



Integrity Action Plan

A handbook for practitioners in defence establishments



CONTENTS

1. INTRODUCTION	6
Growing concern over corruption.....	7
Integrity action plan – A step by step guide	8
2. GETTING STARTED	10
Assessing corruption risk in the defence sector	11
Tailored assessment.....	13
Accounting for context	13
Building political and military support	13
Political leadership.....	14
Military leadership	14
The need for a broad strategy	15
3. PLANNING PHASE	16
Top-level ownership	16
Choosing the right approach.....	17
Establishing a steering group	18
Establishing a working group.....	19
Finding the right people for the working group.....	19
Allocating resources and responsibilities.....	20
Timelines and milestones.....	20
Broader consultation.....	20
Communication strategy.....	21
Analysing risk factors	21

4. DRAFTING THE PLAN	22
Drafting the Integrity Action Plan	23
The Action Plan document	23
Main body of action plan	23
EXAMPLES	24
Areas to include in an Integrity Action Plan.....	27
5. IMPLEMENTING THE PLAN	28
From planning to implementation	29
Regular progress meetings and reporting.....	29
Communication.....	29
Managing the risk factors	30
Review and revision	30
6. EVALUATION	31
Evaluating and monitoring the results.....	31
Selecting indicators	32
Example: Measuring impact.....	33
Methods for long term monitoring through new assessments.....	33
Ownership.....	34
Reporting & communication.....	34
List of references	35

PREFACE




BÅRD B. KNUDSEN
Director, Centre for Integrity
in the Defence Sector

It is my experience from working in many different organisations that it is much easier to spot what needs changing than it is to make the changes. Even the most ambitious plan can flop and produce little change in real terms, because we lacked the ability to achieve the objectives, however well intended. Effective implementation relies crucially on concrete and systematic action. Making plans does not change much – it is the efficient execution of the plans that makes the difference.

This handbook on Integrity Action Plans aims at helping practitioners in defence establishments produce real and lasting change. It outlines how to assess corruption risks and address identified weaknesses and shortcomings. It emphasises the need for leadership and active support from the top in order to secure a clear mandate and how to tailor the chosen approach to the institutional context. The handbook guides you through all the necessary steps – from the planning stage to the actual drafting of the plan to practical implementation, monitoring and evaluation.

This handbook is one of the results of CIDS' Building Integrity Conference *How to develop and implement an integrity plan in the defence sector?* arranged in Oslo 3–6 March 2014. About 60 practitioners from 20 countries shared their ideas and experiences, and it is their input that has provided much of the basis for this handbook. Furthermore, CIDS' close working relationship with Transparency International UK's Defence and Security Programme has greatly contributed to the handbook. TI's substantial experience in integrity-building and anti-corruption work, including the drafting of integrity plans in a number of countries (often called anti-corruption plans or strategies) is unique. We are grateful to our TI partners for their valuable input and a very pleasant and productive working relationship.

We are also grateful to our many colleagues in the Norwegian Ministry of Defence and other parts of the Norwegian defence sector. Although Norway is generally known to have good governance and little corruption, Norway also has its challenges. We still need to handle risk factors and ensure personnel in the defence sector – civilians as well as military – are aware of and adhere to the relevant rules and regulations. These are there after all to safeguard integrity, and



leaders at all levels must provide guidance on ethical issues, like how to avoid conflicts of interest, and how to act in order to live up to high standards.

The handbook will be made available to everyone who is likely to benefit from using it in their work. It will be a valuable added resource to NATO's *Building Integrity Programme* and therefore useful to different countries after completing NATO's *Self-Assessment Questionnaire* and *Peer Review Process*, in order to help them embark on translating the resulting recommendations into action. It can also be used to address weaknesses and shortcomings identified by TI's *Government Defence Anti-Corruption Index*.

There has been a distinct need for a handbook like this, and I hope it will be used actively. We welcome any feedback and ideas for improvements, of course. Finally, I would like to take this opportunity to thank Ingrid O. Busterud at CIDS for her excellent work in editing and bringing the handbook to fruition.

Oslo, 20 November 2014



1. INTRODUCTION

This chapter shows

- The impact of corruption in the defence sector
- The need for an integrity action plan and what it is
- Important steps in developing and implementing an integrity action plan

A STRATEGY IS A PLAN DESIGNED TO ACHIEVE A LONG-TERM OR OVERALL GOAL

AN ACTION PLAN DESCRIBES THE STEPS AND ACTIONS YOU HAVE TO TAKE TO ACHIEVE THE STRATEGY'S GOALS

AN INTEGRITY ACTION PLAN IS A TOOL TO DESIGN AND IMPLEMENT SPECIFIC MEASURES TO CORRECT IDENTIFIED RISKS OF CORRUPTION AND OTHER SHORTCOMINGS IN THE INTEGRITY SYSTEM. THROUGH A HOLISTIC AND SYSTEMATIC APPROACH, SPECIFIC MEASURES MAY BE TAILORED AND IMPLEMENTED IN A WAY THAT REINFORCES INTEGRITY AND REDUCES THE RISK OF CORRUPTION AND OTHER UNETHICAL BEHAVIOUR. THE AIM IS TO INSTITUTIONALISE HIGH ETHICAL STANDARDS AND PRINCIPLES OF GOOD GOVERNANCE.

Many senior defence officials, senior officers and ministers are aware of the corruption risks in defence. They know that public trust is important and that secrecy and corruption scandals damage that trust. They know that corruption corrodes operational effectiveness and puts their soldiers at risk if their equipment is inappropriate or faulty. Until recently, senior officials and leaders in the defence sector in most countries used to feel that corruption was something others had to tackle. Who those others were, and what they could do about it, were questions quietly ignored. While there are innumerable cases of reported corruption in the defence sector worldwide, there is very little scientific research and few specially designed instruments to help ministries and governments prevent and reduce the risk of corruption.

The Norwegian Centre for Integrity in the Defence Sector (CIDS) teamed up with Transparency International UK's Defence and Security Programme (TI DSP) to produce this handbook with a view to helping interested organisations and governments to develop an integrity action plan to counter corruption and corruption risks in the defence sector. The handbook draws on many years of practical experience of working alongside governments globally, and on ideas emerging from the CIDS' *Building Integrity Conference*, in Oslo March 2014. In addition to providing senior military and civilian personnel in ministries of defence and subordinate organisations with a practical tool, this handbook is also meant to be accessible to civil society and other stakeholders so they can assist in developing an integrity action plan.

GROWING CONCERN OVER CORRUPTION

Politicians and military leaders are increasingly changing their attitudes towards tackling corruption. Why

has this change occurred? The main reasons for this attitudinal change are simple:

1. Defence budgets are under pressure and governments need to make sure that money appropriated to defence is well-spent
2. Political and military leaders realise that corruption reduces public trust in the defence sector
3. Recent operational experience, particularly in Afghanistan, have shown the huge losses and vast sums wasted due to corruption

FINANCIAL ENVIRONMENT. The global recession has had a severe impact on most nations, and governments have responded by cutting budgets and focusing on getting the best value for money. Financial concerns have made governments more aware of the importance of good governance in the defence sector, but also underlined the fact that reduced waste due to corruption plays a key part of maintaining operational capability.

POLITICAL ENVIRONMENT. Corruption and other unethical behaviour erode the public's trust in the armed forces, and in some cases can undermine the government itself. Large-scale corruption will evoke public indignation, and may lead to social unrest and revolts. In recent years, senior defence leaders have realised the importance of building integrity and facilitating good governance in the defence sector to maintaining public trust and shoring up the defence budget.

OPERATIONAL ENVIRONMENT. Around the late 2000s, NATO and partner nations learned that huge amounts of money were being lost in Afghanistan because of systemic corruption.¹ Until that point, military and political officials seemingly turned a blind eye to the local corruption as a way of doing business. As

a result, money flowing into the country was often channelled not to those who needed it most, but to criminal patronage networks, including the adversary. The conflict was obviously being funded in part by coalition and donor money. In response, COMISAF issued in 2010 an “Anti-Corruption Guidance” in support of ISAF Strategic Campaign Objective. Corruption had become a strategic challenge.

With global defence budgets estimated at two trillion dollars, and a loss estimated at 20 per cent due to corruption, governments realise that in any future operational engagements corruption risks will have to be addressed prior to, during and post deployment.² Clearly, the deployed forces will need awareness training, the proper tools and other mechanisms in order to prevent and, if necessary, combat corruption.

INTEGRITY ACTION PLAN – A STEP BY STEP GUIDE

Defence ministries and establishments are slowly coming to realise that corruption can be addressed and minimised. But they need benchmarks and guidance. They need to know what it is that characterises a robust integrity system in the defence sector. Who and what should an integrity action plan target? Where are the good practices that can be studied and emulated? This handbook will answer all these questions, step by step.

An integrity action plan aims to improve standards of integrity through transparency, accountability and counter-corruption (TACC) measures.

