment to manage their tasks in an efficient, transparent, and accountable manner.
 - The specific and personal responsibilities of these leaders with respect to corruption risk mitigation and management must be clearly articulated. It is also necessary to strengthen their awareness of the various risks of corruption that are associated with the organization of the event and their ability to mitigate these risks.
 - A clear responsibility centre must be established, at a high level within the Authority, for anti-corruption assessment and planning. That responsibility centre should coordinate its anti-corruption activities with those of other stakeholders.
- 📖 Refer participants to examples of legislation establishing the mandate and responsibilities of an Authority created for the organization of a major

event. (See: Participant Manual, in particular *The London Olympic Games and Paralympic Games Act 2006*, (2006) Elizabeth II, C-12.⁷)

 See Participant Manual, page 32

 Refer participants to examples of governance structure.

 See Participant Manual, page 33

6. Part 2 - Precautions concerning partners, agents, consultants, lobbyists, and politically exposed persons (🕒 25 minutes)

 PPT-Lesson6: slides 8 to 14

 Main points to be covered:

- The organization of a major event necessarily involves entering into various forms of collaboration and partnership agreements.
- The Authority responsible for a major event needs to systematically conduct due diligence exercises before entering into such agreements and ensure that potential partners have anti-corruption policies and practices that are consistent with its own.
- Formal contribution agreements, protocols, and memoranda of understanding are necessary to formalize the relationships and should be subject to regular audits.
- The Authority should review its partners' compliance monitoring mechanisms and compliance records. It should not hesitate to terminate any partnership or joint venture with partners whose practices and policies are inconsistent with its own higher standards of integrity.
- The Authority must undertake and properly document due diligence reviews before appointing agents, consultants or intermediaries and only appoint them if they contractually agree to comply with the organization's anti-corruption policies, keep proper books and records available for inspection by the organization and its auditors, and are not suspected of engaging in corrupt activities.
- Potential conflicts of interest must be identified and addressed.
- All transactions with agents, consultants or intermediaries must be well documented and any compensation paid to them for legitimate services must be appropriate and commensurate with the nature of the services rendered.

⁷ http://www.legislation.gov.uk/ukpga/2006/12/pdfs/ukpga_20060012_en.pdf

- In some countries, the laws governing the behaviour of lobbyists have helped increase the transparency of governmental decision-making and have highlighted the challenges associated with drawing a line between unethical behaviour and legitimate lobbying and advocacy practices.
- Certain individuals potentially represent a greater degree of risk of corruption. This is the case for example with politically exposed persons (PEPs) who may be involved or associated somehow with the organization of a major event. Politically exposed persons are individuals who are, or have been, entrusted with prominent public functions. They represent a higher risk because they are in a position to exert undue influence on decisions regarding the major events or its personnel, procurement or financial management. They may have a higher risk of corruption due to their access to state accounts or funds. The Authority responsible for a major event must identify such persons, as part of its risk assessment process, and take appropriate mitigating measures.
- Similarly, from the point of view of financial institutions, all persons directly involved in decisions concerning the organization of a major event may fall into that risk category. They are potential targets for bribes due to their position or function in that organization. There is a need to be particularly vigilant about financial transactions and various decisions involving these individuals, or to apply a higher standard of due diligence in such cases.⁸

 **Resource material:** On the use of discretionary authority by planning officials: Independent Commission Against Corruption (2012). Anti-corruption Safeguards and the NSW Planning System. Sydney, NSW: IAC.

http://www.icac.nsw.gov.au/component/docman/doc_download/3867-anti-corruption-safeguards-and-the-nsw-planning-system-2012

 **Resource material:** On preventive measures concerning PEPs: Greenberg, T. S. et al. (2012). Politically Exposed Persons - Preventive Measures for the Banking Sector. Washington, D.C.: The World Bank and UNODC.

http://star.worldbank.org/star/sites/star/files/Politically%20Exposed%20Persons_0.pdf

- ☺ Facilitated discussion during which you may want to ask participants to give concrete examples of PEPs they believe would typically be involved in the organization of a major event (⊕5 minutes). If an event is currently being planned in the country (or has recently been organized), invite participants to identify some examples in relation to that particular event.

⁸ See article 52 of UNCAC.

7. Questions for an assessment (🕒 15 minutes)

📖 Refer to the Corruption Prevention Checklist, sections 1.1, 1.9, 1.10.

🗨️ PPT-Lesson6: slide 15

8. Key points to remember (🕒 10 minutes)

📋 Invite participants to identify key points they retained from the discussion.
List the various points on a flip chart for future reference.

🗨️ PPT-Lesson6: slide 16

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LESSON 7: Governance, accountability and leadership

1. Introduction

A transparent, efficient and accountable governance and management structure must be established for the Authority responsible for the organization of the major event. It is also crucial to establish robust and efficient oversight mechanisms.

Structural arrangements can provide the most powerful controls over the activities of the Authority. By assigning accountabilities, coordination mechanisms and the chain of command, structural arrangements contribute not only to organizational performance but also to corruption control.

A competent and accountable leadership team, which brings together credible individuals known for their integrity, is required. The team must be capable of resisting unacceptable political interference or other undue pressure, and be able to assess and mitigate the risk of corruption as part of a broader risk management strategy. The leadership team must set the tone for the entire organization and promote an attitude of zero tolerance of corruption.

2. Objectives

The purpose of this lesson is to introduce participants to a method for analysing the governance accountability structure put in place for the Authority responsible for a major event and for assessing its strengths and weaknesses, as well as the strength of the leadership capacity upon which the Authority rests.

3. Learning outcomes

At the end of the lesson, participants will

- Understand the importance of a robust and accountable governance structure for the organization responsible for the major event
- Be familiar with the kind of integrity policies required of such an organization
- Understand the important role of leadership in the implementation of a culture of integrity and in the implementation of anti-corruption measures.

4. Lesson outline (🕒90 minutes)

- 🕒 Part 1 - Presentation on governance and oversight (🕒 20 minutes)

- 🗨️ Part 2: Presentation on leadership and organizational culture (🕒 20 minutes)
- 🗨️ Part 3: Presentation on policies and responsibilities for anti-corruption activities (🕒20 minutes)
- 😊 Group discussion establishing a culture of integrity (🕒 20 minutes)
- 📄 Main points (🕒10 minutes)

5. Part 1- Governance, accountability and oversight bodies (🕒 20 minutes)

🗨️ PPT Lesson7: slides 1 to 4

🗨️ Main points to be covered:

- The organization of a major event requires the establishment, with an appropriate legal basis, of a clear, transparent and accountable governance structure for the Authority (and/or agencies) responsible for the organization of the event.
- Governance structures that lack accountability and transparency add to the overall risk of corruption. The Authority's governance structure for the organization of a major event must be sufficient to support accountable and transparent management and decision-making practices. In this regard, the Authority may learn from the experience of other organizations which have organized and staged similar events in the past.
- Early in the process, an independent and external oversight body should be mandated to monitor the Authority's activities. The mandate of that body must include the monitoring of the risk and potential incidents of fraud and corruption. That body should have full and complete access to the Authority's information and records. It should have sufficient expertise and resources and be expected to report publicly.

6. Part 2 - Leadership and organizational culture (🕒 20 minutes)

🗨️ PPT Lesson7: slides 5 to 7

🗨️ Main points to be covered in the presentation:

- The successful organization of a major event untainted by corruption requires a competent and accountable leadership team.

- The leadership team must bring together experienced and credible individuals known for their probity and integrity.
- The Authority must also be able to rely on dynamic, responsible and communicative leadership in its relationships with all stakeholders and the public.
- The leadership team must resist unacceptable political interference or other undue pressure and be able to assess and mitigate the risk of corruption as part of a broader risk management strategy.
- The leadership team must set the tone for the entire organization and must activate and promote a culture of zero tolerance of corruption.
- The Authority's leaders must also be involved in and be held accountable for any key decision-making related to the risk of corruption.
- In spite of the complexity of its task, the high public profile of the major event, the reputational risk and political factors at stake, the Authority and its leaders must resist the pressure to succumb to an attitude where the "ends" seem to "justify the means".
- A culture of integrity, transparency and accountability must be instilled within the whole Authority. The Authority's leadership team obviously has a central role to play in that respect and it must begin by setting the right example.
- Proven strategies for promoting a culture of integrity, transparency and accountability within a public organization include:
 - articulating the organization's core values and norms through codes of conduct and policies;
 - modelling ethical practices at the leadership level;
 - training and open dialogue about integrity and the risk of corruption;
 - strong governance structures that encourage and monitor compliance with the organization's values and norms and respond firmly to breaches of conduct.

7. Part 3 – Policies and responsibilities for anti-corruption activities within an Authority (🕒 20 minutes)

📄 PPT Lesson7: slides 8 and 9

🗣️ Main points to be covered in the presentation:

- The leaders of the Authority responsible for a major event should be well informed about existing national policies and legislation and know how they apply to every aspect of the organization of the major event.
- It is important to avoid creating any exception to anti-corruption policies for the Authority or any of the other agencies or stakeholders that may be involved in the organization of the event.
- The Authority should develop its own complementary policies and regulations and ensure that they are well understood, implemented and complied with throughout the organization.
- If the Authority is established by way of special legislation, the legislation should specify the anti-corruption rules and standards to which the Authority is subjected.
- The organization's leaders, at the highest level, must be directly involved in any key decision-making related to the risk of corruption.
- A clear responsibility centre must be established, at a high level within the Authority, for anti-corruption assessment, planning and monitoring. That responsibility centre should coordinate its anti-corruption activities with that of other stakeholders.

8. Group discussion on establishing a culture of integrity (🕒 20 minutes)



What would be some of the main strategies you would employ to create a culture of integrity within a new organization?



PPT Lesson7: slide 10

9. Questions for an assessment (🕒 10 minutes)



Refer to the Corruption Prevention Checklist, sections 1.2, 1.3, and 1.4



PPT Lesson7: slide 11

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LESSON 8: Public reporting and transparency

1. Introduction

Article 10 of the Convention calls for measures to enhance transparency in public administration. It requires that appropriate measures be taken to ensure that citizens understand the workings of public administration and have access to information on the decisions of public officials. These measures should generally apply to the Authority responsible for the organization of a major event. The unique character of such an Authority and its time-specific or event-specific mandate should not be used as a pretext for less transparency. Article 13 calls for measures to promote the active participation of individuals and groups outside the public sector in the fight against corruption and to raise public awareness regarding the threat of corruption.

Every Authority should establish clear policies and procedures for public reporting of all significant transactions and for public access to information. This can be done with due regard for the protection of privacy and personal data and the protection of the integrity of the procurement and public tendering processes. Information technology makes such transparency measures quite feasible.

2. Objectives

The main objective of this lesson is to introduce participants to the crucial role of transparency and public reporting in the prevention of corruption. The lesson also aims to familiarize participants with some best practices in that regard.

3. Learning outcomes

At the end of this lesson, participants will:

- Understand how an Authority responsible for a major event can help prevent corruption, by ensuring a high level of transparency in all its transactions;
- Understand the need for an Authority to put in place the necessary processes and structures for regular public reporting on its activities and facilitating public and media access to information concerning its operations;
- Be familiar with the questions to be considered when assessing the strength of the measures in place to promote transparency and ensure regular and transparent reporting on the Authority's activities.

