Asset Recovery

Interview with
SHERVIN MAJLESSI

Impact Story Competition:
The Winner Comes from Zambia
Queen Kashimbo-Chibwe

MACS 2014 - 2016
Interviews and Impact Stories

IACA’s 4th Alumni Reunion
IACA’s Prestigious Recognition for the MACS Programme
Welcome Word

Dear Alumni,

On 8 March 2017, IACA celebrated the sixth anniversary of its establishment as an international organization. On this occasion, we would like to extend our gratitude to you all in advance for your dedication and enthusiasm in the fight against corruption and for your contribution to IACA’s history. You all are great ambassadors of the Academy, and we are proud of your achievements and enthusiasm.

The last quarter has been very engaging with the fifth session of the Assembly of Parties (AoP) in Vienna and the graduation of the Master of Arts in Anti-Corruption Studies (MACS) class of 2014. In addition, IACA welcomed the incoming MACS class of 2016, which has recently joined the Academy.

In this issue, you will find short introductions, impact stories, and much more from the alumni network.

Furthermore, this issue brings you exciting articles that cover broad topics in the area of anti-corruption and compliance. From Italy, Ruggero Scaturro offers an argument for a human rights-based approach in fighting corruption, and from the outgoing MACS class of 2014, Navin Singh, India, who was honoured for having written the best thesis, shares interesting insights from his research. From the same class, the joint award winners for the most innovative thesis, Malika Aït-Mohamed Parent, Switzerland, and Michael Callan, Australia, write about their experiences while analyzing their respective topics. An exclusive interview with expert Dr. Shervin Majlessi from the UNODC gives us a broader vision of the specialized topic of asset recovery and its significance in the global fight against corruption. Also featured are impact stories from the MACS programme and Regional Summer Academy, which are guaranteed to keep you interested in our endeavour to overcome current shortcomings in knowledge and practice in the field of anti-corruption and to empower professionals for the challenges of tomorrow.

As always, we hope you enjoy this edition. It is a pleasure to welcome you to our campus in Laxenburg any time as well as to receive your writing contributions for IACAlumnus. Please also feel free to provide suggestions for IACA’s alumni network. We would be pleased to hear how we can serve you better.

Sincerely,
The Alumni Team
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How did you choose your career path and what was your motivation behind it?

I was definitely interested in the United Nations from an early age. I was fascinated by the disciplines of international economic law and international financial systems in the latter part of my education, and from there, I looked at my options. The World Bank service was the one that was obviously a good choice for my area of expertise, but I have to be candid in expressing that anti-corruption came as an unforeseen opportunity. When I started getting more information about potential areas of work at the World Bank, I came across this rather new unit that was focusing on investigations and corruption in various projects. It sounded interesting to me. It was a bit of a right place, right time type of situation that led to me taking up the opportunity in this field. Though, I did not plan to enter the field of anti-corruption, I have to say it turned out to be a very interesting career path.

You have very diverse experiences. You have gone from a legal officer to a human rights officer and then into the field of anti-corruption. How has this transition been so far?

I started as an investigator/legal consultant on corruption cases at the World Bank, and after that I was working on one of the biggest transnational corruption cases at that time as a deputy counsel at the UN Oil-for-Food Enquiry. From there, I moved to the Office of the High Commissioner for Human Rights, where I was actually focusing on questions related to corruption and human rights. The Office of the High Commissioner for Human Rights was looking for someone with a background in anti-corruption to work on corruption and human rights questions, and they reached out to me. I was interested at that time in working in policy areas, so that was another opportunity that came by.
Shervin Majlessi has 15 years of experience in areas of rule of law, anti-corruption and good governance. Until April 2015 he was the Regional Anti-Corruption Adviser at UNODC’s Regional Office for Southeast Asia and the Pacific, based in Bangkok. Before taking up his position in Bangkok he managed United Nations Development Programme (UNDP)’s Accountability and Transparency Project in Kabul, Afghanistan. Shervin holds a PhD (Doctor of Civil Law) and a master of laws (LL.M.) in international economic law from McGill University (Canada), a master of laws (LL.M.) in international finance from Harvard Law School (USA) and a bachelor of law and master of public international law from University of Tehran (Iran). He is a member of IACA’s frequent visiting faculty.
What kind of satisfaction does your job provide to you?

It is a very interesting discipline, and I think we, at Stolen Asset Recovery Initiative (StAR)- which is a joint initiative between the World Bank and the UN Office on Drugs and Crime- have an opportunity to engage with countries and networks which are working with actual cases of asset recovery. Being involved in actual situations in which countries are making an effort to bring back resources that can be used for development and providing services to the public comes with a very high level of satisfaction.

Is it a challenge that the requesting countries sometimes approach you in the final stages of the process when the situation is already quite critical?

Countries come to us when they are really making efforts in this area. It is obviously a very rewarding experience to engage with these professionals from all around the world. Bridging the gap between countries which are making requests and the countries which are seeking formal or informal assistance, makes international cooperation possible within this area. This is an overarching mission of the UN system and another rewarding part of my job.

It’s true that in many corruption cases asset recovery is an after-thought that officials focus on only after initial prosecution of the individuals involved. In some cases, countries get in touch with us as soon as they have the opportunity to get serious about asset recovery. Sometimes, it is after a political change in the country, which may be quite some time after actual events took place. Often there is a lot of willingness and enthusiasm to do things, but the process is quite lengthy and complex and countries may lack the necessary expertise. So, it is a very challenging field to work in because we are dealing with complex cases at the domestic level, and you also have to consider all the international political and diplomatic dimensions very carefully.

What do you think are the most common impediments in the implementation at local level which make Chapter V of UNCAC difficult to implement?

We still have quite some way to see thorough implementation of UNCAC mechanisms at the domestic level. We have the Convention, including Chapter V, which is now ratified by
more than 180 countries, but that by itself doesn’t really mean implementation. You really have to localize international provisions and obligations into national laws, and in the area of asset recovery, we are missing a lot of local and national legal frameworks. An example is non-conviction based confiscation which is more familiar in common law countries. However, gradually more countries are adopting the same standards, which will help asset recovery efforts globally. The other problem is the issue of returning assets. Countries need to have a legal framework that allows them to return assets which they have confiscated within their jurisdiction. And because many countries are lacking that framework, there is a lot to be done. Right now, the second cycle of review of the implementation of the UNCAC has started, which will focus on questions of preventive measures and asset recovery under Chapters II and V of the UNCAC. Such a focus on Chapter V will help to understand the gaps that countries have in terms of the localization of such norms.

I think we have to wait and see the result of these implementation reviews, and that will help us understand the current status. However, generally, the impression so far of the engagement level of countries is that there are gaps in terms of legal frameworks, institutional capacities, and operational and communications issues. These are challenges that we have identified through studies done by StAR initiatives. Publications such as “Barriers to Asset Recovery” capture consultations with professionals from around the globe who have been vocal about the main challenges we are facing in this area.