TRANSPARENCY. Transparency means abolishing traditional habits of secrecy, except those concerning information where secrecy is essential for national or operational security. Transparent practice includes holding meetings that are open to the public and the media, providing easy access to documents, plans, and budgets that can be reviewed by anyone, and allowing discussion of Bills and legislation.

ACCOUNTABILITY. Accountability means people will be held responsible for their actions and how they perform their duties. Accountability involves having control and

verification systems in place, and, if necessary, the ability to arrest, prosecute and convict offenders for illegal or corrupt behaviour. All personnel must be held accountable under the law regardless of rank, status and office.

COUNTERING CORRUPTION. Counter-corruption measures include preventative actions that reduce the incentives and opportunities for corruption and other unethical behaviour to occur. The bulk of an integrity action plan will revolve around such preventative measures. Counter-corruption can also include the pro-active enforcement of rules. It includes control, oversight and investigation of suspected corrupt activities and individuals, as well as prosecution by a legal authority. It is important to note that law enforcement relies on, and is inherently linked to, an effective legal system and an independent judiciary.

An integrity action plan involves several stages, each of which we will go through in the following chapters.

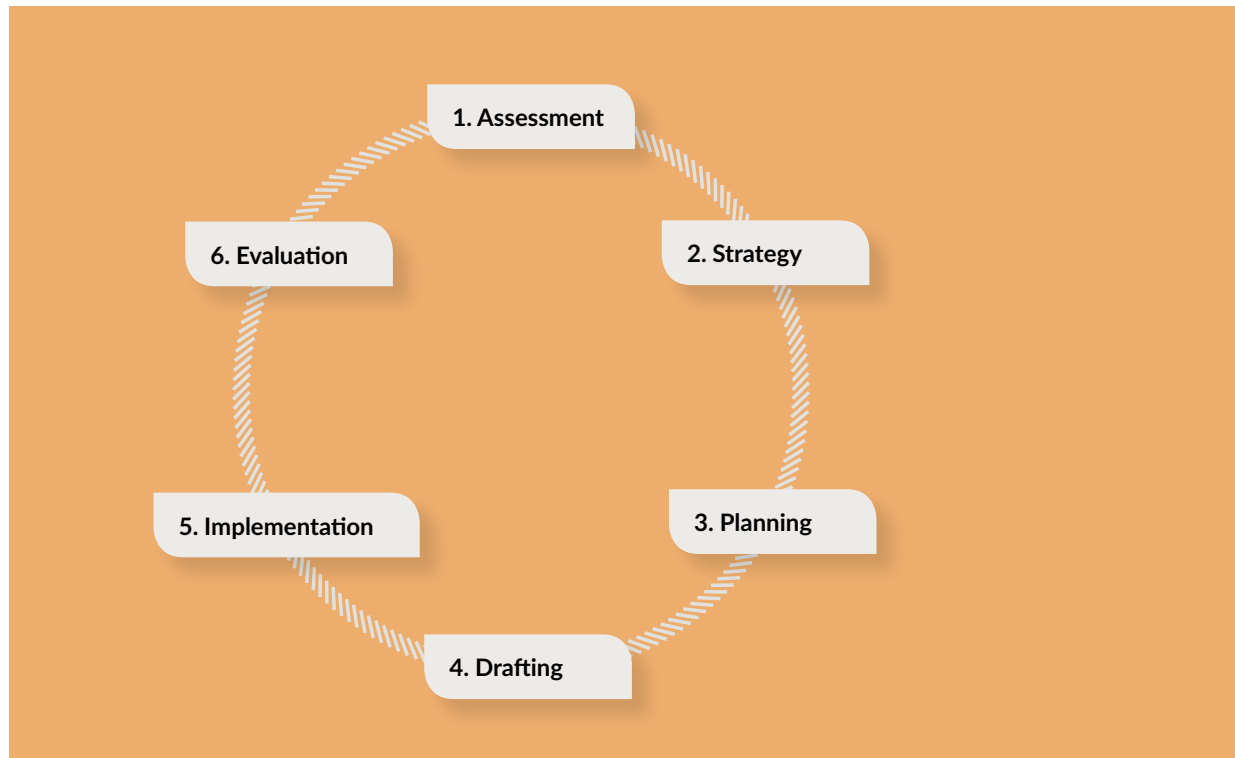
Step 1. Assessing risks. The first step is to make an accurate assessment of the corruption risks within the defence sector, and the political, social, economic and legal environment in which the sector operates. An assessment is a comprehensive analysis that identifies strengths and weaknesses in the integrity system. Questions to ask include whether national legislation is sufficient and effective. What is the public’s perception of the government’s willingness to fight corruption? How well do public officials (military or civilian) understand the relevant rules and regulations, and do they have the necessary tools to adhere to these rules?

Step 2. Strategy development. The results of the assessment will then be used as a basis to draft a strategy. The strategy articulates the overall goal for counter-corruption work in the defence sector. The strategy should be synchronised with other existing strategies set forth government-wide or in other ministries and organisations.

Step 3. Planning phase. In the planning phase we select our approach, set priorities, establish a steering group and working structure, allocate resources and responsibilities, set timelines and consult with civil society organisations.

INTEGRITY IS THE QUALITY OF BEING GUIDED BY STRONG PRINCIPLES OR BEING FULLY OPERATIONAL, INTACT AND INTERNALLY CONSISTENT IN THE APPLICATION OF AGREED-UPON PRINCIPLES AND STANDARDS. INDIVIDUALS HAVE INTEGRITY IF THEY ARE DOING THEIR WORK HONESTLY, COMPETENTLY AND COMPLETELY. AT THE ORGANISATIONAL LEVEL, INTEGRITY SHOULD BE INSTITUTIONALISED BY EMBEDDING HIGH MORAL STANDARDS IN ORGANISATIONS, BUSINESSES AND PUBLIC OFFICES.

“An integrity action plan aims to improve standards of integrity through transparency, accountability and counter-corruption measures”



Step 4. Drafting phase. After completing the planning phase, it is time to start drafting the Integrity Action Plan. The plan describes in detail how to reach the strategic goals, including who does what, what resources are required and the timeline.

Step 5. Implementation. In the implementation phase we set the various reforms and activities specified in the Integrity Action Plan in motion. The timeframe for this phase will depend on the complexity of the Integrity Action Plan, but usually last from 6 months to 3–4 years.

Step 6. Evaluation. The monitoring of activities and evaluation of results are essential to find out whether the plan has succeeded and the goals have been reached. A systematic evaluation allows us to assess the degree of success and impact of the reforms and actions on the target groups. This can be done either as a direct follow-up to implementation, or by carrying out a new comprehensive assessment to identify progress.



2. GETTING STARTED

CORRUPTION IS DEFINED AS THE ABUSE OF ENTRUSTED POWER FOR PRIVATE GAIN.

CORRUPTION RISK REFERS TO THE DEGREE OF PROBABILITY THAT CORRUPTION WILL OCCUR WITHIN A CERTAIN AREA OR ACTIVITY, AND THE POTENTIAL COST ASSOCIATED WITH THAT CORRUPTION. IT THUS REFLECTS THE PROBABILITY THAT SUCH LOSSES, WHETHER MONETARY, SOCIAL, OR POLITICAL, CAN ARISE; AND REFLECTS THE DEGREE OF SUCH COST WHEN IT OCCURS.

This chapter shows:

- How to assess and analyse corruption risks
- What tools are available for assessing corruption risks in the defence sector
- How to build political and military support
- The need for a broad strategy
- How to link the integrity plan to the political context

Prior to developing an integrity action plan and in order to focus its efforts, the MoD or other major defence organisations must identify the most at-risk areas. Measuring corruption, of course, is notoriously challenging. Corruption is complex and secretive and no single instrument can measure corruption exhaustively. Corruption is more than people passing envelopes full of money as personal bribes; it also includes redirecting funds from contracts into personal accounts, theft and resale of defence supplies on the black market, and the use of secret budgets to hide illicit expenditure. Corruption also comprises unethical behaviour among personnel, and the misuse of position and rank, including abuse of power for political gain. People frequently act corruptly because the systems that are meant to prevent them are either weak or non-existent. It is also a question of leadership and how strongly ethical standards that may prevent corruption are institutionally embedded.

ASSESSING CORRUPTION RISK IN THE DEFENCE SECTOR

To learn where the gaps are, i.e. where to target measures, defence ministries must conduct a thorough review, asking how and why corruption may affect their defence sector.

The NATO Building Integrity Self-Assessment Questionnaire is a detailed process designed to help nations assess the strength of the current integrity system in their defence establishments. The self-assessment questionnaire consists of 49 questions divided into

eight areas, ranging from the scope of democratic control and engagement, to procurement, as well as planning and budgeting procedures. This tool was developed by TI-DSP together with NATO in 2008. It can be carried out in partnership with NATO, or independently. The process usually includes a number of steps, including an extensive questionnaire and a peer review stage led by NATO.