4. Lesson outline (🕒 90 minutes)

- 🗣️ Brief presentation on reporting and transparency (🕒 10 minutes)
- 😊 The many aspects of organizational transparency (🕒 10 minutes)
- 📄 Example of Brazil's transparency portal:
<http://www.portaldatransparencia.gov.br/rio2016/>
- 📖 Case study (🕒 30 minutes)
- 😊 Review and discussion of assessment questions (🕒 20 minutes)
- 😊 Key points (🕒 10 minutes)

5. Part 1 – Reporting and transparency (🕒 30 minutes)

- 🗣️ Brief presentation on reporting and transparency
- 📄 PPT-Lesson8: slides 1 to 7
- 👥 Small group discussion on the many aspects of transparency within an organization: should there be limits to transparency around the organization of a major event? (Participants may struggle with the concept of transparency. The facilitated discussion that follows the discussion in small groups can ensure that they have understood the concept.
- 📄 PPT-Lesson8, slide 8

Public reporting on the activities of the Authority is a very important means of preventing corruption. UNCAC calls for measures to be taken to enhance transparency in public administration (article 10), including measures to ensure that the public has effective access to information, to support public information activities, and to promote transparency and public consultation and participation in various aspects of the decision-making process. In addition, the same article 10 of the convention, also calls for *proactive* measures to enhance transparency and the publication by public organizations of periodic reports on the risk of corruption. All these measures generally apply to any organization or agency mandated with the organization of a major public event.

The circumstances surrounding the organization of a major event often require proactive reporting measures to ensure that the public has access to all relevant information in a timely manner. This information should include details on the organization of the Authority, the decisions that it makes, the funds that it manages, the contracts, licences and other advantages that it grants, and the progress that it achieves in the preparation and staging of the major event. In

practice, many of these mechanisms are operated, not by the Authority, but by the finance arm of the Government, lending legitimacy in many instances.

Many countries already have systems in place to facilitate access to information concerning public administration. These countries often have legislation to guarantee the right of citizens to access information on public administration and to set out the rules and procedures regulating such access. This legislation, or its equivalent, should also apply to the Authority responsible for a major public event. In general, access to information systems allow for citizens to apply for the disclosure of information that is held by the Government.

Some Authorities use transparency portals, official websites that are accessible to the general public to allow interested individuals and the media to follow procurement, contracting, and execution of activities as they occur. In some cases, the public is able to track expenditures in real time as the preparations and events unfold. Some transparency portals cover all government activities, while others are established specifically in relation to a major event. Such portals, together with proactive communication campaigns, can not only increase the public's support for these events and calm fears regarding the expenditure of public funds, but also increase the public's ability and willingness to report corrupt activities.

 The Manual refers to the example of Brazil and the initiative of the Office of the Comptroller General to create a transparency portal.

 See Participant Manual, page 42

6. Case study (🕒 30 minutes)

 Review of an example of public reporting.

 See Participant Manual, page 45

 PPT-Lesson8, slide 10

7. Question for an assessment (🕒 20 minutes)

 See the Corruption Prevention Checklist, sections 1.8 and 1.9

 PPT-Lesson8, slide11

8. Key points to remember (🕒 10 minutes)

 PPT-Lesson8, slide 12

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LESSON 9: Mitigating the risk of corruption in the management of human resources

1. Introduction

Article 7 (public sector) of UNCAC focuses on managing human resources within the public sector and the underlying principles of efficiency, transparency and integrity. This emphasis includes ensuring the use of objective criteria for the recruitment of public officials, as well as continuous learning opportunities and adequate and equitable remuneration and conditions of employment for staff in the civil service. In countries that have already aligned their civil servants recruitment and promotion systems with these standards and base their hiring practices on principles of merit, equity and aptitude, it is important to ensure that these standards apply fully to the Authority's human resources management practices.

In countries that have not yet aligned their own legal framework and systems with the standards of the Convention, the organization of a major event and its prominent public profile provides an opportunity to demonstrate the importance and advantages of implementing high standards of integrity and efficiency in the recruitment and management of human resources. It is an opportunity to demonstrate concretely how corruption can be prevented when the risks associated with human resources management are properly assessed and managed.

The organization of a major public event usually requires the recruitment, hiring and management of numerous personnel. This requirement renders the Authority vulnerable to corruption, nepotism and conflicts of interest and also to the recruitment of undesirable or corrupt staff. The urgency of the task at hand – the organization of the major event - should not serve to justify diluting the efficiency and transparency of personnel recruitment and management decisions, nor should it affect the objective criteria that must apply throughout that process.

The Authority must ensure that merit, equity, and aptitude govern all its human resources decisions and that adequate selection and promotion procedures are in place and respected. Corruption prevention measures include the application of codes of conduct, requirements for financial and other disclosures by all staff, and an appropriate disciplinary process to deal with incidents of misconduct or non-compliance with anti-corruption policies.

2. Objectives

The purpose of this lesson is to help participants understand how prevention of corruption within an organization requires actions on many fronts and a comprehensive approach to the prevention in the management of the organization human resources.

3. Learning outcomes

At the end of the lesson, participants will:

- Understand how an Authority can be vulnerable to corruption, nepotism and conflicts of interest and also how it may be at risk of recruiting incompetent, undesirable or corrupt staff;
- Be familiar with the type of human resources management policies and procedures that an Authority should adopt;
- Understand the concept of conflict of interest and be familiar with methods and procedures for reporting real or potential conflicts of interest and addressing them;
- Be able to identify recruitment practices that may help an organization prevent corruption;
- Understand the role of codes of conduct in promoting professional standards and a culture of integrity;
- Know methods of identifying positions that are particularly vulnerable to corruption and providing support and oversight for these positions;
- Know how an Authority can provide training and educational opportunities for its staff to develop a better understanding of their own vulnerability to corruption and have clear directions as to what is expected of them to prevent corruption;
- Understand the importance of establishing effective system for reporting incidents of corruption and for protecting those who report these incidents;
- Be able to identify the main characteristics of a fair and effective disciplinary process within an Authority for dealing with incidents of misconduct and corruption;
- Know how to use the Corruption Prevention Checklist to review an organization's corruption prevention readiness with respect to the management of its own human resources.

4. Lesson outline (🕒 180 minutes – 2 sessions)

- 👤 Part 1: Existing policies (🕒 25 minutes)
- 👤 Brief presentation on mitigating the risk of corruption in the management of human resources
- 😊 Review of article 7 and 8 of UNCAC
- 👤 Part 2: Recruitment practices (🕒 15 minutes)
- 👤 Part 3: Conflicts of interest (🕒 15 minutes)
- 👤 Part 4: Codes of conduct (🕒 10 minutes)
- 👤 Part 5: Positions that are particularly vulnerable to corruption (🕒 30 minutes)
- 😊 Participants are invited to give examples of positions that may be particularly vulnerable to corruption within their own organization
- 📄 Using a flip chart, ask participants about the factors that make these positions particularly vulnerable to corruption, list them on a flip chart, help participants identify what these factors may have in common
- 👤 Part 6: Training of personnel in corruption prevention (🕒 10 minutes)
- 👤 Part 7: Effective supervision (🕒 10 minutes)
- 👤 Part 8: Reporting of incidents of corruption (🕒 30 minutes)
- 😊 Group discussion on what makes it difficult for people to report incidents of corruption and what needs to be done to facilitate this process
- 📖 Case study: Elements of a strong whistle-blower policy
- 👤 Part 9: Disciplinary action (🕒 15 minutes)
- 👤 Key points (🕒 10 minutes)

5. Part 1 – Existing policies (🕒 25 minutes)

📄 PPT-Lesson9: slides 1 to 6

If public sector human resources management laws and policies do not apply directly to the Authority, it must develop its own policies and identify appropriate measures and administrative systems to ensure the efficient, transparent and accountable recruitment, hiring, retention and promotion of the personnel it requires to achieve its goals. Proper personnel recruitment,

selection and vetting policies must be in place very early in the process of shaping the Authority's personnel.

If public sector human resources management laws, policies and procedures do apply to the Authority, their implementation must be treated as an urgent priority. Deviations from these policies, on the basis of expediency or any other reason, should be avoided.

☺ Review of article 7 of UNCAC (⌚ 5 minutes)

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 2.1

6. Part 2 – Recruitment practices (⌚ 15 minutes)

📄 PPT-Lesson9: slide 7

🔑 Merit, equity, and aptitude must govern all decisions relating to human resources. Fair and adequate selection and promotion procedures should be in place and respected. It should be quickly determined whether, and to what extent, the Authority is governed by the same laws and policies that apply to human resources management within the public service. If exceptions to these rules are created, they must be documented, made public and monitored systematically.

Recruiting key personnel with experience in organizing similar major events or managing large infrastructure development projects is usually a priority. Notwithstanding the urgency of putting a leadership team in place, it is important to proceed with extensive background and reference checks, in particular when recruitment occurs internationally.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 2.2.

7. Part 3 – Conflict of interest (⌚ 15 minutes)

📄 PPT-Lesson9: slides 8 and 9

Policies and procedures

🔑 States parties to the Convention must “endeavour to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest” in accordance with the fundamental principles of their domestic law (article 7 (4)).

A conflict of interest involves a conflict between the public duty and the private interest of a public official, in which the official's private-capacity interest could improperly influence the performance of their official duties and responsibilities.

The Convention promotes the adoption of measures to prevent conflicts of interest and to create and support a culture in which the provision of public service is transparent and impartial, where the offering and acceptance of gifts and hospitality is discouraged, and where personal or other interests do not influence or appear to influence official actions and decisions.

 An example of a country's conflict of interest law for public officials. (E.g.: Canada - *Conflict of Interest Act*, S.C. 2006, c. 9, s. 2 - <http://laws-lois.justice.gc.ca/eng/acts/C-36.65/page-1.html#docCont>). If possible use the equivalent legislation in the country of the participants and discuss its relevance and applicability to the organization of a major event.

 Additional resource: OECD, *Managing Conflict of Interest in the Public Sector - A toolkit*. In particular, the "Generic Checklist for Identifying 'At-risk' Areas for Conflict of Interest", pp. 28-31.
www.oecd.org/gov/ethics/49107986.pdf

Compulsory disclosure system

 Article 8 (5) of the Convention calls for measures and systems to be established requiring public officials to make declarations to appropriate authorities regarding, inter alia, their outside activities, employment, investments, assets and substantial gifts or benefits from which a conflict of interest may result with respect to their functions as public officials.

The Authority should institute a compulsory disclosure system applicable to all its managers and employees to prevent or detect possible incompatibilities and conflicts of interest.

This system should be at least as rigorous as the system generally in place for senior civil servants.

The requirement for certain individuals to publicly disclose their assets and interests should be reflected in all employment contracts and agreements and, as relevant, in partnership and other agreements.

The Authority should insist that stakeholders and partners adopt strict policies and procedures to prevent conflicts of interest.

In dealing with representatives of government agencies, stakeholders, partners and agents, the Authority must take steps to protect itself against the risk that confidential information may be misused to favour private interests in matters relating to the organization of the major event.

