

Building Integrity in Operations: A Toolkit for NATO



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"Good governance and integrity are at the core of the Alliance. Allies recognise that corruption and poor governance complicate the security challenges that NATO Allies and partners face.

They undermine democracy, rule of law and economic development, but also operational effectiveness, and erode public trust in defence institutions."

The Secretary General's Annual Report 2020

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Foreword/Acknowledgments

Our project team would like to acknowledge and thank the many colleagues, experts and stakeholders who generously shared their time, insights and expertise, as well as all those who provided support and encouragement along this challenging journey.

Special thanks go to our sponsors at the Supreme Headquarters Allied Powers Europe (SHAPE), Valentin Poponete (J5) and Tom Gooch (J9) for their responsiveness, advice and comments on several drafts of the report.

We would like to thank the excellent Hult Ashridge Executive Education team and our colleagues from NATO Headquarters' Executive Management Division, particularly Giedrimas Jeglinskas, Céline Shakouri-Dias, and Špela Kranjc.

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Stakeholders from other organisations (international, governmental and non-governmental) also contributed information that was vital to the core purpose of this project report.

These include: the European Union Rule of Law Mission in Kosovo (EULEX), the Organization for Security and Co-operation in Europe (OSCE), the Special Inspector General for Afghanistan Reconstruction (SIGAR), Transparency International, Carnegie Endowment for International Peace, the Geneva Centre for Security Sector Governance (DCAF), Forsvaret (the Norwegian Armed Forces) and the Centre for Integrity in the Defence Sector (CIDS).

Last but not least, huge thanks are due to our families, without whose patience and support we could not have seen this project through, especially against the backdrop of COVID-19, which unfortunately affected most of our project team members directly.

As a team, we are proud of our perseverance in the face of adversity, which is yet another valuable lesson we will take away from our uniquely virtual NEDP experience.

The NEDP Building Integrity Team

(Constance Benen, Adelina Campos de Carvalho, Roxana Cimpeanu, Kamila Lenarczyk, Ștefan Olaru, Alexander Vinnikov)

Executive Summary

Integrity, transparency and accountability in the defence and related security sector are fundamental to the stability of the Euro-Atlantic area and beyond, and are essential for international security cooperation. At the 2016 Warsaw Summit, NATO Allies endorsed the Building Integrity policy, and acknowledged that corruption is a security risk that can undermine the effectiveness of operations and missions. The impact of corruption on military operations is multi-faceted. It can affect the public perception of the mission; erode the legitimacy, capacity and authority of the Host Nation's institutions; or impact security forces' ability to operate effectively, ultimately undermining the intended end-state.

NATO has identified a requirement for a practical Building Integrity toolkit, applicable to its Operations Planning Process, and in support of the Military Concept for Building Integrity in Operations developed by the NATO Military Authorities and approved in February 2021. This toolkit is aimed at informing Allied Command Operations (ACO)'s efforts to design a coherent approach that includes Building Integrity planning at the strategic and operational levels. This would avoid Building Integrity activities, at a tactical level, being conducted on an ad-hoc basis and subject to changes linked to the rotation of personnel involved in carrying out these efforts.

This report aims to support the implementation of Building Integrity in operations and, as such, features a number of tools, adaptable to the four key focus areas of the Building Integrity in Operations Framework, namely Understand, Plan, Execute and Assess. These tools are based on the project team's research of operations/missions, case studies, best practices and lessons shared by other international actors involved in Building Integrity and anti-corruption efforts worldwide, as well as direct engagement with various NATO stakeholders, including the Building Integrity team at NATO Headquarters.

The team identified more than 100 tools from its research but chose to include only those tools that were deemed to present

the most potential to support the implementation of Building Integrity in Operations. Tools of note include the Knowledge Development Corruption Checklist, the Preparation of a Comprehensive Awareness Plan, Strengthening Parliamentary Development and Independent Assessment of Building Integrity efforts.

The report draws attention to a number of key findings, two of which are highlighted below. They are related to the "building integrity" terminology and the shortage of NATO Building Integrity experts/advisors supporting the planning and conduct of NATO-led operations and missions.

The term "Building Integrity", on its own, can be seen as too broad and mostly associated with NATO's efforts to support its partners at a political level, to make defence and related security sector institutions more effective. To this end, the newly-developed "Building Integrity in Operations" (BI in Operations or BIIO) designation is meant to address military staff and focus on the operational dimension. The purpose of BI in Operations is to ensure that military lines of effort account for, and mitigate, the risks posed by corruption throughout all stages of NATO-led operations and missions.

Regarding Building Integrity subject matter experts (SMEs), there appears to be a shortage of such personnel across the NATO enterprise, as evidenced in NATO Mission Iraq. The mission draws on only two fully-dedicated Building Integrity positions. This is against the backdrop of corruption being identified by the Iraqi government as its second most pressing security threat after terrorism. Similarly, the Afghanistan experience showed that access to Building Integrity experts was critical to the effectiveness of anti-corruption efforts. Therefore, in order to ensure operation/mission success, NATO may wish to consider making a more substantial investment in Building Integrity expertise and developing new and innovative approaches to addressing corruption within the Host Nation's security forces and institutions.

