

Transparency International Anti-Corruption Helpdesk Answer

Housing policy: corruption risks and potential safeguards

Author: Kaunain Rahman, tihelpdesk@transparency.org

Reviewer: Matthew Jenkins

Date: 26 October 2022

Housing policy is in essence “the quantitative and qualitative provision of housing space” (BBSR 2022). As such, it encompasses a range of government actions from legislation to specific programmes that have an impact on housing supply, availability, and quality. There is a spectrum of housing policy instruments, from stimulative policies such as public sector housing construction and subsidies, to restrictive measures to regulate housing markets such as land use planning and fiscal controls (Shucksmith and Sturzaker 2012).

Bribery, conflict of interest, favouritism in allocation of housing, and procurement fraud, among others, tend to be the main corruption risks affecting housing policies. Mitigation measures for these range from establishing a detailed code of ethics, conducting regular audits, effective monitoring and the establishment of accessible grievance mechanisms.



Query

Please provide details on corruption risks and safeguards in relation to housing policies.

Contents

1. Background
2. Overview of integrity risks in the provision of social housing
3. References

Background

Housing policy is, in essence, “the quantitative and qualitative provision of housing space” (BBSR 2022). It focuses on how to make housing more accessible, affordable, and available to people from different social groups. While the core ideas behind housing policy remain universal, individual policies vary depending on factors such as countries’ “historical evolution, local market structures, national regulatory framework, and funding policy measures” (BBSR 2022). For instance, while all European Union (EU) member states have established housing policies within their own domestic settings, “policies [between states] differ considerably” (BBSR 2022).

There is a spectrum of housing policy tools that can be deployed by governments to regulate housing markets, from “stimulating” on one end to “restrictive” on the other. The primary objective of strategies designed to stimulate residential building is to increase the supply of housing, in particular dwellings that are available at lower prices. This type of policy can cover the following instruments (Kholodilin 2022):

Main points

- Housing policy refers to a range of government actions that typically seek to provide affordable and accessible housing to citizens.
 - Corruption can distort the intended impact of housing policies, so that stated beneficiaries of government policies are not able to secure their human right to adequate housing.
 - In many countries, social housing is a crucial pillar of housing policy, to provide adequate housing to those unable to afford market rates.
 - This paper provides a tabular overview of key integrity risks in the four distinct phases in the provision of social housing (land acquisition; construction; allocation and managing contracts).
- State aid in the form of construction subsidies and low or zero-interest loans
 - State credit guarantees
 - Tax and charge reductions (especially land stamp duty)

-
- Provision of land for construction of new housing stock at lower costs or long-term leasing

Restrictive tools of housing policy, on the other hand, can include instruments such as (Kholodilin 2022):

- Protection of tenants from eviction
- Rent control
- Housing rationing
- Tax treatment of homeownership
- Land use regulations
- Banking regulations
- Environmental policies

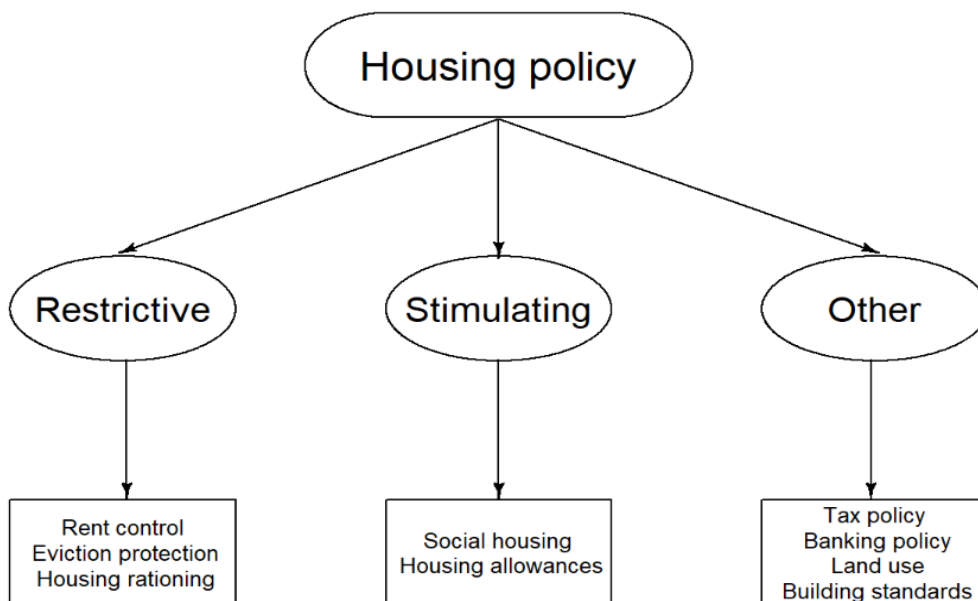


Figure 1: Housing policy tools: wide and narrow sense. Source: Kholodilin (2022)