Extending conflict of interest rules to former employees

- The Authority should have adequate policies and procedures in place to govern the move of members of its personnel, who have resigned or retired, to private sector entities with which the Authority has or had some dealings. Former personnel may hold some sought after confidential or commercial information or they may be recruited or employed in order to influence their former employer or colleagues. See article 12 (2) (e) of UNCAC.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 2.3

8. Part 4 – Professional standards and codes of conduct (🕒 10 minutes)

📎 PPT-Lesson9: slide 10

- UNCAC requires the active promotion of personal standards (integrity, honesty and responsibility) and professional responsibilities (correct, impartial, honourable and proper performance of public functions) among all public officials (article 8 (1) and (2)). To achieve this, guidance should be provided on how public officials inside or outside of the Authority should conduct themselves in relation to those standards and how they will be held accountable for their actions and decisions.

The Authority can establish its own codes of professional conduct or at least adopt the professional standards that generally apply in the public service sector.

At the outset of the organization of a major event, the Authority should review and adapt the standards of conduct that apply to the public sector with a view to strengthening their application and their relevance to the organization of the major event.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 2.4

9. Part 5 – Positions that are particularly vulnerable to corruption (🕒 30 minutes)

📎 PPT-Lesson9: slides 11 and 12

🗨️ The Authority should identify within and around its own organization those positions and functions that are most vulnerable or susceptible to corruption. For example, some positions with key responsibilities within the procurement process or with responsibilities for personnel recruitment may be particularly vulnerable. Measures should be taken to mitigate the risk of corruption associated with vulnerable positions within the Authority. The same measures should be encouraged within the Authority's partner organizations and key stakeholders.

Once such positions have been identified, practical measures can be adopted to mitigate that risk, including: pre-appointment screening of successful candidates to ensure that they have already demonstrated high standards of conduct; specific terms and conditions of service for successful candidates; and procedural controls, such as benchmarking performance, or the rotation of staff, as a means of limiting the risks of corruption arising from protracted incumbency.

There is a need for specific support and oversight procedures for all members of the Authority and related agencies and partners who might be vulnerable to corruption, including regular appraisals, confidential reporting, registration and declaration of interests, assets, hospitality and gifts, as well as efficient procedures to regularly monitor the accuracy of the declarations.

In order to introduce an element of independent but controlled decision-making within the Authority, the decision-making structure should be based to the extent possible on a system of multiple-level review and approvals for higher-risk matters rather than having a single individual with sole authority over those decisions.

😊 Participants are invited to give examples of positions that may be particularly vulnerable to corruption within their own organization (🕒 10 minutes)

📋 Using a flip chart, ask participants about the factors that may make these positions particularly vulnerable to corruption, list them on a flip chart, and help participants identify what these factors seem to have in common (🕒 8 minutes)

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 2.5

10. Part 6 – Training of personnel in corruption prevention (⌚ 10 minutes)

📄 PPT-Lesson9: slide 13

🗣️ With a large complement of new staff and managers, the Authority must pay special attention to training its staff in corruption prevention approaches and precautions.

The Authority needs to create training and educational opportunities for its staff to develop a better understanding of their own vulnerabilities to corruption and clear directions as to what is expected of them in order to prevent it.

Examinations may be held for individuals considered for appointment to leading positions within the Authority to test their knowledge of relevant governance rules and legislation and anti-corruption policies. E-learning programmes may facilitate the training of large numbers of staff across several functions and specific training activities may be developed for targeted groups within and around the Authority.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 2.6

11. Part 7 – Effective supervision (⌚ 10 minutes)

📄 PPT-Lesson9: slide 14

🗣️ Effective supervision is an essential strategy for detecting corruption. It is also important means of preventing corruption by reducing the opportunities for motivated individuals to engage in corrupt conduct. In fact, a review of corruption cases often reveals that inadequate supervision had very often contributed to the problem.

Managers at all levels must be held accountable for the actions and work of their staff. They need to be proactive in their management styles. They need to actively supervise their staff and have measures and systems in place to inform them about what their staff is doing and how they are doing it. Direct supervisors should have a reasonable understanding of each staff member's level of skill, attitudes and overall performance. They should be alert to signs that staff are experiencing difficulties in the workplace or require assistance.

12. Part 8: Reporting of corruption incidents (🕒 30 minutes)

📄 PPT-Lesson9: slides 15 to 17

🔍 Article 8 (4) of the Convention requires States parties to consider “establishing measures and systems to facilitate the reporting by public officials of acts of corruption to appropriate authorities, when such acts come to their notice in the performance of their functions”.

Governments are expected to adopt measures to facilitate reporting by public officials or members of the public of incidents of corruption or conflict of interest. See articles 8 (4) and 13 (2) of UNCAC.

The Authority must set in place mechanisms and systems to facilitate the reporting by its staff of acts of corruption to appropriate authorities, when such acts come to their notice in the performance of their functions.

An important means of identifying breaches of a code of conduct is to introduce an effective system for reporting suspicions of breaches in general, and corruption in particular (“whistle-blowing”).

Whistle-blowers are persons who report, in good faith and on reasonable grounds, an infraction or an irregularity to competent authorities (article 33). Such persons may also act as a witness in the investigation or prosecution of incidents of corruption (article 32). Protecting these individuals is an important part of anti-corruption strategies.

Whistle-blower protection may be mandated in national legislation. Protecting whistle-blowers against reprisal is essential to ensure public reporting of corruption or misconduct and, ultimately, the integrity of the Authority. When the stakes are high, as they are in the context of a major public event, the pressure on individuals to remain silent can be enormous. Ensuring that whistle-blowers do not suffer negative consequences within or outside the organization must become an organizational priority. Finally, it is very important to ensure that reports are taken seriously and acted upon. A belief that reports will be ignored is often quoted as a reason for not reporting incidents of alleged corruption.

😊 Group discussion on what makes it difficult for people to report incidents of corruption and what needs to be done to facilitate this process (🕒 10 minutes)

📁 Additional resources:

Wolfe, S., Worth, M. Dreyfus, S., and A. J. Brown (2014). *Whistleblower Protection Rules in G20 Countries: The Next Action Plan*. Melbourne:

The University of Melbourne and Transparency International Australia.

<https://blueprintforfreespeech.net/394-2/463-2>

UNODC (2015). *Resource Guide on Good Practices in the Protection of Reporting Persons*.

<http://www.unodc.org/unodc/en/corruption/publications.html>

 Case study: Elements of a strong whistle-blower policy (⌚ 15 minutes)

Question for an assessment

 Refer to the Corruption Prevention Checklist, section 2.7

13. Part 9 – Disciplinary actions (⌚ 15 minutes)

 PPT-Lesson9: slide 18

 UNCAC (article 8 (6)) promotes the adoption of appropriate and effective disciplinary or other measures against public officials who violate codes of conduct or standards.

Disciplinary measures should be available and applied fairly and systematically whenever violations of codes of conduct or other standards are identified by the Authority.

 See article 8 (6) of UNCAC.

The Authority should work closely with the media to explain its policies and practices and to enlist their support in the fair reporting of their corruption prevention activities.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 2.8

14. Key points to remember (⌚ 10 minutes)

 Key points (⌚ 5 minutes) and questions by participants (⌚ 5 minutes)

 PPT-Lesson9: slides 19 and 20

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LESSON 10: Mitigating the risk of corruption in financial management

1. Introduction

The large sums received and disbursed as part of the organization of a major event call for robust mechanisms to promote transparency and accountability in the management of these funds.

Depending on the governance and management structures in place for the preparation and management of the event, there is a need to review and strengthen existing financial control mechanisms and to determine how they must apply specifically to the Authority.

At the very least, existing financial management policies applicable to the public service sector must be reaffirmed. If it is deemed necessary to revise and adapt existing policies and procedures, or if deviations from the latter are to be allowed, any such change or exception to existing policies should be discussed and adopted in a transparent and publicly accountable manner. Upon completion of the event, these variations should be evaluated with a view to the identification of good practices.

The Authority must constantly pay attention to the elaborate and rigorous financial control and oversight mechanisms required for the organization and delivery of a major event. Key aspects to be considered are: the accountability structure and process for budgeting and financial management; the integrity of the budgeting and financial planning process; the strength of financial control mechanisms; the need for frequent and thorough internal and external audits; and, the importance of accurate, comprehensive and transparent financial reporting.

2. Objectives

The main objectives of this lesson is to ensure that participants are familiar with the different risks of corruption associated with the financial aspects of the organization of a major event and with the main general strategies to mitigate that risk.

3. Learning outcomes

At the end of the session, participants will be familiar with seven corruption risk management methods regarding the financial management of a major event:

- Ensuring that there is a strong financial management accountability structure in place;
- Ensuring the integrity and efficiency of the budgeting and financial planning process;
- Adopting sound financial management policies, procedures and practices;
- Putting in place strong and effective financial controls;
- Building a strong internal audit capacity;
- Adopting transparent and effective policies and procedures regarding external audits;
- Ensuring financial transparency and regular public reporting.

Participants will understand how to assess whether such risk mitigation strategies have already been implemented by an organization.

4. Lesson outline (🕒 90 minutes)

☺ Discussion: Are major costs overruns inevitable? (📖 see Participant Manual for examples of situations of costs overruns) (🕒 15 minutes)

🔍 UNCAC provisions (see 📄 PPT_Lesson11) (🕒 5 minutes)

🔍 Ensuring that there is a strong financial management accountability structure in place (see 📄 PPT_Lesson11) (🕒 10 minutes)

🔍 Ensuring the integrity and efficiency of the budgeting and financial planning process (see 📄 PPT_Lesson11) (🕒 10 minutes)

🔍 Adopting sound financial management policies, procedures and practices (see 📄 PPT_Lesson11) (🕒 10 minutes)

🔍 Putting in place strong and effective financial controls (see 📄 PPT_Lesson11) (🕒 10 minutes)

🔍 Building a strong internal audit capacity (see 📄 PPT_Lesson11) (🕒 10 minutes)

🔍 Adopting transparent and effective policies and procedures regarding external audits (see 📄 PPT_Lesson11) (🕒 10 minutes)

🔍 Ensuring financial transparency and regular public reporting (see 📄 PPT_Lesson11) (🕒 10 minutes)

5. Part 1 – Costs overruns and corruption (⌚15 minutes)

Using two or three examples of recent major events that have been plagued by major costs escalation, a discussion should be facilitated to help participants understand the impact of corruption on costs of major events.

☺ Discussion: Are major costs overruns inevitable?

📖 See Participant Manual for examples of situations of costs overruns

6. Part 2 – UNCAC framework (⌚ 5 minutes)

📄 PPT-Lesson10: slides 4 and 5

UNCAC requires State parties to take appropriate measures to promote transparency and accountability in the management of public finances, including: (a) procedures for the adoption of the national budget; (b) timely reporting on revenue and expenditure; (c) a system of accounting and auditing standards and related oversight; (d) effective and efficient systems of risk management and internal controls; and (e) where appropriate, corrective action in the case of failure to comply with the measures in place (article 9 (2)). The Convention also highlights the need to put in place measures to preserve the integrity of accounting books, records, financial statements or other documents related to public expenditure and revenue and to prevent the falsification of such documents (article 9 (3)).

A State may have achieved a certain level of compliance with these various requirements as they apply to the public sector as a whole. However, extraordinary precautions are called for to address the unusual circumstances and the huge investments involved in budgeting and managing the funds dedicated to a major event.

📖 See article 9 of UNCAC.

7. Part 3 – Putting in place a strong financial management accountability structure (⌚ 10 minutes)

📄 PPT-Lesson10: slide 5

The responsibility and accountability structure of the Authority must be well defined, clear and unambiguous. The Authority should be empowered to centrally manage the capital budget allocated to the organization of a major event.

