

Transparency International Anti-Corruption Helpdesk Answer

Information disclosure by anti-corruption agencies in select jurisdictions: Botswana, Canada, Hong Kong, Jamaica, Malaysia, New Zealand, Nigeria, Singapore and the United Kingdom

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Anti-corruption agencies (ACAs) are key in the fight against corruption, and there is strong international consensus that they should operate transparently with regular public reporting. Given that there are several types of ACAs, the content of and procedures for information disclosure differ significantly across jurisdictions. Good practice includes having both proactive and reactive disclosure mechanisms while balancing transparency and confidentiality considerations during investigations.

Caveat: the examples in this paper only include illustrative disclosure mechanisms, and the highlighted approaches are not meant to be exhaustive.

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Query

Please provide an overview of information disclosure by anti-corruption agencies in Botswana, Canada, Hong Kong, Jamaica, Malaysia, New Zealand, Nigeria, Singapore and the United Kingdom.

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International standards on the transparency of anti-corruption agencies (ACAs)

ACAs are “key to the fight against corruption”. There is strong international consensus that ACAs should operate transparently, and that a core part of their mandate is public reporting and disclosure to raise awareness about corruption (Transparency International 2017).

The main international instruments that highlight the importance of information disclosure and outline transparency measures surrounding the functioning of ACAs include:

United Nations Convention against Corruption (UNCAC) 2003

The UNCAC is the “only legally binding universal anti-corruption instrument”, and the main areas covered by it include “preventive measures, criminalisation and law enforcement, international cooperation, asset recovery, and technical

Main points

- ACAs should operate transparently with public reporting and disclosure as a core part of their mandate.
- Information disclosure can be proactive (open data, publishing key metrics, investigation reports, and so on) or reactive (response to freedom of information requests).
- Examples from Canada, New Zealand and the UK show how ACAs could deal with balancing confidentiality requirements with adequate transparency procedures.

assistance and information exchange” (UNODC n.d.).

ACAs received international recognition under Article 6 of the convention, which calls for an institutional framework to implement the anti-corruption prevention strategy mandated under Article 5 (UNODC 2009: 7). Article 36, on the other hand, aims to combat corruption through law enforcement (Doig and Recanatini 2021). UNCAC leaves it up to state parties to decide the structure, mandate and powers of ACAs, which can range from single to multiple bodies and can include preventive, investigative and prosecutorial functions (or a combination of these functions) (UNODC 2009: 8-11).

The technical guide to the convention highlights the need for both independence and accountability of anti-corruption bodies, citing that there ought to be “mechanisms to ensure the transparency and accountability of the body or bodies”, via “reporting to or being the subject of review by competent institutions”¹ (UNODC 2009, 11).

The 2009 guide also recognises, however, that transparency processes, including disclosure and reporting, should be cognisant of confidentiality requirements due to the sensitive nature of anti-corruption work that can often “hold a person’s freedom, resources and reputation at risk” (UNODC 2009: 11).

A report looking at the state of implementation of the UNCAC (2021), specifically on the of features criminalisation, law enforcement and international cooperation, highlights that “cooperation in general would be enhanced by... unified reporting on corruption cases and consolidation of the reports by a single body”² (UNODC 2017).

Jakarta Statement on Principles for Anti-Corruption Agencies 2012

In 2012, a range of actors including current and former leaders of ACAs, anti-corruption practitioners and experts from across the world, put together non-binding Principles for Anti-Corruption Agencies to promote and strengthen the independence and effectiveness of ACAs (UNODC 2012).

With respect to information disclosure and reporting measures, the Jakarta Principles recommend that ACAs engage in (UNODC 2012):

- Public reporting: ACAs shall formally report at least annually on their activities to the public.
- Public communication and engagement: ACAs shall communicate and engage with the public regularly in order to ensure

public confidence in its independence, fairness and effectiveness.