Most EU member states utilise a combination of “housing subsidies, homeowner and homebuyer instruments, subsidised housing, and rent regulation” (BBSR 2021). In the provision of housing, the state can deploy a range of operational models. For instance, housing stock may be commissioned and constructed directly by governmental agencies, or indirectly by State Owned Enterprises (SOEs), Public-Private Partnerships (PPPs), and through contracting to private players.

Moreover, decision making and responsibilities with regards to housing policies can be distributed across the national, regional and local levels (Krapp et al. 2020: 22-25).

The core objective of housing policy typically hinges on the delivery of affordable and accessible housing. To this end, there can be a number of actions or phases involved in operationalising housing policy. For instance, the common phases in the development of social housing are depicted in the infographic below (figure 2):

| Process | Land Acquisition | Design & Approval | Construction | Occupancy | Management | Maintenance | Sale or renovation |
|-------------------------|---|---|---|---|--|---|--|
| Actions | Land acquisition | Site design Plan preparation Consultation Statutory planning process | Costing Tendering Site preparation Construction Certification | Marketing and allocation of available dwellings Fault fixing | Tenancy and asset management Support services, community linkages, place making | Accumulate reserves, sinking to fund Maintain and replace dwellings | Active asset management and update needs analysis |
| Expenditure and Income | Management costs, Market feasibility/ sensitivity analysis Loan repayments | Management costs Planning approval Financial and Real estate services fees Loan repayments | Management costs Construction costs Loan repayments Certification fees | Management costs Provision for repairs Loan repayments Tenant rents Operating subsidy Service fees | Management costs Provision for minor and major repairs Tenant rents Service fees Operating subsidies | Management costs and fees Provision for minor and major repairs Tenant rents Service fees Operating subsidies | Management costs and fees Real estate and sales costs Provision for minor repairs Tenant rents and services Operating subsidies Proceeds from sales |
| Financing (if required) | Development (construction) finance | | Construction finance | Operational finance Refinancing development finance with lower cost long term bond finance | | Sinking fund, surplus equity, receipts from sales and development finance | |

Figure 2: Common phases in the development of social housing. Source: Lawson et al. (2018: 21)

Corruption and housing policy

Corruption can have a significant impact on housing policy and result in the intended recipients not fully benefitting from policies intended to support them. For instance, there are reported cases in the US state of Washington in which

affordable housing units are not actually allocated to low-income residents, but rather to affluent non-resident owners who sublet the apartments for profit (Ingalls 2018). This speaks to the need for robust oversight and means testing during the distribution of affordable social housing to tenants.

Other aspects of housing policy can also be affected by corruption. In Hawaii, for example, public officials were charged in a corruption scheme related to affordable housing. They had received bribes and kickbacks from developers in exchange for approving housing projects that allowed the developers to “fraudulently obtain at least [US] \$10,980,000 worth of land and excess affordable housing credits (AHCs)” (U.S. Attorney’s Office, District of Hawaii 2022).

Corruption in the real estate sector affects affordable housing as a whole. For example, money laundering schemes that artificially inflate the sale price of property (often via opaque

channels) in an attempt to “integrate ill-gotten gains in the legal economy” have knock-on effects in the real estate market, distorting prices and making housing unaffordable for common citizens (GIZ 2020). This phenomenon has been observed in European cities including Berlin and London (Penke 2020; GIZ 2020; Konotey-Ahulu 2020).

In recent years, with increasing housing prices, the main focus of housing policy in Europe has been on the provision of affordable housing. For instance, in the EU, house prices went up by 30.2% and rent prices increased by 14.8% in the last ten years (Housing Europe 2021: 19).