The Authority must have in place a strong and accountable financial management structure and systems. These must be consistent with professional

standards as well as applicable national standards for the management of public finances

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 3.1

8. Part 4 - Ensuring the integrity and efficiency of the budgeting and financial planning process (🕒 10 minutes)

 PPT-Lesson10: slides 6 and 7

Budgeting and financial planning for a major event can be very challenging. The requirements of the event may not have been fully specified from the beginning and may be expected to evolve and change over time. Broad consultations are required with multiple stakeholders and partners (e.g. host cities, government departments) with varying levels of expertise and preparedness and must take place during relatively brief periods of time. Related policy objectives (e.g. environmental impact, indigenous participation, sustainability, and legacy use) must also be factored into the planning process.

The state of the market, the effectiveness of the Authority's procurement process and revenue generating activities will have an impact on expenditures and revenues which may be hard to predict initially. This creates a crucial need for periodic reviews of budgets, cost estimates, and revenue forecasts as well as budget comparisons against activities and progress to date.

Transparency at all stages of the budgetary reviews, adjustments and approval processes is essential to preserve the integrity of a high-profile initiative and maintain public support for it.

Apparent overestimations of costs of certain aspects of the organization of the event may be signs that bribery or illegal commissions have been factored into the initial estimates. Cost overruns may result from poor or insufficiently transparent or accountable budgeting and financial management practices.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 3.2

9. Part 5 - Adopting sound financial management policies and procedures (🕒 10 minutes)

 PPT-Lesson10: slide 8

The Authority must have in place measures to ensure the sound financial management of its activities. To strengthen budgetary controls, the Authority must specify the responsibilities and procedures for approving the use of funds and expenditures at all levels. The Authority should adopt criteria for spending on receptions and entertainment, business trips, consultancies, remuneration of specialists and professionals, as well as a set of strict approval procedures for these kinds of expenses and for any other major expense. Weak financial management policies, procedures and practices are an open invitation to corruption.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 3.3

10. Part 6 - Putting in place strong and effective financial controls (🕒 10 minutes)

📄 PPT-Lesson10: slide 10

A clear sign of an organization's vulnerability to corruption and fraud is a lack of attention paid to issues uncovered by internal audits.

The Authority must have in place strict measures to preserve the integrity of accounting books, records, financial statements or other documents related to public expenditure and revenue and to prevent the falsification of such documents.

The Authority should subject its internal control systems, in particular its accounting and record keeping practices, to regular reviews and audits in order to provide assurance on their design, implementation and effectiveness.

A high-level financial supervision committee may be established within the Authority.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 3.4

11. Part 7 - Building a strong internal audit capacity (🕒 10 minutes)

📄 PPT-Lesson10: slide 11

Regular reviews and internal audits should be conducted by experts with adequate forensic training in detecting suspicious transactions, bribes, potential fraud and apparent conflicts of interest.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 3.5

12. Part 8 - Adopting transparent and effective policies and procedures regarding external audits (🕒 15 minutes)

📄 PPT-Lesson10: slide 12

External audits, following rigorous standards, must be conducted prior to, during and after the event. Government appointed independent auditors must be granted unlimited access to all financial transaction records.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 3.6

13. Part 9 - Ensuring financial transparency and reporting publicly (🕒 10 minutes)

📄 PPT-Lesson10: slide 13

Transparency is linked to accountability and is the best antidote to organizational corruption. The Authority must actively promote transparency in its budgeting and financial administration, as well as in all key decisions affecting the financial viability/sustainability of the event or any of its major components.

Measures must be implemented to facilitate frequent, timely and accurate financial reporting to public authorities and to the public.

Financial information must be reported publicly at all stages of preparation of the event and thereafter.

Reporting on any transfer of assets to other entities for legacy use or any other purpose must continue even after the major event has taken place and the project's financial records are finalized.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 3.7

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LESSON 11: Mitigating the risk of corruption in the procurement process

1. Introduction

Because of the scale of the procurement process involved in staging a major event and the short time frame within which it must be completed, the Authority needs to establish appropriate systems of procurement based on transparency, competition and objective criteria in decision-making. This is absolutely crucial and an obligation under the Convention.

Existing public procurement policies must be reaffirmed. If existing processes and criteria for public procurement decisions need to be adapted in some way to the circumstances surrounding the organization of the major event, the new criteria must be firm, objective, transparent and publicly available.

Published public procurement and tendering rules must establish, in advance, the conditions of participation, including selection and award criteria. In particular, time pressures and predictable calls for efficiency and expediency should not in any way weaken existing procedures to properly document procurement decisions and allow for the subsequent verification of the application of the relevant rules and criteria.

2. Objectives

This lesson exposes participants to the considerable risks of corruption, sometimes on a huge scale, associated with the procurement process related to the organization of a major event. The main purpose of the lesson is to familiarize participants with some of the key principles involved in strengthening the procurement process and protecting its integrity.

3. Learning outcomes

At the end of this session, participants will understand the risks of corruption associated with the procurement process for a major event and will be generally familiar with some of the main aspects of corruption risk mitigation measures that can be taken, including:

- Adopting effective procurement policies to achieve value for money and prevent corruption;
- Building the Authority's procurement capacity;
- Adopting effective procurement practices;
- Adopting and practicing sound contracting practices and procedures;

- Ensuring the close supervision of every stage of the procurement process;
- Keeping complete, accurate and transparent records of procurement;
- Adopting measures to reduce corruption in the Authority's supply chain.

4. Lesson outline (🕒 90 minutes)

- 😊 Discussion: What, in your view, are the basic principles or goals that should guide procurement in the public sector? (🕒 10 minutes)
- 📄 If possible, make information available on the laws governing the procurement process in the country where the training workshop is being offered. Invite participants to explain how familiar they are with these laws. (🕒 10 minutes)
- 🗣️ UNCAC dispositions (🕒 5 minutes)
- 🗣️ Adopting effective procurement policies to achieve value for money and prevent corruption (🕒 5 minutes)
- 🗣️ Building the Authority's procurement capacity (🕒 5 minutes)
- 🗣️ Adopting effective procurement practices (🕒 25 minutes)
- 🗣️ Adopting and practicing sound contracting practices and procedures (🕒 5 minutes)
- 🗣️ Ensuring the close supervision of every stage of the procurement process (🕒 5 minutes)
- 🗣️ Keeping complete, accurate and transparent records of procurement (🕒 5 minutes)
- 🗣️ Adopting measures to reduce corruption in the Authority's supply chain (🕒 10 minutes)
- 🗣️ Key points (🕒 5 minutes)

5. Procurement (🕒 20 minutes)

- 📄 PPT-Lesson11: slides 1 to 9
- 😊 Discussion: What, in your view, are the basic principles or goals that should guide procurement in the public sector? What are the basic principles guiding procurement in the public sector. (📖 Participant Manual, page 68) (🕒 10 minutes)

- 🗨️ Procurement activities related to a major event usually occur within the broader framework of legislation and governmental policies governing procurement practices in the public sector.
- 🗨️ Explain to participants that the procurement of major constructions and infrastructure and the procurement of security services and equipment is sufficiently different from general procurement to justify separate lessons. We will get to those later.

6. Part 1 - Adopting effective procurement policies to achieve value for money and prevent corruption (🕒 5 minutes)

📄 PPT-Lesson11: slides 7 to 9

🗨️ UNCAC provisions

- 📄 If possible, make information available on the laws governing the procurement process in the country where the training workshop is being offered. Invite participants to explain how familiar they are with these laws.
- 😊 What are the public procurement laws of the country? Do they satisfy the main goals discussed previously?

If the Authority is not automatically governed by the standard public procurement laws and policies, it must put in place its own policies and procedures and make them publicly available.

Notwithstanding existing procurement laws and policies that may already apply to the Authority, the Authority should develop, as early as possible, its own internal policies and procedures in line with the objectives and requirements of the event. Such policies and procedures must be capable of producing the expected results in terms of the timely delivery of the venues, infrastructure, logistics, systems and services that are required for a successful event.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 4.1

7. Part 2 - Building the Authority's procurement capacity (🕒 5 minutes)

📄 PPT-Lesson11: slide 11

There must be an effective procurement capacity and effective procedures and systems in place to ensure the timely acquisition of goods and services while achieving value for money and avoiding abuses in the procurement process.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 4.2

8. Part 3 - Adopting effective procurement practices (🕒 25 minutes)

📄 PPT-Lesson11: slide 12

🗨️ This part of the lesson covers six aspects of procurement practices that help mitigate the risk of corruption. They are the following:

1. Establishing a transparent and fair tendering process and publishing solicitations of proposals and notices of procurement;
2. Having in place a well-defined and transparent process for pre-qualifying or pre-selecting potential suppliers and contractors;
3. Verifying the qualifications of potential contractors and suppliers and disqualifying those that do not meet pre-established criteria;
4. Setting in place a fair procedures for communicating with potential contractors and suppliers, or potential bidders;
5. Establishing in advance the criteria for the evaluation of proposals, making the criteria public and ensuring a fair evaluation of all proposals against these criteria;
6. Establishing an effective mechanisms and procedures for potential contractors and suppliers who participated in the procurement proceedings to challenge the procurement process.

Establishing a transparent and fair tendering process and publishing solicitations of proposals and notices of procurement (🕒 4 minutes)

📄 PPT-Lesson11: slide 13

Different methods of procurement may be used by the Authority (open tendering, restricted tendering, requests for proposal without negotiation, two-stage tendering, etc.). The choice of method should be guided by policy and the decisions concerning the method to be utilized in each procurement activity should be transparent, fair, well documented, and subject to review.

The type of procurement procedure chosen may have a direct impact on the corruption risk involved in a public procurement. For this reason, the open

tendering procedure is often considered the method of first resort (i.e., the default procurement method), and single-source tendering - which poses perhaps the highest risk of corruption and favouritism - is typically allowed only under exceptional circumstances. Single-source contracting brings with it a major risk corruption.

Notices of procurement and solicitations of proposals must be communicated in a fair, timely and realistic manner and without creating, or appearing to create, an unfair advantage in favour of potential bidders.

One must be attentive to any sign that the bidding process has been compromised. For example, any evidence that someone outside of the procurement process may have heard of a notice of procurement or the terms of a solicitation for proposals in advance of these being officially issued, may be a sign that the integrity of the procurement process has been compromised.

Having in place a well-defined and transparent process for pre-qualifying or pre-selecting potential suppliers and contractors (🕒 4 minutes)

📄 PPT-Lesson11: slide 14

The Authority should have well-defined, fair and transparent procedures in place to pre-qualify or pre-select potential suppliers and contractors. The procedures should be designed to ensure that potential suppliers and contractors meet certain ethical standards, are solvent, and have the capacity to deliver what they offer. The procedures should allow the exclusion of potential suppliers and contractors when there is evidence of a conflict of interest, or of corrupt or unethical conduct on their part.

Verifying the qualifications of potential contractors and suppliers and disqualifying those that do not meet pre-established criteria (🕒 4 minutes)

📄 PPT-Lesson11: slide 15

Pre-selection procedures should verify the qualifications of potential contractors or suppliers, including professional and technical qualifications, managerial capacity, financial resources, and the legal capacity to enter into a procurement contract. They must meet ethical standards and cannot be insolvent or bankrupt. They should not be the subject of legal proceedings for insolvency, breach of ethical standards, or acts of corruption.

