Comparative best practices to manage corruption

Johan Coetzee[*]

Namibia University of Science and Technology

Introduction

During the last two decades debates about corruption and ways to contain it have acquired a new intensity and concentrated focus. There are increasing attempts to construct a global framework of best practices to manage corruption. Because corruption is a systemic challenge that needs a long-term approach to manage, it is worthwhile focusing on best practises that have proved to be the most durable (most sustainable). Such practices that demonstrate elements of systemic reform include reforms in two newly industrialised and two developed countries. In all four cases there was no masterplan and reform evolved over time. Ongoing successes reinforced the momentum of change, and these successes became institutionalised in government processes and the culture of participative governance.

Research objective, methodology and problem situation

The objective of this paper is to investigate the common denominators of comparative best practices of reforms of, firstly, Hong Kong and Singapore, and secondly, the United States of America (USA), and thirdly, the United Kingdom (UK), as well as to highlight some trends in detecting corruption and rewarding whistle-blowers. The author developed a taxonomy that is his interpretation of the reforms mentioned. The purpose of the paper is not to compare best practices to the situation regarding corruption in Namibia, but only to illustrate some similarities of Namibian cases of corruption with incidents of corruption in the said mentioned four countries.

The research methodology applied is systems thinking and, specifically, a 'soft systems approach' (SSA) (Checkland, 1981). SSA is aimed at tackling complex real-world problematic situations and the two best known applications of SSA are Checkland's (1981) soft systems methodology (SSM) and Ackoff-Gharajedaghi's 'social systems methodology' (Ackoff, 1999; Gharajedaghi, 1982, 1999). Both of these approaches to complex problem research such as corruption are useful (corruption consists of sets of problem situations), but the social systems approach is especially suitable because it focuses on outlining a multidimensional context in which to study factors or contributors that may

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[*]**Johan Coetzee** is teaching at the Namibia University for Science and Technology. E-mail: jcoetzee@nust.na

obstruct social development. In particular, idealised design and interactive (participative) planning are two facets of the social systems methodology that are most relevant for the study of systemic corruption (Ackoff, 1999). Idealised design focuses on an appropriate framework that can be used and contextualised to dissolve complex problem situations such as systemic corruption, while interactive planning is a process design for involving stakeholders in the planning process. Idealised design starts with the premise that it is of little value to remove or prevent particular problems when faced with a complex problem situation in society. The environment must be changed in order to make improbable the emergence of a systemic problem situation (Gharajedaghi, 1982, p. 30) – that is to dissolve complex problem situations such as corruption.

Systemic reform is needed to reform the 'whole' system, for example, a society. Systemic reform is multidimensional and includes economic; values; governance; aesthetical, and knowledge, the drivers of development as outlined in the Ackoff-Gharajedaghi Five Dimensional Design of Development (Gharajedaghi, 1982, p. 64). In the Ackoff-Gharajedaghi approach to development, 'softer' as well as 'harder' or legal-institutional strategies are needed for systemic reform of a whole system. This approach of systemic reform is used for this paper.

The World Bank (WB) defines corruption as the use of "public office for private gain" (World Bank, 1997, pp. 9-10). This is one of the most commonly used definitions of corruption within the public domain. In its 2007 publication the WB still maintains the definition of the 1997 publication, but when read in the context of the whole publication, the definition acknowledges the complex nature of the phenomenon (World Bank, 2007, p. 434). Self-serving behaviour is the hallmark of corruption (Coetzee, 2012, p. 16). Corruption is the antithesis of a 'desire to serve'. Corruption is also the antithesis of integrity (Spies, 2003, p. 9), because a breakdown of integrity means a systemic breakdown. Corruption breaks down integrity and can be defined as "an impairment of integrity, virtue or moral principle; depravity, decay, and/or an inducement to wrong by improper or unlawful means, a departure from the original or from what is pure or correct, and/or an agency or influence that corrupts" (Merriam-Webster Dictionary, 2010, n.p.). A scholar may argue about what is meant by "a departure from the original or from what is pure or correct", because whose standards are applicable in determining 'what is pure and correct'? (Coetzee, 2012, p. 11) Nevertheless, the essential attributes of corruption represented in this definition are clear and will be used in this article. Although more recent definitions of corruption are available, none illustrates the systemic nature of corruption with the same appropriateness as the definition in the Merriam Webster Dictionary

(2010). The focus is on 'institutional integrity'. It is the most appropriate definition of systemic corruption and is used in this paper.