1. Obtain a high level mandate for the assessment
2. Designate a single responsible person for conducting the self-assessment
3. Establish a working group drawn from across the ministry
4. Collect answers and complete the questionnaire
5. Organise interviews for an expert peer review team
6. Conduct a top-level peer review
7. Establish recommendations for follow-up action
8. Repeat on a regular basis to examine progress

More details can be obtained at the [NATO Building Integrity website](#).

The Government Defence Anti-Corruption Index (GI), published by Transparency International UK's Defence and Security Programme is a tool that assesses corruption risks in the defence sector of a given country. This



EFFECTIVE ANTI-CORRUPTION RESPONSES CANNOT BE DESIGNED WITHOUT A THOROUGH ASSESSMENT OF THE PROBLEM: CORRUPTION IS A SYMPTOM OF INEFFECTIVENESS OF INSTITUTIONS, SYSTEM GAPS OR FAILURES. PROPER DIAGNOSTIC RESEARCH IS NEEDED TO IDENTIFY AND UNDERSTAND THE SPREAD OR CONCENTRATION OF CORRUPTION WITHIN A SYSTEM (A SINGLE ORGANIZATION OR A SYSTEM OF ORGANIZATIONS), THE SPECIFIC FORMS THAT IT TAKES, AND THE VULNERABILITY OF SYSTEMS AND PROCESSES TO CORRUPTION.³

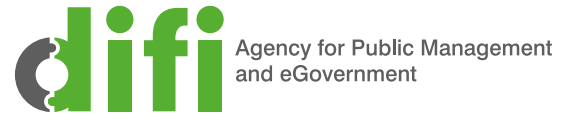
“An assessment is a comprehensive analysis that identifies strengths and weaknesses in the integrity system”

BUILDING INTEGRITY AND ANTI-CORRUPTION AWARENESS ARE VERY HIGH ON MY AGENDA. IN THE NORWEGIAN MOD WE HAVE USED TRANSPARENCY INTERNATIONAL'S GOVERNMENT DEFENCE ANTI-CORRUPTION INDEX ACTIVELY TO IDENTIFY ROOM FOR IMPROVEMENT IN OUR INTEGRITY SYSTEM. WE ARE NOW DEVELOPING AN INTEGRITY ACTION PLAN BASED ON THE RESULTS FROM THIS INDEX.

SECRETARY GENERAL IN THE NORWEGIAN MOD, ERIK LUND-ISAKSEN

index, based on 77 questions, provides governments and citizens with information on how their own defence ministries and armed forces compare to others in tackling defence corruption. It measures the degree of corruption risk and vulnerability in government defence establishments – the defence ministry, the armed forces, and other relevant government institutions in that country (such as auditing institutions) that may influence levels of corruption risk in the sector. Countries are also ranked by performance into various bands, where band A is for the best performing and band F the worst performing countries. The banding is based on a unique set of 'model answers' to each of the 77 questions and is undertaken by independent assessors. The analysis is subjected to peer reviews, and each government is consulted prior to publication of results. The 77 questions cover 29 areas of risk within political, finance, personnel, operations and procurement areas.

The index is an external and independent assessment that may be used as a basis for reform and serve as a tool to identify where to concentrate efforts. The GI's comprehensive 'model answer' section allows it to be easily used for measuring change over time. Additionally, TI UK's Defence and Security Programme has developed a range of tools to assist defence organisations reduce the risk of corruption through a variety of steps, including training and capacity building. For more information, visit [TI DSP's website](#).



The Norwegian Agency for Public Management and eGovernment (Difi) has developed a comprehensive tool to identify the risks of corruption/unethical behaviour in defence sector institutions. The Difi assessment tool with benchmarks is based on a total of 260 questions, covering nine topical areas: parliamentary oversight, anti-corruption policies, specialised anti-corruption bodies, conflicts of interest, freedom of access to information and transparency of defence budgets, internal and external audit, ombudsman institutions, public procurement and asset disposal, and human resources management. The benchmark guidelines use the standards embedded in a large number of international conventions and agreements as the basis for assessing the status of a given country's integrity system. Thus, the assessment allows us to evaluate the extent to which these standards are institutionalised in the country in question. Based on those findings, it is possible to identify major gaps between the normative standards and their actual extent of institutionalisation and implementation; and propose measures to address these shortcomings.

TAILORED ASSESSMENT

If the above tools do not suffice for an accurate assessment of the integrity system and the corruption risks in particular parts of the defence sector, it may be necessary to conduct a specifically tailored assessment. This should be carefully developed in consultation with anti-corruption and defence experts, drawing on external expertise from both international organisations and civil society when possible.

When assessing the integrity system of a particular defence sector there are three levels that should be examined:

- Individuals – Are individuals properly trained, are they held to account, are they performing their work competently, honestly and completely? What kind of values and standards are instilled within the personnel, and how are they recruited and paid?
- Processes – What risks are accounted for in processes such as salary disbursements, contracting or other handling of money and assets? Is there a whistle-blower protection scheme? If so, how does it work?
- Organisation – How well is the organisation structured and how are the leaders appointed at different levels? What are the legal powers and constraints of the organisation, and how does it interact with external bodies?

An honest and valid assessment needs the support of the leadership and should be carried out objectively.

ACCOUNTING FOR CONTEXT

In the early stages of developing an integrity action plan and while conducting an assessment of corruption risk we need to make note of the various contextual factors likely to compound corruption or indeed impact any potential actions we undertake as part of the integrity plan. It is particularly important to conduct a stakeholder analysis to examine the varying interests at play. By identifying at an early stage the individuals or groups that are likely to affect or be affected by the integrity action plan, it is easier to address and involve them later in the process. When we develop an integrity action plan we need to look at what are considered 'best practices' in other countries, and adapt them to the local context.

Domestic political dimensions. To what extent are corruption and integrity a topic of conversation and discussable in the country? Could anti-corruption efforts be hijacked for political purposes and used as a means to isolate specific people, political groupings, or civil society organisations? How is politics linked to business interests?

International dimensions. Corrupt activities may be linked to relationships with other governments, political actors, private interests, criminal elements or safe havens. Corruption in one country or within a specific sector may have links to international criminal networks.

Civil Society. Beyond using the technical measurements set forth in indices such as Transparency International's Government Anti-Corruption Index, also engage with civil society organisations to understand the level of public trust and with other governmental organisations to ascertain intra-governmental trust and relations. Public support of anti-corruption efforts is key to maintaining momentum and developing sustainable forms of democratic accountability.

Rationale for Programme. We have to appraise the rationale for developing the action plan. In this we need to check whether the programme was initiated following a change of government, as an internally driven reform agenda, is it being used to demonstrate change to the international community, or are there other reasons? Understanding short and long term commitment to introduce changes are important. Institutions should take the opportunity to build on high political will and institutionalise necessary reforms before the political will to produce real change disappears.

BUILDING POLITICAL AND MILITARY SUPPORT

Building support for reforms among both the political and military leadership is an essential part of the initial phase. In order to obtain broad support, key leaders need to understand the actual impact of corruption on the defence sector. One way to raise awareness and understanding among the leadership is to initiate a high-level internal workshop where top officials can



AS A STARTING POINT I THINK WE MAY AGREE THAT ALL COUNTRIES, NOT ONLY THOSE EMERGING FROM CONFLICT OR IN A TRANSITION FROM A NON-DEMOCRATIC SYSTEM OF GOVERNMENT, SHOULD SPEND TIME ADDRESSING THE ISSUE OF CORRUPTION. I BELIEVE HIGH INTEGRITY AND FIGHTING CORRUPTION IS INDISPENSABLE TO ANY COUNTRY THAT ADHERES TO INTERNATIONAL RECOGNIZED RULES AND PRINCIPLES.

NORWEGIAN
MINISTER OF DEFENCE,
INE ERIKSEN
SØREIDE,
4 MARCH 2014

develop a common understanding of how corruption risks should be faced and the best means of addressing them.

Expertise from relevant international organisations, together with lessons learned from similar reform efforts in other countries, may help in communicating the reality that corruption is inherently a political and economic challenge worldwide. Both NATO and Transparency International offer various courses and workshops on these issues, like the Senior Leaders Day.

During this process of awareness-raising, there may be resistance from certain members or groups within the establishment. Some officials will contend that there is no need for an integrity action plan in the first place, or they will argue that the existing plans of the various departments are sufficient. However, experience shows that such approaches are inadequate. Corruption cuts across organisations and requires a holistic approach in order to deliver genuine change. It is crucial to gain the support of all levels for the suggested changes and reforms. Resistance from mid-level officials should not be underestimated, and it is therefore important to introduce a robust, strategic communications and training programme early in the process. Some of the following arguments may help you convince leaders in your organisation that an integrity action plan is a good idea.