Résumé du Rapport

L'intégrité, la transparence et la redevabilité dans le secteur de la défense et de la sécurité sont fondamentales pour la stabilité de la région euroatlantique et essentielles pour la coopération internationale dans le domaine de la sécurité. Lors du Sommet de l'OTAN à Varsovie en 2016, les Alliés ont approuvé la politique pour le développement de l'intégrité et reconnu que la corruption constitue un risque de sécurité, qui peut nuire à l'efficacité des opérations et des missions. Les retombées de la corruption sur les opérations militaires sont multiples. Cette pratique peut affecter la perception du public à l'égard de la mission; entamer la légitimité, la capacité et l'autorité des institutions étatiques du pays hôte; ou avoir un effet négatif sur l'efficacité opérationnelle des forces de sécurité, compromettant à terme les objectifs fixés.

L'OTAN a souligné le besoin d'établir une boîte à outils pour le développement de l'intégrité, applicable au processus de planification des opérations (OPP), et appuyant le concept militaire de développement de l'intégrité dans le cadre des opérations, qui a été élaboré par les autorités militaires de l'OTAN et approuvé en février 2021. Cette boîte à outils vise à informer le Commandement allié Opérations (ACO) lors de la conception d'une approche cohérente du développement de l'intégrité pour la planification aux niveaux stratégique et opératif.

Cette approche éviterait que les activités de développement de l'intégrité au niveau tactique soient menées de façon ponctuelle et sujettes aux changements liés à la rotation du personnel impliqué dans la réalisation de ces efforts.

Ce rapport vise à soutenir la mise en œuvre du développement de l'intégrité dans le cadre des opérations et, à ce titre, il présente un certain nombre d'outils, qui peuvent être adaptés aux quatre domaines clés du développement de l'intégrité dans le cadre des opérations, à savoir: Comprendre, Planifier, Exécuter et Évaluer. Ces outils se fondent sur les recherches effectuées par l'équipe de projet sur les opérations/missions, les études de cas, les meilleures pratiques et les leçons partagées par d'autres acteurs internationaux impliqués dans la lutte contre la corruption dans le monde et le développement de l'intégrité, ainsi que sur son interaction avec diverses parties prenantes de l'OTAN y compris l'équipe de développement de l'intégrité du siège de l'OTAN.

L'équipe a recensé plus de 100 outils par ses travaux de recherches, mais a choisi de n'inclure que les outils jugés comme présentant le potentiel le plus important pour soutenir

la mise en œuvre du développement de l'intégrité dans le cadre des opérations. Ces outils incluent notamment une liste de contrôle pour le développement des connaissances sur la corruption, la préparation d'un plan de sensibilisation exhaustif, le renforcement du développement parlementaire et l'évaluation indépendante des efforts de développement de l'intégrité.

Le rapport attire l'attention sur un certain nombre de constats importants, dont deux sont présentés ci-dessous. Ces constats sont liés à la terminologie du « développement de l'intégrité » et à la pénurie de spécialistes en matière de développement de l'intégrité à l'OTAN qui soutiennent la planification et la réalisation des opérations et des missions menées sous le commandement de l'OTAN.

Le terme « développement de l'intégrité », seul, peut être considéré comme trop imprécis et reste largement associé aux efforts que l'OTAN fournit pour soutenir ses partenaires au niveau politique, afin de rendre les institutions du secteur de la défense et de la sécurité plus efficaces. À cet effet, le nouveau titre de « développement de l'intégrité dans le cadre des opérations » (BI in Operations ou BIIO) devrait permettre de répondre aux attentes du personnel militaire et de mettre l'accent sur le niveau opératif. Le but du développement de l'intégrité dans le cadre des opérations est de garantir que l'effort militaire prenne en compte et atténue les risques posés par la corruption à toutes les étapes des opérations et missions de l'OTAN.

En ce qui concerne les spécialistes du développement de l'intégrité, il semble y avoir une pénurie de conseillers en la matière à l'OTAN, comme en témoigne la Mission OTAN en Irak. La mission repose sur seulement deux postes entièrement dédiés au développement de l'intégrité, alors que la corruption a été identifiée par le gouvernement irakien comme la deuxième plus grande menace pour la sécurité du pays après le terrorisme. De même, l'expérience (de l'OTAN et des Alliés) en Afghanistan a montré que l'accès à des spécialistes du développement de l'intégrité était essentiel à l'efficacité de la lutte contre la corruption. Par conséquent, afin de garantir le succès de ses opérations/missions, l'OTAN pourrait songer à envisager d'investir de façon plus importante dans l'expertise sur le développement de l'intégrité, et de développer des approches nouvelles et innovantes pour lutter contre la corruption au sein des forces de sécurité et des institutions étatiques du pays hôte.

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“NATO leads by example in upholding the principles of democracy and human rights; doing so increases our operational effectiveness. We remain committed to good governance of the defence sector and promoting transparent and accountable defence institutions under democratic control, including through our Building Integrity Policy.”