According to the Colombo Commentary (2020) on the Jakarta Statement, in practice, ACA transparency and accountability measures in the form of public reporting, communication and engagement could encompass:

- Reports on activities and the impact of the ACA’s work should be proactively published to encourage public support for and understanding of anti-corruption bodies’ efforts (UNODC 2020: 71).
- The content of these reports can range from annual reports on functions and expenditures and key caseload statistics (such as the number of complaints, prosecution percentage), among others, depending on the function and mandate of ACAs (UNODC 2020: 72-73).
- Several ACAs report regularly to the legislature, which in turn could “review, scrutinise and respond to such reports as appropriate”. However, in cases where ACAs respond to the executive, there is a potential to “provide a weaker accountability mechanism because such reports may not automatically become public” (UNODC 2020: 73).
- Citizens can also gain access to ACA data and information through freedom of information requests. However, this would only be possible in jurisdictions which have freedom of information (FOI) laws (UNODC 2020: 74). Moreover, for effective public access, FOI laws need not only be robust but also be supplemented with on-ground procedural implementation, informational accessibility and be adequately promoted (Transparency International 2018).
- Information requests regarding on-going investigations, however, may be subject to confidentiality requirements (UNODC 2020: 77). Nevertheless, the Commentary adds that “ACAs should align their internal disclosure policies with key global

¹ Such as parliamentary committees, external auditors and where relevant to the courts through judicial review (UNODC 2009, 11).

² The report also noted that “shared databases, however, may not always reflect the needs of a criminal justice

system and may even run contrary to other considerations, notably confidentiality and data protection requirements” (UNODC 2017).

transparency initiatives, such as the Open Government Partnership³ and the International Open Data Charter⁴ (UNODC 2020: 77-78).

- ACAs can also have surveys conducted, preferably by un-biased third parties to understand public views on corruption to focus attention on areas requiring more preventive and investigative action while also tracking the progress of anti-corruption measures and public perceptions (UNODC 2020: 80).

Summarising transparency measures on information disclosure:

Proactive disclosure: also known as “affirmative publication” involves information being publicly available prior to public request (OECD 2011: 142). The type of information proactively disclosed varies across countries. The majority of countries proactively disclose information around budgets, annual ministry reports and audit reports, among others. Few countries (such as Chile, Estonia, Iceland, Israel, Italy, Mexico, the Netherlands, Turkey and the United Kingdom) proactively publish lists of public servants and their salaries (OECD 2011: 142). Open data, which is “data that can be freely used, re-used and redistributed by anyone”, applied in the context of governance allows “informed debate, better decision making, and the development of innovative new services” (Open Knowledge Foundation n.d. and Open Government Partnership 2022).

Reactive disclosure: entails a question being asked for a specific answer to be provided. Therefore, public information must be requested before it is disclosed. Most government information falls into this category and can include right-to-know, freedom of information and public records laws (Sunlight Foundation n.d.). However, having FOI laws is not enough, they need to be supplemented with effective implementation. For example, complex bureaucratic procedures can

make information out of reach to ordinary citizens (Transparency International 2018).

ACAs as public bodies can adopt both proactive and reactive ways to disclose information. Given that ACAs are set up varyingly, depending on the national context in which they operate, the content and mechanisms of information disclosed by ACAs differ widely between proactive and reactive approaches (including a combination of the two kinds).

As noted in the previous sections, when it comes specifically to disclosing information around on-going investigations, confidentiality requirements ought to be considered due to the sensitive nature of anti-corruption work so as to not cause defamation repercussions (working on the concept of innocent until proven guilty). However, as ACAs are public institutions “funded by taxpayers’ money” to combat corruption, there is consensus that they must also be “transparent, accessible, and accountable to citizens” (Transparency International 2022).

The literature presented in the upcoming sections suggest that ACAs disclosing information around investigations transparently is often linked to public interest for various reasons including but not limited to building trust in the working of ACAs, for evidence and whistleblowers to come forward and, in cases where publicly listed companies are involved, information on investigations are market sensitive and therefore the market must be informed. The following collection of examples (from Canada, New Zealand and the UK in particular) show how ACAs can deal with the task of balancing confidentiality requirements with adequate transparency procedures.