POLITICAL LEADERSHIP

- Corruption reduces public trust in the defence sector
- Involvement in anti-corruption work (and the communication thereof) can strengthen public trust and may be used to build political credibility and support
- Corruption wastes scarce resources. Improving the integrity systems will save you money
- International companies tend to avoid corrupt economies. Corruption therefore slows economic growth, development and investment⁴
- Corruption can intensify existing rifts between different groups or within society by favouring one group over another
- Corruption can facilitate other key threats such as international and organised crime, terrorist activity and illicit trafficking and smuggling of narcotics, people, and scarce resources
- Corruption undermines the rule of law and fosters a culture of impunity

MILITARY LEADERSHIP

- Corruption reduces public trust in the armed forces, which again will reduce the support for public spending in the defence sector
- Corruption leads to the acquisition and utilisation of less or poor quality equipment which can endanger the safety of troops and citizens
- Corruption can reduce operational effectiveness and put soldiers' lives at risk
- In international operations, funding meant for reconstruction can end up in the wrong hands, including the enemy's
- A robust and transparent integrity system with committed leaders will motivate staff to support other defence reforms in the armed forces
- Corruption undermines long-term stability
- Preventing corruption could increase funds available to ministers and commanders and enable a lowering of taxes, better pay for military personnel, better or more equipment, higher pensions, etc.

THE NEED FOR A BROAD STRATEGY

All too frequently anti-corruption efforts are the result of uncoordinated, ad-hoc initiatives.⁵ This sort of piecemeal approach can be detrimental to anti-corruption work and even broader governance and defence reform. The ad-hoc approach usually stems from actors feeling under pressure to do something rather than nothing. But the fight against corruption requires a well thought-out, comprehensive, strategic plan.⁶ The development of an integrity action plan should be aligned with other anti-corruption efforts in all parts of the government. Clearly, as corruption has no respect for organisational and functional boundaries, corruption and unethical behaviour cannot be effectively combated by isolated anti-corruption measures. Lasting progress can only be achieved by improving the framework of public governance in a country. Reforms of security institutions should be seen in a wider reform perspective that includes appropriate anti-corruption mechanisms in the different civilian policy sectors. But the reform process needs to start somewhere, and the hierarchical and disciplined nature of defence institutions make them a suitable place to start.

Prior to embarking upon specific reforms as embodied in an integrity action plan, defence establishments are advised to develop a defence-wide anti-corruption strategy to frame the specific actions emanating from a broader approach. This strategy should synchronise with any existing government-wide, ministerial or organisational strategies.

An integrated strategy. To effectively close whatever loop holes corruption profits from, we need a comprehensive integrity action plan design. Corruption risks can be found in a variety of different departments, processes and institutions. To tackle the problem locally or develop individual anti-corruption measures in each department is not enough. To systematically reduce the risk of corruption, the plan needs to be approached consistently by all involved departments, with separate efforts coalescing into one overall plan.

Be as clear and precise as possible. As stated above, a strategy is a plan designed to achieve a long-term or overall goal. The goals should be articulated in a clear and precise manner so that they are easily understood by everyone involved, at all levels. The strategy should be stated in a simple, easily communicable language.

Set your scope early on. The scope of the strategy depends on the approach chosen. For example, for a narrow strategy focused on just three principal areas of action, the goal could be as simple as “Improving the integrity system in the Ministry of Defence and Armed Forces by implementing better procedures for procurement, strengthening the personnel policy and implementing an ethical code of conduct for all employees”.

The Bulgarian MOD, in its Action Plan (2009), stated its goal as follows:

Increase in the effectiveness of defence policy through abolishing the conditions of corruption in the Ministry of Defence, introduction of new governance practices and establishing a medium for the development and endorsement of adequate values, morals and conduct of the defence personnel.

This is the goal of the Montenegrin Integrity Plan (2014):

Main goal of the Integrity Plan of the Ministry of Defence and Armed Forces of Montenegro is to create preconditions for preventing and sanctioning corruption at all levels of the Ministry and Armed Forces by further enhancement of institutional framework, prevention, education and monitoring the implementation of Integrity Plan 2014-2016.



3. PLANNING PHASE

This chapter shows:

- Different approaches
- How to establish a steering group
- How to set priorities
- How to establish a working structure
- Allocation of resources and personnel
- Setting timelines
- How to conduct broader consultations
- How to plan a communications strategy

TOP-LEVEL OWNERSHIP

Now that the assessment has been completed, it is time to proceed to the planning phase.

Planning cannot start before it has been determined who will lead the development of the strategy and later design of the action plan. It is essential that the integrity initiative is seen to be led from the top. On a sensitive subject like integrity and anti-corruption, staff, officers and troops will be watching carefully to see how thoroughly the initiative is really owned by the leadership. There will be very limited support for the integrity plan if the reform initiatives are perceived

to focus solely on those at the bottom rather than also addressing corruption risks at the highest levels.

A senior sponsor can be anyone with the power to instigate change. This person can be an individual, such as a defence minister, chief of defence staff, an MoD secretary general, or the chief of the general staff. Equally, it could be an MoD or military top leadership group, as represented by the chair of that group. Whoever it is, that person becomes the embodiment of the commitment of the organisation to the plan. They need to speak about it regularly, both internally and externally, and demonstrate in their actions the reality, substance and permanence of the initiative.

CHOOSING THE RIGHT APPROACH

Because countries differ so markedly, each one has to tailor its anti-corruption approach to fit its own situation. The list below shows the eight different types of approaches that have been adopted by various countries. Choosing between them is the single biggest strategic choice of the entire process. Different approaches can be used in combination.

1. Narrow focus
2. Broad focus
3. External focus
4. Internal focus
5. Integrity building through training
6. Punitive approach
7. Disciplinary approach
8. External oversight

1. NARROW FOCUS

The first strategic choice when designing an action plan is to decide whether to go for a narrow or a broad focus. A narrow focus may be most appropriate when the identified corruption risks are concentrated in a limited number of areas. Alternatively, if the corruption problems range broad and deep, it makes sense to focus initially on just a few of the main problems so as to be able to demonstrate progress. In one such example where much of the most significant abuse was in the procurement of national defence equipment services, it would benefit the credibility of the leadership if it could show it could tackle and resolve this particular problem first, and then move on to others later. A second, but quite different, example is where we face a wide range of known corruption problems, but the corruption issues are so sensitive that the only way for the people executing the plan to gain momentum is to focus on one of the more resolvable issues, for example the training of senior officers in good conduct.

2. BROAD FOCUS

A broad approach requires a comprehensive plan for the entire defence sector. This is the sensible approach when the defence leadership wants to flag it as one of their main priorities, and a central pillar of their

programme of institutional strengthening. It would also be the right approach when the risk of corruption is pervasive or compromises several levels and areas, and the leadership feels sufficiently confident to push through comprehensive reforms. One example of this approach is the action plan developed by the Bulgarian Ministry of Defence – which wanted to make progress on a broad front. In other situations, countries receiving significant amounts of technical assistance from international donors may want to use this support to make progress in all the principal problem areas.

3. INTERNAL

Another strategic choice is whether to focus on high profile reforms that are visible to the public or reforms relating to the internal institutional strengthening of the ministry of defence and the military. Internal reforms, such as improving integrity in high value procurement activity, may be very significant financially but are unlikely to be very visible externally.

4. EXTERNAL

Usually, externally visible reforms – e.g. stopping the practice of taking bribes at checkpoints – are much less significant financially but may have a bigger effect on public opinion and public support of the military or security forces.

5. INTEGRITY-BUILDING FOCUS

A further strategic choice involves finding the balance between integrity-building efforts, such as the training of personnel and facilitating counter-corruption controls. Integrity building measures are less contentious politically, and fall in line with the values of civilian and military personnel. They thus tend to be popular with the military, and can serve as one way of rallying support for the action plan. A focus on training can also be the right approach when there is little or no top-level buy-in on countering corruption, but where there is none the less enthusiasm for reform at the middle level and downwards.

6. TAKING ACTION AGAINST CORRUPT DEFENCE OFFICIALS

Most integrity action plans do not prioritise actions against corrupt officials. This is partly because it is difficult to prosecute senior officers or senior staff in legal environments that may be fragile and politicised, and/or the prosecuting environment is used as a political tool. Furthermore, the judiciary will normally involve tasks belonging to institutions outside the defence sector. The part of punitive action in an integrity action plan may therefore be limited to bringing cases of suspected corruption or fraud to the attention of the police or other external agency for investigation and potential prosecution.

However, if cases of corruption are so visible and/or egregious that an anti-corruption plan would not have credibility unless active measures were being taken against the offending individual, punitive action should be a component of the action plan.

7. FOCUS ON INTERNAL DISCIPLINE

This is a less visible version of the prosecution approach. In one example, in which a large number of officers from the rank of colonel upwards were known to be abusing the system, requiring a group of officers to make strong asset declarations proved an effective way of showing reduced tolerance for this behaviour without going the extra step to prosecution. Or it might be an idea to give the Inspector General and his department more independence, authority and competence as a way of strengthening internal integrity across the military and in the ministry. Focusing on internal discipline is, in most cases, a successful approach. However, it must be checked on regularly, be controllable and applicable to all groups of personnel.