The expanded definition of the WB distinguished between "isolated" and "systemic" corruption (World Bank, 1997, pp. 9-10). Isolated (or accidental) corruption is described as "rare, consisting of a few acts, it is straightforward (though seldom easy) to detect and punish". In this case, non-corrupt behaviour is the norm, and public and private sector institutions support the preservation of integrity. Both formal and informal systems are strong enough to return the system to a non-corrupt equilibrium. Systemic corruption, on the other hand, is pervasive or entrenched; it is a condition where corruption is routine between and within the public sector, companies or individuals. Formal and informal rules "are at odds with one another". Corruption may be illegal, but in this case it appears to be routine in transactions with government or business. Equilibrium prevails where incentives for corruption are very attractive for companies, individuals and public servants – attractive and difficult to resist because of a high likelihood of success in an environment supportive of corruption, also called a "systemic corruption trap" (Coetzee, 2012, p. 10).

All countries discussed in this paper were systemically corrupt, prior to reform. The term 'reform' is more appropriate here than 'transformation', because continuous change took place incrementally over approximately four decades. Reforms in all four countries were not originally systemic in design, but their systemic nature evolved over time. In the reforms of Hong Kong and Singapore, anti-corruption agencies played a central role.

Hong Kong and Singapore reforms

The focus is first on Hong Kong, a former British colony that was leased to Britain for 99 years and returned to China in 1998. Today, the country is recognised by international institutions as one of the least corrupt places in the world, having the most powerful and famous anti-corruption agency. However, during the 1950s corruption was common and ingrained in society. Corruption was related to "cultural gift giving" and the exploitation of public office for personal gain (Klitgaard, 1988, p. 120). Corruption was pervasive in the police, described by Klitgaard (1988, p. 106) as "syndicated or institutionalised corruption", which was in fact 'systemic corruption' as will become clear in the discussion that follows. Ernest Hunt, a convicted police officer said: "Corruption in the Hong Kong police force is a way of life. I mean it is as natural as going to bed and getting up in the morning and brushing your teeth ... One of my senior colleagues fled to Canada with a personal fortune ... as soon as the Anti-Corruption Laws were passed" (cited by Klitgaard, 1988, p. 100). In the rest of the public

service, corruption was manifested in many forms, including graft. A scandal involving a high-ranking police officer was one of the triggers for reform. The Independent Commission Against Corruption (ICAC) was created in Hong Kong in 1974 and reported to the Governor.

The ICAC had immediate success in the 'frying' of some 'big fish', namely prosecuting people with status. Godber was the second 'big fish' (Klitgaard, 1988, pp. 118-119). Chief Superintendent Godber escaped to Britain to avoid questioning about his 'unexplained wealth'. Commissioner Cater was instrumental in having him extradited to stand trial and to be sentenced to four years in prison in Hong Kong (Klitgaard, 1988, pp. 104-113). The agency had political support to prosecute corruption at the highest level and to change perceptions, one of several important co-producers of their success. The ICAC investigated bank accounts and checked for 'syndicated corruption', namely drug dens, prostitution agencies, gambling houses, transportation networks and the internal flow of funds within the police (Klitgaard, 1988, p. 117). The agency had 'scary powers' such as acting according to the principle 'guilty until proven innocent' and the right to violate the privacy of individuals suspected of corruption. If the ICAC was suspicious of someone, all that was needed for an arrest was to say that the Commissioner had reasons to believe that the person had participated in corruption. In some exceptional cases, ICAC officers could search and confiscate documents without a warrant. Anybody could be required to provide information if the Commissioner required it. Bank accounts, assets and properties could be frozen. Travel documents could be seized (Klitgaard, 1988, p. 108). Despite their 'scary powers', the agency chose a 'low and cooperative profile' to get the most effective assistance from other government offices. The ICAC realised that they could not succeed if they created hostility and alienation. Officials of the ICAC were paid better salaries than the rest of the public service. A ten percent pay allowance was added to the government rates (Klitgaard, 1988, p. 118).