³ The Open Government Partnership (OGP) is a broad partnership that includes members at the national and local levels and civil society organisations (CSOs). OGP governments sign on to the [Open Government Declaration](#) and are required to work with civil society organisations to co-create reforms as part of an action plan.

⁴ The Open Data Charter is an initiative through which governments and CSOs are enabled to collect, share and use well-governed data, to respond effectively and accountably to the following focus areas: anti-corruption, climate action and pay equity.

State of information disclosure of ACAs in select jurisdictions

As discussed, there are varying types of information disclosure of (proactive/reactive), and the content and extent of disclosure can differ depending on the context. This paper demonstrates the ways in which a representative cross-section of ACAs adopts varying approaches to information disclosure.

Approach 1: focus on balancing transparency and confidentiality

Canada: [Office of the Conflict of Interest and Ethics Commissioner \(OCIEC\)/Commissariat aux conflits d'intérêts et à l'éthique](#)

There is no central ACA tasked with investigating corruption matters in Canada. [Corruption of Foreign Public Officials Act \(CFPOA\)](#) deals with foreign bribery, whereas the [Criminal Code](#) addresses domestic bribery and corruption (such as bribery of officials, breach of trust by public officers, fraud on the government, corrupt record and account keeping). Both the CFPOA and the criminal code are addressed as police matters and are investigated and enforced by the Royal Canadian Mounted Police (RCMP) (Osler, Hoskin & Harcourt 2021: 132).

In the province of Quebec, the Unité permanent anticorruption (UPAC) enforces anti-corruption compliance as per the province's [Anti-Corruption Act](#), which is the country's only broad sub-federal anti-corruption legislation (Osler, Hoskin & Harcourt 2021: 132 and Carsten et. al 2022).

The OCIEC is an "independent Officer of Parliament" responsible for administering the [Conflict of Interest Act](#) for public office holders as well as the [Conflict of Interest Code for Members of the House of Commons](#) (OCIEC n.d.). Investigations under the act are called "examinations" and investigations under the code are called "inquiries". However, in few cases, an individual can be investigated under both regimes. The commissioner issues a report at the end of an investigation (OCIEC 2021a).

Since neither of the two aforementioned legislations delineate the procedure for conducting

investigations, the commissioner "has adopted a process that balances confidentiality obligations, the integrity of the investigation process and procedural fairness" (OCIEC 2021a).

Information collected during the course of examinations and inquiries are kept confidential. Information is only revealed by the OCIEC in cases where it is "necessary to carry out the investigation or to establish the grounds for the analysis and conclusions in a report". Moreover, the commissioner does not usually comment on an on-going investigation, except to confirm that a request to investigate has been received or that an investigation is complete (OCIEC 2021a).

The OCIEC is mandated to submit two annual reports to parliament by 30 June each year, on the administration of each of the aforementioned provisions (OCIEC 2021b). Otherwise, more generally, open government data (OGD), including budget expenditures, government contracts and information on key industries, among others, is available on the country's [Open data portal](#).

Canada has an Access to Information Act (ATIA) which enables citizens, permanent residents, individuals and corporations present in the country to access records under the control of government institutions (currently 260 institutions). To aid effective implementation of FOI, the law states that "exceptions to the right of access should be limited and specific", and the rulings on the release of government information ought to be evaluated separately from the government (Government of Canada 2019).

New Zealand: [Serious Fraud Office \(SFO\)](#)

The New Zealand SFO is the "lead law enforcement agency for investigating and prosecuting serious or complex financial crime, including bribery and corruption". It is also tasked with anti-corruption prevention (SFO 2022a).

With respect to on-going cases, the SFO considers several matters before making a public statement to avoid compromising the investigation. The SFO decides whether to issue a public statement based on the following factors, among others (SFO 2022b):

- public interest
- reputational damage or harm to individuals or businesses under investigation

- level of detail required to ensure high levels of accuracy in reporting
- other information which is in the public arena – for example, confirmation of a referral to the SFO by another agency
- investigations into the relevant matter by other organisations

- [solicitor-general guidelines – media protocol for prosecutors](#)

The information disclosed at various stages of a case are depicted in Figure 1.