8. FOCUS ON EXTERNAL CONTROL AND OVERSIGHT

A final strategic choice is whether to strengthen the credibility of anti-corruption initiatives by working with external bodies, such as civil society organisations, think tanks, parliamentary defence committees, as well as supreme audit institutions in the monitoring and evaluation of the plan. Most ministries of defence may

be inclined to make this an internal reform. This may well be the correct choice, but there are advantages to external control and monitoring, notably that it may provide a stronger push for change and strengthen the credibility of the reforms. Furthermore, external monitoring allows for the use of external benchmarks to credibly demonstrate successful implementation of the plan both nationally and internationally, and to the government as well as the public.

The chosen approach may of course combine several elements from the above list.

ESTABLISHING A STEERING GROUP

In parallel with the planning process described above, there is a need to establish a steering group. It will be in charge of reaching the goals of the anti-corruption strategy and integrity action plan. The steering group should consist of senior officials overseeing the drafting and subsequent implementation of the action plan. The steering group should be headed either by a senior military officer or ministerial official in order to ensure delivery and sufficient coordination across institutional and organisational boundaries. The steering group then appoints a working group and a leader of the working group.



ESTABLISHING A WORKING GROUP

The work of implementing and monitoring the integrity action plan can be done by a working group as a part time or full time activity. Alternatively, it can be mainstreamed into the procedures of relevant departments. Choosing which structure to use will depend on the local setting, organisational structure and scope of the action plan.

It is important that the leader of the working group is fully committed to the work, and has a clear mandate from the steering group. The steering group explains the full extent of leader's responsibilities and powers, and gives him/her the authority to put the plan in motion.

If choosing a broad approach, i.e. by developing an action plan for the entire defence sector including the MoD, armed forces, procurement agency, secret services etc., we would need a full time working group consisting of members drawn from different parts of the defence establishment. The benefits of this organisational structure are that the members of the working group can concentrate all their time and energy on the project, and the group leader will have a well-defined leadership role.

If choosing a narrow approach and the action plan is addressing a certain department only, it might be feasible to appoint a project leader within or with good knowledge of that organisational unit and to mainstream the work within the day-to-day business. Mainstreaming the action plan into existing work streams can be advantageous since it will utilise already-existing chains of command, allow for quick decision-making, and facilitate knowledge-sharing and supervision. As a generality, we recommend that the project leader and at least some of the working group members work on a full time basis for an appropriate period of time to ensure consistency and institutional memory throughout the lifetime of the implementation period.

FINDING THE RIGHT PEOPLE FOR THE WORKING GROUP

The leader of the working group will need to find the right people with the right expertise and qualifications to

be part of the group. The working group should consist of dedicated personnel, and include both civilian and military personnel. If the integrity plan encompasses the entire defence sector, all relevant institutions such as the ministry of defence, armed forces, secret services, border control, procurement agencies, education services, etc. should be represented on the team. At a minimum, there should be one representative from each affected agency. If the integrity action plan only concentrates on the MoD or a particular defence institution, the team will need to have representatives from all the departments in that institution. The composition of the working group will require careful consideration and need to be assembled according to the specific context of the given organisation.

Once working group members are chosen the leader should present his nominees to the steering group for approval. Working group members should be well informed with ongoing efforts related to anti-corruption and integrity building. It is important that all members of the group are passionate about and committed to taking part in and leading the reform process. These members will all be 'reform agents' and it is therefore crucial they have credibility and act as good role models within their organisation.

Before the working group starts to draft the action plan, the working group leader needs to ensure that all members of the group have understood their mandate and respective tasks. One way to ensure this is to organise a 'kick-off' event for the whole team. This is a good way for the working group to get together and mark the beginning of the project. It is also a good opportunity to present and discuss the anti-corruption strategy and the goals and priorities of the action plan. A shared understanding of these elements is essential. The 'kick-off' event should ensure such a common understanding at the outset. Involving all members as early as possible will also bring a sense of ownership of the work ahead for all those involved.

CONSIDER:

- A kick-off event serves as the starting point for the entire working group and should create a shared understanding of the project

THE LEADER OF THE WORKING GROUP HAS OVERALL RESPONSIBILITY FOR THE PLANNING, EXECUTION, MONITORING, CONTROL AND CLOSURE OF THE PROJECT. THE WORKING GROUP LEADER REPORTS BACK TO THE STEERING GROUP

- Well-informed personnel are more motivated and contribute more to the project
- Create a safe and comfortable working environment but expect and make room for disagreements and possible conflicts
- The working group should meet regularly and submit regularly progress reports to the various stakeholders
- Celebrate milestones and build on successes

ALLOCATING RESOURCES AND RESPONSIBILITIES

For an action plan to be successful it is critical to have sufficient resources, both in terms of financial resources, manpower, and other necessary resources. It does not cost a lot to develop an integrity plan, and its implementation is first and foremost dependent on the people involved in it. Activities should therefore be based on a clear mandate and capacities of designated staff, well-suited for the job. Nevertheless, the steering group needs to allocate sufficient resources in the initial planning phase, and the leader of the working group needs to communicate personnel and resource needs.

It is also critical that the working group assign responsibilities internally. Some of the roles may include, but are not limited to: project assistant, budget and financial officer, subject matter expert, or communication manager.

TIMELINES AND MILESTONES

To combat corruption and build integrity as an aspect of promoting good governance will take time. Nonetheless, the plan needs to show progress over shorter timeframes. Setting a realistic timeline will help identify important milestones, deadlines and what resources are needed along the way. The action plan should include a clear timeline. When should the action plan be implemented? What are the important milestones? Generally, the head of the working group must try and avoid adjusting the timeline too frequently. Timelines focus and stimulate effort. However, there needs to be a degree of flexibility to account for last-minute

changes, new requirements or unforeseen obstacles. The following is one possible template for the timetable:

PLANNING ACTIVITIES:

Month 0–1:

- Leadership discussion to determine the need for an anti-corruption strategy and action plan
- Development of strategy

Months 1–3:

- Setting up steering group, choosing the approach

Months 4–6:

- Establish working group and drafting the action plan

Months 7–18:

- Implementation and follow-up

Months 18–30:

- Evaluation and monitoring

BROADER CONSULTATION

Consulting with and involving a broad range of stakeholders from the earliest stage of the project phase is highly recommended. The action plan should be developed in consultation with relevant civil society actors and others such as the defence and security industry. Consulting with NGOs, academia, anti-corruption agencies, as well as regional and international organisations, can add valuable input to the process. For instance, civil society organisations will normally possess invaluable knowledge about how corruption affects people's lives, while academia can provide knowledge-based information and relevant research.⁷

MAKE SURE THAT SUFFICIENT RESOURCES ARE ALLOCATED, BOTH IN TERMS OF FINANCIAL RESOURCES AND IN TERMS OF PERSONNEL

COMMUNICATION STRATEGY

Communication is a key success factor of any action plan. Both internal and external communication should be integral to the planning and implementation process. The leader of the working group should be responsible for internal communication within the working group, as well as to the steering group. It is essential that members of the working and steering groups stay well informed about the action plan and its implementation throughout the process. This will not only ensure better coordination of activities, it will also create a greater sense of ownership, and allow for open discussions and revision of on the ongoing work. When informing the defence organisation(s) as such, it would be wise to use existing channels of internal communication, such as intranet or newsletters.

As for external communication, this should be the responsibility of the leader of the steering group, or someone representing the top level leadership of the affected organisation. Preferably, the minister of defence, chief of defence or secretary general at the MoD should communicate anti-corruption efforts to the public. Clearly, it is important to prepare the message and information in close collaboration with the leader of the working group and/or steering group. To ensure a consistent and coherent message, it is also useful to involve professional personnel from the communication unit. External communication, in particular, should be coordinated and consistent with the MoD's general communication strategy and the activities of the MoD's and armed forces' daily communication work. Inconsistent messages, or even conflicting messages, may undermine the progress of the integrity action plan.

Careful consideration should be taken in regard to *who* should be informed (e.g. media, civil society organisations, international organisations) and *how* to present the information. Make a communication plan if feasible. One way of informing the public is to organise press briefings. Other means of communication include newsletters (either electronically or on paper) or the Internet. If suitable, use current websites such as the ministry of defence or armed forces' website. If this is not feasible, consider establishing an independent website or blog

to provide updated information. Communication via social media could also be an effective tool, but make sure this is aligned with the general strategy of the government and MoD. Communicating with external bodies such as the media and civil society will help you get your message across and build momentum. It should, however, be done carefully. Beware promising results it may prove difficult to deliver.

ANALYSING RISK FACTORS

Managing risk factors is essential to the success of an action plan. Risk management can mitigate the impact of the obstacles and challenges arising during the implementation phase. In order to be prepared for such events, we need to think about risk factors before we start implementing the plan. Discuss with the team the potential risks and events that could affect each member's specific tasks and timelines.