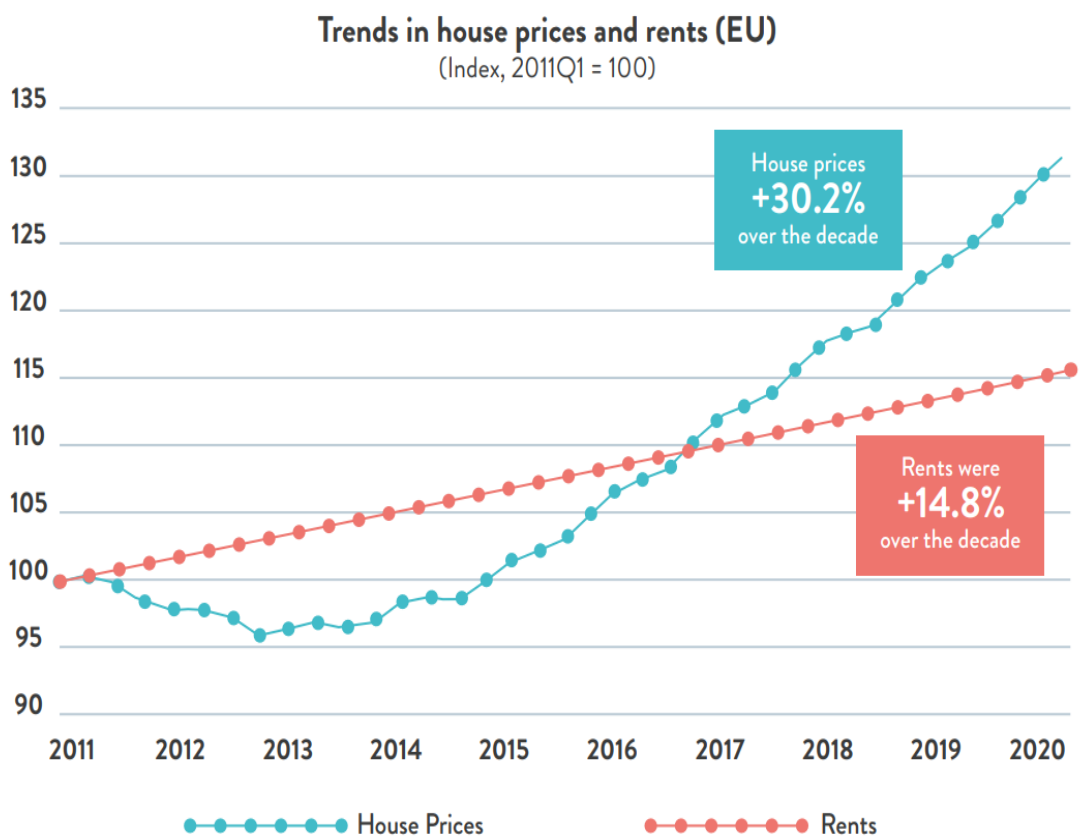


Figure 3: Trends in house prices and rents (EU). Source: Housing Europe (2021: 19).

“Unmet housing needs” across Europe are set to grow (Housing Europe 2021: 19). As a result, “the sector has been striving to keep supplying new

housing whilst also renovating the existing stock” (Housing Europe 2021: 22). In such a context, this paper focuses on potential corruption risks in the

provision of social housing. Social housing can be defined as “residential rental accommodation provided at sub-market prices that is targeted and allocated according to specific rules, such as identified need or waiting lists” (OECD 2020: 3).

It is known as social or subsidised housing (Australia, Canada, Germany and the United Kingdom), public housing (Australia, United States), council housing (United Kingdom) or general housing (Denmark), among others (OECD 2020: 3)