How can the private sector be a partner in asset recovery initiatives?

The private sector can collaborate in many ways. The first way is prevention. This is especially important due to the crucial role that financial institutions can play in dealing with and exposing money laundering and improper payments through money laundering, particularly to politically exposed persons. Secondly, they can contribute as lawyers who can take on cases, particularly private civil actions, which are one of the legal avenues available for asset recovery. I would also say there is an issue that is being increasingly discussed in relation to the concepts of beneficial ownership and transparency in that area so that it is known who is actually behind these large corporations. This is an area, in my opinion, that we need to make certain policy changes globally, and the private sector perhaps should be a part of that solution in order to bring more transparency to corporate ownership.

Finally, what would be your suggestion for young professionals who are eager to take up asset recovery as an opportunity or career field? What kinds of skillsets are required in this field of work?

As with the broader field of anti-corruption, young professionals can come from diverse professional backgrounds to take up asset recovery as a career choice. There is a range of professions that could be involved in the process of asset recovery. Everyone from backgrounds such as law, investigation, forensics, prosecution, auditing, accounting, and information technology can take up this exciting profession. A career in asset recovery can come from a general interest in the broader field of anti-corruption, of which asset recovery is just a small part. However, it is an area where you need some technical expertise. It is a complicated concept, but, as I mentioned earlier, it is already a subset of law enforcement and anti-corruption work in great part. So, for those who are working in that area I think it is vital to focus on certain skillsets which are more related to financial investigations and that can be developed by working on more complex cases in this area. It requires training, which can be acquired though opportunities like those offered at the International Anti-Corruption Academy (IACA). I do not think anything replaces on-the-job training or experience that can be acquired from doing practical work, but if someone is interested in this area, I think it would be worth it to focus early on this niche area and to get expertise as a professional forensic accountant or as a lawyer or investigator who focuses particularly on legal avenues available for asset recovery.
Last September, IACA organized its second Regional Summer Academy. After a successful debut in Latin America in November 2015, Eastern Africa was chosen as the location for the program’s second year. From 3 to 9 September 2016, 60 anti-corruption and compliance professionals sat down together in Kampala, Uganda to learn from regional and international experts and to share their achievements and challenges with each other. As is always the case, the Regional Summer Academy managed to bring together participants from various sectors and countries - 14 East-African countries and Burkina Faso!

As a follow-up activity, an impact story competition was launched, in which participants were asked to describe how the IACA Regional Summer Academy – Eastern Africa has impacted, or is expected to impact, both their personal and professional development. The selection committee had a really hard time evaluating all the stories they received, but in the end, they unanimously agreed that one story, in particular, stood out. The winner, Ms. Queen Kashimbo-Chibwe, from Zambia, won the competition and thus the award – a fully-funded open training at IACA in 2017. IACA would like to congratulate Queen and the other participants for their numerous and very well-written submissions to the competition.

We would like to share the winning story with IACA’s Alumni, as it perfectly describes the training and its main goals. The IACA Regional Summer Academy - Eastern Africa, including the impact story competition, was funded by the Austrian Development Agency, in cooperation with IACA.
IMPACT STORY COMPETITION: 
THE WINNER COMES FROM ZAMBIA

Queen Kashimbo-Chibwe

It is common for most career professionals who have worked in the same organization for more than ten years to begin to feel that one may not be doing enough to successfully contribute towards the attainment of the organization’s objectives. This was the case for me in the months from January to about mid-April of 2016 when I began to contemplate how I can make meaningful and impactful contributions in the fight against corruption. Being a person who has worked for an Anti-Corruption Agency for close to 15 years, I started feeling less motivated seeing how the devastating effects of corruption were impacting negatively on society, especially the poor. Hardly did I know that being focused on such thoughts would turn my life upside down and lead my professional career onto path that would change the way I look at tackling corruption. Further, the feeling of determination to do something different in the fight against corruption gave me impetus to consider applying for the IACA Regional Summer Academy, which was to take place in the beautiful Eastern African country of Uganda.

The IACA Regional Summer Academy, which was held at Uganda’s Kabira Country Club from 3 to 9 September 2016, is one programme I will always remember whenever feelings of vocational demotivation want to weigh me down. That is because the entire process of this programme left such an impact in my life socially and professionally.

To begin with, the registration process at Kabira Country Club was so organized and was a projection of a positive outlook of things to come during the entire conference. Facilitators of the Regional Summer Academy were readily at hand to ensure that the right participants obtained the needed documentation and information to guide them through the rest of the activities that would take place. This, I thought, was a very important initial aspect of the seminar process because, even in the fight against corruption, a successful anti-corruption operation highly depends on proper planning and motivated implementation of a project.

Queen Kashimbo-Chibwe (Zambia) holds a Master of Arts in Peace and Conflict Studies from the Copperbelt University under the Dag Hammarskjold Institute of Peace Studies. She is currently working as a Senior Community Relations Officer at the Anti-Corruption Commission in Zambia. She also represents Zambia as a Liaison Officer to the Association of Anti-Corruption Agencies in Commonwealth Africa. Queen is also a development expert as she holds a Bachelor of Arts in Development Studies obtained at Zambian Open University. Additionally, she has background in the media, where she worked for four years for two privately owned radio stations as a journalist, using the competencies she obtained through her diploma in Journalism and Public Relations. She participated in the IACA Regional Summer Academy - Eastern Africa 2016.
The process of registration set the pace for my motivation and enthusiasm and whetted my appetite to delve into an imagination of what the diverse professional participants would offer and, more importantly, what I would gain from the so obviously brilliant anti-corruption and compliance experts.

The participants’ profiles made me ponder, “I have never been to a training in which professionals were drawn from such a diverse and wide array of backgrounds and rich experiences.”

Additionally, the impressive backgrounds, expertise, and experiences of the anti-corruption and compliance experts were all well documented in the programme booklet. Reading the first few attributes of each of the lecturers gave one the confidence to believe that such training is meant to enrich professionals with a practical, valuable, and insightful wealth of knowledge that should make a difference towards tackling corruption.

The following 1,000 words will not be enough to fully explain the impact that this training had and will continue to have on me as a person and as a professional. This is because, like any other country in Eastern Africa and the region at large, my country, Zambia, and all its citizens agree that corruption exists and is among the vicious enemies of the societal and general development of humanity. There is dissonance, however, in the fact that, despite this consensus, individuals distance themselves from taking responsibility and are not willing to act against corruption. Individuals are only interested in self-gain.