2018 Brussels Summit Declaration
by NATO Heads of State and Government

Photo: NATO Flickr



1. Introduction

1.1. The Assignment

This introductory chapter provides the reader with background information on the project, defining its scope and detailing the methodology adopted by the project team to deliver this Report as part of the 12th edition of the NATO Executive Development Programme (NEDP).

1.1.1 Background

The focus of the NEDP is to support the growth of selected NATO civilian personnel into future executives who can skilfully adapt to a challenging environment, drawing from their broad awareness of NATO and specifically, topics influencing the strategic direction of the Alliance. The programme takes place over nine months and consists of five week-long modules developed by NATO and its academic partner for the NEDP, Hult Ashridge Executive Education, under the sponsorship of the Assistant Secretary General (ASG) for Executive Management.

As part of the programme, NEDP participants are given the opportunity to participate in group projects on topics identified by NATO bodies for their relevance to the future direction of the Alliance. Students may only choose and participate in one project during the NEDP and express their preference at the start of the programme. Participants are encouraged to select projects on unfamiliar topics or in a field unrelated to their own to challenge themselves and accelerate their learning curve. The intention of this project work is to expand the participants' knowledge of NATO and raise awareness about topical issues faced by various NATO bodies. It provides participants with opportunities for problem-solving and decision-making, as well as collaboration with colleagues from different NATO entities. This work is accomplished over seven months, between October and May, and its output is a formal project report complemented by a presentation delivered by the project team at the end of Module 5.

1.1.2 Scope

This Report is the culmination of the project work accomplished by a team of six NEDP 12¹ students from five different NATO entities, located in six different countries. The

project's title, as agreed with the Sponsors from Supreme Headquarters Allied Powers Europe (SHAPE) J9 and J5, is:

BUILDING INTEGRITY IN OPERATIONS: A TOOLKIT FOR NATO

In essence, the team was requested to research best practices and lessons learned from NATO, Nations, other international organisations and Non-Governmental Organisations (NGOs) to identify strategic and operational-level tools that may be used for the understanding, planning, conduct and assessment of Building Integrity (BI) activities in NATO operations and missions. The project team was asked to recommend practical tools, which could be used across NATO, in support of the Operations Planning Process (OPP).²

Identifying "BI Tools" employed by various international and governmental organisations proved to be more complex than initially anticipated. Although the project team identified several references describing "tools," there is still confusion over the use of terms such as "tools," "toolkit," and "toolbox". Instead, other terms such as "approach," "methods," and "instruments" are used to reflect BI aspects that the project team considered in formulating potential "tools" supporting the implementation of BI in Operations.

1.2. Methodology

The team used a multi-faceted methodology for this project, following a four-step approach: Problem Understanding, Data Collection, Analysis and Quality Assurance.

Weekly internal coordination meetings were held to align and provide progress updates. Additionally, the project team coordinated their work with the project's Sponsors from SHAPE, validating next steps at every stage. NEDP coordinators and lecturers also provided specific guidance and suggestions, particularly during the Project Clinic session and in project meetings during NEDP modules.

1 NEDP 12 is the 12th edition of the NATO Executive Development Programme, which took place during the 2020-2021 academic year.

2 (Comprehensive Operations Planning Directive (COPD), 2021)

1.2.1 Problem Understanding

Initially, the project team conducted several internal meetings to brainstorm and discuss the expected output for this project. The team also met with the Sponsors to clarify the scope of the work, deliverables, as well as the level of ambition in light of the limitations associated with the online format of the programme, due to the COVID-19 pandemic.

Furthermore, the team conducted a review of key documents related to Building Integrity, which were highlighted by the Sponsors as essential background material for the project. These documents – the Military Concept for Building Integrity in Operations³ and the NATO Building Integrity in Operations Allied Command Operations (ACO) Handbook⁴ – formed the foundation for the team's knowledge about BI and were a solid starting point for the next steps in the project work.

The Military Concept for BI in Operations presents a four-part structured framework supporting the integration of BI considerations along the NATO Operations Planning Process. During the research, the project team did not identify any similar frameworks employed in other organisations considered within the scope of the project. Therefore, the project team used its own judgement and interpretation when matching the identified BI tools to the BI in Operations Framework, based on their relevance to activities related to each of the Framework's key focus areas (Understand, Plan, Execute, and Assess).

1.2.2 Data Collection

This step of the project required a significant effort from the team as it became quickly evident that there was a wealth of information on BI, and that repositories with data sources on this topic were spread across various stakeholders within and outside NATO. The project Sponsors' expertise in this field proved invaluable, as they were able to direct the team to various specialised documents, points of contacts (POCs) and subject matter experts (SMEs) from different entities tackling BI efforts.

Apart from this research and the review of existing documents, case studies, handbooks and reports, the team prepared and distributed a survey to designated POCs and SMEs. The aim of the survey was to identify BI tools used in operations by NATO and other entities, their level of success, and suitability for NATO operations and the NATO OPP. Some responses triggered an exchange of correspondence between team members and stakeholders, extracts of which are included in this report. A matrix overview of the survey and the project team's communication with stakeholders is presented to the Sponsors with this Report.