'New blood' was brought in, namely experienced police officers from the British Home Office. A very popular and credible Commissioner, Cater, was appointed. He recruited the best Hong Kong Chinese who worked alongside experienced British police officers (Klitgaard, 1988, p. 110). The ICAC had the power to investigate and prosecute cases and to recommend administrative changes. The unchecked power of the ICAC, however, created a non-transparent environment that co-produced a number of corruption cases in the ICAC that damaged its reputation. Internal controls and outside advisory boards were put in place to analyse information about possible corruption in the ICAC itself. Klitgaard (1988, p. 118) described these controls as constituting "a remarkable system". These citizen advisory committees included government critics such as members of Hong Kong's Executive and Legislative Councils. The Attorney General decided which cases would be prosecuted, which

prevented clouding the objectivity of the ICAC (Klitgaard, 1988, p. 109). The ICAC received adequate funding to implement its reform strategies. Its budget increased from US$2 million in 1974 to approximately US$14 million in 1982 (Klitgaard, 1988, p. 115).

Since Britain returned Hong Kong to China in 1998, the accountability of the top leaders who govern Hong Kong has been compromised by the authoritarian influence of China, because China has been reducing the participation of citizens in governance structures ever since 1998. Hong Kong citizens demonstrated their resistance to Chinese authoritarian governance, as illustrated during weeks of peaceful demonstrations during 2014 that eventually turned violent when the military intervened. Singapore is another success story where an anti-corruption agency has been playing a central role. During the colonial era Singapore was intensely corrupt. After World War II civil servants were poorly remunerated and supervision was totally inadequate. Graft was a huge problem in the police. The Corrupt Practices Investigations Bureau (CPIB) was established in 1952, but had limited success. Only after the People's Action Party (PAP) became the ruling party did the CPIB receive political support and was strengthened. One of many co-producers of Singapore's success has been the country's copious record keeping, which has made it easy to investigate the origins of asset ownership (Klitgaard, 1988, p. 127). The small size of the country has helped to bring rumours to the attention of the CPIB. The government and the private sector share information about people losing their jobs due to corruption. Public officials also have had to declare their assets biannually. The CPIB has been known for its thoroughness and efficiency. Fear of being investigated has played a role in deterring people from corruption. Like the ICAC, the CPIB has received political support to 'fry the big fish', such as ministers, lawyers and surgeons. Public servants who have not been found guilty in court could still be charged departmentally, fired or receive a reduced pension. The penalties for corrupt public servants have been severe, usually including both a fine and serving time in jail (Klitgaard, 1988, p. 128). Supervisors have also been punished, increasing the importance of accountability. The customs department has a sophisticated system of reporting and accountability. They have executed frequent checks and observations. The department has conducted weekly sessions where members of the anti-corruption agency could 'meet the people' to seek redress. Where possible, monopolies and discretion have been reduced. For example, low-level officials work in pairs if circumstances permit. What is of importance here is that redress has been created "outside the bureaucracy, which has increased the probability of detecting some kinds of corruption" (Klitgaard, 1988, p. 129). The CPIB has been reporting to the Prime Minister (Rose-Ackerman, 1999, pp. 159-160). But this line of reporting has created the opportunity for corruption within the CPIB. An anti-corruption agency cannot be created without external checks. Even people with the best intentions tend to become cor-

ruptible when they are confronted with lucrative opportunities. Nonetheless, the CPIB has received numerous quality awards and Singapore has consistently been rated and rewarded as one of the least corrupt countries: it has received, for example: ISO 9000 certification, 1997; Singapore Quality Class, 1998; People Developer Award, 1999; Public Service Award for Organizational Excellence, 2000; People Excellence Award (first public institution to receive it), 2003; Service Class Award and Innovation Class Award, 2004 (Our Quality Journey, 2009).