In Zambia, for instance, a local survey, which was started in 2012 and is carried out biannually, shows that people know what constitutes corruption and where to report cases of corruption and yet they still go ahead and pay bribes. In 2014, the survey report showed that out of 667 respondents who were asked for a bribe, 57.1% paid it. Further, 82.5% of the respondents who acknowledged knowing what constitutes corruption also scored highly with regards to offering a bribe, especially in relation to seeking public goods and services (ACC & TIZ: ZBPI 2014).

This survey is conducted by Zambia’s Anti-Corruption Agency in collaboration with the local chapter of Transparency International. The major challenge that this survey has repeatedly highlighted is the fact that both public officers in various service delivery institutions and members of the general public engage in bribery even when they have full knowledge of the devastating effects of the scourge.

As an anti-corruption practitioner, I have been wondering why well-informed people would continue to perpetrate acts of bribery when, in fact, the focus of every well-meaning citizen should be to promote integrity, conduct oneself in an honest way, and discourage acts of bribery if prosperity is to be achieved.

These challenges, among many other issues, were the centre of my motivation to attend the Eastern Africa Regional Summer Academy. I was hopeful that at the end of the seven days, the diverse experiences of professionals intertwined with highly qualified and exceptionally selected competent lecturers would inspire me to get back on the road of making a difference in the fight against corruption. I was not far from the truth because the entire programme was not only meant to impart academic or theoretical topics but also covered practical lessons and cases that could easily be implemented in my own country to address the highlighted challenge.

The entire period of the programme was put to good use in that each lesson and activity, including social aspects of it, had an impact on me both socially and professionally. With each lecturer/presenter who delivered their papers, I looked at each topic of the presentations from mainly three perspectives:

1. What are the practical aspects of the presentation that I can effectively use to address the specific challenges in
the fight against corruption back home?
2. What opportunities exist back home that I can take advantage of and use to implement these ideas?
3. What further information do I need to make full use of the practical lessons learnt?

This kind of focus made me appreciate the need for me to map out strategies of how I will make good use of the information gained.

The fight against corruption is not “an easy commodity to sell” so to say, just like compliance may not be easily appreciated by people. With these two negatives being the focus of the training, the impact that the Summer Academy had on me emanated from the positive passion that accompanied each speaker’s delivery of their presentations. This was the positive outlook that professionals who have been given the task of marketing a not-so-liked commodity needed. The optimism expressed by both the participants and the presenters was not only an eye opener but also an encouragement of how I needed to look at the fight against corruption and the reinforcement of compliance towards values of integrity in order to tackle corruption and other related offences.

Additionally, I gained new insight that broadened my scope of understanding as to how Zambia ranked among other countries with regard to areas that were susceptible to corruption and abuse of authority, as well as areas that hampered human and social development. International reports, such as the Global Competitiveness Report, made me appreciate areas that can be targeted for the implementation of initiatives to enhance improvements in various sectors of human and social development.

Further, the use of case studies gave me an understanding of how developing countries in South America, Asia, and other continents have managed to tackle corruption and bring it to manageable levels. Most case studies taught me that a clean and committed local leadership, even at the community level, is enough to create the change that is needed to deal with corruption. Practically, a leader who insists on involving the community and letting them benefit from the results of fighting corruption is easily appreciated and supported and any proposed anti-corruption programmes could win the support of the society. Community anti-corruption initiatives and compliance programmes can also be simplified so that community members can more easily understand them and perhaps be more willing to participate.

The deliberations and experiences of participants were also an important aspect of the Summer Academy. They provided opportunities to identify solutions which could be used in my home country. It was also encouraging to learn how Uganda’s Anti-Corruption Court has a 99.9% conviction rate of their cases. During interactions with colleagues, I was motivated to learn that all cases were well investigated and properly scrutinized before they were submitted to the Anti-Corruption Court, a step that contributed to such a high conviction rate. Such results call for officers who have specialized training and are well motivated.

In conclusion, the Regional Summer Academy-Eastern Africa enabled me to think deeply about some challenges that my Anti-Corruption Agency is faced with when soliciting support to tackle corruption from the general public and both the informal and formal sectors. The issue is how to make everyone be part of the solution and not perpetrate the problem. People need an appreciation for their roles, collaboration with others from similar environments, and the expertise for the practical application of suitable solutions. Other than this, the answers to the three questions that I used in trying to fully benefit from the programme will help me create the impact I need as I implement project activities in the years to come.

REFERENCE

ACC & TIZ (2014): Zambia Bribe Payers Index
IACA’s Master in Anti-Corruption Studies (MACS) has once again been included by the Indian Government on a select list along with programmes offered by just five of the world’s leading universities.

The Indian Government recognizes and supports the two-year MACS - together with long-term training programmes at Harvard, Oxford, Johns Hopkins, Duke, and Cambridge universities - under the Government’s Domestic Funding of Foreign Training (DFFT) Scheme. This recognition means that Indian public officials participating in the MACS programme are eligible to have their programme fee, travel, and accommodation paid by the Indian Government.
Visit to the National Congress of Brazil during Module VII in-class session in Brazil

Study visit to the INTERPOL’s Global Centre for Innovation during Module VI in-class session
Module IV in-class session

Module VI in-class session in Malaysia

Graduation ceremony, December 2016

Master in Anti-Corruption Studies
MACS
Class of 2014 - 2016
Graduation ceremony, December 2016
Insights and Other Thoughts of the Best Master’s Thesis Awardee

NAVIN KUMAR SINGH

What was the underlying interest in pursuing the MACS programme?

Corrupt practices have been impacting me since childhood. Corruption diminishes the utility of all public services and raises issues of legitimacies of the governments in power. Working as a Superintendent of Police in various districts, affected by left wing extremism, I was moved by the extent of impact corruption had on the development of society. Even the best conceived developmental/welfare schemes of the government are not giving in the intended benefit to the downtrodden in the society, despite pumping of huge funds for the same; mainly due to the pilferage of developmental funds at various levels starting from the top. This has been an important contributor to the rise of left-wing extremism problem in the country, which in turn has further contributed to the lack of development in these areas. The various corrupt practices being followed by the political parties and their candidates result in election of political

Navin Kumar Singh (India), is Joint Director at the Central Bureau of Investigation of the Republic of India. In his role, he works to fight corruption in India by enforcing anti-corruption regulations, implementing preventive measures, and supervising investigations. He holds a Bachelor of Technology in Computer Science and Engineering from the Indian Institute of Technology in Kanpur, India. He recently completed IACA’s Master in Anti-Corruption Studies programme. Mr. Singh was honoured for having written the Best Master’s Thesis in his class, titled: “Noble Cause Corruption in India: Causes and Possible Solutions”.

Interviews

MACS 2014-2016

NAVIN KUMAR SINGH

MALIKA AIT-MOHAMED

MICHAEL CALLAN
representatives, who perpetuate the corrupt practices. I am of the firm opinion that these vicious circles need to be broken for the Indian democracy to prosper. Being a firm believer in the rule of law and in justice, these things have always shaken me from the core and motivated me to address these issues to the core.