There should be a fair and transparent system in place to ensure that certain potential suppliers or contractors can be excluded from the procurement process when there is evidence that they have bribed or attempted to bribe

someone to influence the procurement process, when they are in a conflict of interest, or have an unfair competitive advantage.

Setting in place a fair procedures for communicating with potential contractors and suppliers, or potential bidders (⌚ 4 minutes)

📄 PPT-Lesson11: slide 16

All communications with potential contractors and suppliers must be handled fairly so as to avoid giving or appearing to give an undue advantage to any potential bidder. All communications should be fully documented and available for future reference.

In order to prevent any abuse of selection procedures and to promote confidence in the selection process, confidentiality must be observed by all parties, especially where negotiations are involved. This is important in order to protect any trade or other information that bidders may include in their proposals and that they would not wish to be made known to their competitors.

Ensuring a fair evaluation of all proposals against these criteria (⌚ 4 minutes)

📄 PPT-Lesson11: slide 17

Procurement criteria must be set in advance, be fair, and be publicly available. The evaluation procedure should be made public and the evaluation process must be transparent. The integrity of the evaluation process must be protected at every stage.

The evaluation procedures must ensure that individuals involved in the evaluation of applications or submissions by potential suppliers or contractors act fairly, impartially, and are not in a real or perceived conflict of interest.

Establishing effective mechanisms and procedures for potential contractors and suppliers who participated in the procurement proceedings to challenge the procurement process (⌚ 5 minutes)

📄 PPT-Lesson11: slide 18

It is important for the Authority to have in place fair and open mechanisms and procedures for potential contractors and suppliers who participated in the procurement proceedings to challenge the procurement process, bring any alleged non-compliance with applicable laws, policies and procedures to the attention of the Authority, or apply for reconsideration of a procurement decision that has been made.

This process should ideally include the possibility of a review by an independent body.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 4.2

9. Part 4 - Adopting and practicing sound contracting practices and procedures (🕒 5 minutes)

 PPT-Lesson11: slide 19

Procurement activities must be supported by effective contracting policies and practices, as well as diligent contract monitoring, supervision, and enforcement. Major events often require a flexible contracting strategy capable of addressing changing requirements, correctly allocating risk to the parties who can manage it most effectively, and controlling costs. In addition to standardized and efficient contract management procedures, the proactive management of risks, including the risk of corruption, must become an inherent part of contracting activities.

The Authority should also monitor significant contractors and suppliers, their performance and their financial situation and it should have a right of termination of contractual arrangements in the event that they are found to pay bribes, place themselves in a conflict of interest, or not comply with the terms of their contract.

All procurement contracts, including the identity of the supplier, the service or goods provided, and the price of the contract should be made public.

All instances in which it is necessary to renegotiate the terms of a contract with a supplier should be scrutinized and reviewed carefully for signs of potential weakness or lack of integrity in the procurement process.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 4.3

10. Part 5 - Ensuring the close supervision of every stage of the procurement process (🕒 5 minutes)

 PPT-Lesson11: slide 20

The nature of the procurement process necessarily involves discretionary decision-making on behalf of an organization. The individuals entrusted with that discretionary authority fall within the high-risk group of persons

vulnerable to corruption. The procurement function therefore requires a higher level of assurance against abuse and its specific vulnerabilities need to be identified and addressed. Proactive measures are necessary to support and supervise employees performing these functions.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 4.4

11. Part 6 - Keeping complete, accurate and transparent records of procurement (🕒 5 minutes)

🔗 PPT-Lesson11: slide 21

It is absolutely essential to ensure that all aspects of all procurement proceedings are properly documented and available for review as necessary.

The Authority must maintain records of procurement proceedings in order to ensure transparency and accountability and to facilitate the exercise of the right of review of decisions by unsuccessful bidders. With e-procurement systems, a web-based process to decentralize, automate, and control purchasing, specific measures to create permanent and safe records of all transactions are particularly important.

This documentation should also include all aspects of the contracting, the contract monitoring and enforcement process, and the contractors' performance.

All documentation should be kept and made available for review, as required, for a fixed and adequately long period after the major event has been held, or for any length of time required by law.

It is often worthwhile to review procurement records and data for patterns that may indicate higher risks of corruption, e.g. a large concentration of orders to the same supplier or large variations in item contract prices within the same industry or among contracts negotiated by different procurement officers. When the data is digitalized or when an e-procurement system is used this can be routinely accomplished.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 4.5

12. Part 7 - Adopting measures to reduce corruption in the Authority's supply chain (🕒 15 minutes)

📄 PPT-Lesson11: slide 22

An assessment of the risk of corruption in the supply chain should be part of a more general assessment of corruption risks and part of the Authority's comprehensive risk management process.

Fighting corruption in the supply chain requires an assessment of risks, a balancing of costs and benefits, and the tailoring of measures to address the risk profile.

The Authority can establish a control and monitoring framework for contracted and sub-contracted suppliers to reduce the risk of corruption in its own supply chain. Contractors can be encouraged or required to do the same for their own supply chain.

	Resource and learning material
	<p>United Nations Global Compact (2010). <i>Fighting Corruption in the Supply Chain: A Guide for Customers and Suppliers</i>. New York; United Nations.</p> <p>http://www.unglobalcompact.org/docs/issues_doc/supply_chain/fighting_corruption_in_the_supply_chain.pdf</p> <p>UNODC (2013). <i>Guidebook on anti-corruption in public procurement and the management of public finances</i>. United Nations: New York.</p> <p>http://www.unodc.org/documents/corruption/Publications/2013/Guidebook_on_anti-corruption_in_public_procurement_and_the_management_of_public_finances.pdf</p>

😊 Discussion: What is a supply chain? How does a supply chain increase the risk of corruption in the procurement process? (📖 see the Participant Manual for an example of a weak/corrupt supply chain). (🕒 5 minutes)

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 4.6

13. Key points to remember (🕒 5 minutes)

📄 PPT-Lesson11: slide 23

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LESSON 12: Mitigating the risk of corruption in construction and infrastructure development projects

1. Introduction

The organization of a major event typically requires significant investments in the building and improvement of infrastructure, the construction of venues, or modifications to existing venues and facilities. The event may further require substantial investments in conference facilities, stadiums, hotels, health equipment and facilities, airports, roads, urban transportation, telecommunications, electric power, sanitation, and security systems.

Poor procurement and project management practices may considerably increase the risk of fraud and corruption. Delays, bid-rigging, low construction standards, failed execution of contracts, and uncontrolled expenditures lead to more delays and greater costs. Risk management strategies can be employed by the Authority to mitigate these risks.

2. Objective

This main objective of this lesson is to ensure that participants are aware of the risk of corruption associated with the large construction and infrastructure development projects involved in the organization of a major event, that they appreciate the crucial importance of proper project management practices and procedures and that they become familiar with some of main approaches that can be taken to prevent corruption associated with these activities.

3. Learning outcomes

At the end of this lesson, participants will:

- Understand the nature of the pervasive risk of corruption that exists in the large scale construction and infrastructure development projects that are usually required for a major event;
- Appreciate the consequences of this type of corruption in terms of delays, bid-rigging, low construction standards, failed execution of contracts and uncontrolled expenditures;
- Be familiar with methods of mitigating the risk of corruption in the procurement for major construction and infrastructure development projects;

- Know what standard precautions should be taken during the procurement process when dealing with a consortium of companies or developing private-public partnerships;
- Be familiar with the concepts of risk allocation and risk management in the context of major construction or infrastructure development projects;
- Be familiar with some of the main risks of corruption associated with the financing of major construction projects and the approaches for mitigating that risk;
- Understand the importance of close and effective supervision of all major projects;
- Know some basic approaches in preventing corruption in relation to the legacy use of assets acquired or created for a major event.

4. Lesson outline (🕒 90 minutes)

There are four major components to this lesson: (1) procurement; (2) private financing of projects; (3) supervision of projects; and, (4) legacy use of assets.

- ☺ Discussion: What kinds of major construction or infrastructure development may be required for a major event? (🕒 5 minutes)
- 🗨️ Adopting effective procurement policies and practices to achieve value for money and prevent corruption – there are four components to this section (🕒 40 minutes)
- 🗨️ Corruption prevention and the private financing of projects (🕒 10 minutes)
- 🗨️ Ensuring the effective supervision of all major construction and infrastructure development projects (🕒 10 minutes)
- ☺ Discussion: What is an appropriate legacy use of assets? Invite participants to describe examples of legacy use of assets in their country (🕒 10 minutes)
- 🗨️ Preventing the risk of corruption in relation to the legacy use of assets acquired or created for the major event (🕒 10 minutes)
- 🗨️ Key points to remember (🕒 5 minutes)

5. Part 1 – Procurement in relation to major construction and infrastructure development projects (🕒 45 minutes)

- ☺ Discussion: What kinds of major construction or infrastructure development may be required for a major event? (🕒 10 minutes)

🔗 PPT-Lesson12: slides 1 to 6

Capacity issues

🔗 PPT-Lesson12: slide 7

Procurement activities relating to major construction and infrastructure projects can be very complex and often involve a number of public agencies in addition to the Authority itself. Procedures must be in place to ensure a competitive, fair and diligent procurement process for the selection of companies with a record of integrity and a capacity to deliver construction and infrastructure projects on time, on budget, and according to specifications.

The process must be able to detect and deter situations in which companies do not behave responsibly in order to maintain fair competition for all and to ensure value for the Authority's investments.

Dealing with consortia

🔗 PPT-Lesson12: slide 8

Because of the large scale of most infrastructure projects, the interested companies often participate in the selection proceedings through consortia specifically formed for that purpose. Information required from members of bidding consortia should relate to the consortium as a whole as well as to its individual participants. The pre-selection process must include a careful review of the composition of the consortia and their parent companies. To prevent leakages of information or possible collusion among consortia and to avoid undermining the credibility of the selection process, a company should not be allowed to join more than one consortium to submit proposals for the same project.

Risk identification, allocation and management

🔗 PPT-Lesson12: slide 9

The precise allocation of risks among the various parties involved in a construction or infrastructure project needs to be defined after consideration of various factors, including the Authority's requirements for the successful delivery of the major event and the level of risk faced by the project companies, other investors and lenders (and the extent of their ability and readiness to absorb those risks at an acceptable cost). Adequate risk allocation is essential to reducing project costs and to ensuring the successful implementation of the project. An inappropriate allocation of project risks may compromise the project's financial viability or hinder its efficient management, thus increasing the cost at which the service is provided. The risk allocation

negotiation and agreement process, if not properly managed, contains its own specific risks of corruption.

Project companies are typically established as an independent legal entity to manage large infrastructure projects, thus limiting the liability of the private entity or entities involved in a large construction or infrastructure project. Their establishment facilitates coordination in the execution of the project and provides a mechanism for protecting the interests of the project.

The Authority must ensure that the project company has an equity level that ensures a sound financial basis and guarantees its capability to meet its obligations. The Authority must also ensure that the statutes and by-laws of the project company adequately reflect its obligations under the project agreement.