The discussion that follows highlights the common denominators of systemic reform in Hong Kong and Singapore is illustrated in Table 1.

Table 1: Common Denominators of Hong Kong and Singapore Reforms

Denominator	Characteristics
Commitment	Political, administrative, public and private
Coverage and timeframe	Widespread and over ±40 years
Mandate and power of CPIB and ICAC	Excessive powers of enforcement, detection, investigation and prosecution
Detection	Credible law enforcement, strong legislation and excellent information-gathering techniques increased the risk of being caught
Perceptions	Raising awareness and educating public changed perceptions and the culture of corruption
Opportunities	Fewer monopolies and discretion reduced lucrative opportunities
Quality of staff	Competent, well-trained and ethical staff
Funding and working conditions	Adequate funding ensured efficient and effective strategies; improved conditions and remuneration
Control	Internal and external measures

Source: Own compilation, based on Klitgaard (1988: 110-133) and Rose-Ackerman (1999, pp. 159-160)

Both sets of reforms were supported by commitment from top politicians and public officials. Reform was based on prevention, law enforcement and public education.

Widespread reform of the civil services supported initiatives of detection and prosecution by anti-corruption agencies over a period of about 40 years. Information-gathering activities of both were

outstanding. Financial records of public servants and their families were challenged for "unexplained assets" by means of "surveillance, undercover work, citizens' complaints, and spot checks". These information-gathering techniques increased the risk of being caught (Klitgaard, 1988, pp. 132-133). Both agencies had credible law enforcement operating under strong legislation that increased the possibility of detection. Restrictive laws were replaced, which paved the way for efficient procedures that removed incentives for corruption.

The increased risk of detection was the basis for respect for the law. The credibility of both anti-corruption agencies' public integrity as discussed was "cleaner than clean, technically competent, politically potent, and armed with a full legal and investigatory arsenal" (Klitgaard, 1988, p. 133). Reform of remuneration and working conditions of officers of anti-corruption agencies reduced the 'level of temptation' to be bribed because they were underpaid and/or could not make a decent living. Where monopolies and wide discretion could not be reduced, the 'principal-agent client relationship' changed, such as low-level officials working in pairs. Although in terms of numbers, the CPIB is by far the bigger of the two agencies, both received adequate funding to execute their strategies with thoroughness and efficiency. Both agencies' systemic approach focused on three areas, namely raising the risk of being caught, reducing the opportunities for corruption and changing people's perceptions. An extremely important element is that internal and external control measures were put in place to control corruption within the ICAC and CPIB. These control measures ensured that these agencies, which were granted excessive powers, could be kept in check. If such powers were left unchecked and unchallenged, it could have opened up lucrative opportunities for the abuse of power, which would in turn have undermined their own credibility and reduced their success rate. Therefore, it would have been better if both these anti-corruption agencies reported directly to the respective parliaments. This would have made them less subject to political influence and more independent.

Reforms in Hong Kong and Singapore were not the only sustainable reforms; some of the biggest success stories are from the UK and the USA.

United States of America and United Kingdom reforms
The USA and UK can serve as two of the best examples of sustainable and long-lasting reform. These reforms took place over a period of about 40 years. Reform started as early as the late 18th and beginning of the 19th century (Rose-Ackerman, 1999, pp. 204-206) in these two countries. Over time

reform has become institutionalised in their governance processes and became part of the culture of governance.

The present author's taxonomy (based on systems thinking) that follows indicates why reforms in the USA and UK demonstrate elements of being systemic.