| COUNTRY | TOTAL PRESENT UNMET HOUSING NEED | OF WHICH: TOTAL UNMET SOCIAL & AFFORDABLE HOUSING NEED | AVERAGE ANNUAL DELIVERY (2017-2019) | | MAIN ISSUES DRIVING UNMET NEED |
|--------------------|--|---|-------------------------------------|--------------------|--|
| | | | New homes | New social housing | |
| ENGLAND | Around 3.5 million households have some form of unmet housing need | Around 1.6 million | 169,000 31,000 | | <ul style="list-style-type: none"> • Insufficient supply • High volume of young people still living with their parents • Strong population growth |
| GERMANY | Roughly 1 million homes | At least 225,000 units | 288,000 26,280 | | <ul style="list-style-type: none"> • Strong population growth • Insufficient supply • ‘Secular shrinkage’ of the social housing sector |
| IRELAND | At least 165,000 | At least 80,000 | 17,800 7,500 | | <ul style="list-style-type: none"> • Consistent shortfall in new construction compared to underlying need • High volume of young people still living with their parents • Insufficient supply of new social housing |
| LUXEMBOURG | Difficult to estimate due to high volume of cross-border workers - 35,000 -unit shortfall in recent years | Difficult to estimate due to high volume of cross-border workers – c.6,000 on official waiting lists | 4,050 65 | | <ul style="list-style-type: none"> • Strong population & economic growth • Insufficient new supply |
| NETHERLANDS | 331,000 | At least 110,000 | 67,000 20,135 | | <ul style="list-style-type: none"> • Strong population growth • Insufficient supply |
| SLOVENIA | No reliable estimates available | Around 10,000 | 3,165 75 | | <ul style="list-style-type: none"> • Insufficient supply in urban areas • Internal migration related to economic pull factors (i.e. rural to urban) |

Figure 4: Housing Europe estimates of unmet housing needs, based on information obtained from ‘The State of Housing in Europe’ questionnaire, November 2020- January 2021. Source: Housing Europe (2021: 20).

Overview of integrity risks in the provision of social housing

The following section discusses the relevant processes, actors, corruption risks and potential safeguards/standards across the four main elements of supplying housing: land acquisition, the construction of new housing, distribution systems and the management of contractual relationships with beneficiaries.

The information presented here is meant to be illustrative and not exhaustive.

Land acquisition

| Relevant process | Relevant actors | Potential corruption risks | Relevant standards/safeguards |
|--------------------------------------|--|---|---|
| Selecting land to acquire (GAO 2019) | Landowners, as well as nationally specific public authorities. In Germany, for instance, national, regional and local bodies play a role in housing policy, but local municipalities are tasked with land use planning (Krapp et al. 2020: 25; Crook 2018: 8-12) | Undue influence; Conflict of interest; | <p>Ensure the capacity and accountability of local and regional governments (UN Human Rights Council 2020: 15). See the Guidelines for the Implementation of the Right to Adequate Housing (2020), particularly Guideline 3 “Ensure meaningful participation in the design, implementation and monitoring of housing policies and decisions.”</p> <p>Identify and properly manage conflict of interest (IBAC 2022). See: Corruption risks in the social housing sector (2022)</p> <p>Development and use of land use handbook for housing programmes (Ministry of Housing, Communities and Local Government 2020). See: Public Land for Housing Programme 2015 – 2020 (2020)</p> <p>Land use planning needs to balance public and private interests</p> |

| | | | |
|---|---|--|--|
| | | | (OECD 2017: 4). See: The Governance of Land Use (2017) . |
| Land surveys to mark, measure and plan (Karmakar 2022) | Land surveyors (public officials or private contractors); Land Economist/Estate Manager; Architects/other Related Professionals (Dudek 2022; Morgan, Kwofie and Afranie 2013: 10) | Undue influence; Fraudulent land assessments | Independent audits of land surveyors, and public reviews of draft, approved and actual compensation plans by independent committees (Wheatland 2016: 7). See: Corruption risks and mitigation measures in land administration (2016) |
| Environmental Impact Assessment – (EIA) (World Bank 2020) | Public authorities responsible for assessments (Lead Agency); third party contractors (including lawyers, scientists, engineers); intended beneficiaries (REMA n.d.: 2; Middleton 2021) | Bribery; Extortion; Kickbacks; Fraudulent/manipulated data collection and presentation | Improving the following (Williams and Dupuy 2016: 13,14): <ul style="list-style-type: none"> - technical training of private EIA experts and provide them with specific anti-corruption training; - accountability and sanctions regime for EIAs - enhancing public information provision - sanctions of experts for submissions of consistently poor EIAs - appeal systems and grievance mechanisms <p>See: Deciding over nature: Corruption and environmental impact assessments (2016)</p> |
| Property appraisal and just negotiation | Purchasing authority; land seller; valuation officials | Bribes, extortion, kickbacks to either undervalue land (for the benefit of | Ensuring fair land estimations (Eurostat-OECD 2015). See: |

| | | | |
|---|---|---|--|
| of purchase price (GSA n.d.: 6) | | developers) or overvalue land (for officials to gain extra from the deal) | Eurostat-OECD compilation guide on land estimation (2015) |
| Purchasing land from landowner (GAO 2019) | Purchasing authority; land seller; banks; | Embezzlement of public housing funds during sale; | Implementing an integrity framework for managing all public investments, which includes measures for identifying and mitigating corruption risks as well as strengthening monitoring and control (OECD 2016a). See: Integrity Framework for Public Infrastructure (2016) . |