In this background, my desire to join the MACS program came from my hunger for an international multi-disciplinary exposure to the problem of corruption and a desire to understand this universal phenomenon of corruption in its entirety. As a police officer enforcing anti-corruption laws, it was necessary to look at the various perspectives of the problem of corruption in order to find a holistic and sustainable solution to this endemic problem.

I did this programme to acquire new knowledge, skills and deploy them in the fight against corruption in the world in general, and India in particular.

Last but not the least, the MACS course was ideally designed for a working professional like me and came at the right time in my career where I had sufficient first hand exposure of tackling the phenomenon of corruption to appreciate the nuances of the deliberations and still had sufficient age on my side to implement the takeaways of this course.

How did the MACS programme contribute to your professional capacity?

The MACS program has not only provided the theoretical construct embedded in research, but has also helped me develop insights, skills and capabilities to formulate and implement strategies to counter the problem of corruption from its roots in real life situations. MACS programme has helped me shift my focus from a mere post-mortem based approach of investigations and prosecutions to tackle corruption to having a preventive, holistic and multi-disciplinary outlook in the battle against corruption. By doing this course, I also got a formal degree, which has opened a plethora of further opportunities in my career like further study on the topic e.g. doing a PhD or get a new and exciting career in this field.

It gave me substantial exposure to the way the best professionals across the globe in this field tackle the problem of corruption and also know the best practices currently prevalent in the world in this regard.

Most importantly, it not only demonstrated how one size or one reform model cannot fit all countries/places but also taught me how to formulate and implement strategies to tackle corruption of a particular country/place by taking into account its stark ground realities.

Can you describe one of your best experiences during the MACS programme (students, lecturers, etc.)?

My best experience of the MACS programme has been to work as the "Admin" of the WhatsApp group of all the students of the course, which I started on the day we joined the MACS programme in November 2014. This helped the group use technology to promote networking and get updated with the developments of the course in general and the most recent trends in corruption/anti-corruption across the globe by sharing our individual knowledge/expertise on this group platform. It also works like an instant moving encyclopaedia for most of us in the group. Any question, whose answer anyone wants just needs to put that question in the group, and then there is always someone in the group putting the right answer to it almost instantaneously. I am happy to have kept almost all the participants of MACS 2014-16 still inter-connected through it. This has helped us continue to interact with each other on regular basis; thus continuing to enrich and help each other in our professional as well as personal endeavours.

What was the source of your inspiration for choosing the topic of your Master Thesis?

Police corruption differs from other forms of corruption in many important ways. Police officers are often armed, having the wherewithal to use more or less legitimate violence in a way that most other state officials cannot. Secondly, some aspects of the police work, like the undercover intelligence
A type of behaviour particularly associated with the police is the so-called noble-cause corruption (NCC), also known as the “Dirty Harry Syndrome”. Here, the police officers abuse their official position not for any personal gain but because they believe that they are doing what is right for the society. While scholars disagree on whether such police conduct can be called corruption or just serious misconduct, they all agree that we need to address this problem of police misconduct in general to improve its image and efficiency, and more particularly legitimacy.

The breach of trust that the police engages in while committing acts of NCC leads to a lack of trust and decline in the public confidence of the police; loss of moral authority and gives opportunity to the public to question the legitimacy of the police organisation and hence the state. Further, in terms of equitable law enforcement in a democratic society, excessive force, brutality etc. are serious matters and can affect the very basis of our democratic polity.

The problem of NCC in police has become all the more important as the legal authority of the police to intervene in citizens’ affairs is increasing, even in the developed world, following the 9/11 terror attacks in U.S and the recent terror attacks in Paris. This has been facilitated by the legislatures and the courts, which are panic-stricken over media-amplified images of terrorism, crime and social decay. The expansion in legal and extra-legal authority of the police has also been supported by a crime-fearing public and even some academics.

When uncovered as a pattern or practice, the police crimes defined as NCC can result in constitutional rights litigation that can financially cripple agencies and can destroy the life of police officers as well as their family members. For example, in India, the National Human Rights Commission ordered monetary relief action in 356 cases during 2012-13. It is seen that even many simple, honest and humble background police officers in India actually believe that NCC in some form or the other, is necessary for good and effective policing. Once someone starts endorsing the NCC, it may become difficult for him to resist/contain many other more corrupt activities. So, the need of the hour is to have an environment where at least the majority of the honest and well-meaning police officers do not feel that NCC is necessary for effective policing, thus preventing it from becoming an organisational culture; thus restoring police credibility, respectability and legitimacy. For this, it is important to understand the reasons for the prevalence of NCC, the attitudes of the police officers and the public towards NCC, which in turn can provide useful insights into its possible solutions.

Being a senior police officer of my country for last 18 years, all the above mentioned factors motivated me to choose the topic of my MT.

What was the methodology for research?

For any successful study, the methodology adopted should be tailored not only to the subject matter but also to the information required to provide an understanding of the research subject and the answers to the research questions. Further, a study should attempt to validate any findings through the use of more than one technique to examine the research subject. Police misconduct and the Noble Cause Corruption is an extremely sensitive topic. The blue code of silence (recognized as a part of the police culture) that leads individuals not to report the unethical actions of their colleagues also prohibits some from discussing their opinions on misconducts. Keeping the above considerations in mind and the limiting factors like the lack of enough previous empirical research, non-availability of and unwillingness of some organisations to share, where available, the official statistics/records on the topic, the time-scale of this project and the available resources, a multi-angled approach was adopted for the research which was a mix of interviews, surveys and focus groups of police officers of various organisations, key stakeholders and the public. All possible secondary data sources were also tapped to the extent possible for the research. Adequate data collection within the given constraints with robust data analysis procedures were also adopted for the research.
Insights into Corruption Prevention and Control in the Humanitarian Space

MALIKA AIT-MOHAMMED PARENT

In your view, why does corruption attain a “unique characteristic” when it comes to humanitarian assistance?

This is certainly because humanitarian assistance is value driven. This is in contrast to the private sector, which is accustomed to the money-driven agenda. When driven by values, most of the stakeholders are interacting based on a shared vision of “good will”. This creates a certain sense of naivety, a hypothesis that I validated in my research.

Would you agree on the hypothesis that corruption in humanitarian assistance might have not been addressed so far due to the fear of opening a Pandora’s Box? In other words, could the will of reaching more transparency and the consequent detection of corrupt acts lead to donor distrust. How would you handle this situation?