There was a balance of political forces because two strong parties could facilitate reform. The UK's parliamentary system with its strong party discipline limited the scope for individual favouritism. The increased size of the electorate and doing away with small constituencies reduced the opportunities and gains from patronage (Rose-Ackerman, 1999, p. 204). However, in the USA party discipline prior and during the beginning of the reform, in the 19th century came late compared to the UK. In the USA an additional reason for reform was the federal structure of government. Federal politicians supported reform because political appointments were increasingly controlled by politicians of state governments and local party bosses, whose interests were not the same as those of federal politicians. Federal politicians tend to act more in the interest of the majority compared to state politicians. Table 2 illustrates common denominators in these two countries.

Table 2: Common Denominators of USA and UK Reforms

Denominators	Characteristics
Political	Balance of political forces
	Increased electorate
	Better educated and critical voters
	Politicians could lose voters' support if no reforms instituted
	Critical mass of voters anticipated benefits of reform
	Voters dissatisfied with increasingly inefficient public service
Fiscal	Constraints put pressure on politicians to reform
Public service	Small number of public servants as opposed to private sector employees
	The number of public servants was not significant enough to resist reform
Business	Leaders threatened to withdraw party political funding if politicians do not execute reforms
	Privatisation increased inefficiency and corruption
Leadership	Moral and committed leadership
Culture	Strong and accepted cultural guidelines
	Reinforced core values

	Accepted and moral behaviour
	Strong and clear policy guidance
	Implementing of transparent processes

Source: Own compilation, based on references as indicated in text

Fiscal constraints during reform in the two countries put more pressure on politicians to reform. The costs of allocating jobs and contracts through political appointments and payoffs (bribery) outweighed the benefits for political leaders. Voters became dissatisfied with an increasingly inefficient public service as a result of patronage. With the growing total number of public servants employed by the federal government in the USA, there was a loss of organisational control because the bureaucracy was just too large. That led to reform pressures (Johnson & Libecap, 1994, pp. 91-119). However, although the number of public servants was increasing, the number of public sector employees in relation to private sector employees was small. The number of public servants was not a significant pressure group to resist reform (Rose-Ackerman, 1999, pp. 216-217). In addition, politicians privatised public services. Because there was limited competition among privatised services, inefficiency in the private sector increased. The public complained about these deteriorating privatised services. Politicians could lose voters' support if they did not reform. No political party benefited more than others from the opportunity to make political appointments, also known as patronage: "the power of appointing people to governmental or political positions" and "the positions so distributed" (Webster's II New College Dictionary, as cited by the World Bank Group, 2004). Reforms could be carried out because a critical mass of voters began to see that reform was beneficial. All politicians shared in the benefits of reform in the form of voters' support.

The quality of government services became a serious concern in voters' minds as transparency and understanding of the impact of corruption increased. All politicians began doubting the political benefits of patronage. Business leaders threatened that they would not provide funding for political campaigns if politicians did not reform. Politicians responsible for taking the lead in introducing reforms in the USA and UK mobilised powerful business support for a more efficient public service. Business support is imperative for funding political parties in the USA.

The strong presence of business and entrepreneurship in the USA tolerated corruption until such time that graft levels increased from 10 to 30 percent of the value of contracts and benefits (Calvert, 1972, pp. 44-45). Graft occurs when a public official uses advance and confidential information to produce profits for individual gain. Such official, through the use of inside information, 'steals' from