Construction of new housing

| Relevant process | Relevant actors | Potential corruption risks | Relevant standards/safeguards |
|---|-------------------------------|---|--|
| Developing a Request for Proposals (RFP) and selecting a developer (Housing Toolbox 2022) | Housing authority; developers | Collusion; bid-rigging; undue influence; bribery; conflict of interest; favouritism; favours during procurement processes, including gifts, benefits and hospitality. | <p>Putting into practice guidance on procurement for housing projects, based on the core elements of (OECD 2016b):</p> <ul style="list-style-type: none"> - Integrity - Transparency - Stakeholder participation - Accessibility - E-procurement - Oversight and control <p>See: Preventing Corruption in Public Procurement (2016)</p> <p>Guidelines for participation in housing construction by the municipal housing companies (2017-2020)</p> |

| | | | |
|---|--|--|--|
| | | | <p>Procurement Handbook for Public Housing Agencies (2007)</p> <p>Review into the risks of fraud and corruption in local government procurement (2020)</p> <p>Tools to reduce private sector engagement in grand corruption during the award of public contracts (2013)</p> <p>In the case of Public-Private Partnerships, guidelines on partner selection need to be adhered to. Moreover, there is a need to have a clear division of roles and responsibilities against the backdrop of a robust regulatory framework (UN Habitat 2011). See: Public-Private Partnership in Housing and Urban Development (2011).</p> |
| <p>Designing and planning* (Design Council 2018)</p> <p>*This can precede the selection of developers in certain cases</p> <p>This stage includes determining percentage/criteria and thresholds for “social housing”</p> | <p>Architects; engineers; developers; relevant housing authorities</p> | <p>Over-estimation of required materials; inflation of construction costs; Undue influence in setting social housing thresholds.</p> | <p>Transparent planning and purchase. Audit mechanisms to check for cost estimations (Brady et al. 2018; Eisenberg et al. 2012).</p> <p>See: Improving transparency in construction management: a visual planning and control model (2018)</p> <p>Retrofit Audits and Cost Estimates: A Look at Quality and Consistency (2012)</p> <p>A new deal for social housing: how design makes the difference (Design Council 2018)</p> |

| | | | |
|------------------------------|---|---|---|
| within housing developments. | | | Social Housing Design Guideline (Queensland Government 2021) |
| Permits for construction | Nationally specific building, power, water licensing authorities; Developers | Facilitation payments; gift giving; bribery | Having a neutral mechanism for resolving disputes when it comes to licensing, confidential corruption reporting mechanisms, and application of internal anti-bribery project control measures (The Constructor n.d.; Sohail and Cavill 2008). See: Good practices in preventing corruption in planning and zoning at the local level (2017) Accountability to Prevent Corruption in Construction Projects (2008) |
| Construction | Construction workers; developers; suppliers | Embezzlement of funds; inflation of material purchase prices; non-compliance with building standards | Ensure anti-corruption protocols are being followed through the construction process (i.e., increasing supply chain visibility, controls on payment of contractor's claims, providing anti-corruption training to key decision makers; regular audits and inspections to check on compliance with building codes etc.) (CHAS 2022; CIOB 2022; UNDP 2018). See: Corruption in Construction: How to Tackle This Industry-Wide Problem (2022) Anti-corruption & anti-bribery standards, systems and strategies |

| | | | |
|--|--|--|--|
| | | | for optimising engineering projects delivery (2019) Social Housing (2018) . |
|--|--|--|--|