Big donors, such as the state (or multi-state) development and aid agencies from Australia (AUSAID), Europe (ECHO), the United-Kingdom (DFID), Japan (JICA), Norway (NORAD), Sweden (SIDA), and the USA (USAID), are very strict in terms of transparency and accountability. Their donations are based on tax payers’ contributions, towards which they are themselves accountable. So, I would not validate this assumption without further analysis. Additionally, most of these larger donors had to reform their own process mechanisms to be more transparent as well. One of the great examples is DFID from UK. In 2014, they began the process of a fairly comprehensive institutional reform in order to better address the underlying causes of poverty and conflict.
When donors represent multiple stakeholders, such as the European Civil Protection and Humanitarian Aid Operations, known as ECHO, more control mechanisms are in place, which create an increased expectation of strict compliance in the humanitarian system. Having said that, the ‘back donors’ do not ignore the security and time pressure that humanitarian assistance is subject to. That is why the working relation between big donors and big humanitarian stakeholders has evolved towards effective partnerships, rather than a pure ‘top-down control relationship’

Malika AIT-Mohamed Parent (Switzerland) is an international trainer and speaker on topics related to fraud, corruption prevention, ethical organizational culture, and corruption in international aid, with over 30 years of experience in the humanitarian sector. She holds two master’s degrees: one in management from McGill University in Canada and the other in economics from Pantheon-Sorbonne University in Sorbonne, France. She is also a certified Synergologist. She recently completed IACA’s Master in Anti-Corruption Studies programme, with the class of 2014 - 2016. She also attended IACA’s Local Governance, Anti-Corruption in Procurement, and “Best Of” trainings.

Malika received an award for the Most Innovative Master’s Thesis, written on “Corruption Prevention and Control in the Humanitarian Space: Paving the Way from Naivety to Compliance”.

and ensure that safeguards existed to responsible handle tax payers’ money.

Non-financial forms of corruption and risks are not negligible. Nepotism, gifts, sextortion, and ‘ghost lists’ are the most common. One has to realize that, whatever the form, financial or non-financial, corruption kills. For instance, “the systemic corruption in the west Africa Ebola epidemic has killed more than 9500 people.” It is more than urgent that the humanitarian community put the corruption risks, both financial and non-financial, at the top of their agenda.
The accountability frameworks and transparency plans of action will certainly help. However, this is not enough. A more proactive approach towards compliance is necessary. Open debate on institutional behaviours, integrity matters, and ethical expectations should be stimulated as well.

Corruption prevention and control in the humanitarian space is an ongoing challenge and must be given the right attention and the right investment, thus paving the way from naivety to compliance.

Can you give a brief explanation of institutional corruption and grey networks, the two main concepts covered in your thesis, and how they are related?

The term “Institutional Corruption” comes from the work of Lawrence Lessig and refers to an institution that has a systemic and strategic influence that is legal and even ethical, that diverts it from or weakens its ability to achieve its purpose. The simplest manner of explaining this is to say: an organisation is institutionally corrupt when it behaves in a manner that weakens its ability to achieve its obligatory purpose. What institutional corruption is not - is an organisation that is inherently corrupt in its approach and conducts itself in an illegal manner. Hence, institutional corruption occurs when the systems and processes are set up to deliver an outcome, but they fail to do so due to the behaviour of the people in the system based on internal or external influence economies.

The legality of the behaviour makes institutional corruption hard to detect and harder to fight. In my experience the three best practices to fight institutional corruption revolve around deterrence and disruption of the ability of small groups within an organisation to operate without oversight. Institutional corruption, in my view, starts with small teams and infects the broader organisation by corrupting processes or by forcing other teams and management to behave like them.

In my thesis, the cause of institutional corruption within the Australian Department of Defence was power imbalances between senior decision makers and project teams. The project teams formed grey networks, which provided them

ENDNOTES


INTERVIEWS

MACS 2014-2016

Grey Networks and Institutional Corruption

MICHAEL CALLAN
with a power over senior management. I defined grey networks as:

A group or system of interconnected people that use informal ties and employ operational security measures and/or clandestine techniques through varying degrees of overt, or more likely covert, activity to conduct activities to achieve legitimate purposes.

The grey networks, holding sole control over the required finances and information, operated independently from the organisation’s norms to produce results they thought were correct or in the network’s best interest. In doing so, they corrupted the entire process, from the project team right up to the government level, blinding senior decision makers as to the true state of the project. Additionally, they made sure that it was too late for any senior decision maker to intervene, except to comply with the project team’s view on what needed to be done. In this respect, members of senior leadership were forced to satisfice the government, rather than maximise return for the government. While not illegal, the behaviour of grey networks had a deleterious effect on the outcome of projects and the obligatory purpose of the organisation. This included damaging the reputation of the organisation.

The three best practices I have used to overcome these networks and their impact are:

1. Build simple governance processes with clear accountability and hold teams to those processes.

Complex processes with no clear reporting lines lead to teams ignoring them, abusing them, and hiding behind them. Once hidden teams can be influenced by external stakeholders and other vested interests into satisfying their own demands rather than those of the organisations.

2. Observe teams very closely to ensure their compliance with reporting requirements, especially teams who hold control over a process or have sole responsibility for interaction with key providers or stakeholders. Teams that do not report effectively need to be investigated quickly and robustly by an independent body.

3. Once institutional corruption is detected, remove the leadership of the team. This means removing all leaders at all levels and replacing them with new leaders who are briefed on the problems within the team. In my experience, the loss of experience and productivity is quickly recovered and more than made up by the improvement in performance of the team.

My thesis on this matter has two case studies that illustrate how the failure to maintain observation and control over the project teams within the Australian Department of Defence turned simple issues into long term financial drains.

How do we tackle issues like conflicts of interest in institutional corruption scenarios?

There has been a suggestion that we use blinding as a method of reducing institutional corruption. Hence, tackling the ability for external stakeholders to influence this process...
should resolve the issue. In this scenario, the decision maker does not know which stakeholder is obtaining a material benefit from their decision. Therefore, I can see this being valuable for single procurement actions but not for institutional corruption. In particular, the formation of grey networks, which breed the power imbalances that are so fundamental to developing institutional corruption, are long term problems that not only impact early decisions but also infect and corrupt long term projects and processes.

My experience based on my research shows that a poor decision, based on a conflict of interest, may create a poor environment for a project or a team. However, a team which is well governed should effectively remediate the situation as failures appear in the project or service. However, when grey networks form, this ability is lost. The grey network achieves greater influence over the process and can itself blind the broader organisation to emerging issues with the team or project.

How do grey networks develop, and how can their impact be mitigated?

Additional training is not the answer to this problem, as the Australian Department of Defence conducts mandatory training on an annual basis. This does not change the behaviour nor did conducting cultural change and additional ethics programs. What is needed is to simplify processes so that the detection of problems and emerging crises is easier, allowing these situations to be dealt with more quickly. The challenge is ensuring that the balance is right when dealing with problem projects. Early detection should be met with reminders and possibly retraining to allow for personnel to learn from the experience. Continued intransigence by leaders and teams should be met with swift and decisive action.