the public by forcing excess payment for an item of value over and above what is legitimate. For example, tender specifications may be written so that a specific company could be the only one to qualify, with prices artificially increased for the enrichment of the official and his/her family (Gildenhuys, 1991, p. 46). As Rose-Ackerman (1999, p. 218) said, "If a vigorous private sector feels constrained by an ineffective public sector, conditions may be ripe for reform". *The Namibian* (14 July 2016) reported that the Tender Board lost a court case in which the High Court ruled during March 2016 that a tender allocated to Namibia Rail Construction has to be revisited (Mongudhi, 2016: 1-2). The latter company did not meet the tender specifications on several requirements in terms of quality, cost, incomplete tender documents and late submission of test results. However, the decision of the court has not been implemented yet. Allegedly, senior officials of the Ministry of Works are changing the tender specifications in an attempt to award the tender to Namibia Rail Construction. Other tender allocations have been overruled by the High Court in the past. However, this case in which tender specifications are allegedly being changed after a court ruling is alarming and can contribute towards further distrust in the tender allocation process in general.

In the USA moral leadership of President Arthur in the 1880s started to change the executive administrative system that was used for appointments and promotions from a spoils system (based on patronage) towards a merit-based administrative system where appointments were made on the basis of qualifications, experience and performance (Maranto & Schultz, 1991, pp. 30-36, 50-55; Anechiarico & Jacobs, 1996, pp. 19-21). Since the 1880's examples of whistle-blowing and legislation preventing corruption that were created, include the following: False Claims Act, Whistleblower Protection Act, Foreign Corrupt Practices Act, Public Company Accounting Reform and Investor Protection Act (in the Senate) and Corporate and Auditing Accountability and Responsibility Act (in the House of Representatives), commonly called 'Sarbanes-Oxley', enacted during 2002, the Sunshine Act, 1976 (Act 1241 of 1976) and Freedom of Information Act.

In the USA moral leadership was supported by strong and accepted cultural guidelines built around and reinforced by core values, accepted behaviour, and strong, clear policy guidelines, such as disclosure of business interests by politicians. Increasingly transparent processes linked with increased information that was more critically evaluated by more educated voters played a significant role in the transformation process.

In all four countries committed leaders enforced appropriate and strong legislation. The discussion that follows integrates trends in detecting corruption, punishing offenders and rewarding whistle-blowers.

Trends in detection, punishment and rewards

Society is a 'system', a 'whole' that cannot be subdivided. Systemic reform merges dimensions of the 'softer' or socio-economic and 'harder' legal-institutional framework of such a society. Systemic reform in the USA was supported by effective anti-corruption legislation. Examples include the following: False Claims Act, Whistleblower Protection Act, Foreign Corrupt Practices Act, Public Company Accounting Reform and Investor Protection Act (in the Senate) and Corporate and Auditing Accountability and Responsibility Act (in the House of Representatives), commonly called 'Sarbanes-Oxley', enacted during 2002, the Sunshine Act, 1976 (Act 1241 of 1976) and Freedom of Information Act.

In the USA legislation focuses on the possibility of catching the corrupters and corruptees (detection) and on punishment and the penalties introduced. Penalties include both those of the legal system and loss of reputation (Becker, as cited by Rose-Ackerman, 1999, p. 52). The possibility of detection should increase at the same rate as penalties increase. If only penalties increase and the possibility of detection remains the same, this can lower the incidence of corruption but the size of the bribes and the amounts of the payoffs can increase. A fixed penalty can have the same effect, because once a payoff passes the threshold of the fixed penalty, the amount of the payoff and the size of the bribe can increase (Rose-Ackerman, 1999, p. 54). To make corruption unattractive, every Namibian dollar/Rand increase in benefits from corruption should be matched with more than a Namibian dollar/Rand increase in costs. The maximum penalty in Namibia for money laundering should be removed, because the maximum penalty of N$500,000 and/or 5 years in jail (the Anti-Corruption Act 18 of 2003) reduces the number of small payoffs, but raises the larger payoffs.

The maximum penalty should be replaced with a sliding scale penalty that is directly linked with the cost (and should always be more than the cost) to deter corruption. Penalties that are enforced on bribers should be greater than the total value of their gains or benefits from corruption, after deducting their costs, for example, the amount of the bribe and the risks associated with being caught (Rose-Ackerman, 1999, p. 55). Corrupters act on the likelihood (i.e. the probability) of being caught. Such probability is linked to the effectiveness and efficiency of being caught and punished.

