

U4 Helpdesk Answer

Donor agencies' anti-corruption training and capacity building

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International donor agencies are the principal actors responsible for delivering aid and executing development projects in aid-recipient countries. Their presence in corruption-prone environments, frequent interaction with local partners and contractors, as well as the overlapping oversight and regulatory jurisdictions are all factors that increase donor agencies' vulnerability to corruption.

Many donor agencies have implemented anti-corruption training programmes centred on anti-fraud, as well as the identification of corruption risks and potential conflicts of interest. However, there is scant information in the public domain about aid agencies' specific anti-corruption training curricula.

After surveying topics typically covered in donor agencies' anti-corruption training programmes, this Helpdesk answer looks at training provided by the World Bank, AusAid, the Asian Development Bank and UN agencies, all of which stand out because of their comprehensive application of anti-corruption training in their operations.

Query

Please provide an overview of topics covered in donor agencies' anti-corruption curricula, such as procurement, conflicts of interest, foreign bribery, background training on international conventions and so on.

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Caveat

This Helpdesk Answer reviewed publicly available information on 72 different donor agencies' anti-corruption and bribery training programmes. Unfortunately, in the large majority of cases, agencies provide very little information about the anti-corruption training they offer to staff: of the agencies reviewed, for instance, only five donors state that they provide training on whistleblowing and other channels to report corruption. It is worth noting, however, that many agencies may provide training but do not state so publicly.

Overview of anti-corruption training in donor agencies

Corruption and anti-corruption in international aid

In 2015, overseas development aid amounted to US\$344 billion (Devinit 2016), with more recent estimates putting it at around "7 per cent of total international inflows and 2.5 per cent of government spending in developing countries"

(Kenny 2017). International aid represents an important source of income for lower income nations, and supports many underfinanced government institutions around the world. International donor agencies are the principal actors responsible for delivering aid and executing international development projects in these countries. Donors can be both bilateral agencies as well as multilateral organisations, which are composed of members from various countries.

The impact of development assistance on levels of corruption is contentious. A number of studies has found that international aid can have a negative effect on governance in aid-recipient states as a result of the rent-extracting opportunities offered by the influx of donor funds, an issue exacerbated by the complications of exercising effective oversight of aid money in states with inadequate public financial management systems (see David-Barrett et al. 2017; Yanguas and Hulme 2015). Other studies contend that development assistance plays an important role in strengthening public institutions, improving state accountability and reducing incentives for petty corruption (see Sarwar et al. 2015; David-Barrett et al. 2017).

As well as seeking to reduce corruption in their own operations to enhance the effectiveness of their interventions, aid agencies also allocate resources to programmes aimed at curbing corruption and improving governance in partner countries (Miliband, D., & Gurumurthy 2015).

Regardless of the effect of international aid on the quality of governance in recipient countries, donor agencies can themselves be highly vulnerable to corruption, not least due to their constant interaction with local partners and contractors in high-risk environments as well as the overlapping oversight and regulatory jurisdictions in which they operate. There are as yet no reliable aggregate estimates of the costs of corruption, fraud and embezzlement to international aid. Nonetheless, a 2004 evaluation of World Bank operations estimated that at least US\$100 billion had been lost to corruption over the preceding three decades (Mawere and Tandi 2016). Another study from 2012 found that 157 World Bank contracts signed between 2007 and 2012 and worth US\$245 million were sanctioned for fraud or corruption (Kenny 2017). Across the sector, there are numerous cases of donor programmes plagued by corruption and fraud (Savedoff et al. 2016).

Efforts to improve the efficiency of aid delivery have led to numerous internal governance reforms within international aid organisations (David-Barrett et al. 2017). These include ex-ante good governance requirements for dispensing aid, improving oversight of procurement processes, establishing robust sanction mechanisms, introducing codes of conduct, tightening up staff regulations, as well as the provision of anti-corruption training for staff, partners and service providers (Kenny 2017; Savedoff 2016).

Anti-corruption training has been a feature of most international aid organisations since the World Bank implemented anti-bribery training in the late 1990s to increase awareness of its internal governance rules (Lie 2015). Today, most multilateral and bilateral aid agencies, as well as

many private philanthropic foundations employ various forms of anti-corruption training (Quibria 2017).

General topics covered in training curricula

Anti-corruption training curricula take many forms depending on the recipients of that training (directors, headquarters staff or in-country personnel) as well as the particular challenges a donor agency is faced with and the context in which it operates. The following section summarises some themes commonly covered in donor agencies' anti-corruption curricula.

