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The United Nations Convention against Corruption  
**Safeguarding against Corruption  
in Major Public Events**

**LESSON 17: Compliance monitoring**



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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.



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## Compliance monitoring

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;
- ✓ Assessing the adequacy of anti-corruption procedures, particularly in high-risk areas.



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## Responsibility for compliance monitoring

- No expectation of “impunity” associated with the importance of the major event.
- 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**.
- This person or centre must be independently responsible for overseeing anti-corruption compliance processes and activities.



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An example:

THE SUPERVISORY AND COMPLIANCE MONITORING  
PROCESS IN PLACE FOR THE ORGANIZATION OF  
THE BEIJING OLYMPICS



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## Main elements of the Beijing monitoring approach

1. Establish a supervisory body with clear-cut responsibilities.
2. Awareness raising activities to implant integrity and self-discipline.
3. Continuously improving the regulatory system, establishing strict work procedures, and strengthening supervision over implementation.
4. Strengthening supervision on the construction of Olympic venues in line with the requirement of "sunshine project".
5. Strengthening supervision on financial management of BOCOG through strict budget and audit procedures and standards.
6. Applying strict managerial procedures to centralized procurements and strengthening supervision on procurements made by BOCOG.
7. Station supervision organizations in venues to strengthen supervision on venue operation and games-time operation.
8. Strengthening post-game supervision on the management of funds and materials to prevent asset loss.



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## Organizational Structure of the Supervision Committee of the 29<sup>th</sup> Olympic Games

- The Supervision Committee consisted of 30 members from Central Government departments, related functional departments of Beijing Municipality and the general public.
- The Supervision Committee was headed by a vice minister from the Ministry of Supervision.
- Each member of the Supervision Committee represented a supervision organization so that the whole committee could give play to the comprehensive supervision functions of administrative supervision, audit supervision, financial and economic supervision, project supervision and democratic supervision.



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## Duties and Responsibilities of the Supervision Committee

- The General Office of the Supervision Committee was the Supervision and Audit Department of the BOCOG.
- The Supervision Committee was responsible for supervising the whole preparation process of the Olympic Games, including the work of the BOCOG and the construction of Olympic venues, and coordinating with related department and organs to improve their regulatory systems and supervising the implementation of rules and regulations.
- It accepted and processed complaints and corruption reports from the public.





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The Supervisory Committee ensured transparency in the construction of Olympic venues by publicizing information related to all project stages ranging from examination and approval, planning, house relocation, to bidding, construction and final acceptance.



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## Testing

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



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## Integrity “assessment” or “testing”

- A most important part of any risk mitigation strategy is the process of “integrity assessment” or “testing”.
- 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.
- A type 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.
- It provides a basis for constantly refining and improving the agency’s corruption risk mitigation measures.



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## Questions for an assessment

Have a look at section 1.7 of the Corruption Prevention Checklist.

- 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?

**Any question, comment, suggestion?**



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## Key points to remember

- ✓ Identifying a responsibility centre (or individual), at a high level, who is responsible and accountable for the Authority's overall corruption prevention programme.
- ✓ Creating an "ethics and compliance function" (or responsibility centre) within the Authority.
- ✓ Periodic testing of corruption prevention and risk prevention measures, properly document the results of such tests and take corrective action as necessary.