| Stage of service delivery | Key stakeholders | Examples |
|--------------------------------|---|---|
| Project selection | <ul style="list-style-type: none"> Public clients Private clients | <ul style="list-style-type: none"> Corruption can negatively affect the selection of projects. For example, corruption can divert resources away from social sectors and toward major infrastructure projects. Corruption may also encourage the selection of uneconomical projects because of opportunities for financial kickbacks and political patronage. |
| Planning stages | <ul style="list-style-type: none"> Public clients Private clients Financiers Legal advisors | <ul style="list-style-type: none"> Project used as vote winners/opportunities for personal gain not on basis of priority/availability of financial resources. Planning in favor of high value infrastructure (white elephant projects) and against the interest of the poor. Project requirements may be overstated or tailored to fit one specific bidder. |
| Inspection stages | <ul style="list-style-type: none"> Regulatory authorities | <ul style="list-style-type: none"> Weak oversight and supervision mechanisms have been created that would prevent detection of fraud and corruption. Kickbacks can be given to persuade inspectors to turn a blind eye to slow implementation of projects, unfulfilled contract requirements, and other instances of malpractice. |
| Design | <ul style="list-style-type: none"> Design consultants Public clients Private clients | <ul style="list-style-type: none"> Corrupt selection of consultants for feasibility studies, preparation of specifications/bid documents. Overdesigned and overpriced projects to increase potential corrupt earnings during implementation. Bribe for favorable environmental impact assessment/planning proposal/approval. Project design has been manipulated to benefit particular suppliers, consultants, contractors, and other private parties. The timing of the project has been altered to suit vested interests. |
| Bid and contract signing stage | <ul style="list-style-type: none"> Contractors Subcontractors Suppliers | <ul style="list-style-type: none"> Political parties levy large rents on international businesses in return for government contracts. Officials take percentages on government contracts. Officials receive excessive "hospitality" from government contractors and benefits in kind. Kickbacks for construction and supply contracts. Lack of competitive/inequitable contract practices. Inappropriate bidding procedures; excessively short bidding time or insufficient or inadequate advertising of tender. Corrupt practice on the part of bidders (e.g., unjustified complaints, misleading bids, etc.). Collusion among firms or between public officials and bidders. Bid rigging in construction contracts can be facilitated by corrupt project managers and quantity surveyors (people who are supposed to be policing contracts and making sure the clients get value for money). Compensation payments included in the tender price: when two firms collude, and one prices itself out of one of the jobs and receives a compensation payment from the other as a reward. Cash-plus contracts enable unscrupulous firms to inflate the value of the contract The entrance fee, for example, a public authority agrees to give a private company the contract, provided that the company pays a fee. The company that pays the highest entrance fee wins the concession. |
| Construction | <ul style="list-style-type: none"> Contractors Subcontractors Suppliers | <ul style="list-style-type: none"> Changing subcontract party after receiving bribes. Cutting corners, ignoring rules, bypassing procedures. Payment for equipment, materials or services which were not supplied. The provision of equipment or goods of lower than specified quality (typical examples include lesser cement or steel reinforcements). Concealing substandard work. Bribe the relevant official to certify that the work was done according to specification. Nonimplementation. Unjustified complaints from contractors as a way to obtain unjustified contract price increases. Duplication of payments, alteration of invoices, lack of supporting records, ineligible payments, overbilling, misuse of funds (i.e. for purposes other than those aligned to project needs), misappropriation of discounts from suppliers/contractors, unauthorized payments, etc. Unauthorized use of project property. Theft of materials, equipment, or services. Entrepreneurs and brokers that exist as "fixers" facilitating relations between government and business players and negotiate the various administrative and legal steps. |

Figure 5: Corruption risks across the construction phase. Source: *The Constructor* (2022).

Distribution of housing to beneficiaries

| Relevant process | Relevant actors | Potential corruption risks | Relevant standards/safeguards |
|--|---|--|---|
| Eligibility assessment | Beneficiaries; depending on the context: national, region or local governmental departments may be responsible for determining eligibility for social housing. In United Kingdom, for example, it is done by Local Councils (Gov.uk 2022) | Petty bribery to be deemed eligible, conflict of interest in determining eligibility, discrimination against vulnerable groups such as persons with disabilities, women (especially single women), migrants etc. | <p>Addressing discrimination and ensuring equality (UN Human Rights Council 2020). See Guidelines (8, 9, 10) for the Implementation of the Right to Adequate Housing (2020)</p> <p>Having and adhering to code of ethics for housing professionals, including highlighting relevant principles and self-evaluation questions (Wellhouse 2018). See: Code of Ethics for Housing Professionals (2018).</p> <p>Declaration of conflict of interests by employees upon assessing a friend/relative's case (IBAC 2022). See: Corruption risks in the social housing sector (2022).</p> <p>Grievance mechanisms that are accessible to groups at risk of discrimination (GIZ 2018). See: Managing grievances effectively: How do I proceed? (2018).</p> |
| Ranking applications (priority list, wait list, lottery) to allocate housing | Housing authorities; Beneficiaries | Favouritism in the waiting list system; bribery to jump places in the waiting list; conflict of interest | Clear and transparent criteria for allocating people to social housing, including transparency and openness of waiting lists, criteria, status of candidates, different options and costs (Treanor 2015; UNDP 2018). See: |

| | | | |
|--|--|--|---|
| | | | <p>Housing policies in Europe (2015) and Social Housing (2018).</p> <p>Develop and maintain a register of all the social housing held and rented out. Consider introducing e-registers.</p> |
|--|--|--|---|