What could damage or delay the process? Looking at some of the recent experience of work on integrity action plans, risk factors include

- Elections
- Changes of government
- Changes of prioritisation within the top leadership
- Spending too much time on one objective at the cost of another
- Resources prove insufficient or funds are withdrawn
- Friction in decision processes
- Implementation depends too heavily on developments in areas outside the control of the defence sector such as legislation, judiciary capacity, education and schooling, etc.
- Other unexpected events (e.g. sickness among staff)

4. DRAFTING THE PLAN



This chapter shows:

- How to draft an integrity action plan
- Which areas to include in the plan
- Examples of action plans

DRAFTING THE INTEGRITY ACTION PLAN

Now that the planning phase is done, it is time to start drafting the action plan document. Before reaching this step, a series of important elements have to be in place:

- A risk assessment has identified gaps /shortfalls
- The approach has been decided upon
- The priorities have been stated
- The steering group has been appointed and working structure established
- Resources have been allocated
- Responsibilities are delegated and clear
- Timelines are set

When all these steps are ready, the working group can start drafting the action plan document. The plan will then be sent to the steering group for approval.

THE ACTION PLAN DOCUMENT

The action plan document needs to explain why the plan meets a defined need, the linkages between these needs and the overall anti-corruption strategy, the chosen approach and why the specific areas of priority in the plan were selected. Additionally, the plan should describe specific objectives of the selected areas of reform, the steps to be taken in each area, a timeline and milestones. The action plan should be a road map signalling what to do, why, and in what order, and provide guidance on how to proceed – especially with contentious issues and sensitive areas.

The action plan document needs to be written in a way that is easily accessible to a wide audience of different stakeholders. The following elements, which were described in the previous chapters, may help you structure the document.

1. Introduction to the plan and why it is needed
2. How it relates to the strategy, the overall goal and prioritised areas
3. Who is responsible at each level (top leadership, steering group, working group)
4. Specific objectives for each area
5. Risks and challenges
6. Mechanisms for coordination and broader consultation
7. Communication strategy
8. Mechanisms for evaluation and monitoring
9. **Main body of action plan** (see examples of different matrixes below)

MAIN BODY OF ACTION PLAN

The main body of the action plan describes in detail how to reach the goals set out in the strategy. There are different ways of designing the matrix and various templates to be used. Generally, the action plan should include information on

- What actions are to be taken
- Responsibility (i.e. who will carry out the various action items)
- Resources (i.e. funding, manpower)
- Timeline

Note that the action plan should be as specific as possible. The action items should describe the activity that will be undertaken. As seen in the example below, there could be more than one activity connected to each objective. Replacement of responsibility is essential, as is setting a deadline. Accurate time estimation may prove difficult, and we often underestimate the time needed to complete the various steps. Therefore, try to calculate for unexpected events and high priority demands, which may affect the deadline.

EXAMPLES

1. INTEGRITY ACTION PLAN TEMPLATE

Area	Objective	Action	Responsibility	Resources	Time
Personnel	Strengthen HRM arrangements in MoD	Produce handbook of HRM containing relevant legislation, guidelines and procedures. Hardcopy and softcopy	A. Johnson, MoD	HR department MoD Costs: (layout, printing hardcopy) EUR 1500	1 September 2015
Personnel	Strengthen HRM arrangements in MoD	Provide training sessions for HR personnel. 3 x 1 day workshops	M. Olson, MoD	HR department MoD Costs: (external trainer, facilities, refreshments for participants) EUR 2000	1 December 2015
Procurement	More transparent procurement processes	Disclose all defence purchases in reports and online. Publish yearly plans for future defence purchases	G. Jefferson at the Procurement Department, MoD	Procurement agency	15 September 2015
Finance	Reinforce internal audit training in MoD	Train and educate MoD auditors to internationally accredited standards. Provide training to 30 auditors per year, based on 4 x 2 days workshops	T. Adams	Internal audit department MoD. Costs: (external international trainers, education material, facilities) EUR 8000 per year	1 January 2017
Operations	Include section on corruption in the Joint Military Doctrine	Establish working group to draft text proposal. Implementation in next Joint Operational Doctrine (issued 15 Jan 2016)	B. Wilson to lead working group	National Defence Academy and Joint Doctrine Center	15 Jan 2016
Operations	Introduce corruption as topic in pre-deployment training for military commanders	Develop one day module focusing on anti-corruption and integrity in military operations	R. Watson at National Defence Academy	National Defence Academy, TI UK, NATO, PSOTC Sarajevo	1 August 2015

2. BUILDING INTEGRITY ACTION PLAN OF THE MINISTRY OF DEFENCE, GEORGIA, 2014-2015⁸

Main Directions	Planned Activities	Dates of Implementation	Responsible Unit	Supervisor Deputy Minister/ Deputy Chief of General staff	Obligation Under	Assessment Indicators
Parliamentary Oversight	Developing and submitting annual reports to the Parliament and its Defence and Security Committee on the implemented and planned reforms in the defence system, as well as on the incurred expenses	Annually	Defence Policy and Planning Department, J5	Xxx Xxxx Xxx Xxxx	Minister's Vision 2013-2014	Annual reports Minister's reporting meetings with the Parliament members
	Notifying the Defence and Security Committee of the Parliament on the planned high-value procurements	Ongoing	Procurement Department	Xxx Xxxx Xxx Xxxx	Minister's Vision 2013-2014	Information submitted to the Defence and Security Committee of the Parliament
	Improving cooperation between the Ministry of Defence and the Defence and Security Committee of the Parliament (in line of international best practices)	Q3, 2014	Department of Legal Issues and Relations with Parliament, Defence Policy and Planning Department	Xxx Xxxx Xxx Xxxx	Minister's Vision 2013-2014	The issues discussed and the meetings held between the representatives of the Ministry of Defence and the Defence and Security Committee of the Parliament

3. INTEGRITY PLAN OF THE MINISTRY OF DEFENCE AND ARMED FORCES OF MONTENEGRO (2014)

NAME OF INSTITUTION:		MINISTRY OF DEFENCE				INTEGRITY PLAN FOR 2014 - 2016						
		ASSESSMENT AND MEASUREMENT OF RISKS				REACTION TO A RISK				REVIEW & REPORTING ON RISKS		
General areas of risks	Working posts	Name of the risk	Existing control measures	Residual risks	Probability	Influence	Risk level	Suggested/implemented measures for risk reduction	Responsible person	Deadline	.	Progress made since last check
Institutional leadership and management	Minister State Secretary Chief of Defence (CHOD) Senior Leadership Defence Inspector	Disruption of institutional integrity Violation of transparency	Existing Defence Strategy and Strategy on National Security Strategy for the fight against corruption and organized crime Law on the prevention of conflict of interests	Incomplete definition of strategic documents in the area of building integrity in defence system	2	6	12	Drafting new Defence Strategy with the Chapter defining the issue of integrity within defence system Recommendation to the Authority responsible for drafting new Strategy on National security referring the issue of integrity building and combating corruption	General Director of the Defence Policy Directorate CHOD Head of Directorate for the strategic planning of defence Head of Department for legislation and European integrations	2015	.	
	Minister Chief of Defence (CHOD) Senior Leadership Chief of Staff of the General Staff Adviser to the Minister for military issues Commanders of the Armed Forces Units	Incomplete and ambiguity regulations Conflict of interests Disruption of reputation and integrity of institution	Existing regulations Code of Military Ethics	Ambiguity of the Law on Armed Forces in the area of building integrity in defence sector	7	7	49	Drafting the new Law on Armed Forces of Montenegro To insert provisions on the prevention of conflict of interest and protection of professional military persons reporting corruption and other anti-corruption provisions To draft accompanying sub/legislation/internal acts	Working group for drafting new Law on Armed Forces	2015-2016	.	

AREAS TO INCLUDE IN AN INTEGRITY ACTION PLAN

POLITICAL

- Facilitate parliamentary oversight of the defence budget (including secret items) and debate of defence and security policy
- Public access to information on defence and security policy
- Public access to defence budgets
- Openness towards civil society and inclusion of civil society in debates on policy
- Control and oversight of secret services
- Control of and oversight of arms deals/transfers
- National anti-corruption laws and policy
- Ratification of international conventions⁹
- Anti-corruption policy in defence and security institutions

FINANCE

- Planning and budgeting
- Financial management
- Transparency concerning defence budgets
- Rules and regulations on secret budgets
- Off-budget items
- Internal and external audit
- Inspector generals
- Beneficial ownership and military-owned businesses
- Acquisition planning process
- Legal framework and procedures on asset disposals

PERSONNEL

- General Human Resources Management arrangements
- Regulations pertaining to payroll, promotions, appointments, rewards
- Code of conduct
- Conflicts of interest
- Training on anti-corruption, ethics and integrity within professional development programmes
- Rules on gifts and hospitality
- System for whistle-blowing and protection of whistle-blowers
- Ombudsman institution
- Prosecution and disciplinary mechanisms

OPERATIONS

- Military doctrine addressing corruption and integrity in operations
- Pre-deployment training on corruption issues at all levels
- Training of anti-corruption advisors for operations and peacekeeping missions
- Incorporation of corruption risk into security assistance programmes and capacity building activities
- Guidance and staff training on addressing corruption risks in contracting and procurement in operations
- Policy and guidance on the use of private military- and security contractors

PROCUREMENT

- Legal framework on public procurement
- Legal framework on defence procurement
- Procurement procedure manual
- Transparency of procurement law and regulation
- Procurement oversight mechanisms
- Tendering/tender boards
- Transparent and competitive bidding processes
- Training for procurement personnel
- Offset contracts
- Requirements concerning sub-contractors
- Mechanisms to regulate contact with business and industry
- Mechanisms which enable companies to complain about perceived malpractices

The image is a composite of two photographs. The top half shows a modern building with a series of large, vertical glass windows set in a dark frame, under a clear blue sky. The bottom half shows a close-up of a brick wall with a pattern of vertical columns of bricks, possibly a decorative or structural element. A green horizontal bar is overlaid on the top half of the image, containing the text '5. IMPLEMENTING THE PLAN' in white, bold, sans-serif font.