Corruption, bribery risks and do no harm

The identification of operational corruption and bribery risks is one of the most typical topics covered in anti-corruption training in donor agencies. Most donors have established codes of conduct that specifically demarcate which actions constitute illicit, corrupt, or unethical acts. Training modules are often designed to heighten awareness of these acts through the use of case studies and practical examples that agency staff may encounter in their daily work (Transparency International UK 2014; Roht-Arriaza 2018; GIACC 2016; Hart 2015).

Anti-corruption training does not have to take place in a classroom setting, and may be provided through training manuals and e-platforms, which can be especially useful for staff not in frontline or procurement roles, where there is a lower exposure to corruption risks (GIACC 2016). At higher levels of agency hierarchies, the identification of corruption and bribery risks is generally conducted during the process of programme and policy

development, and is likely to focus primarily on the structural drivers of corruption.

Increasingly, donors are incorporating political economy analysis into anti-corruption training, with the objective of ensuring that programme and project leads are able to assess how their activities may contribute to corruption in destination countries or which expose staff to situations of corruption (see Yanguas and Hulme 2015; Fisher et al. 2013).

Anti-fraud and misuse of resources

Measures to counter fraud in development projects were among the first internal governance policies that most aid agencies incorporated. Measures to curb fraud, generally understood to involve deceit to “gain some financial or other advantage” (GIACC and Transparency International UK) have long been viewed as a key component of aid efficiency (Kenny 2017).

Anti-fraud training aims to instruct staff on how to identify fraud and the misuse of resources when evaluating or auditing projects, focusing on issues such as mis-invoicing and the identification of red flags in project documentation (Kenny 2017; Miliband and Gurumurthy 2015). Fraud training often includes consideration of the role of local partners, contractors and consultants. It also often includes heightening awareness among aid agency staff of the risks of these actors falsifying reports on activities and budgets. Training are often also delivered directly to external partners to ensure they are familiar with the donor’s anti-fraud policy.

Procurement and interaction with partners/contractors

Anti-corruption training in donor agencies often places special emphasis on corruption that occurs when procuring goods and services, as well as project execution where responsibility is delegated to a third party (Musah et al. 2018). This could occur where an aid agency launches a tender for construction companies to install water infrastructure, or where an agency partners with a civil society organisation to deliver water conservation workshops to citizens. In both cases, the agency is delegating functions to a third party, relinquishing some degree of oversight and control over the execution of the project (Kenny 2017).

Anti-corruption training in these situations can be targeted at three different groups. First, agency staff, who can be instructed in techniques to identify corruption risks in procurement processes or the misuse of funds, as well as concomitant mitigation measures (Musah et al. 2018). Second, anti-corruption training can be conducted for local partners, to familiarise them with donors’ integrity policies, oversight mechanisms and financial management practices. A third type of training focuses on contractors, and is intended to familiarise them with their contractual obligations, expected forms of behaviour, channels to report wrongdoing as well as how to deal with cases of corruption with sub-contractors and suppliers.

Conflict of interest and gifts

Interactions with local partners, governments and contractors in development settings can result in situations in which different parties take divergent views of the same practice. Formulating clear policies on how to identify and manage potential conflicts of interest, as well as rules on gifts and

gratuities can help to resolve this issue by stipulating acceptable and unacceptable actions in relation to private benefits for staff, whether real or perceived.

Training on the practical application of these policies is vital to ensure they do not exist merely on paper but rather are taken to heart by all relevant actors to avoid potential conflicts of interest resulting in outright malfeasance. Tailoring training to the local context is especially important when it comes to less straightforwardly corrupt practices, such as gift giving or nepotism.

Whistleblowing and recourse in the event of corruption

Establishing channels to receive reports of corruption and process whistleblower disclosures should be key elements of any donor's integrity system. As such, agency staff must be instructed in the function and availability of mechanisms to report wrongdoing, as well as how to use these channels in practice (Transparency International UK 2014). Training can take the form of a simple review of processes, from how complaints are received to how the reported issue is addressed and those reporting it protected from any retribution. It can also feature more personal training, whereby staff are instructed that the organisational culture encourages the reporting of wrongdoing. For those tasked with receiving and processing reports, training in inter-personal skills can help to ensure that whistleblowers feel safe and are able to report comprehensively.

Trends in donor agency anti-corruption training

In general, there is a high degree of institutional and technical opacity among international aid and donor agencies (Weaver 2019). Technical information about training programmes is not usually made publicly available and, when published, it is typically summarised with technical aspects omitted. Despite this dearth of information, some evidence can be found regarding the extent of anti-corruption training among donor agencies.