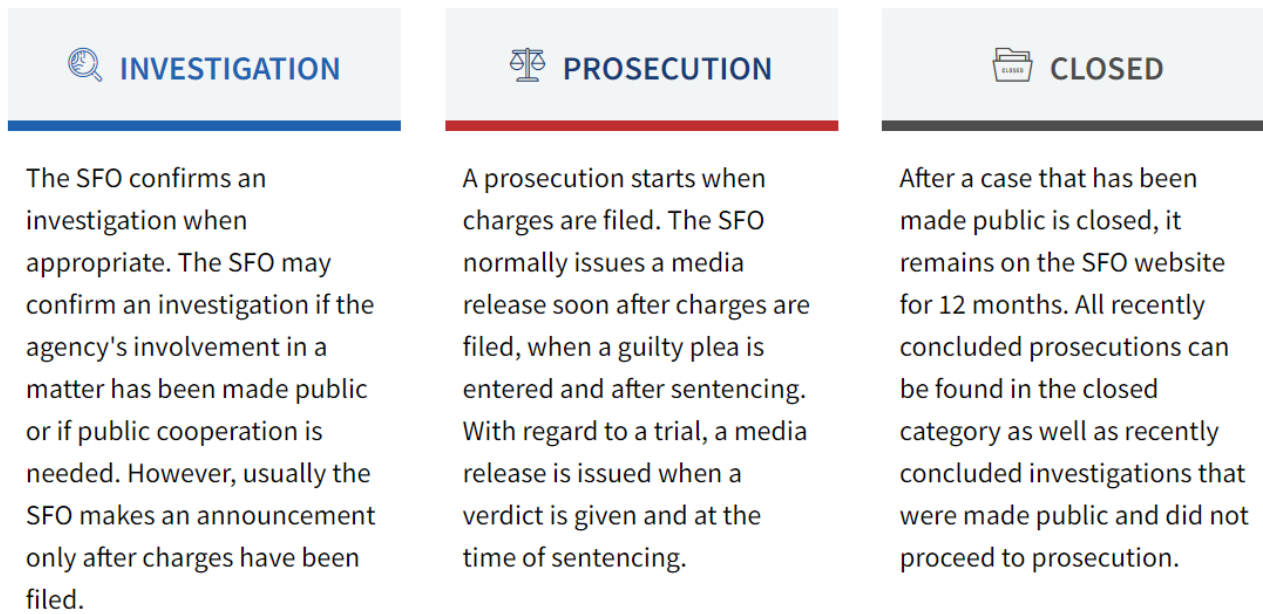


Figure 1: case information disclosure guidelines (Source SFO 2022c).

Information on cases is published in categories of open, investigation, prosecution and closed. They are available [here](#).

New Zealand also has an FOI law in the form of the Official Information Act (OIA), which allows citizens, permanent residents and anyone who is in New Zealand to request any official information held by government agencies, including the Ministry of Justice (MoJ 2021). The country's open data portal is available [here](#).

United Kingdom (UK): Serious Fraud Office (SFO)

In the UK, there are multiple ACAs with differing mandates. The [Serious Fraud Office \(SFO\)](#) and the [National Crime Agency's International](#)

[Corruption Unit \(ICU\)](#) share the primary responsibility for investigating allegations of International Bribery and Corruption.⁵ The Crown Prosecution Service (CPS) prosecutes international corruption investigated by the NCA and other investigative bodies (UK Home Office 2021).

in terms of disclosure policies for on-going investigations, the SFO does not comment on allegations made against either companies or individuals before the commencement of an investigation. Once a formal investigation begins, the position of information disclosure depends on the following (SFO 2022a):

- the company being investigated makes the information public. This is usually the case when a publicly listed company is informed of an SFO investigation and considers this fact to be market sensitive information of

⁵ Allegations of UK-based bribery, or cases of corruption outside the remit of the SFO and NCA, are reported to the local police force (UK Home Office 2021).

which it must inform the market. In such cases the SFO will (usually in coordination with the company's lawyers) confirm the "fact and focus of the investigation" after the market has been informed.