Managing contractual relationships with beneficiaries

| Relevant process | Relevant actors | Potential corruption risks | Relevant standards/safeguards |
|--|---|---|--|
| Establishment of contracts (i.e., rental contracts with tenants) | Housing authorities; Beneficiaries | Tenancy fraud; favouritism; allocation to ineligible candidates; unlawful occupations; rent collection fraud; unauthorised subletting; | <p>Regular checks to determine unlawful occupations, robust internal controls to detect corruption by staff, consistent application of audits and training, etc. (National Fraud Authority (2010). See: The Guide to tackling housing tenancy fraud.</p> <p>Regular rotation of officials involved in contracting processes (UNDP 2018). See: Social Housing (2018).</p> |
| Maintenance | Housing authorities; Maintenance contractors; beneficiaries | Maintenance fraud through poor reconstruction in exchange of bribes/ kickbacks; Bribes to overlook violations during inspections; overburdening vulnerable tenants with utility bills that they are unable to pay | <p>Accessible grievance mechanisms and ombudsman procedures. See: Regulator of Social Housing, and Housing Ombudsman Service: factsheet (2022).</p> <p>Ensure rigorous controls in maintenance/reconstruction approval processes, including the use of external expertise as required (UNDP 2018). See: Social Housing (2018).</p> |

| | | | |
|--|--|--|---|
| | | | Investments in energy efficient infrastructure and utilities that reduce burdens on beneficiaries (European Construction Sector Observatory 2019: 38, 67). See: Housing affordability and sustainability in the EU (2019) |
|--|--|--|---|

References

- Brady, D. A., Tzortzopoulos, P., Rooke, J. and Formoso, C. 2018. [Improving transparency in construction management: a visual planning and control model](#). *Engineering Construction & Architectural Management* 25(4)
- CHAS. 2022. [Corruption in Construction: How to Tackle This Industry-Wide Problem](#).
- CIOB. 2022. [Compliance in the construction industry](#).
- Crook, T. 2018. [Local authority land acquisition in Germany and the Netherlands: are there lessons for Scotland? A discussion paper](#). *Land lines*.
- Design Council. 2018. [A new deal for social housing: how design makes the difference](#).
- Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ). 2020. [Trends in urban corruption ... and how they shape urban spaces](#).
- Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ). 2018. [Managing grievances effectively: How do I proceed?](#)
- Dudek. 2022. [Why you Absolutely Need a Land Surveyor to Avoid Risk to your Development Project](#).
- Eisenberg, L., Shapiro, C. and Fleischer, W. 2012. [Retrofit Audits and Cost Estimates: A Look at Quality and Consistency](#). US Department of Energy.
- European Construction Sector Observatory. 2019. [Housing affordability and sustainability in the EU](#).
- Eurostat and OECD. 2015. [Eurostat-OECD compilation guide on land estimation](#).
- Federal Institute for Research on Building, Urban Affairs and Spatial Development (BBSR). 2022. [Housing Policies in the European Union](#).
- Federal Institute for Research on Building, Urban Affairs and Spatial Development (BBSR). 2021. [Housing policies in the European Union: A comparative research project illustrates Europe's diversity](#).
- GSA Public Buildings Service. No Date. [Real Property ACQUISITION Handbook: How the U.S. General Services Administration Acquires Real Property for Programs and Projects](#).
- Housing Europe. [The State of Housing in Europe 2021](#).
- Housing Toolbox. 2022. [The housing development process](#). Massachusetts Housing Partnership.
- Independent Broad-based Anti-Corruption Commission (IBAC). 2022. [Corruption risks in the social housing sector](#).
- Ingalls, C. 2018. [Exposing corruption in the affordable housing industry](#). Independent American Communities
- Karmakar, S. 2022. [Land Acquisition Process Made Easy – What Do You Need to Know?](#)
- Kholodilin, K. A. 2022. [Lectures on housing economics: A European text](#).
- Konotey-Ahulu, O. 2020. [London Luxury Homes Are a Prime Location to Hide Dirty Money](#). Bloomberg.
- Krapp, M., Vaché, M., Egner, B., Schulze, K. and Thomas, S. 2020. [Housing policies in the European Union](#). Institut Wohnen und Umwelt GmbH, Technische Universität Darmstadt.