A 2015 survey of OECD Development Assistance Committee members found that 92 per cent conducted anti-corruption training, though most of this training was targeted at headquarters staff rather than at in-country offices (Shenfeldt 2016; Hart 2015). Almost 70 per cent of respondents to this survey stated their agency used interactive training methods (in-person, involving discussions and scenario analysis) rather than only passive training (reviewing manuals, e-platforms) (Hart 2015). Most respondents stated that their training usually had less to do with identifying corruption risks in operational scenarios and focused rather on familiarising staff with the agency's own anti-corruption tools and policies (Hart 2015).

A review conducted for this Helpdesk Answer of website and academic literature relating to 39 national and 33 multilateral aid agencies (see Annex 1) finds some general trends in anti-corruption training. Twenty-seven of these agencies made no public mention of any type of training provided to staff. Another 24 agencies only feature information about general "anti-corruption", "integrity" or "ethics" training for staff, without offering further details of the specific subjects covered. Many of these simply make broad references to training on compliance with anti-

corruption policies or dissemination of codes of conduct.

Two agencies mention their explicit modules on anti-bribery, while seven state they offer conflict of interest and gift management training for staff. Identifying corruption risks was a common subject covered, with 15 agencies stating that their training focused on that. The Swiss Agency for Development and Cooperation and the Millennium Challenge Corporation explicitly include political economy analysis in their training curricula. Anti-fraud training is also common, with 23 of the reviewed agencies stating on their website that they offer it in some form, though specialised training on tackling corruption in procurement processes appeared to be absent from donor training programmes.

Likewise, only five donors stated that they provide training on whistleblowing and other channels to report corruption. Only the Italian Development Agency and the Caribbean Development Bank offer dedicated courses on the receipt of corruption complaints from non-whistleblower sources.

Finally, ten of the reviewed agencies publicly state that they deliver anti-corruption training via e-learning platforms.

Notable case studies

The following section provides an overview of a selection of cases of agencies that have incorporated training programmes in their operations. This is not an exhaustive list and corresponds to publicly available information about these training programmes. It is worth noting that many agencies may provide training but do not state so publicly.

Beyond in-house training, many agencies undertake external training through organizations like the U4 Anti-Corruption Resource Centre and the International Anti-Corruption Academy. For example, the U4 Anti-Corruption Resource Centre offers their partner agencies' staff and agency partners access to online courses on topics ranging from corruption risk management to sector specific courses such as corruption and health (U4 Anti-Corruption Resource Centre 2020).

Asian Development Bank

The Asian Development Bank was among the first multilateral agencies to create a comprehensive anti-corruption policy that involved proactive staff training (Asian Development Bank 2006). Staff receive initial and periodic training on identifying corruption risks, integrity in procurement and project oversight.

According to observers, the Asian Development Bank provides a good example of how to integrate partners and contractors in anti-corruption training as the agency provides regular seminars for governments, suppliers and contractors on countering corruption and in relation to the Bank's official policy on anti-corruption (Trsinar 2018).

AusAid

AusAid provides a good example on how to diversify training to address the different needs of various actors related to the delivery of development assistance. Headquarters staff judged to be at low risk of corruption are provided with basic anti-corruption training (U4 Anti-Corruption Resource Centre 2020; U4 Anti-Corruption Resource Centre 2017; OECD 2018). In addition, the Aid Business Branch (ABB), which leads complex aid procurement processes at defined

thresholds, provides both online and in-classroom training to staff who will be directly responsible for procuring goods and services abroad for aid projects (Department of Foreign Affairs and Trade 2019).

AusAid also provides specialised training for mission staff. In the mid-2000s, for instance, AusAid launched dedicated training programmes for agency staff working in delegations in Timor-Leste, Philippines and Papua New Guinea, aimed at addressing governance vulnerabilities. The main topics covered related to project implementation risks, notably corruption and fraud (Kenny 2017). The training programme evolved to include local partners and civil society organisations tied to project implementation (Kenny 2017). The success of this programme led to its mainstreaming across all AusAid operations, with the development of specialised anti-corruption training by sector and region (U4 Anti-Corruption Resource Centre 2017; U4 Anti-Corruption Resource Centre 2020).

Swedish International Development Agency¹

At SIDA, all staff, including local project staff, are expected to take an online training course that includes an overview of corruption, including definitions, preventative strategies, as well as how to manage cases of corruption or instances of ethical uncertainty. This training is supported by a training guide for managers that provides more in-depth guidance.

SIDA also hosts a two-day, in-person course at headquarters, which aims to provide tools to detect and deal with corruption. The course is open to

civil society organisations, and is built around a participative approach that draws on inputs relating to experiences with corruption on the part of SIDA staff, employees of other agencies and civil society.

Beyond this course, other courses and trainings are provided by the SIDA Partnership Forum in Härnösand. These are targeted specifically at members of the international aid and development community in Sweden. SIDA regularly features anti-corruption modules within these training sessions.