- there are "operational reasons" for announcing the investigation (such as a call for witnesses).
- there is some other "substantial reason" for the announcement of the investigation to be in "public interest".

For instance, in a recent case, a publicly listed telecoms company, O2, disclosed that it is under investigation by the SFO for potential breaches of the Bribery Act (Shaw 2021). All current SFO cases can be found [here](#), with the case archives available [here](#).

The SFO disclosure policy also highlights that the focus and scope of investigation can change as evidence emerges through the process, and information which emerges need not always be disclosed. The relevant name and charges are made public once the decision to prosecute is reached. However, SFO information on the website states that the disclosure policies are "intended for guidance only" and are applied differently on a "case by case basis in light of all relevant circumstances" (SFO 2022a).

The SFO's annual reports and accounts are available [here](#). Moreover, the SFO has a separate section on its website with proactively published data on (SFO 2022b):

- director and senior management team expenses
- non-executive directors – declaration of interests
- government procurement card spend over £500
- procurement spends over £25,000
- non-consolidated performance related pay
- exceptions to spending moratoria applied for by the Serious Fraud Office
- prompt payment data
- civil service people surveys
- equality and diversity data
- workforce management information

The UK's Freedom of Information Act 2000 accords "right of access" to information held by

public authorities. The government's open data portal is available [here](#).

Approach 2: focus on confidentiality

Botswana: Directorate on Corruption and Economic Crime (DCEC)

The DCEC is responsible for investigating allegations of corruption and economic crime, supporting with the prosecution of offenders, educating the public on the effects of corruption and preventing corruption (Government of Botswana 2021).

The most recent publicly available [auditor general report \(financial year 2019\)](#) contains information on the use of funds by the DCEC (Republic of Botswana 2020). While the DCEC [government website](#) contains a section to access publications and reports, at the time of this study, no content was available for viewing.

With respect to information disclosure around on-going investigations, DCEC does not outline a concrete procedure. However, Article 44 of the [Corruption and Economic Crime Act \(1994\)](#) prohibits disclosure of information from on-going investigations, and those violating the provision could face imprisonment (not exceeding one year) or a fine (not exceeding P2000/US\$175) or both. Open data for the country can be accessed [here](#). Botswana currently does not have FOI laws.

Jamaica: Integrity Commission

Governed under the Integrity Commission Act (ICA), 2017, the objectives of the Integrity Commission are (Integrity Commission 2021a):

- encouraging and promoting propriety and integrity among persons exercising public functions in the country
- promoting and strengthening measures for the prevention, detection, investigation and prosecution of corruption
- ensuring that government contracts are awarded, varied, renewed or terminated impartially, on merit and in a financially prudent manner
- enhancing public confidence that corrupt actions by public officials will be

appropriately investigated and dealt with in a manner which “achieves transparency, accountability and fairness”.

The commission conglomerates the functions of three former entities: Office of the Contractor General (OCG),⁶ Commission for the Prevention of Corruption (CPC)⁷ and the Integrity Commission (Parliamentary)⁸ (Integrity Commission 2021a).

When it comes to on-going investigations, the Integrity Commission is subject to a “gag clause”. According to Section 53(3) of the ICA, “until the tabling in parliament of a report under Section 36, all matters under investigation by the director of investigation, or any other person involved in such investigation shall be kept confidential, and no report or public statement shall be made by the commission or any other person in relation to the initiation or conduct of an investigation under this act” (Integrity Commission 2021b). The reasoning provided for this gag clause is to prevent reputational injury to those being investigated (Integrity Commission 2021b).

The commission publishes [annual reports](#) (along with [legacy annual reports](#) from the CPC), [investigation reports](#) upon the conclusion of an inquiry, [special reports](#) to parliament and official [gazettes](#), among others (Integrity Commission 2021c). Moreover, anti-corruption resources by the commission are available [here](#).