Private-public partnerships

📄 PPT-Lesson12: slide 10

Public-private partnerships normally involve the granting of various concessions and advantages. That process creates additional risks of corruption that must be mitigated by rigorous policies and procedures.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 5.1

6. Part 2 - Corruption prevention and the private financing of projects (🕒 10 minutes)

📄 PPT-Lesson12: slide 12

While public financing was traditionally used for major infrastructure and constructions projects, this is changing and alternative arrangements often play a role in the development of the infrastructure required for a major event. Some projects may be approved with exclusively or predominantly private funding sources (e.g. loans or equity investments) while others may be based on public and private investments that are combined in arrangements referred to as “public-private partnerships”.

These kinds of public-private partnerships may be regulated by law or policies which may or may not apply to the Authority. In either case, the Authority should have adequate measures in place to ensure fair competition between public service providers or to prevent abuse of monopolistic conditions where competition is not feasible.

Privately financed infrastructure projects may include concessions for the construction and operation of new infrastructure facilities or the maintenance, modernization, expansion and operation of existing infrastructure facilities. Policies should be established that specify the type of concessions that may be granted for different types of infrastructure.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 5.2

7. Part 3 - Ensuring the effective supervision of all major construction and infrastructure development projects (🕒 10 minutes)

📄 PPT-Lesson12: slide 13

A lax or incompetent supervision of major construction or infrastructure projects can create numerous opportunities for corruption. Effective project supervision must be ensured. In particular, all decisions to modify or accept variations in project specifications, timelines or costs must be reviewed and approved through a rigorous process.

Agreements relating to large construction or infrastructure projects should not only allocate project risks, but also define clearly the performance standards that will be monitored and enforced by the Authority. Each agreement should specify the liability or penalties that will be imposed on the contractor in case of non-performance or a failure to fulfil its obligation. The monitoring and enforcement function must be protected from undue pressure or corruption.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 5.3

8. Part 4 - Preventing the risk of corruption in relation to the legacy use of assets acquired or created for the major event (🕒 20 minutes)

📄 PPT-Lesson12: slide 14

(Potential case study: Plan for the disposal of assets following the Beijing Olympic Games; see Participant Manual).

Given the significant amounts of public funds often required to build the venues, systems and infrastructures required for a major event, it is strongly recommended that a plan be developed for the transfer of these assets to the competent authorities for public use after the event. The transition to legacy

use of these assets creates several opportunities for fraud and corruption. That risk is accentuated by the fact that the transition is often poorly planned and not managed by the Authority itself. Existing community infrastructures and venues may have been improved or upgraded by the Authority in exchange for their use during the major event. These arrangements bring their own risks of corruption that should be assessed and managed carefully.

☺ Discussion: What is an appropriate legacy use of assets? Invite participants to offer and describe examples of legacy use of assets in their country.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 5.4

9. Key points to remember (🕒 5 minutes)

📄 PPT-Lesson12: slide 16

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LESSON 13: Mitigating the risk of corruption associated with the security infrastructure and arrangements

1. Introduction

Security operations are one of the most significant costs associated with the hosting of a major event. Given the global stage on which events are organized and held, there may be intense political pressure to overestimate security risks which can create opportunities for corruption in the procurement related to security arrangements. There is the further risk that an almost limitless budget can be justified in the name of planning in order to avoid the consequences of a major security breach during the event.

Anti-corruption policies, procedures and practices are required for all aspects of the Authority's procurement activities. However, because of their sensitivity, the procurement and delivery of security infrastructure and services requires particular attention.

One major, yet obvious, specific characteristic of security procurement is the need for confidentiality and secrecy to preserve the efficiency and efficacy of security arrangements. Revealing the exact nature of the security arrangements established for a major event could defeat the purpose of these arrangements.

2. Objectives

The main objective of this lesson is to familiarize participants with the risks of corruption associated with the procurement of security services and equipment and some of the main elements of a mitigation strategy to address that particular type of risk.

3. Learning outcomes

After the successful completion of this lesson, participants will:

- Be familiar with the organizational and accountability structure that should be in place to prevent the risk of corruption in the procurement of security services and equipment;
- Be familiar with measures to protect the integrity and efficiency of the procurement process for security services, infrastructure and equipment;

- Be familiar with measures to prevent corruption in relation to the legacy use of infrastructure and equipment procured in preparation for a major event.

4. Lesson outline (⌚ 90 minutes)

① Discussion of the type of security arrangements that may be required for a major event. (⌚ 10 minutes)

- 🔍 Organizational and accountability structure to prevent the risk of corruption in the procurement of security services and equipment (⌚ 30 minutes)
- 🔍 Protecting the integrity and efficiency of the procurement process for security services, infrastructure and equipment (⌚ 20 minutes)
- 🔍 Preventing corruption in relation to the legacy use of security infrastructure and equipment procured in preparation for a major event (⌚ 15 minutes)
- 🔍 Arrangements with public and private agencies responsible for security (⌚ 10 minutes)
- 🔍 Key points Arrangements (⌚ 5 minutes)

5. Part 1 - Organizational and accountability structures to prevent corruption in the procurement of security services and equipment (⌚ 30 minutes)

📄 See PPT-lesson13: slides 1 to 7

In some jurisdictions, there may be a national law enforcement agency with a capacity to manage the security requirements of the event. If so, the relationship between that agency and the Authority, as well as their respective responsibilities with respect to security arrangements for the event, must be clearly delineated.

Where such an agency is not available, alternate arrangements must be made in cooperation with various stakeholders, including the various security agencies involved.

Given the time pressures and highly charged nature of security planning, it is important to ensure that key security positions at both the planning and execution stages of the event are filled with individuals capable of fulfilling the critical roles assigned to them.

Law enforcement agencies responsible for securing major events must avoid the tendency to assign, often on the basis of seniority, highly specialized responsibilities (e.g., project planning, procurement, mobilization) in-house to people who do not have the required experience and expertise.

Given the ever-increasing budgets required for security arrangements for a major event, a singular budgeting and financial management responsibility centre is required with clear lines of reporting and accountability to the Authority.

Mechanisms must be in place in order to make information about the security arrangements available to the public without compromising the integrity of these arrangements.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 6.1

6. Part 2 - Protecting the integrity and efficiency of the procurement process for security services, infrastructure and equipment (⌚ 20 minutes)

 See PPT-lesson13: slide 8

It is most important to ensure that the planning and procurement of security services, equipment and infrastructure are conducted by experienced individuals with prior experience in managing large and complex security arrangements who have the knowledge, skills and expertise required to undertake the activities associated with staffing, procurement, logistics and budget oversight.

Local law enforcement agencies may not always have the necessary experience to perform these critical functions which may amplify existing risks of corruption.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 6.2

7. Part 3 - Preventing corruption in relation to the legacy use of security infrastructure and equipment procured in preparation for a major event (⌚ 15 minutes)

 See PPT-lesson13: slide 9

It is critical that the Authority is aware that the potential for corruption exists beyond the closing ceremonies or last day of the event. There must be mechanisms to ensure a culture of integrity and transparency as decisions are made with respect to the assets acquired or developed as part of the security arrangements for the event.

Since most security-related assets are typically transferred to some of the same agencies who were involved in the procurement process, specific opportunities for corruption may exist both during the procurement process and at the time of the disposal or transfer of these assets after the event.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 6.3

8. Part 4 - Arrangements with public and private agencies responsible for security (⌚ 10 minutes)

 See PPT-lesson13: slide 10

The Authority should be ready to contract out roles that are more effectively fulfilled by other public and private agencies.

The Authority should consult with key agencies in the public security sector to develop an overall security plan and delineate the respective roles and responsibilities of all the agencies involved.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 6.4

9. Key points to remember (⌚ 5 minutes)

 See PPT-lesson13: slide 11

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LESSON 14: Involving the private sector in the corruption prevention strategy

1. Introduction

The private sector plays a huge role in the preparation of a major event. The potential for sizeable profits attracts various segments of the private sector. The sponsorship, procurement of goods and services and the development of the infrastructure required for a major event directly involve the participation of the private sector. The financial services sector is involved in financing various aspects of both the activities of the public and the private sectors in relation to the organization of a major event. Given the sound business basis that motivates most corporate involvement, the private sector has its own reasons for wanting to prevent corruption. There are also significant reputational and financial risks involved for a company entangled in a corruption scheme.

The relative strength of the private sector's own corruption prevention policies and practices is very relevant to the Authority which can work with the private sector to identify corruption-related risk factors and help the private sector address these factors. Mapping common risks and threats can help in the formulation of effective responses and support meaningful cooperation between the Authority and relevant private entities. Incentives can be offered for the adoption of good practices.

2. Objectives

The main objective of this lesson is to ensure that participants understand the role of the private sector in preventing corruption and how this role can be supported. They should also be familiar with the measures that can be taken to prevent corruption in relation to sponsorship agreements and the negotiation of broadcasting rights.

3. Learning outcomes

At the end of this lesson, participants will:

- Understand the importance of working collaboratively with the private sector to prevent corruption;
- Be familiar with the measures that can be taken to prevent corruption in the granting and receiving of sponsorships;
- Be familiar with measures to prevent corruption in relation to the sale of broadcasting rights.

4. Lesson outline (🕒 90 minutes)

- 🕒 The UNCAC framework (📄 see PPT-Lesson14) (🕒 5 minutes)
- 🕒 Cooperation with the private sector to prevent corruption (📄 see: PPT-Lesson14) (🕒 10 minutes)
- 🕒 The objectives of the UN Global Compact – the rules (📄 see PPT-Lesson14) (🕒 5 minutes)
- 📄 Case study – Brazil and the World Cup preparations (📄 see PPT-Lesson14) (🕒 10 minutes)
- 🕒 Anti-corruption programmes in the private sector (📄 see PPT-Lesson14) (🕒 15 minutes)
- 🕒 Laws regarding the public sector's involvement with the private sector (📄 see PPT+Lesson15) (🕒 15 minutes)
- 🕒 Measures to prevent corruption in the granting and receiving of sponsorships (📄 see PPT-Lesson14) (🕒 15 minutes)
- 🕒 Measures to prevent corruption in relation to the sale of broadcasting rights (📄 see PPT-Lesson14) (🕒 15 minutes)

5. Part 1 – The UNCAC framework

📄 PPT-Lesson14: slides 1 to 8

Article 12 of the Convention calls for action to prevent corruption involving the private sector. This includes ensuring that private enterprises have sufficient internal auditing controls to assist in preventing and detecting acts of corruption and that their accounts and required financial statements are subject to appropriate auditing and certification procedures.

Cooperation between the Authority and relevant private entities is very important and can be supported by concrete measures such as those provided in article 12 (2) of UNCAC. These measures can focus on: promoting good commercial and contractual practices among businesses and in the contractual relations of businesses with those responsible for the organization of the major event; training business actors involved in the procurement processes, sponsorship arrangements and business contracts with the agency responsible for the organization of the major event; preventing conflicts of interest; ensuring transparency within the private entities, including in relation to the identity of the legal or natural persons involved in the establishment or management of companies; and, preventing the misuse of procedures

regulating private entities, including those regarding subsidies and licences granted by public authorities or the Authority.

UNCAC further requires States parties to consider adopting legislation and other measures not only to prevent bribery of public officials and bribery in the private sector, but also to establish it as a criminal offence in law (articles 15 and 21). Some of these laws make a company liable to prosecution if a person associated with it bribes another person intending to obtain or retain an advantage in the conduct of business for that organization.