Furthermore, the team interviewed the BI team at NATO Headquarters (HQ) during a live video call, which was followed by a discussion on the topic. During the semi-structured interview, the NATO HQ BI team expanded on their work in the context of NATO operations and missions. The topic of BI tools used in NATO operations was specifically addressed during this exchange, as were assessment mechanisms for validating their efficiency.

As the project was centred on the NATO OPP and the Military Concept for Building Integrity in Operations, the team divided the research into four work strands, for the four key focus areas of the BI in Operations Framework. The information collected was reviewed from four different angles, which helped the team categorize and evaluate BI tools while providing the final structure of the Report.

Data sources used for research are depicted in the figure below.



Figure 1: Building Integrity Source Collection

1.2.3 Analysis

As mentioned above, the team first reviewed and analysed the Military Concept for Building Integrity in Operations, which helped extract the activities to be implemented under each key focus area of the BI in Operations Framework: Understand, Plan, Execute, Assess. A description of the BI in Operations Framework is provided later in this Report.

Secondly, the team conducted a qualitative analysis of the data

³ (Military Concept for Building Integrity in Operations, 2021)

⁴ (NATO Building Integrity in Operations ACO Handbook, 2020)

it collected, to extract tools relevant for BI in Operations. Close communication and alignment within the team was necessary due to the vast number of tools identified. In March 2021, after rehearsing its project presentation in the front of the cohort, NEDP providers and the programme's Executive Sponsor, the team agreed to stop researching new sources of information, to focus instead on analysing the sources identified thus far. It should be noted that further research on BI efforts outside of NATO would have been possible and could have yielded results, identifying more tools, had the team not been bound by time and the agreed level of ambition for the project.

The team identified more than 100 tools from its research but chose to include only those tools that were deemed to present the most potential to support the implementation of BI in Operations. Having stopped its research, the project team grouped and mapped the tools in accordance with the most relevant activities related to the Framework. The project team further analysed this categorisation and further grouped the tools based on their affinity to each key focus area.

Finally, the project team drew on their specific areas of expertise, identifying tools used in other fields, which could be relevant and applicable to BI in Operations. These tools were consolidated and included in this Report; they are listed in the respective key focus area of the BI in Operations Framework.

1.2.4 Quality Assurance

While working on this project, the team continuously discussed and reviewed the course of action taken to tackle the topic. The results of the research and various versions of the Report were shared with the Sponsors for their awareness and feedback. Comments were discussed within the team and incorporated in the Report or further clarified with the Sponsors.

This Report is therefore the result of the research done by this NEDP 12 project team and their collaboration with SHAPE J9 and J5 Sponsors.



“Corruption in these institutions kills. It kills when weapons are illegally sold to terrorists and criminal groups. It kills when a blind eye is turned to human trafficking. And it kills when military personnel are given equipment that is unsafe.”

Assistant Secretary General for Operations, John Manza, 2020

Photo: Joint Force Command Naples

2. Building Integrity (BI) in NATO Operations

2.1. Building Integrity in Operations Timeline

Building Integrity (BI) works to support NATO as an organisation, Allies and partner countries, to promote good governance and implement the principles of integrity, transparency and accountability in the defence and related security sector. According to NATO Headquarters BI experts, the evolution of BI within NATO has been significant over the last 13 years and has encompassed four specific phases of development, as illustrated in the figure below. Future plans are also evolving.

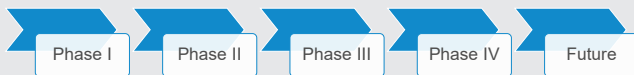


Figure 2: Building Integrity Timeline in NATO

2.1.1 First Phase (2007 – 2010)

The first phase started in November 2007 when Building Integrity was established by the Euro-Atlantic Partnership Council, with the aim to develop institutional capabilities in key areas identified in the Partnership Action Plan on Defence Institution Building,⁵ which was agreed at the 2004 Istanbul Summit. The 2009 Strasbourg-Kehl and 2010 Lisbon Summits supported further development of BI initiatives. As part of the first phase, several key BI tools were developed in support of the BI Trust Fund, namely:

- The BI Self-Assessment Questionnaire (SAQ) and Peer Review Process;
- The establishment of a pool of BI Subject Matter Experts (SMEs); and
- The publication of the first Compendium of BI Best Practices.

2.1.2 Second Phase (2011 – 2014)

The second phase consisted of several efforts, which led to important achievements including:

- BI initiatives opened to Allies and partners;

- The development of tailored programmes for Afghanistan and South Eastern Europe;
- The establishment of BI as a NATO Education and Training Discipline, following a North Atlantic Council (NAC) decision in August 2012.

Additionally, in 2014, the NATO Wales Summit reaffirmed BI as an integral part of NATO's Defence and Related Security Capacity Building Initiative.