-
- Lee-Jones, K. 2017. [Good practices in preventing corruption in planning and zoning at the local level](#). Transparency International.
- Manuhwa, M. 2019. [Anti-corruption & anti-bribery standards, systems and strategies for optimising engineering projects delivery](#).
- Middleton, T. 2021. [What is an Environmental Impact Statement?](#) American Bar Association (ABA).
- Ministry of Housing, Communities and Local Government. 2020. [Public Land for Housing Programme 2015 – 2020](#).
- Morgan, J., Kwofie, T. and Afranie, I. 2013. [Land acquisition challenges for urban housing development in Ghana](#).
- OECD. 2016a. [Integrity Framework for Public Infrastructure](#).
- OECD. 2016b. [Preventing Corruption in Public Procurement](#).
- OECD. 2017. [The Governance of Land Use](#).
- OECD. 2020. [Social housing: A key part of past and future housing policy](#).
- Penke, M. 2020. [Ich habe nicht, was du nicht siehst](#).
- Queensland Government. 2016. [Design and Construction Standards for Remote Housing](#).
- Queensland Government. 2016. [Design and Construction Standards for Remote Housing](#).
- Queensland Government. 2021. [Social Housing Design Guideline](#).
- Queensland Government. 2021. [Social Housing Design Guideline: A QCompanion document](#).
- Rwanda Environment Management Authority (REMA). No Date. [Sector guidelines for environmental impact assessment \(EIA\) for housing projects in Rwanda](#).
- Shucksmith, M. and Sturzaker, J. 2012. "Rural Housing", in [International Encyclopaedia of Housing and Home](#).
- Sedlenieks, K. 2002. [Corruption in the Process of Issuing Building Permits](#).
- Sohail, M. and Cavill, S. 2008. [Accountability to Prevent Corruption in Construction Projects](#). Journal of Construction Engineering and Management 134(9).
- Strozyk, K. 2022. [How to Buy Land: Step-by-Step Guide, Types & Pros & Cons](#).
- The Constructor. No Date. [Minimising corruption in the construction industry: strategies and approaches](#).
- Treanor, D. 2015. [Housing policies in Europe](#).
- U.S. Attorney's Office, District of Hawaii. 2022. [Four Charged in Big Island Affordable Housing Corruption Scheme](#). United States Department of Justice.
- UN Habitat. 2011. [Public-Private Partnership in Housing and Urban Development](#).
- UN Human Rights Council. 2020. [Guidelines for the implementation of the right to adequate housing](#).
- United Nations Development Programme (UNDP). 2018. [Social Housing](#).

US Government of Accountability Office (GAO).
2019. [A Look at How the Government Acquires
Public Lands](#).

Wellhouse. 2018. [Code of Ethics for Housing
Professionals](#).

Wheatland, B. 2016. [Corruption risks and
mitigation measures in land administration](#).
Transparency International and U4 Anti-Corruption
Resource Centre.

Williams, A. and Dupuy, K. 2016. [Deciding over
nature: Corruption and environmental impact
assessments](#).

World Bank. 2020. [Binh Duong Water Environment
Improvement Project: RESETTLEMENT ACTION
PLAN \(RAP\)](#)

“Anti-Corruption Helpdesk Answers provide practitioners around the world with rapid on-demand briefings on corruption. Drawing on publicly available information, the briefings present an overview of a particular issue and do not necessarily reflect Transparency International’s official position.”

*Transparency International
International Secretariat
Alt-Moabit 96
10559 Berlin
Germany*

*Phone: +49 - 30 - 34 38 200
Fax: +49 - 30 - 34 70 39 12*

*tihelpdesk@transparency.org
www.transparency.org*

*blog.transparency.org
facebook.com/transparencyinternational
al twitter.com/anticorruption*

*Transparency International chapters can use the Helpdesk free.
Email us at tihelpdesk@transparency.org*