5. IMPLEMENTING THE PLAN

This chapter shows:

- How to move from the planning to the implementation phase
- Procedures for meeting and reporting
- Communication
- Managing risk factors
- Review and revision mechanisms

FROM PLANNING TO IMPLEMENTATION

After completing the planning process and the action plan has been produced, we move to the implementation phase. During this phase a broad range of activities will be carried out in different agencies and departments. If the action plan has been drafted in a clear and precise manner, everyone involved will be aware of their tasks and responsibilities. However, activities have to be coordinated, checked and reported to the right individuals. The leader of the working group shoulders a great responsibility in the implementation phase. Whether the strategic goals are reached will depend on the success of the implementation and post-implementation phases. Below you will find some important elements to bear in mind when implementing the plan.

REGULAR PROGRESS MEETINGS AND REPORTING

The leader of the working group is responsible for organising regular meetings to ascertain progress. The frequency of the meetings will depend on the scope of the integrity action plan. If the timeline is short, progress meetings could take place weekly: In other cases, meetings once or twice a month may be sufficient. The purpose of the progress meetings is to report on activities as they are executed, and allow for the staff responsible for those activities to discuss and exchange lessons learned. In this way, all members of the working group will know what the others are doing, how well the plan is progressing and have an opportunity to resolve challenges in a coordinated

manner. These meetings are also a forum to discuss and analyse achievements and potential problem areas.

The leader of the working group reports back to the steering group regularly on progress during the implementation phase. Make sure to establish good routines for these meetings, and try to keep the meetings simple and short. One example of an agenda could be:

1. Status (i.e. where do we stand and what are some recent achievements?)
2. Challenges
3. Measures to meet challenges
4. Risks
5. Any other business

REMEMBER:

- Distribute the action plan in writing to all members, with names attached to specific tasks
- Display the action plan prominently
- Keep it updated and alive with the leader of the working group as responsible
- Make sure timelines are clear and realistic
- Make sure that monitoring includes mechanisms for feedback, adjustment of the plan, and updating

COMMUNICATION

It is important to keep the wider defence establishment aware of the ongoing efforts with respect to building integrity. Building internal support through an internal strategic communications campaign will prove useful when engaging with the various departments that

are highlighted and expected to deliver in the action plan. In addition, it can increase motivation and lets staff know that this is something the leadership, and the defence establishment as a whole, takes seriously.

The working group should also look to develop an external-facing communications campaign. This can assist in building support and trust between the public and the defence establishment. In one case, a defence establishment established a Citizen Reception Office within the MoD which could accommodate any queries from the public on issues related to corruption and integrity. It is important, however, that the public affairs or communications staff involved is realistic in their messaging as challenges, delays and an inability to meet established targets could harm the legitimacy and success of building integrity efforts in the eyes of the public. For instance, if a hotline for corruption has been set up, and the defence establishment lacks the resources or authority to deal with the complaints, the public may see this new tool as a broken promise.

MANAGING THE RISK FACTORS

The term risk management refers to the practice of identifying potential risks in advance, analysing them and taking precautionary steps to reduce the risk during the project.

Some of the risk factors during implementation are elections and changes of government, change of prioritisation within the leadership, insufficient resources allocated to the project, or other external developments influencing the progress. Other risk factors could include spending too much time on one objective at the cost of another, which will impact the timeline and progress. There could also be friction in decision processes within the steering group, or implementation may rely too heavily on developments in areas beyond the control of the defence sector, such as legislation, judiciary capacity, or external education and training.

As discussed in chapter 3, risk factors should be identified early on in the planning phase. However, these risks need to be actively managed throughout the entire process. Risk management requires the identification, assessment and prioritisation of risks.

Risks are sometimes unavoidable, in which case the best the leader of the working group can do is to work with their team to minimise the threat. For instance, a sudden change in political leadership could stall reform efforts. While the working group leader will not be able to change the political situation, they can put plans in place to sustain the momentum of reform by reinforcing the activities of middle management.

REVIEW AND REVISION

If unexpected events occur, as they probably will, you must have plans in place to accommodate or deal with them, and not lose sight of the original objectives. Try to remain flexible and allow for the necessary degree of change in the project. Incidents such as a change of government or other complicating events may represent unforeseen obstacles to the original timeline. Try not to see these changes as game-stoppers, but use the opportunity to adapt and revise the plan according to the transformed circumstances, building on practical experience already obtained.

Internal progress reviews should be conducted routinely. For very comprehensive action plans involving many institutions, designated independent government officials may review progress in terms of defined milestones. The results of internal reviews should be discussed by the steering group which then reports to the top leadership.

External reviews are useful in order to encourage transparency. This may mean bringing in independent anti-corruption experts as well as members of civil society. The results of such reviews should be made public whenever possible. Read more about evaluation and monitoring in the following chapter.

6. EVALUATION

This chapter shows:

- Why evaluation and monitoring is important
- How to select indicators
- Methods for long term monitoring
- Reporting and communication

EVALUATING AND MONITORING THE RESULTS

It may prove useful to distinguish between reviewing and adapting the action plan during the implementation phase, and evaluating and monitoring the results produced by the plan. Evaluation can help establish whether the plan's goals of reducing corruption and vulnerability to corruption have been reached. One way to evaluate the results of the action plan is to carry out a new assessment of corruption risks (possibly using one of the tools mentioned in Chapter 2) and compare that outcome with the previous assessments. A new assessment should probably be carried out at least six months or more after the implementation of the action plan has been concluded.

Monitoring involves checking the results produced by the plan over time, in order to determine whether

the results are lasting and whether they change over time, either by becoming weaker or stronger. Below are some factors to consider when monitoring the plan. Developing a comprehensive approach to the issue of evaluation is time well spent.

Integrity of Effort. To earnestly tackle the issue of corruption, defence establishments must track their success in creating change. The defence establishment must review past efforts and track how they have contributed to achieving the objectives set out by the anti-corruption strategies and integrity action plan. This may entail dealing with sensitive issues, conflicts of interest, uncovering unethical behaviour, organisational friction, and sometimes even threats to individuals. A solid evaluation process will determine whether there was consistency of actions, values, methods, measures, principles and expectations, and to determine how that

ASSESSMENT FOCUS: INSTITUTIONALI- SATION AND INTERNALISATION OF NORMATIVE STANDARDS¹⁰

THE LEGAL FRAMEWORK, I.E., TO WHAT EXTENT ARE THE NORMATIVE STANDARDS REGARDING THE CHOSEN DOMAINS OF INTEGRITY-BUILDING MECHANISMS REFLECTED IN DOMESTIC LEGISLATION?

ADMINISTRATIVE ARRANGEMENTS, I.E., DO THE NORMATIVE STANDARDS ACTUALLY INFLUENCE ORGANISATIONAL ARRANGEMENTS, WORK PRACTICES AND STAFFING PATTERNS, AND IF SO, TO WHAT EXTENT AND IN WHAT WAYS?

INTERNALISATION OF THE NORMATIVE STANDARDS, I.E., THE EXTENT TO WHICH THE NORMATIVE STANDARDS ARE KNOWN, UNDERSTOOD, AND ACCEPTED

consistency, or lack thereof, influenced the outcomes.

Maximum Effect. There are boundless examples of anti-corruption institutions and efforts that were set-up only to result in lip-service and few tangible actions. Perceived failure of an anti-corruption body, or even of an integrity action plan, can seriously and negatively harm public perceptions of the defence establishment. Awareness of this factor must be exercised at all times. Institutional friction and personal unwillingness to acknowledge and rectify poor conduct can be overcome by unity of effort. The defence establishment should ensure cohesion between how the plan is communicated, how its independence is exercised, stand firm on the principle of no impunity, and obtain the support of recognised and agreed civil society institutions.

Countering Spoilers. In particularly subversive environments where corruption is more endemic, it can be difficult to counter corruption and build integrity. Malicious individuals or groups can take counter measures to neutralise integrity-building efforts. Reviewing what works and what doesn't is one way the defence establishment can protect itself from such hazards to the reform process. Evaluating how spoilers were dealt with during the implementation phase is an important lesson to take forward.