2.1.3 Third Phase (2015 – 2018)

During the third phase, the first NATO BI Policy was endorsed by Heads of State and Government at NATO's Warsaw Summit in July 2016. Partners of the Euro-Atlantic Partnership Council (Afghanistan, Australia and Colombia) contributed to the NATO BI Policy and became associated with it. A first BI Action Plan was developed to implement the BI Policy within NATO, Allies and partner countries, and to enhance cooperation with international partners. Reports on this implementation were noted at the 2018 NATO Brussels Summit and the June 2020 Foreign Ministerial. A BI Reference Curriculum and Online Awareness Course were developed, while tailored support was expanded to cover 19 nations.⁶

2.1.4 Fourth / Current Phase (2019 – 2022)

During the current phase, efforts have been focused on mainstreaming and embedding BI into the three core NATO tasks: Collective Defence, Crisis Management and Cooperative Security.

NATO has formed BI-related partnerships with international organisations (e.g. the NATO- European Union (EU) agreement to enhance cooperation in promoting good governance, the first EU contribution to the BI Trust Fund) and the private sector. This has enabled BI cooperation between NATO and the EU, the United Nations, the World Bank, the Organization for Security and Co-operation in Europe (OSCE), and the African Union as well as the private sector, academia and representatives from the civil society. For example, the BI Trust Fund for this phase is led by Norway, Switzerland, the United Kingdom and the EU.

⁵ More details on Defence Institution Building are available online (Defence Institution Building)

⁶ Afghanistan, Armenia, Bosnia and Herzegovina, Bulgaria, Colombia, Croatia, Georgia, Hungary, Kyrgyzstan, Latvia, the Republic of Moldova, Montenegro, Norway, Poland, Serbia, the former Yugoslav Republic of Macedonia, Tunisia, Ukraine and United Kingdom (BI Building Integrity Factsheet, 2016)

In 2012, the NATO Headquarters Building Integrity team launched the Arabic translation of Building Integrity and Reducing Corruption in Defence, a Compendium of Best Practices.

Photo: NATO

The Allied Command Operations (ACO) Handbook on BI in Operations was published in 2020 and a Military Concept for BI in Operations (detailed in the next section of this chapter) was developed by the NATO Military Authorities and approved by the NAC in February 2021. Additionally, a new BI Action Plan for the next four-year period was approved in February 2021.

2.1.5 Future Efforts (2023 +)

Future BI efforts are foreseen, with several significant initiatives already being shaped. These include:

- A BI in Operations ACO Directive;
- A BI in Operations training course;
- A second volume of the Compendium of BI Best Practices.

Therefore, a significant level of effort is to be invested in the implementation of BI in Operations, meant to be operationalised within the BI in Operations Framework.

2.2. Building Integrity in Operations Framework

The Building Integrity in Operations Framework is described in the Military Concept for Building Integrity in Operations as aiming to “enable NATO to mitigate the risk of corruption and its influence in and to military operations.”⁷ From an operational perspective, corruption is linked to four main risks, meaning it can:

- Undermine the desired end-state;
- Promote instability;
- Waste resources and effort;
- Damage mission credibility.

This concept is founded on three key principles, namely: integrity (both at individual and organisational level), transparency, and accountability (for NATO itself and partners) and must be integrated in all stages of NATO operations and reflected in all relevant planning and training documents/publications.

The Alliance will focus the implementation of BI in NATO operations, missions and activities, across all key focus areas of the NATO Operations Planning Process within the Understand, Plan, Execute, and Assess framework as presented in Figure 3 and described below.

7 (Military Concept for Building Integrity in Operations, 2021, p. A.2)

To enable this implementation, NATO should consider associated elements across all lines of capability development.⁸

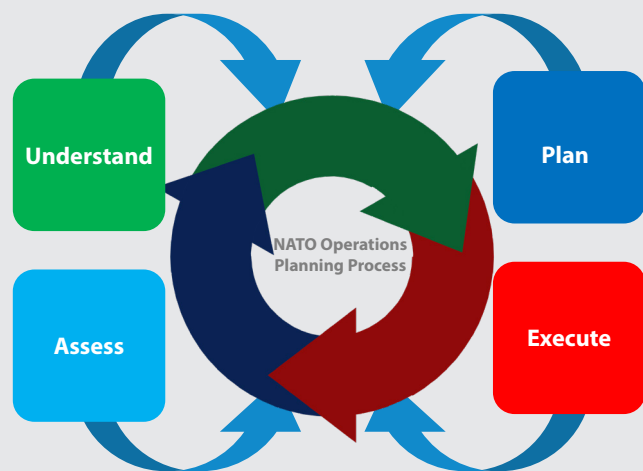


Figure 3: The four key focus areas of the Building Integrity in Operations Framework

2.2.1 Understand

Overall situational awareness, and a thorough understanding of the nature, sources, forms, drivers and risks of corruption and its effects are critical for the implementation of BI in Operations across all its key focus areas. In order to support a comprehensive understanding process, NATO could consider establishing a range of indicators to enable data collection and analysis of the operating environment, including local corrupt networks, their operating procedures and vulnerabilities, as well as security implications of corrupt and illicit networks.

2.2.2 Plan

BI efforts could be planned from the initial strategic level and included in high-level documents such as SACEUR's Strategic Assessment, Military Response Options, Concept of Operations and Operations Plans at the strategic level, to ensure approval and commitment from the North Atlantic Council (NAC).