📄 Refer to text of UNCAC

6. Part 2 - Cooperation with the private sector to prevent corruption (🕒 25 minutes)

📄 PPT-Lesson14: slides 9 to 11

The Authority may work with the business community, suppliers and contractors and make them an integral part of its anti-corruption plans and activities. Integrity agreements (pacts) may be encouraged among key stakeholders to encourage transparent, ethical and collaborative public-private partnerships and to encourage an anti-corruption culture. A sectoral approach can be used to work with different sectors to encourage a sense of communal accountability and professional pride in maintaining a high level of integrity.

Integrity pacts and similar citizen-monitoring mechanisms for major events, in particular for infrastructure projects, procurement and other contracting activities, are emerging as a promising corruption prevention strategy.

📄 The objectives of the UN Global Compact – the rules (📄 see PPT+Lesson15) (🕒 5 minutes)

📄 Case study – Brazil and the World Cup preparations (📄 see PPT-Lesson14) (🕒 10 minutes)

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 7.1

7. Part 3 - Anti-corruption programmes in the private sector (🕒 15 minutes)

📄 PPT-Lesson14: slides 12 to 13

The Authority may provide specific guidance to the private sector about how it may achieve compliance with national laws criminalizing bribery and other corruption offences.

Companies doing business with the Authority or any of the stakeholders involved in the organization of the major event must commit themselves to implementing and enforcing a programme to prevent and counter corruption.

Taking into account their obligations under the laws of the countries in which they operate, companies must adopt and implement strict anti-corruption policies, integrate these policies into organizational structures, assign roles and responsibilities, and develop and enforce detailed implementation plans.

The Authority can also seek and obtain the cooperation of professional associations, unions, and key financial institutions in preventing corruption.

	Example
<p>The Authority may require the private companies it deals with to implement rigorous and well-grounded anti-corruption policies and practices in order to be eligible to bid on contracts associated with the major event. Taking into account their obligations under the laws of the countries in which they operate, companies can be required to adopt and implement strict anti-bribery policies, integrate these policies into organizational structures and assign responsibility, as well as develop detailed implementation plans.</p> <p>An increasing number of companies are demonstrating leadership by implementing effective anti-corruption ethics and compliance programmes. To be effective, such a programme must be integrated into the company's overall ethics and compliance framework. General Electric's Government Business Centre of Excellence provides an example of a private sector initiative to develop a readiness to respond to bidding requirements and the pressures inherent in completing contracts for major events once they have been awarded. The comprehensive and well established internal compliance programme grounded the involvement of GE in Olympic sponsorship since 2003.</p>	

	Resource and learning material: An Anti-Corruption Ethics and Compliance Programme for Business
<p>Neither governments nor companies can fight corruption alone. The private and public sectors must work together in this effort. To this end, the most significant international anti-corruption instrument—the United Nations Convention against Corruption (UNCAC)—considers the private sector's engagement as essential to the fight against corruption.</p> <p>It is now generally accepted that businesses have a responsibility to act as good</p>	

corporate citizens. This tenet is increasingly complemented with evidence and understanding among companies that fighting corruption makes good business sense and that a well-executed anti-corruption ethics and compliance programme yields greater value over time.

The evolving international legal framework and the rapid development of rules of corporate governance around the world are now prompting companies to focus on anti-corruption measures as an essential component of their mechanisms to protect their reputation and the interests of their investors and shareholders. Increased costs due to corrupt payments, unfavourable dependencies between the supply and demand side of a corrupt act (resulting in continuous extortion requests) or missed business opportunities in distorted markets are further examples of the negative consequences of corruption for companies. But most of all, corruption is illegal and companies face serious consequences for violating the law. Such consequences, going beyond legal penalties, have a strong impact on companies, including, most prominently, on their reputation.

Companies that understand that countering corruption requires more than complying with domestic laws and avoiding negative consequences are increasingly encouraged to set themselves apart from their peers.

The Anti-Corruption Ethics and Compliance Handbook by the OECD, the World Bank and UNODC compiles such guidelines and related material on private sector anticorruption compliance into one easy-to-use publication. Following a comprehensive structure, the Handbook outlines principles from major organizations and complements them with anonymous, real-world cases.

In addition, UNODC has published An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide. The Guide explains that while the approach to how an anti-corruption ethics and compliance programme is developed may vary from company to company, there are some basic common elements which a company should address. Challenges and opportunities for small and medium-sized enterprises (SMEs) are emphasized throughout that Guide. In addition, practical information for companies of all sizes regarding public disclosure of their anti-corruption endeavours to demonstrate commitment to the fundamental values of integrity, transparency and accountability is given.

UNODC (2013). *An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide*.

http://www.unodc.org/documents/corruption/Publications/2013/13-84498_Ebook.pdf

OECD/UNODC/World Bank (2013). *Anti-Corruption Ethics and Compliance Handbook for Business*.

<http://www.unodc.org/documents/corruption/Publications/2013/Anti-CorruptionEthicsComplianceHandbook.pdf>

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 7.2

8. Part 4 - Laws regarding the public sector's involvement with the private sector (🕒 15 minutes)

📎 PPT-Lesson14: slides 13-15

National legislation may offer a framework for the prevention of corruption, particularly as it relates to the interaction between the public and the private sector. This should guide the activities of the Authority and serve as a framework for defining the minimum standards of integrity expected from the private sector.

Conflicts of interest regulations and related restrictions are normally imposed on the professional conduct of civil servants. Civil servants, for example, may be prohibited from engaging in certain activities in relation to public tendering, procurement and consultancy activities. These prohibitions may also apply for a set period of time to former public servants. Such measures should apply to the Authority.

If relevant legislation or regulations do not already exist at the national level, the Authority should set its own conflict of interest rules and make them widely known within both the public and the private sector.

📎 If possible, the relevant national legislation should be quoted and discussed.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 7.3

9. Part 5 - Measures to be taken to prevent corruption in granting and receiving of sponsorships (🕒 15 minutes)

📎 PPT-Lesson14: slides 16 to 19

Sponsorship involves providing funding for an event in return for branding and advertising opportunities or other special privileges or concessions. Sponsorships enable companies to increase their public profile in a relatively cost-effective manner. Companies often compete fiercely for sponsorship opportunities related to a major event.

There is a potential for corruption linked to the lack of transparency and accountability within the organization selling the sponsorship opportunity. The risk of this kind of corruption occurring within and around the Authority must be assessed and addressed.

It is important to raise awareness among the sponsoring companies and within the Authority itself about the risks of corruption around sponsorship agreements and ways to mitigate these risks. Training tools and information can be made available as to the proper precautions to be taken to avoid corruption related to sponsorships. The Authority should develop and adhere to policies for granting and receiving sponsorships.

A sponsor may offer gifts or benefits to individuals within the Authority in order to influence sponsorship decisions. A sponsor may use a sponsorship arrangement to cultivate relationships with key people within the Authority in order to influence various internal decisions. A sponsor may also offer generous sponsorship terms in return for favourable decisions in relation to regulation, procurement or other obligations.

A sponsorship policy should provide that any actual or potential conflict of interest posed by a potential sponsorship arrangement should be identified as part of a risk assessment process.

	Resource and learning material: <i>Corruption in Sport Sponsorship and Hospitality</i>
UN Global Compact (2013). <i>Fighting Corruption in Sport Sponsorship and Hospitality: A practical guide for companies.</i> http://www.unglobalcompact.org/docs/issues_doc/Anti-Corruption/SportsSponsorshipHospitalityGuide.pdf	

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 7.5

10. Measures to prevent corruption in relation to the sale of broadcasting rights (🕒 15 minutes)

 PPT-Lesson14: slide 20

Given that the sale of broadcasting rights for many major events - particularly sporting events - may be a significant source of revenue for the Authority, it is necessary to have a strong, fair, and well managed process for allocating and selling these rights and obtaining fair value for them. The competitive bidding and contract negotiation processes are both complex and potentially vulnerable to corruption.

The media are responsible for adopting their own rules and policies with respect to the acquisition of broadcasting rights for major events. These rules must also cover their relationship with major corporate sponsors of the event

who will wish to maximize the commercial impact of their sponsorship investments through media advertising.

Questions for an assessment

 Refer to the Corruption Prevention Checklist, section 7.6

11. Key points to remember (🕒5 minutes)

 PPT-Lesson14: slide 20

LESSON 15: Detection of corruption and law enforcement

1. Introduction

For preventive measures to be effective, they need to be supported by adequate and firm responses to incidents of corruption. The Authority has no direct responsibility for law enforcement, but it has a duty to cooperate with law enforcement agencies in the detection, investigation and prosecution of acts of fraud and corruption. The Authority also has a responsibility to put in place internal compliance mechanisms and procedures to receive, monitor and investigate complaints relating to alleged or suspected incidents of fraud or corruption.

2. Objectives

The purpose of this lesson is to draw the attention of participants to the need to detect and respond firmly to incidents of corruption. In order to do so, an authority is expected to work and collaborate with law enforcement and prosecutorial authorities.

3. Learning outcomes

At the end of the session, participants will:

- Understand the responsibility of the Authority to set in place adequate mechanisms for detecting, receiving complaints, and monitoring and investigating incidents of alleged or suspected corruption or fraud;
- Understand the role a “compliance officer” can play in detecting and responding to incidents of corruption;
- Be familiar with different approaches to offering whistle-blower protection and the usefulness of establishing a whistle-blower unit;
- Understand the need for an Authority to cooperate closely with law enforcement authorities;
- Understand the typical complexity of corruption investigations and some of the methods used in such investigations.

4. Lesson outline (🕒 90 minutes)

- 🕒 UNCAC provisions (🕒 10 minutes)
- 🕒 Responsibility for compliance monitoring (🕒 20 minutes)
- 🕒 Whistle-blowing and whistle-blower protection (🕒 30 minutes)

- ❑ Invite participants to list some of the reasons why people may be reluctant to report suspected incidents of corruption.
- ❑ Invite participants to give examples of whistle-blowing in their organization or in other contexts.
- 📄 Example of whistle-blowing law
- 📄 Example of private sector offering anonymous reporting (whistle-blowing) services
- 🕒 Cooperation with law enforcement (⌚ 10 minutes)
- 🕒 Corruption investigation (⌚ 15 minutes)
- 🕒 Key points to remember (⌚ 5 minutes)

5. Part 1 – UNCAC framework (⌚ 10 minutes)

📄 PPT-Lesson15: slides 1 to 4

Chapter III of the Convention requires the criminalization, prosecution and sanction of corruption, including corruption in the private sector (articles 21-22). The effective enforcement of anti-corruption measures requires mechanisms to facilitate the reporting of corrupt behaviours, such as protection for whistle-blowers (article 33) and witnesses (article 32), and measures to encourage cooperation between national authorities and the private sector (article 39). Measures to criminalize the obstruction of justice (article 25) and to ensure that legal persons are held liable for acts of corruption (article 26) are also directly relevant.

6. Part 2 – Responsibility for compliance monitoring (⌚ 20 minutes)

📄 PPT-Lesson15: slide 5

The issue of compliance monitoring will be examined in greater detail in lesson 18. This section emphasizes the role of managers and supervisors throughout an organization in ensuring compliance with existing anti-corruption policies and in detecting and reporting apparent incidents of corruption.

The Authority should adopt procedures and mechanisms to receive, monitor and investigate complaints relating to alleged fraud and corruption. The Authority also needs to have an internal capacity to investigate such allegations. The Authority should establish a compliance officer function within its organization.