When evaluating the effects of the integrity action plan, it is important to connect individual behaviour with the strategic objectives, linking day-to-day job handling in the MoD or other defence institutions with the desired change. The evaluation will therefore have to be done at different levels, from tracking detailed contract vetting procedures, to monitoring human resource management. You should be able to identify possible performance gaps between what ought to be produced according to relevant rules and procedures, and what is being produced in practice.

If a serious gap is detected, it is important to determine whether it is a result of lack of training or insufficient information, or whether there is a wilful neglect of the existing rules and procedures. In the latter case, there may be a need for disciplinary action, a transfer to other responsibilities, or dismissal. The message from the top should be clear and consistent:

spoilers will not be tolerated.

Evaluating the results of the action plan and monitoring whether these results are lasting over time, or whether they tend to fade, represent crucial lessons learned in terms of how to conduct future integrity building measures. If we take a look at the model of the integrity action plan stages, as presented in chapter 1, we find the evaluation stage leads us back to the first step – assessment. Carrying out a new assessment will help identify the changes that have been achieved and the shortcomings in the integrity system that need to be addressed through a follow-up action plan.



SELECTING INDICATORS

How do we know whether the implementation of the action plan has been successful or not? In measuring the success of various reforms, we need to have, from the start, the necessary measurable indicators of change. It is frequently difficult to measure behavioural change and indicators will therefore often be defined in terms of actions taken, knowledge acquired and attitudes changed. Are the actions in accordance with the rules, and are the prescribed procedures being followed? Are new or modified organisational arrangements properly understood and seen as authoritative guidelines? And especially in high-risk areas: have previously identified risks of corruption been sufficiently mitigated?

Some indicators may be monitored for a longer period of time (attitudes, ethical standards of staff), whereas others (enactments of certain laws or ratification of a certain convention) may not require as much. When selecting indicators, make sure to link them up with suitable data sources which can be used as valid indicators. For instance, for measuring sufficient

knowledge of new rules and procedures, the amount of training (e.g. whether all staff has been trained through relevant courses) might serve as a general indicator. To gain a more in-depth understanding of the impact of such training, you may want to develop surveys that can gather information about attitudes and behavioural shifts before and after the training has been conducted.

EXAMPLE: MEASURING IMPACT

Objective	Activities	Indicators	Means of Verification	Assumption
To improve understanding of corruption and its impact on defence	Training courses on building integrity	Number of students Number of students who agree or strongly agree that they have an improved understanding of the subject	Surveys conducted at the end of the course	Willingness by course participants to learn new ideas
The defence budget is publicly available and accessible	Capacity building with MoD staff and parliamentarians; website development; joint working group on budget transparency	Publication of the budget on the MoD website; discussions with civil society on the budget	Quarterly report from MoD and parliament; website verification	Favourable legal environment on freedom of information, open government data, etc.

PLANNING FOR EVALUATION AND MONITORING:

1. Define the objective of the evaluation, and how and when to do it
2. Develop your theory of change
3. Determine your data sources for your indicators, your baseline and your target activities, personnel and outcomes
4. Determine who will conduct data collection and reporting
5. Determine which indicators should be monitored over time, and when it should be done
6. Set reporting timelines and requirements
7. Define your communication – who reports to whom?

METHODS FOR LONG TERM MONITORING THROUGH NEW ASSESSMENTS

In chapter 2 we presented three different tools which could be used to assess corruption risk in the defence sector. They are the NATO Building Integrity Self-Assessment Questionnaire; Transparency International's Defence Government Index (GI); and the Difi assessment process. For long-term monitoring, make sure you use the same assessment method to systematically identify the effects of the integrity plan. If the integrity action plan is based on Transparency International's Defence Government Index, then use the next version of the index to check where you succeeded and where new efforts are needed. Since this index, based on independent external evaluation, will be issued every two years, it can track progress over several years.

To complement this, defence establishments may also want to use the Corruption Perception Index (CPI), which shows the perception of overall corruption levels within the country. By comparing the GI

score with the Corruption Perception Index score, defence establishments will be able to determine how the defence sector fares with respect to the general perception of corruption levels across government.

OWNERSHIP

Usually, several individuals, departments and institutions will be involved in the preparation, implementation and evaluation phases of an integrity action plan. Typically, no one person will be 'responsible' for all three. Most action plans involve groups, teams, or whole networks of colleagues and this complexity means there is a big chance that no one takes full ownership of the overall results. Ideally, the top leadership should take ownership of the project, but leaders have many other responsibilities and little time to actively investigate the concrete results of the action plan. This is particularly true if some of the objectives are not reached, or only partly reached. That means that for the entire defence sector, or within each major defence institution, there should be a specific unit or team to continue monitoring the integrity system. Such a unit or team may also assume responsibility for organising a new comprehensive assessment once the time is right, and to organise a new action plan to

address remaining corruption risks. Their tasks will also include collecting supporting documents as evidence of change and will, therefore, require a great deal of coordination with the other groups and individuals involved in the implementation phase of the action plan.

REPORTING & COMMUNICATION

Ensure that mechanisms are in place to allow for necessary communication between those involved in the evaluation and monitoring processes and the members of the action plan's working and steering groups. Such communication may prove particularly valuable in order to establish valid lessons learned, what worked well, what worked less well, and what did not work at all. Information to and communication with external partners, civil society organisations, and media, should continue once the action plan has been fully implemented and the results and practical impact have been evaluated.

To conclude, integrity planning is new to defence establishments and the model described in this handbook may be altered and improved at any given time. All revisions will be reflected in the online-version on [CIDS'](#) website regularly. The handbook is a living document.

LIST OF REFERENCES

- 1 Tisdall, S. (2009, December 18). Corruption at heart of Afghan state. The Guardian. Retrieved from <http://www.theguardian.com/commentisfree/2009/dec/18/afghanistan-corruption>; Capaccio, T. (2014, April 30). Afghanistan Corruption Fostered by U.S., Pentagon Finds. Bloomberg. Retrieved from <http://www.bloomberg.com/news/2014-04-29/afghanistan-corruption-fostered-by-u-s-pentagon-found.html>
- 2 Transparency International. Corruption by topic, defence and security. Retrieved from http://www.transparency.org/topic/detail/defence_security
- 3 UNDP. (2011). Practitioners' Guide: Capacity Assessment of Anti-Corruption Agencies, 71. Retrieved from <http://www.undp.org/content/undp/en/home/librarypage/democratic-governance/anti-corruption/Guide-to-Capacity-Assessment-of-ACAs/>
- 4 Mauro, P. (1995). Corruption and growth. The quarterly journal of economics, 681-712.
- 5 Coonjohn, J. J. & Lodin, A. (2014). Developing a Strategic Implementation Plan for Anti-Corruption. Retrieved from http://www.jicoonjohn.com/pdf/Strategic_Implementation_Plan.pdf
- 6 Kwok, T. M. (2005). Formulating an effective anti-corruption strategy – the experience of Hong Kong ICAC. Resource material Series, (69).
- 7 See for instance OECD (2003). Fighting Corruption. What role for civil society? The experience of the OECD. Retrieved from <http://www.oecd.org/daf/anti-bribery/anti-briberyconvention/19567549.pdf>; Abbas, T. & Wawro, L. (2014). Defence and security programme unveiling the 'shadow world': Civil society engagement and public control of the defence sector. In Eduardo Bohórquez and Nora Etxaniz (eds.), A new generation of public control. Mexico: Transparencia Mexicana.
- 8 Building Integrity Action Plan of the Ministry of Defence 2014-2015. Retrieved from <http://www.mod.gov.ge/documents/BuildingIntegrity.pdf>
- 9 E.g. the EU, OECD, the Council of Europe, OSCE, the UN, the International Parliamentary Union.
- 10 Based on Difi Criteria for Good Governance in the Defence Sector. International Standards and Principles. (forthcoming).



While there are innumerable cases of reported corruption in the defence sector worldwide, there is very little scientific research and few specially designed instruments to help ministries and governments prevent and reduce the risk of corruption. This handbook aims at helping practitioners in defence establishments produce real and lasting change by developing an Integrity Action Plan. The book will guide you through all the necessary steps – from the planning stage to the actual drafting of the plan to practical implementation, monitoring and evaluation.

In addition to providing senior military and civilian personnel in ministries of defence and subordinate defence institutions with a practical tool, this handbook is also accessible to civil society and other stakeholders so they can assist in developing an integrity action plan. The handbook has been produced and edited by the Centre for Integrity in the Defence Sector in collaboration with Transparency International UK's Defence and Security Programme.

Published by: Centre for Integrity
in the Defence Sector
Contributor: Transparency International UK
Defence and Security Programme
All photos: Norwegian Armed Forces
(Stian Lysberg Solum, Torgeir Haugaard,
Taral Jansen, Håvard Madsbakken)
Design: www.melkeveien.no
Print: Norwegian Government Security and
Service Organisation 12/2014 – Impression 250



CENTRE FOR INTEGRITY
IN THE DEFENCE SECTOR

www.cids.no