What should not be allowed to occur, though, is the rewarding of teams and leaders that form grey networks, as this only encourages others to engage in the same behaviour.

How can the concepts of institutional corruption and grey networks be applied in other contexts?

Institutional corruption applies to all organisations and is well researched within the US Congress, the pharmaceutical industry, and in the financial firms involved in the sub-prime mortgage disaster. The real concept that needs to be applied in other contexts is that of grey networks. These networks are ones that generally appear in large organisations with devolved, geographically dispersed teams or workforces. There’s need to be more research conducted into their appearance and how they blind organisations by developing an internal influence market they control. Their application is much broader than just organisational failures but also in how they present a bigger risk envelope for organisations. The behaviour of grey networks, their control, and their withholding of information from the broader organisation, leads to weaknesses in transparency and oversight. These weaknesses allow dark networks to penetrate organisations with a greater deal of security.

My view is that more research is needed into grey networks and their impact on organisations, including their effect on encouraging corruption through blinding the organisation. This research should look more closely at private firms who are engaged in public procurement to determine whether grey networks occur within private firms and if these networks allow more traditional corruption and other crimes to flourish.

BIBLIOGRAPHY


International Anti-Corruption Academy

MACS Graduates 2014 - 2016

impact
stories

HAUWA IBRAHIM GARBA
CHRISTIAAN MOLL

ELNUR MUSAYEV
SIMON OBERMAYER
My name is Hauwa Ibrahim Garba. I was born in the state of Kaduna in Northern Nigeria. I hold both a Bachelor of Science in Economics from a university in the northern part of Nigeria and a Master of Arts in Anti-Corruption Studies from the International Anti-Corruption Academy in Laxenburg, Austria. Since February 2008, I have been working with the Economic and Financial Crimes Commission in Nigeria. My study at IACA was the experience of a lifetime because of its diverse programme. The opportunity to meet world-renowned academics and practitioners in the field of anti-corruption sharpened my reasoning, deepened my thinking, and better prepared me for the fight against corruption.

It has long been my desire to do something to help and promote my country, Nigeria. The massive theft of public funds in the country moved my interest towards the study of anti-corruption, with particular interest in asset recovery and forfeiture. Because I am not in a position to advise or implement any anti-corruption policies in the government, I chose to devote myself to writing publications on anti-corruption to facilitate meaningful discussions, contribute to the global effort to combat corruption, promote good governance, justice, and rule of law, and also to educate the younger generation. There is also an urgent need to deal with the major causes of corruption, which stem from a lack of commitment to the nation and absence of a sense of patriotism, as well as a lack of social and economic security. Due to the fact that these are virtually the only ways I can impact my country for now, I am considering furthering my education in the same or a related field while I wait for the time when my voice is heard and my policies can be implemented for the development of the country. Thank you.
“Empowering professionals” as a Never-Ending Story

Christiaan Moll

Looking back, my experience in the Master in Anti-Corruption Studies (MACS) programme was a valuable, enriching, and unique experience in a number of ways. So, how has it impacted me personally, professionally and, network-wise?

To illustrate the programme’s impact on me personally, let me take you back in time a bit. My background is in the military and international law, and I have international experience in both regulatory and legal capacity-building and development. Due to my background, I was looking for an international academic environment that could offer in-depth insights on corruption issues and would enable me better understand them. This initially brought me to sign up for IACA’s Legal Incentives for Corporate Integrity Training in 2014, after which I participated in International Summer Academy 2014. Essentially, the Summer Academy served as a kind of “appetizer” for me. The event was exceptionally well-organized and really gave me a taste of what I was looking for. It made me decide to order IACA’s “main course,” the MACS programme. The MACS curriculum has a multidisciplinary approach, which was very challenging and enriching for me. For instance, through lectures by renowned international academics and practitioners, I learned that lawyers and economists have fundamentally different perspectives of corruption and what to do about it. Some proposed solutions I would certainly not endorse as a lawyer, but I have come to understand the suitability and acceptability of these perspectives from an economic point of view. Another enriching aspect of the MACS programme has been the modules on location in Laxenburg. They added an extra...
dimension to the international character of the MACS. Finally, the interaction with fellow students, who seemed to have been picked from every corner of the globe, added to the unique experience through learning about their diverse walks of life, interests, and views. We did not only learn about corruption, but we had fun too!

From a professional and networking perspective, my freshly acquired Master in Anti-Corruption Studies has allowed me to turn and target professional opportunities and assignments with more academic weight and credibility. Now, after having just recently completed the MACS programme, the early signs and responses have been quite encouraging enabling me to confirm that MACS has already made a noticeable difference for me professionally. Network-wise, my experiences in the MACS programme have enabled me to contribute, with more expertise, to the diligent advocacy work of Transparency International, which I have supported in a number of capacities for years. Recently, I have become involved in a young and fascinating international initiative that is looking into the feasibility of establishing an International Anti-Corruption Court. Finally, I have acquired a seat in the Board of the Institute for Financial Crime (IFFC). This think tank, based in The Hague, seeks closer cooperation between public and private organizations that operate to combat fraud and corruption internationally. These new opportunities that I have become involved in since my time in the MACS programme have opened up considerable networking possibilities that I am eager to explore.

What is after MACS for me? Will I stop here in my academic development in the anti-corruption field? Most certainly not. I am afraid that the genie is out of the bottle. Since completing the MACS programme, I have developed plans for further academic development in the anti-corruption field. Participating in the next edition of IACA’s “Best Of” series is just a minor part of this. Personally, I am not so convinced there is an end to IACA’s mission of empowering professionals, nor do I think there is an end to continuing to learn and grow as a professional in the field of anti-corruption.
Corruption is a curious thing. While most of us will agree that reciprocity is an essential requirement for the functioning of our societies, families, and relationships, some sorts of reciprocity, typically referred to as corruption, are also amongst the most harmful crimes of humanity. It is this particular understanding that comes to my mind when reflecting on my past two years at IACA.

When applying for IACA’s MACS programme in the spring of 2014, my primary intention was to support my professional development. By then, I had been working as a compliance manager for a German multinational corporation for about one year. While IACA’s MACS programme clearly helped me in this regard, my key take-away was something different. In fact, the last two years made me realize the full, devastating impact that corruption can have and the politics and power struggles behind it. In doing so, I realized how societies struggle to determine a certain set of reciprocity as immoral, whilst condoning and actively encouraging it in general. It is this realization, in particular, that also helped me gain the required certainty I needed when judging activities in my professional role, activities that may or may not be considered corrupt in legal and social terms.