The implementation of BI in Operations requires detailed planning for the establishment of three pre-conditions for success: achievement of relative security in theatre; commitment of local leadership to combatting corruption; and public support for the fight against corruption.

The implementation of BI efforts in Operations requires a joint civil-military effort for planning and execution. This effort may wish to consider the following activities.

Own forces, including personnel and resources may focus on oversight mechanisms; contracting guidance and vetting procedures.

External forces/actors may focus on the rule of law; management of human resources and systems improvement; and transparency and accountability.

2.2.3 Execute

When duly authorised, commanders in the field may wish to engage with host government institutions as well as with the international community to coordinate the implementation of BI objectives, avoid competing agendas and duplication of effort. Given the rotational nature of forces in theatre, the maintenance of institutional knowledge and reach-back to specialised expertise (especially outside the military) could be prioritised. Awareness of corruption areas (e.g. contracting, financial assistance, contacting) supports an effective implementation of BI in Operations. Military commanders should be required to monitor and report incidents of corruption, even those outside the immediate scope of the mission.

2.2.4 Assess

The implementation of BI activities in operation could be assessed by defining corruption baselines as the benchmark against which progress is measured. Evidence-based assessment of BI efforts could focus on outcomes and changes in behaviour of corrupt individuals and networks based on qualitative and quantitative data gathered from a wide variety of sources.

Several specific, measurable, attainable, relevant and time-bound (SMART) indicators are needed to assess the implementation of BI in Operations in order to:

- Reflect de facto changes and behavioural changes;
- Prioritise sensitivity to context over standardisation;
- Measure specific types of corruption;
- Ensure that changes in corruption trends are attributable to specific BI efforts.

Based on the assessment, several conclusions and recommendations could be formulated and fed into other key focus areas of the BI in Operations Framework, namely Understand, Plan, Execute, thus supporting any necessary changes, timely decision-making and allocation of resources.

⁸ This includes the development of the required doctrine, organisation, training, materiel, leadership, personnel and facilities (also known as DOTMLPF) to accomplish a mission.

3. Proposed Building Integrity in Operations Toolkit

3.1. Understand



"When security institutions are undermined through corruption, they are unable to protect people, defeat terrorism and organised crime, or defend national sovereignty. Corruption in the military, police and border forces also causes people to lose faith in legitimate authority and opens up a vacuum that terrorists, drug traffickers and other organised criminals exploit."

Anti-Corruption Summit | London 2016 Communiqué

3.1.1 Introduction

Corruption and conflict go hand in hand,⁹ and it is likely that any future missions in fragile and failed states will need to contend, as it happened in the past, with corrupt practices that can undermine the mission's objectives and perpetuate insecurity. Military commanders need to understand the impact that corruption can have on the mission and assess the role that the mission itself can play in either mitigating or exacerbating corruption risks.¹⁰

A comprehensive understanding and analysis of the operating environment, its elements, actors and their relationships is a prerequisite to the NATO Operations Planning Process (OPP). *"Commanders and the staff must build and foster a comprehensive understanding of the operating environment and promote this understanding continuously throughout the entire operations planning process in conjunction with higher headquarters, component commands and other actors."*¹¹

It is for these reasons that Building Integrity (BI)-related aspects, including the potential impact of corruption on operations, should be considered from the outset of planning, to inform the commander's understanding of operational and reputational risks and enable them to implement robust mitigation measures.¹²

The OPP is adaptable enough to allow for BI elements to be addressed at various points along the process. For example, the *"Comprehensive Understanding of the Environment" is one of the operations planning principles in the Comprehensive Operations Planning Directive (COPD), which refers to the need to understand, from the very early stages of the NATO Crisis Response Process [...] the complexity of the operating environment and the linkages, strengths, interdependencies and vulnerabilities"*¹³ specific to each operation; so that planners can fully support the commander's decision-making cycle.¹⁴

3.1.2 Identified BI Tools

Tool #1 – Knowledge Development corruption checklist

Understanding BI elements in operations and missions can be built over time, using already existent analytical techniques and processes including horizon scanning (HS), Indications and

Warning (I&W) and the Intelligence Cycle. These contribute to the overall Knowledge Development process, which, in turn, supports the entire OPP.

Relevant staff may wish to consider integrating BI elements throughout the Knowledge Development process by using a corruption checklist as a tool tailored to some of its supporting components (i.e. HS, I&W, PESTL¹⁵ analysis and intelligence cycle), as described below. This is a suggestion based on the project team's identified BI practices and lessons shared by other international organisations involved in BI and anti-corruption efforts worldwide and its own knowledge and professional experience.

Horizon scanning

Horizon scanning (HS) and crisis monitoring in peacetime can help the Alliance stay on top of activities of interest and be proactive rather than reactive. Information can be collected and accessed at short notice in order to mitigate unexpected situations that will need a quick response.