The focus in the argument about the increased possibility of detection is on law enforcement, rewards and incentives. Law enforcement needs to be increased only temporarily until a 'change of

phase' or long-term change is achieved (Lui, 1986, pp. 21-22). Once the public know that the chances are very good that they will be caught, resources for enforcement can be reduced (Cadot, 1987, pp. 223-244). The possibility of detection is not only a question of law enforcement, but also of creating protection and incentives to report corruption. People who take the risk of reporting corruption must be protected and rewarded. If not, they will not risk the possibility of isolation, losing their jobs, losing their friends and facing intimidation, harassment and even murder. In the USA the Whistleblower Protection Act of 1989 protects government employees from retaliation from their employer. The False Claims Act of 1863 provides protection and incentives for all people inside and outside a company reporting corruption. Under the False Claims Act, if a person (whistle-blower) brings a lawsuit to court and bears the legal costs, the reward can be 25 to 30 percent of the loss recovered that harmed the Federal Government. If the Justice Department is bearing the legal costs of the whistle-blower, the maximum is 15 percent (Rose-Ackerman, 1999, pp. 52-59). Any sustainable reform needs to increase penalties for corruption together with raising the probability of detection, as well as increasing incentives for reporting. Because corruption is not only a moral challenge, but also an economic problem of demand and supply of employment opportunities and services, people tempted to report corruption should be encouraged to do so by rewarding them financially for facing the risks of being fired, jeopardising their careers, and being victimised and threatened.

Four cases with probably the most successful long-term reforms to manage corruption, as well as some trends in detecting, punishing and rewarding the reporting of corruption, have been discussed. It is time to reflect on what has been achieved and what pitfalls countries can consider to manage corruption sustainably.

Conclusion

Based on the best practices of the cases as interpreted in terms of the author's understanding of the systems model, these reforms do have certain systemic characteristics in common. Reforms took place over a prolonged period of about 40 years, illustrating that it took at least a generation to change attitudes and to institutionalise a new culture of governance. Political commitment, and moral and transformational leaders, enabled a top-down institutionalising of strong and accepted cultural guidelines. The public has been educated about the negative impact of corruption and the benefits of reform. Increased public awareness changed perceptions and the culture of corruption. Private sector support ensured that corruption in the public sector could be detected and punished. The risk of detection increased with the risk of punishment. In this process the benefits of corruption became less than the risks attached to corruption. Broad-based public sector reform prevented ma-

jor sections that were underperforming from resenting pockets of excellence and in effect resisting reform. Information sharing and transparent processes became part of the culture of governance.

The discussion on detecting, punishing and rewarding the reporting of corruption illustrated that the probability of detection should increase at the same rate as the punishment of corruption. The risks of detection and punishment should always be greater than the benefits received from corruption. A fixed penalty is ineffective, because if the benefits of corruption are greater than the risks attached to such a penalty, corruption becomes worthwhile pursuing. Rewarding the reporting of corruption makes it less risky for those brave enough to blow the whistle and more risky for those tempted to engage in corruption. Because corruption is not only a moral problem, strong anti-corruption legislation should be enforced, offenders should be punished and whistle-blowers should be encouraged financially to report corruption. Both incentives (carrots) and punishments (sticks) are needed to manage corruption.

The focus of the paper was to compare some best practice reforms, to investigate any common denominators of such reforms and to highlight trends in detecting, punishing and reporting corruption. Despite sustainable reforms in Hong Kong and Singapore, on the one hand, and in the USA and UK, on the other hand, the common denominators derived from these reforms are not blueprints to guarantee successful reforms elsewhere. These common denominators are based on numerous variables embedded in unique environments that are country and context specific. However, these common denominators can serve as starting points to investigate the contexts of institutions before designing appropriate strategies to change such environments and reform corrupt institutions in countries such as Namibia.

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