Whilst any gain in knowledge is important, it still remains a rather abstract achievement. Instead of knowledge, I would like to point out the interactions that I enjoyed; Interactions with a unique group of experienced professionals with diverse backgrounds and coming from all continents. In fact, this was likely MACS’ biggest impact by far. I applied for MACS looking for interaction, networking, and knowledge sharing in the beginning, but I now realize that I have gained something far bigger. I have gained many good friends.
Learnings from the MACS Materialize in Innovative Ways to Fight Corruption in Azerbaijan

ELNUR MUSAYEV

Elnur Musayev (Azerbaijan), Senior Prosecutor, has been working at General Prosecutor’s Office since 1998. He has 19 years of professional experience, including 11 years dedicated to countering corruption through prevention and investigation. He received his law degree from Baku University, a BSc in International Law and Social Sciences from Khazar University, and an MA in Law from the University of Sheffield, UK. He recently completed IACA’s Master in Anti-Corruption Studies programme with the class of 2014 - 2016.

Before enrolling in the MACS 2014-2016 programme, I had already reached a senior position in the field of law enforcement in Azerbaijan and gained experience in international anti-corruption country evaluation, in particular through involvement in the major international anti-corruption mechanisms of GRECO, OECD ACN, and the UNCAC Implementation Review. Furthermore, I had also been teaching in a top national law school. Therefore, when I signed up for the MACS programme, career advancement was not my motivation.

However, MACS gave me something more valuable. It added an academic dimension to my professional work and a professional dimension to my academic efforts. The similitude of this change is a switch from two- to three-dimensional geometry, i.e. adding another angle which enables rising above the problem and discerning its strong and weak features.

We studied many aspects of corruption, including its driving forces, diverse manifestations, and relevant macroeconomic theories. We probed the habitat of corruption networks, guided by sociological theories and the concept of political economy. My experience has irreversibly changed my understanding of this phenomenon. Corruption has turned out to be a three-dimensional evil figure, instead of a flat word scribbled on the page of a criminal case file. Its roots go deeper and its arms spread wider, with consequences of unimaginable proportions. Throughout my studies I developed a new concept of operation for my institution, which I submitted immediately after graduation. In simple terms, my proposal suggests using a multi-disciplinary approach involving a wider circle of stake-holders, accentuating various combinations of prevention tools. MACS came in handy in developing strong arguments, which stand firm on a solid conceptual and scientific ground.

Additionally, the MACS programme allowed me to gain a unique educational experience that is worthy of replication, and even further development, in my own classroom. I have already adopted several practices used during the MACS programme into my own role as a lecturer at Baku State University, such as the peer review process, individual and group presentations, case-studies, and student satisfaction surveys. I am also trying to pass on the knowledge and skills learned during my studies at IACA to replicate the atmosphere of free debates and scrutiny. Nothing can be more rewarding for a teacher than to see his students not only grasping the material, but also growing in confidence through critically thinking and by analyzing and challenging conventional theories and concepts.

Perhaps in the span of a few years, other MACS graduates will join my institution, and, with the knowledge and insight we gained from IACA, we will come up with new and innovative ways to fight corruption in Azerbaijan.
Supporting the Human Rights cause is always a challenging task, especially when it comes to analysing topics that have always been looked at from a strictly legal perspective. However, when it comes to or analyzing a deviant behaviour with a strong cultural connotation, its mere criminalization might not be enough. Hence, the need of broadening the range of approaches arises. In this regard, the promotion of a human rights-based approach is meant to look at corruption as linked to certain fundamental rights violations. The assumption taken here would indicate, ultimately, two benefits: a better philosophical understanding of corruption’s root-causes and, on the other side, the possibility to adopt human rights protection mechanisms for a greater impact in the field.
Promoting a Human Rights Based Approach to Anti-corruption

by Ruggero Scaturro

How acts of corruption constitute a criminal offence has been broadly treated in most national constitutions around the globe and, internationally, by the 2005 United Nations Conventions against Corruption (UNCAC). Specifically in Chapter III “Criminalization and Law Enforcement,” the Convention names and regulates, in a very comprehensive manner, a series of acts such as bribery, embezzlement, and money laundering as corrupt behaviours to fight against. As a matter of fact, by looking at the existing regulations one could easily realize how well treated the matter is and, consequently, how adequately punished the offences are. Nevertheless, what have not been treated with the same emphasis as the infringements identified in the criminalization section are the consequences, in terms of human rights violations, that may derive from the occurrence of certain acts of corruption. In other words, in addition to constituting an offence under international and national criminal laws, what has not properly been taken into account is the fact that particular corrupt acts might undermine specific human rights. But what are human rights? From a philosophical perspective, “human rights are the only universally recognized values system under present international law comprising elements of liberalism, democracy, popular participation, social justice, the rule of law, and good governance”1.

Back to the aforesaid relation, in literature there has been profound development due to a very broad range of interesting publications provided by academia as well as international and non-governmental organizations2. In this respect, a thorough understanding of this relationship was provided, in 2009, by the International Council on Human Rights Policy which, in its “Corruption and Human Rights: Making the Connection”, identifies three different so-called causal links3:
- **Direct Violation**

A direct violation occurs when a corrupt act is deliberately used as a means to violate a right. A practical example would be when an individual must bribe a doctor to obtain medical treatment.

- **Indirect Violation (corruption as a necessary condition)**

An indirect violation occurs when corruption is an essential factor contributing to a chain of events that eventually leads to the violation of a right. For instance, when women and children are trafficked for sexual or labour exploitation, corrupt officials are often responsible for not accurately investigating and intervening.

- **Remote Violation (where corruption is one factor amongst others)**

A remote violation occurs when corruption is not necessarily the only or determining cause of violations of human rights. One example could be the widespread influence of corrupt practices in the electoral process. This can often lead to protests which are violently repressed by the police with possible consequences in terms of violations of rights such as freedom of expression or freedom from torture and other ill-treatments.