Horizon scanning is a collaborative effort drawing on all NATO political and military capabilities at all levels to assess potential risks and threats to NATO's security interests.¹⁶ Specifically, a horizon scanning capability should enable crisis identification within a designated Area of Interest (AOI) by continuously monitoring the security environment.

Relevant staff may wish to consider:

- Employing HS to identify the presence and risks of corruption in areas where potential crisis might ensue;
- Employing HS to inform the preliminary understanding of the nature, sources, forms and drivers of corruption and its effects;
- Incorporating HS into scheduled analytical production – as opposed to ad-hoc production - to be able to identify and understand trends and whether corruption in a particular AOI is worsening;
- Integrating corruption analysis into day-to-day research, particularly within those teams across Allied Command Operations (ACO) that are already engaged in HS efforts. Corruption is a cross-cutting topic and should be analysed across all PMESII¹⁷ domains.

9 (Anti-Corruption Summit: London 2016 Communiqué, 2016, p. 8)

10 (Corruption and Military Operations: A Note for Commanders, 2019, p. 1)

11 (Allied Joint Doctrine for the Planning of Operations, 2019, pp. 2-4)

12 (Journal, 2018, p. 61)

13 (Comprehensive Operations Planning Directive (COPD), 2021, pp. 1-10)

14 (Good Governance through Counter-Corruption and Anti-Corruption, Lessons for NATO, 2019, p. 18)

15 Political Economic Social Technological And Legal (PESTL)

16 (Comprehensive Operations Planning Directive (COPD), 2021, pp. 2-4)

17 Political, Military, Economic, Social, Infrastructure, Information (PMESII)

Indications and warning analysis

Once areas of interest have been identified, indicator-based analysis may be conducted, in accordance with NATO indications and warning tradecraft, to provide strategic warning of emerging crisis that could have implications to NATO's security interests.

Indications and warnings may be identified and reported by NATO operations centres monitoring an AOI, as well as by Nations. They are assessed and shared across ACO to inform situational awareness and decision-making with regards to any developing risks, or threats to NATO's security interests.

Relevant staff may wish to consider:

- Integrating corruption indicators, identified in Annex C of the Building Integrity in Operations ACO Handbook, February 2020 with the already existent set of PMESII indicators pertaining to respective warning problems;
- Integrating corruption analysis, as much as possible, within existent warning problems and strategic and operational warning to ensure a comprehensive understanding of corruption drivers and effects in a particular AOI and to avoid duplication of efforts;
- Applying the indicator-based warning methodology and employing I&W analysis to help establish baselines of local corruption dynamics in a particular AOI. These, in turn, could provide a benchmark against which changes and progress can be measured.

PESTL grid of analysis

Another example of analysis that could be employed to understand corruption dynamics in a particular operating environment and/or Host Nation is the PESTL grid, which refers to the following domains:

- **Political** - Pressure from politicians (executive, legislative, political parties) to get advantages for themselves and/or others;
- **Economic** - Pressure from economic groups or lobbies to obtain advantages;
- **Social** - General values of society more or less permissive to corruption in official institutions;
- **Technological** - Systems and developments which can be favourable to the development of certain corruption;
- **Legal** - Legal 'gaps' and judicial attitude towards certain law violations.

This is an example recommended and showcased in the Toolkit on Police Integrity, published by DCAF, the Geneva Centre for Security Sector Governance.¹⁸

Intelligence cycle

BI-related topics could be integrated in the intelligence cycle. The key to operational success is gaining intelligence dominance of the operational environment. Intelligence provides insights concerning ways to defeat the adversary, helps the commander define the desired end-state and determines when that end-state has been achieved.

Intelligence planning, collection, processing, analysis and dissemination is generally focused on the enemy, in that it seeks to understand opposing forces (i.e. army, insurgents, terrorist groups, external supporters etc.). However, if the right questions are asked, the intelligence cycle could provide vital information of corrupt activities in an operating environment.

Transparency International UK - Defence and Security Programme - recommends including corruption-related considerations when conducting intelligence analysis.

This is regarded as one of the specific preparatory actions aimed at military and civilian leadership and their staff involved in planning and carrying out operations.¹⁹

In peacetime, BI-related elements including corruption, poor governance and the rule of law could be acknowledged as standalone topics and included in relevant ACO directives on intelligence analysis production and warning. This could increase awareness of the importance of BI elements, particularly when analysing post-conflict states.

Commanders may wish to direct production of corruption - related intelligence products and include corruption aspects in their Critical Information Requirements and any subsequent Collection Plans.

Equally, a corruption-related taxonomy could be created within intelligence repositories and operations planning functional systems. Relevant products should be tagged accordingly to ensure information is available and easily discoverable, thus enabling long-term research, analysis and identification of trends and patterns.

Both in peacetime and particularly prior to a potential operation, intelligence collection could focus on information required to understand the roots of the system of corruption and patronage.