Internal auditors should be called upon to help investigate situations where there is a suspicion of corruption.

All supervisors and senior managers should be alert to the risk of corruption in their respective areas of responsibility. They need to have an understanding of what corruption is and how it can occur. They should be aware of things that might constitute **red flags** (🚩), or indicators of corruption. Corruption is likely to continue undetected if the relevant managers or supervisors are not alert to the possibility of corrupt conduct and is unaware of the corruption risks in his or her own area of responsibility.

Effective supervision and checking practices are essential strategies for detecting corruption. They are also important means of preventing corruption by reducing the opportunities for motivated individuals to engage in corrupt conduct. In fact, a review of corruption cases often reveals that inadequate supervision has very often contributed to the problem.

Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, section 8.1

7. Part 3 – Reporting (🕒30 minutes)

📄 PPT-Lesson15: slides 6 and 9

An important means of identifying breaches of a code of conduct and potential incidents of corruption is therefore to introduce an effective system for reporting suspicions of breaches in general, and corruption in particular (whistle-blowing).

Agencies should have measures in place to facilitate the reporting by public officials or members of the public of acts of corruption, misconduct, or conflicts of interest that come to their attention. Confidential phone lines and other practical measures can be used for that purpose.

The Authority should have an adequately resourced reporting unit (or whistle-blower unit) that processes reports at the highest level possible. This is most important for encouraging employees, business associates, partners, agents and others to report suspicious circumstances or activities to the Authority.

There should be a process and procedures in place that maximize assurances of confidentiality when reporting alleged incidents of corruption, including hotlines, need-to-know information transfer procedures, and identity disclosure protections.

- ❑ Invite participants to list some of the reasons why people may be reluctant to report suspected incidents of corruption.
- ❑ Invite participants to give examples of whistle-blowing in their organization or in other contexts
- 📄 Example of private sector offering anonymous reporting (whistle-blowing) services.

Questions for an assessment

- 📖 Refer to the Corruption Prevention Checklist, section 8.3

8. Part 4 – Cooperation with law enforcement (⌚10 minutes)

- 📄 PPT-Lesson15: slide 10

The Authority is not directly responsible for law enforcement, but it has a duty to cooperate with law enforcement agencies in the detection, investigation and prosecution of acts of fraud and corruption.

Questions for an assessment

- 📖 Refer to the Corruption Prevention Checklist, section 8.2

9. Part 5 – Corruption investigation (⌚15 minutes)

- 📄 PPT-Lesson15: slide 11

An Authority should have an internal capacity to thoroughly investigate and report on any alleged incident of corruption or misconduct on the part of officials and staff. The mission of this unit is generally one of oversight, including the investigation of all incidents of alleged corruption. In some instances, they share this responsibility with other external agencies, such as a comptroller general office, a law enforcement agency, or an anti-corruption body. In all instances, the units have a responsibility to cooperate with law enforcement agencies.

The selection of the members of an effective internal investigation team is crucial to the success of an investigation. Members should possess the specific investigative skills likely to be needed, should have proven integrity, and should be willing to undertake the work. Corruption usually involves a financial gain. The investigators must be familiar with financial investigation and prosecution methods. The backgrounds of investigators should be thoroughly checked from time to time, including social and family ties and lifestyles.



If some of the participants are from a law enforcement agency, invite them to share with the group some of their experience in investigating alleged incidents of corruption and some of the challenges they have faced.

10. Key points to remember (⌚5 minutes)

📄 PPT-Lesson15: slide 12

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LESSON 16: Mitigating the risk of corruption in post-event activities

1. Introduction

Even once the major event is over, some of the activities following its conclusion may hold a high risk of corruption. This is the case, for example, in the process of disposal and transfer of assets for legacy use once the work of the Authority has been completed. That risk may be amplified by the fact that the process in question may not be conducted directly by the Authority itself. At the same time, the post-event period also offers the Authority, the various stakeholders and the Government involved in preparing and holding the major event a unique opportunity to draw the lessons they have learned with respect to corruption prevention.

2. Objectives

The main objective of this lesson is to ensure that participants understand the risks of corruption that persist even after a major event has been successfully held and that they become familiar with some of the basic precautions that must be taken to mitigate these risks.

3. Learning outcomes

At the end of the lesson, participants will:

- Understand and be able to identify the risks of corruption associated with the disposal of assets and will be familiar with measures to mitigate these risks;
- Be familiar with the corruption risks associated with the collection of revenues, royalties, penalties after the conclusion of the major event and will be familiar with measures to mitigate these risks;
- Be aware of the importance of drawing lessons from the experience of holding a major event in terms of corruption prevention.

4. Lesson outline (🕒 90 minutes)

🗨️ Disposal of assets (🕒 15 minutes)

📖 The measures put in place in China after the Beijing Olympics (🕒 30 minutes)

🗨️ Rights of successor(s) (🕒 20 minutes)

👤 Learning opportunities (⌚ 25 minutes)

5. Part 1 – Disposal of assets (⌚ 45 minutes)

📄 PPT-Lesson16: slides 1 to 5

The various assets acquired or created for the purpose of the major event must be sold, transferred, converted for legacy use, or otherwise disposed of. Measures must be taken by the Authority or its legal successor(s) to supervise the disposal of such assets and prevent asset losses or illegal/corrupt transfers.



The measures put in place in China concerning the disposal of assets after the Beijing Olympics.

6. Part 2 – Rights of successors at the end of the Authority's mandate (⌚ 20 minutes)

📄 PPT-Lesson16: slide 6

It is important to ensure the continuation of legal and other procedures to collect penalties, fees and royalties and recover damages that may be owed to the Authority.

7. Part 3 – Learning opportunities (⌚ 25 minutes)

📄 PPT-Lesson16: slide 7

Given the Authority's considerable investment in corruption prevention strategies and systems, procedures and activities, there is a unique opportunity for important lessons to be drawn and for good practices to be identified and transferred to others.

8. Questions for an assessment

📖 Refer to the Corruption Prevention Checklist, sections 9.1, 9.2, 9.3

9. Key points to remember (⌚5 minutes)

📄 PPT-Lesson16: slide 8

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LESSON 17: Compliance monitoring

1. Introduction

The Authority must identify a responsibility centre or individual, at a high level, who is responsible and accountable for the Authority's overall corruption prevention programme. That ethics and compliance function is crucial to the prevention of corruption.

There must be someone within the Authority who is independently responsible for overseeing anti-corruption compliance processes and activities. This centre or individual must have adequately mapped specific control activities to identify and manage corruption risks, including controls designed to address the risk of management overriding existing control measures and the risk of third party corruption.

Compliance monitoring, at the highest level of the Authority, also includes: monitoring the results of both internal and external audits; examining and following-up on allegations and reports of fraud or corruption; reviewing accounting policies and practices used and monitoring changes to these policies; and, assessing the adequacy of anti-corruption procedures, particularly in high-risk areas.

The Authority should periodically and methodically test its corruption prevention measures, properly document the results of such tests and take corrective action as necessary.

One should remember that secrecy about compliance monitoring reports, including internal and external audits, and delays in making such reports public may add to the Authority's vulnerability to corruption.

2. Objectives

The purpose of this lesson is to ensure that participants understand the crucial importance of having someone within the Authority who is independently responsible for overseeing anti-corruption compliance processes and activities and of having a process and a program for testing the integrity of the prevention measures that have been implemented by the organization.

3. Learning outcomes

At the end of this lessons participants will

- Understand the importance of compliance mechanisms

- Be familiar with the process of integrity testing applied to corruption prevention measures
- Will understand the importance of identifying a responsibility centre (or individual), at a high level, who is responsible and accountable for the Authority's overall corruption prevention programme.

4. Lesson outline (🕒 90 minutes)

- 🗨️ Responsibility for compliance monitoring (🕒 15 minutes)
- 📖 The Supervisory Committee established in China for the Beijing Olympics (🕒 30 minutes)
- 🗨️ Testing of prevention measures (🕒 40 Minutes)
- 🗨️ Key points

5. Part 1 – Responsibility for compliance monitoring (🕒 45 minutes)

- 📖 The Supervisory Committee established in China for the Beijing Olympics (🕒 30 minutes)
- 🔗 PPT-Lesson17: slides 1 to 9

Question for an assessment

- 📖 Refer to the Corruption Prevention Checklist, section 1.7

6. Part 2 – Testing of prevention measures (🕒 40 Minutes)

- 🔗 PPT-Lesson17: slides 10 and 11

One of the most important parts of any risk mitigation strategy is the process of “integrity assessment” or “testing”. Integrity testing is a continuous process whereby the various aspects of an agency’s risk mitigation strategy are subjected to a rigorous test to ensure that they actually function and address the particular risk they were designed to mitigate. It is a form of audit in which the risk mitigation strategies and the control process that have been put in place are tested to ascertain that they are actually applied and, if so, with what results. This on-going process provides a basis for constantly refining and improving the Authority’s corruption risk mitigation measures.

Public integrity assessment tools usually aim at assessing the institutional framework for promoting integrity and combating corruption across the public

sector and/or to identify corruption and corruption risks within specific government agencies and/or among public officials. The majority of assessment tools focus on assessing the integrity of an institution as a whole, as opposed to that of individuals. In some instances, institutions and agencies have tested public officials' integrity by simulating corruption opportunities (i.e., integrity testing) or checking their lifestyle and background (i.e., lifestyle check). This other type of "integrity test" focuses on individuals rather than systems and institutions and is more likely to prove relevant to the task of detecting and deterring corruption than to the development of comprehensive risk mitigation strategies.

The Organisation for Economic Co-operation and Development (OECD) has developed an assessment framework for public sector integrity which provides policy makers and managers with a useful roadmap to design and organize sound assessments in specific public organizations and sectors. It includes practical checklists, decision-making tools and options for methodologies based on good practices. That tool contains an inventory of methods and solutions used worldwide for conducting well-designed assessments.

Question for an assessment

📖 Refer to the Corruption Prevention Checklist, section 1.7

📄 PPT-Lesson17: slide 12

- Does the Authority have procedures in place for the periodic and methodical testing of its anti-corruption measures, documenting the results of such tests, and taking corrective action as necessary?
- Are these procedures regularly applied?
- Have corrective actions been taken after integrity testing?

7. Key points to remember (🕒 5 minutes)

📄 PPT-Lesson17: slide 13

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LESSON 18: Conclusion and feedback from participants

1. Lesson outline

Retention test

Optional: Distribute retention test found in the appendix to this package. If you have decided to do so, make sure that participants were informed of this expectation during the first lesson.

Group discussion – What have we learned?



In small discussion groups, participants are asked to draw the five main points they have learned throughout the workshop.

Conclusion

☛ The instructor summarizes some of the main points that were covered, or emphasizes some additional points that may not have been covered in the discussion groups' reports.

Learning expectations and outcomes

☺ If participants were invited to list their expectations during lesson 1:

- Refer again to the main points recorded on flip charts during that first session and invite participants to comment on whether their expectations were met;
- Ask whether there are other expectations participants now wish would have been addressed during the workshop (to improve future workshops).

☛ Remind participants to fill in the workshop evaluation questionnaire. Please thank them for doing so.

Concluding remarks

- ☛ Thanks to participants, sponsors, host, etc.
 - Distribution of certificates of participation

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