This useful classification system serves as a tool to recognize whether an act of corruption leads to human rights violations and, if it does, then to what extent. At this point, consequently, the assessment of how the human rights inner-mechanisms and background could impact the anti-corruption field seems essential to understand how its adoption could be significantly beneficial. Starting with the origins, the creation of the Universal Declaration of Human Rights (UDHR) in 1948 marked a watershed moment in the history of international relations. For the very first time, in fact, an immense paradigm shift occurred by introducing a subject unknown hitherto: international human rights law. This date established the beginning of an era of drafting, writing, and ratifying a series of international covenants which brought about the coinage of the term Core Human Rights Treaties. For the sake of clarity, however, the philosophical foundation of human rights did not appear for the first time in 1948: already in the 18th century documents such as the 1776 American Declaration of Independence and the 1789 French Declaration des droits de l’homme et du citoyen constituted strong advances in the protection of human rights. Descriptively speaking, human rights are those fundamental rights which empower human beings to shape their lives in accordance with liberty, equality, and respect for human dignity. Not surprisingly, it is exactly the focus on the latter and, ultimately, individuals that set the aforementioned watershed. While classical international law has always been based on the concept of states’ sovereignty, meaning states are the subject of international law and the only ones entitled to provide for the enforcement of any international obligation, international human rights law sets individuals’ protection as the subject of any regulation and introduces the concept of collective enforcement through international bodies. Collectivity, furthermore, one of the most essential principles at the basis of the noteworthy follow-up mechanisms of the aforementioned Core Human Rights Treaties. The implementation of each convention is, in fact, monitored by a committee (a quasi-judicial body established by the treaty) of independent and impartial experts (between 10 and 26) which issues non-binding General Comments or Recommendations after analysing state reports (mandatory procedures in all treaties) and individual complaints (optional procedure) amongst other procedures. The will of focusing on these two practices derives from an interesting aspect which associates them: although the committees cannot provide for legal enforcement, both state reporting and individual complaint procedures involve actors which, in classical international law, are left aside. Indeed, through writing shadow reports and assisting victims whose rights have been violated, single individuals, civil society, and NGOs are entitled to play a fundamental role in holding the states in examination accountable (at least politically), raising victims’ awareness, and, thus, empowering the vulnerable groups concerned.

By having a look at the general comments and recommendations delivered by the treaty committees, it is worth pointing out the existence of a discrepancy between the number of cases in which corruption has been addressed by some committees (CCPR committee: 28 times, CESC committee: 31 times) and the volume of cases in which the underlying role of corruption has been underestimated or even ignored (CEDAW committee: 3 times, CERD committee: 7 times).

The existing inhomogeneity within the set of recommendations may indicate two possible root causes: a first reasonable assumption could imply that corruption has nothing to do with certain human rights violations. Alternatively, however, the low number of observations addressing corruption may be a consequence of a lack of information and accountability: an option more likely to be taken into account, especially in the presence of vulnerable groups such as women, refugees, and ethnic minorities. A possible solution to this issue would be approaching corruption with the same framework used by the committees of the Core Human Rights Treaties. The creation of an analogous committee would allow a group of independent and impartial experts to focus on the human rights dimension of anti-corruption work, reducing the aforesaid inhomogeneity and empowering the role of specific vulnerable groups. This would be possible only by analyzing, case by case, all of the causal links between corruption and human rights raised, not only by state reports, but also by individual complaints: procedures which entitle single citizens to empower themselves through holding accountable those who have a duty to act. This new perspective would lead, in practice, to the adoption of an already existing conceptual
framework operationally directed to promoting and protecting human rights: the well-known human rights-based approach. In other words, the adoption of this method would mean establishing a new structure anchored in a system of rights and corresponding obligations (implying rights holders and duty bearers) which, ultimately, would lead to the inclusion of the UNCAC in the Core Human Rights Treaties. This eventuality, in practice, would imply the beginning of a new process and usher in a new era of international agreements which would further strengthen all the meaningful work done so far under UNCAC in this regard.

ENDNOTES

4 Ibid.
9 Although the CRC Committee has addressed corruption in 29 cases, the CEDAW and CERD Committees have treated corruption only in 3 and 7 cases respectively.

BIBLIOGRAPHY


It is our pleasure to invite you to IACA’s fourth Alumni Reunion, which will take place on 6 and 7 July 2017! This year, we have prepared an action-packed programme for two full days. We are extremely glad to share with you some of the lecturers that have already been confirmed for the event: Michael Johnston (Dana Professor of Political Science Emeritus at Colgate University and active in the field of anti-corruption for the past forty years); Drago Kos (Chair of the OECD Working Group on Bribery and former Chairman of the Council of Europe’s Group of States against Corruption - GRECO for ten years; and Daniel Li (a career officer with the Hong Kong Independent Commission against Corruption - ICAC for over 35 years). Additional lecturers and activities will be announced in the next weeks. There will be a get-together in Vienna on the evening of Wednesday, 5 July, to unofficially mark the beginning of the Alumni Reunion. The programme will officially begin on the following morning, 6 July. Apart from in-class lectures, the event will feature networking activities and social events. On Thursday evening, you are all invited for dinner and dancing at the Gallo Rosso restaurant in Laxenburg.
Those wishing to come in their national dress are encouraged to do so. The dinner will be a combined event, together with participants of IACA’s seventh annual Summer Academy, which will coincide with the Alumni Reunion. The participation cost for the Alumni Reunion 2017 is 150 EUR and includes two full days of lectures, the shuttle bus service between Vienna and IACA (Laxenburg), coffee breaks and lunches, as well as the gala dinner on Thursday, 6 July.

We would also like to inform you about the “Best Of” Seminar, taking place at IACA two days before the start of the Alumni Reunion. This year’s expert will be Mr. Drago Kos, Chair of the OECD Working Group on Bribery and member of IACA’s frequent visiting faculty. A special package price is offered to those wishing to attend both the “Best Of” Seminar on 4 and 5 July and the Alumni Reunion on 6 and 7 July. While the regular price for the “Best Of” Seminar is 690 EUR, the special package price for both the “Best Of” Seminar and the Alumni Reunion is 740 EUR, covering all lectures, coffee and lunch breaks, the shuttle bus service, and the gala dinner on 6 July. For detailed information about the “Best Of” Seminar, we invite you to consult IACA’s website.

Registration for the Alumni Reunion 2017 will be available online at http://www.iaca.int/ end of March 2017. In case of questions, please send us an email at alumni@iaca.int.
1. IACAlumnus Crosswords are open to members of the IACA Alumni Association.
2. The minimum word length is three letters.
3. No individual IACAlumnus Crosswords will contain the same answer twice.
4. IACAlumnus Crosswords are thematic. Emphasis is given to anti-corruption/corruption, and compliance-related vocabulary.
5. Together with the last issue of the IACAlumnus magazine in a calendar year, a final word will be formed from all the letters positioned in the grey cells of previous IACAlumnus Crosswords in that year.
6. To be considered for the IACAlumnus Crossword Award, alumni should send a picture of the last IACAlumnus Crossword containing the final word to alumni@iaca.int no later than 18:00 CET on 31 December 2017.
7. The participant who sent the first email received by IACA with the correct final word shall be the winner. The decision in this regard shall be final.
8. The winner will be announced in the following issue of IACAlumnus where his/her name, picture, and short biography will be published upon his/her consent and will receive the award.

Guidelines

ACROSS

2 Obedient (Verb)
3 Not Unlawful
5 Moral principles
8 Agreement
11 Anti-corruption legislation (UK)

DOWN

1 Comply (Noun)
4 Anti-corruption legislation (US)
6 Form of Void
7 International Organization promoting Anti-corruption education and research
9 Firm belief in the reliability of someone
10 Gridlock

Good Luck and Enjoy!
Upcoming Programmes, Activities, and Events

IACA Programmes and Activities

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Events

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