UN agencies

UN agencies differ widely in how they approach anti-corruption training. There is a general anti-corruption directive stemming from the UN Code of Conduct (United Nations 2020), yet how training is to be undertaken is not clearly defined.

In 2013, a UN System Staff College was established to provide anti-corruption, integrity and transparency training to all non-headquarters UN staff (UNDP 2013).

Some agencies go beyond this directive to establish their own anti-corruption policies and training regimes. The FAO has mandatory training courses for all staff and non-staff employees on prevention of fraud, corruption and sexual exploitation and abuse, available in four languages. The modules aim to prevent these occurrences while simultaneously gathering information on staff insights, which are used as part of a feedback loop to prepare more specialised training (Finance Committee 2017). For its part, UNDP provides a

¹This information was provided by U4 Anti-Corruption Resource Centre.

training manual that directly links to training modules on corruption themes available on the UNDP intranet (UNDP 2017).

obligatory and certain privileges were directly tied to the completion of training modules (Lie 2015).

Finally, the UNICEF anti-corruption training course has been lauded due to the level of accessibility and transparency that it has for the general public. Its mandatory course, “Ethics and Integrity at UNICEF”, covers the division of functions and tasks between integrity and anti-corruption bodies, ethics in emergencies, avoiding conflicts of interests, policies on gifts, as well as ethics in career development. The course includes extension courses on “training for ethics trainers” and “training against the abuse of funds from projects” (UNICEF 2017).

World Bank

The World Bank delivers several anti-corruption training modules through its Preventive Services Unit (PSU). This unit provides general training on World Bank integrity policies and codes of conduct, as well as more specialised operational training on preventing corruption and dedicated training for high-level decision makers (World Bank 2020).

Weaver (2019) notes that in response to the observation that World Bank staff were initially antipathetic to integrity policies introduced as part of the bank’s 2007 governance and accountability strategy plan, senior staff at the World Bank devised a multiyear training plan to train employees on new policies. Among other measures, this involved the declassification of 17,000 case documents, many of which were used in integrity training sessions to acquaint staff with real world corruption issues and illustrate the gravity of the matter. This training programme was made

Annex 1: Aid agencies reviewed for this Helpdesk Answer

African Development Bank
African Union
Agence Francais de Developpement (France)
Agência Brasileira de Cooperação (Brazil)
Agencia de Cooperacion Internacional (Chile)
Agencia Española de Cooperación Internacional para el Desarrollo (Spain)
Asian Development Bank
Asian Infrastructure Development Bank,
AusAID (Australia)
Austrian Development Agency
Camoses (Portugal)
Caribbean Development Bank
Cascos Blancos (Argentina)
China International Development Cooperation Agency (China)
Compatriots Living Abroad and International Humanitarian Cooperation (Россотрудничество, Russia)
Czech Development Agency
Danish International Development Agency
Department for International Development (UK)
Development Bank of Latin America
Development Bank of Southern Africa
Development Cooperation Department (Poland)
Enabel (Belgium)
Eurasian Development Bank
EuropeAid Development and Cooperation
European Bank for Reconstruction and Development
European Investment Bank
Federal Agency for the Commonwealth of Independent States
Finnish International Development Agency
Food and Agriculture Organisation
Gesellschaft für Internationale Zusammenarbeit (Germany)
Global Affairs Canada
Inter-American Development Bank
International Cooperation and Development Fund (Taiwan)
International Development Law Organisation
International Fund for Agricultural Development
International Labour Organisation
International Monetary Fund
International Organisation for Migration
Irish Aid
Islamic Development Bank
Italian Development Cooperation Programme
Japan International Cooperation Agency

Korea International Cooperation Agency
Kuwait Fund for Arab Economic Development
La Agencia Mexicana de Cooperación Internacional para el Desarrollo (Mexico)
Lux-development (Luxemburg)
MASHAV (Israel)
Ministry of Development Cooperation (Netherlands)
Multilateral Investment Guarantee Agency
Norwegian Agency for Development Cooperation
NZ Aid (New Zealand)
Organisation for Economic Co-operation and Development
Organisation for Security and Co-operation in Europe
Romanian Agency for International Development
Saudi Development Fund
Swedish International Development Cooperation Agency
Swiss Agency for Development and Cooperation
The Millennium Challenge Corporation
Turkish Cooperation and Coordination Agency
UN Conference on Trade and Development
UN Development Programme
UN Environment Programme
UN High Commissioner for Refugees
UN Industrial Development Group
UN International Children's Emergency Fund
UN Office for the Coordination of Humanitarian Affairs
UN Office of Project Services
UN Population Fund
United States Agency for International Development
World Bank,
World Food Programme
World Health Organisation
World Trade Organisation

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