The country has an [open data portal](#) covering topics such as finance, economy, infrastructure and health, among others. The Access to Information Act 2002 allows public access to information held by government institutions.

Approach 3: disclosure of data, statistics and processes

Hong Kong: Independent Commission Against Corruption (ICAC)

Hong Kong’s ICAC has a “three-pronged approach of law enforcement, prevention and community

education to fight corruption” (ICAC 2019). The body published annual reports on its operations, which contain key metrics such as the number of corruption complaints and performance reviews of various departments such as the [Administration Branch](#), [Operations Branch](#), [Corruption Prevention Department](#) and [Community Relations Department](#). Reports on [ICAC Advisory Committees](#) are also available (ICAC 2021a).

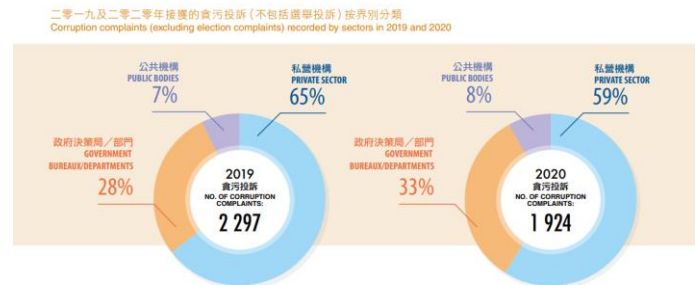
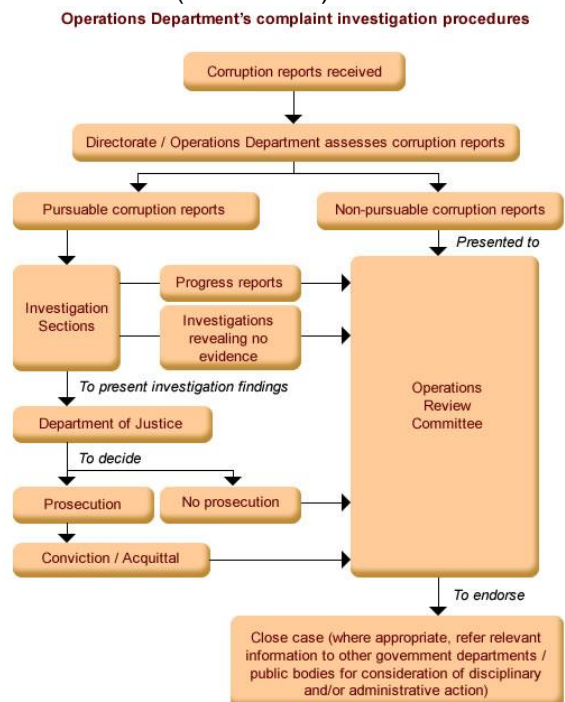


Figure 2: illustration of how statistics on corruption complaints 2019/20 is presented by ICAC (Source: ICAC 2021a)

ICAC also makes publicly available the investigation procedure for corruption complaints that it receives (ICAC 2017).



⁶ Responsible for ensuring that government procurement procedures and the issuance of government licences and permits were free of impropriety and irregularity.

⁷ Public officials filed their heir income, asset and liability statements annually to this body.

⁸ To which parliamentarians were required to file their income, asset and liability statements annually.

Figure 3: Investigation Procedure of the Hong Kong ICAC (Source: ICAC 2017)

When it comes to on-going investigations, unauthorised disclosure of investigation details is prohibited under Section 30 of the Prevention of Bribery Ordinance as “premature disclosure of information” could “jeopardise the investigation” and carries reputational risks for the accused (ICAC 2016).

The ICAC is under “no legal obligation” to inform the employers of those being investigated (for both public and private sectors). For government officials, the ICAC notifies the corresponding head of the department upon the officer’s arrest. However, if deemed necessary, in the course of the investigation, the ICAC can contact employers to understand if the suspected person was “given permission to accept advantages” (ICAC 2016).

