

# Broad Anti-Corruption Programs Are the Wrong Approach

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April 30, 2019



*The Corruption in Fragile States Blog welcomes back Mark Pyman, founder of the sector-based corruption reform website [curbingcorruption.com](http://curbingcorruption.com). He has blogged previously on this site [on the unhelpful nature of anti-corruption research](#), and in a [follow-up post](#).*

In countries enduring high levels of corruption, whether related to conflict or instability, it is easy to see endemic corruption as something overarching, requiring similarly broad reform strategies. However, my experience in Afghanistan suggests the opposite; ***anti-corruption strategies need to be tailored to the specific enablers and drivers of each particular sector.***



I first went to Afghanistan in 2009, working on corruption reform in the Afghan Defence Ministry and with the Afghan National Defence Forces. I later served as one of the three international Commissioners of the Afghanistan Joint Independent Anti-Corruption Monitoring and Evaluation Committee, otherwise known as “MEC,” from 2015 until

November 2017. Through the MEC role I met and interviewed many of the ministers of the government of President Ashraf Ghani and Chief Executive Abdullah Abdullah. MEC carried out detailed independent reviews of the corruption reforms of many of these ministers, examining in some depth what they were – or were not – doing to reform their ministries.

At the beginning of this period, 2015, most of the ministers were regarded by both citizens and external observers as highly corrupt. MEC’s reviews also found this to be so. For example, the plan of the Ministry of Haj and Religious Affairs had no substance, no commitment behind it and no significant actions were being taken. The plan of the Ministry of Communication and Information Technology was a charade, with no plans for how to ensure transparency in revenue collection, principally from a new 10% mobile phone tax, and a huge amount of money missing. Even the Ministry of Finance anti-corruption plan had been developed largely to satisfy the requirement to have a document to show to the international donor community, rather than to address corruption.



Things improved in late 2016/early 2017 as the political standoffs within the government reduced and many ministers were replaced. Afghan colleagues estimated that 60% of the ministers (we counted 19 out of 32) had reputations as well-intentioned reformers at that time. But however well inclined, it is almost impossible for a minister to avoid some degree of corruption. All prospective ministers have to be confirmed in their official position by Parliamentary approval, and this hurdle is routinely used by MPs as a device to extract large obligations from candidates. The MPs are well known to be highly corrupt: one of my colleagues estimated that of the 249 members of the lower house (Wolesa Jirga), only 8 were seen as largely non-corrupt. No minister can expect to get through this approval process unscathed.

Nonetheless, this does not stop ministers from working hard to have a positive impact against corruption in their ministry: either from a genuine desire to see improvement, or because they were being pressed hard by the president or chief executive to deliver promised improvement. My observation was that many of these ministers had thought hard about how to reduce corruption in their ministry/sector and were implementing well-chosen strategies.

What was most interesting – and the principal reason for this blog – was how greatly the chosen strategies differed from one ministry to another and the extent to which they were prioritized. Here are five examples:

In the Transport Ministry, the revenue comes mostly from a levy on trucks crossing each city entrance, each province and each national border crossing point. About 80% of this levy was being diverted corruptly. With the arrival of the new minister, a strategy was put in place that targeted the key border crossing form. The existing document was a perfect design to *enable* corruption. The new minister put in place a more tamper-proof form, genuine monitoring and a focus on credible returns from each crossing point.

In the plan of the Ministry of Higher Education, the minister brought major reform in two areas: the process of issuing licenses to private universities and in the human resources management within the ministry itself.

In the Ministry of the Interior, the new minister understood the disastrous state of the ministry and the lack of even the most basic controls. Budgeting and accounting was in a shambles. On the HR side, staff routinely discussed their personnel files with MPs so that the MP could pressure the minister to upgrade the position and/or salary of the person in return for both money and loyalty from the candidate. That minister concluded that his core anti-corruption strategy could only have two elements: getting a competent finance department and ensuring that personnel files were kept confidential and internal.

The plan at the Ministry of Refugees and Repatriation focused on one major priority, addressing the legal ambiguities of the laws related to land distribution. They planned a quick abrogation of Land Distribution Law of Afghanistan, a poor law that has facilitated corruption in the process of land distribution.





The Ministry of Public Health took yet another approach, a broader one encompassing reform of the regulation and import of drugs along with hospital and ministry reforms. As an integral part of their strategy, they also championed a publicly available independent quarterly monitoring of reform progress in health.

These examples show the variety of the reform measures and make clear how they were highly specific to each ministry. They illustrate why attention to corruption reform *within sectors* is so important. Each sector has its own challenges, its own common language and common concepts, its own “rules of the game”; most share a conviction that their sector is quite different from every other.

Perhaps most important of all, the political economy differs substantially by sector, from education to mining to health, and so forth. The political context and political elites, even in situations of entrenched corruption, are rarely homogeneous, allowing differing corruption reform to be envisaged.

Of course, not everything is sector-specific. There are key cross-sectoral areas that do need particular attention in Afghanistan, notably public procurement, the civil service and justice. Each of these has been the subject of very specific anti-corruption reforms.

I encourage all public officials, politicians and anti-corruption reformers to pay more attention to this sectoral approach: disaggregating the corruption types in each sector, directly addressing the political feasibility of each one, paying most attention to narrow strategies that would be more likely to succeed within each sector and considering the implications for what constitutes success. The website [curbingcorruption.com](http://curbingcorruption.com) brings together reform knowledge and experience across multiple sectors to help advance this policy.



## About the author

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**Dr. Mark Pyman** is an experienced advocate, scholar and practitioner at the forefront of untangling the nexus between corruption and insecurity worldwide. He is currently one of three International Committee Members on the Afghanistan independent Anti-Corruption Committee. For the previous eleven years he led the global Security and Defence Programme at the NGO Transparency

International. This groundbreaking programme worked on the ways that corruption undermines countries, especially in relation to security and conflict. He has led the team's field work in over 30 countries, including Afghanistan, Bulgaria, Burundi, Colombia, Georgia, India, Kenya, Latvia, Lebanon, Norway, Palestine, Poland, Saudi Arabia, South Korea, Taiwan, Turkey, Uganda, Ukraine, UK and the USA.

His work has been instrumental in shaping the United Nations Arms Trade Treaty (2013), in influencing NATO policy and operations in respect of counter-corruption, in shaping the military doctrine of several countries, and in policy forums such as the Munich Security Conference. He has also led the development of techniques for evaluating the corruption vulnerabilities of all the world's defence companies. His last publication for TI in 2015 reviewed the 165 largest defence companies worldwide in an analysis that is viewed by the industry as the most authoritative analysis available.

He has authored or supervised some sixty publications. He has also supervised detailed reports analysing the defence corruption vulnerabilities of 120 countries.

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