The right of access to information is a fundamental right provided under Article 16 of Section 8 of the Bill of Rights Ordinance (Cap. 383) in Hong Kong. However, Hong Kong does not have a dedicated law governing FOI. At present, there is a non-statutory Code on Access to Information (the “Code”) 1995, under which members of the public may make requests to various government bodies for access to the information they hold (Legislative Council Secretariat 2018: 1).

Open data in Hong Kong, including but not limited to finances, law and security, and the legislature is available [here](#).

Singapore: Corrupt Practices Investigation Bureau (CPIB)

The CPIB is mandated to investigate corruption and other related offences under the Prevention of Corruption Act 1960. CPIB’s powers include investigating “any act of corruption in the public and private sectors in Singapore, and in the course of doing so, any other offences under any written law”. Through the course of its investigations, if it finds any corruption prone areas or loopholes in procedures in government departments, then it reviews and recommends changes to the concerned department. Anti-corruption awareness is also a focus area for CPIB, and it works towards public education and community outreach (CPIB 2022a).

Proactive disclosure by CPIB includes information on [statistics](#) (number of corruption cases reported/prosecuted) (CPIB 2022b). With respect to the disclosure of information pertaining to on-going investigations, there is no information available on the CPIB website or in the aforementioned anti-corruption legislation. The country does not have FOI legislation (Freedom House 2021). The open data portal for Singapore is available [here](#).

Approach 4: using sanctions lists

Malaysia: Malaysian Anti-Corruption Commission (MACC)/Suruhanjaya Pencegahan Rasuah Malaysia (SPRM)

Formed in 2009, as per the Malaysian Anti-Corruption Commission Act (MACC), the MACC/SPRM deals with anti-corruption enforcement, prevention and education (MACC 2020a). It is tasked with (MACC 2020b):

- receiving and considering any report of a corruption offence as per the MACC 2009, and investigating those that the chief commissioner or the officers consider practicable
- detecting and investigating any suspected corruption as per the act of 2009
- examining practices, systems and procedures of public bodies to facilitate the discovery of corruption offences, and consequently adequate revision of these practices
- when requested, instructing, advising and assisting any person on how corruption can be eliminated
- advising heads of public bodies on anti-corruption practices, systems or procedures
- educating the public against corruption
- fostering public support against corruption

The MACC/SPRM publishes [statistics](#) on arrests as well as on the provision of online services, such as the complaints management system (CMS) and integrity screening system (eSTK) (MACC 2021c). Moreover, the MACC/SPRM website houses the [corruption offender database](#) to serve as a deterrent measure. It contains the name, photographs (where

available) and other details of convicted offenders⁹ for all new corruption cases.

The country does not have national FOI legislation; however, the FOI laws operate in two states, Selangor and Penang (FMT Reporters 2021 and Gabriel and Singam 2021). Malaysian national open government data can be found [here](#).

Nigeria: Economic and Financial Crimes Commission Independent Corrupt Practices and other related Offences Commission (ICPC)

In Nigeria, the ICPC, inaugurated in 2000, is tasked with receiving corruption related complaints, as well as investigating cases and prosecuting offenders. Moreover, it reviews and modifies systems and processes at public institutions to make it anti-corruption compliant, while raising awareness to and fostering support against corruption (ICPC 2022a).

The ICPC [Information Centre](#) houses anti-corruption resources such as [news releases](#) on corruption related matters, [data on petitions received and investigated](#), [records of funds and properties recovered](#), procurement information, sector specific risk assessment reports, among others (ICPC 2022b).

The ICPC website does not provide specific information with respect to its approach to the disclosure of information during an investigation. However, the ICPC issues and publishes a [list of wanted persons](#), which contains names and photographs of alleged offenders. The list aims to gather information from whistleblowers on the alleged offenders' whereabouts (ICPC 2022c).

The Freedom of Information Act 2011 allows any person, group, association, organisation to request information from government in compliance with specific institutional requirements (NCC 2022). The country's open data portal is available [here](#).

⁹ Details are removed from public access after three years.

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