One of the recommendations of the Special Inspector General for Afghanistan Reconstruction (SIGAR) 2016 Report was that

¹⁸ (Toolkit on Police Integrity, 2019, p. 93)

¹⁹ (Corruption Threats and International Missions: Practical Guidance for Leaders, 2016, p. 37)

at the onset of any contingency operation, the intelligence community should analyse links between host government officials, corruption, criminality, trafficking and terrorism. Baseline assessments should be updated regularly.²⁰

In light of this, relevant staff may wish to:

- Study the enemy as well as the host government and other friendly, neutral actors;
- Analyse underlying social, economic and political factors that facilitate or drive corruption within the Host Nation;²¹
- Collect information about where corruption is occurring, including the identification of particular public or private sector activities, institutions or relationships. Data is often gathered about particular government agencies, for example, or about relationships or processes such as public service employment or the making of contracts for goods or services;²²
- Collect information about what types of corruption are occurring. This could include an overall assessment of which types are prevalent, but may usually involve a more detailed focus on which types of corruption tend to occur in each specific agency, relationship or process for which corruption has been identified as a problem. Research might show that bribery is a major problem in government contracting, for example, while public employment is more affected by nepotism;²³
- Conduct network analysis and include local powerbrokers, their families, protégées, and economic interests (i.e. front companies, etc.);
- Analyse familial, ethnic, and political associations of elites, their economic interests, their licit and illicit financial networks, and their geographic spheres of influence;²⁴
- Focus on understanding host government personalities, patronage networks, ties to criminality, the formal rules of the game as well as the “unwritten rules of the game”;
- Ask questions such as:
 - *What does the anti-corruption law say and is it being enforced?*
 - *What is the number of prosecutions for corruption-related*

offences?

– *What are ministries or security forces tasked to do?*

– *Is the law easily changed?*²⁵

- Include in their analysis potential civil society members and/or groups who can assist rebuilding as well as procurement oversight;
- Ensure information collection also includes embassy personnel, non-governmental organisations (NGOs), and key ministries employees;
- Evaluate open sources to assess their reliability and understand their strengths, weaknesses and biases in a society;
- Crosscheck facts and corroborate information before including it in any analytical assessment;
- Ask questions such as:
 - *What are the links between key actors and corrupt networks?*
 - *What is their involvement with corruption?*
 - *What is the impact of corruption on stability in the potential AOI?*
 - *Does it feed into civil unrest or factional rivalries?*
 - *Have corrupt networks captured the political system?*
 - *Has corruption enabled the theft of public goods (i.e. revenue from natural resources)?*
 - *Is corruption enabling a permissible environment for violent extremist organisations to operate?*
 - *Will high-level political corruption in the host government make the handover to a legitimate, capable government impossible?*²⁶

Tool #2 – Corruption threat assessment

“Threat assessments should be conducted by a mixture of staffs, often a combination of specialists, intelligence and planning

20 (Corruption in Conflict: Lessons from the US Experience in Afghanistan, 2016, p. 83)

21 (Corruption in Conflict: Lessons from the US Experience in Afghanistan, 2016, p. 84)

22 (Anti-Corruption Toolkit, 2002, p. 18)

23 (Anti-Corruption Toolkit, 2002, p. 18)

24 (Corruption in Conflict: Lessons from the US Experience in Afghanistan, 2016, p. 84)

25 Example questions included in (Corruption Threats and International Missions: Practical Guidance for Leaders, 2016, pp. 37-39)

26 Example questions included in (NATO Planning Guidance: Operational Level (Joint Headquarters), 2021)

*staffs. Such an assessment begins with gathering and processing quite generic information, such as national and international corruption assessments, and police and military force corruption assessments, together with available intelligence on political dynamics and financial flows*²⁷.

Similar to intelligence analysis, Transparency International United Kingdom (UK) – Defence and Security Programme - recommends including corruption-related considerations when conducting a threat assessment. This is regarded as one of the specific preparatory actions aimed at military and civilian leadership and their staff involved in planning and carrying out operations.²⁸

In light of this, relevant staff may wish to:²⁹

- Formulate and develop a strategic assessment of corruption threats and risks by using a list of the main corruption issues relevant to the Host Nation and corroborating and validating the assessment in consultation with experts on the country in question;
- Understand the subjective perception of corruption by those involved or affected by it. All assessments of corruption may include both objective measurements (of what is actually occurring) and subjective assessments (of how those involved perceive or understand what is occurring). Generally, this information is needed because the reactions of people to anti-corruption efforts will be governed by their own perceptions³⁰;
- Assess the risks of corruption in terms of the likelihood of it occurring, the extent to which it could compromise development objectives, and the willingness/capability of the Host Nation to act to control it;³¹
- Identify those corruption risks that may have an impact on mission success by collating corruption reports on the Host Nation. Sources can include classified intelligence, foreign ministry briefings, open source material from organisations such as the World Bank, the United Nations (UN), Transparency International, the United States Institute of Peace, Global Integrity, etc. Corruption surveys that include the Host Nation should also be identified and taken into consideration. Additionally, the Centre for Integrity in the Defence Sector (CIDS) recommends the following sources for identifying and understanding corruption risks in the defence sector:³²

- NATO Building Integrity Self-Assessment Questionnaire;
- The Government Defence Anti-corruption Index (GI) published by Transparency International UK - Defence and Security Programme;
- The Norwegian Agency for Public Management and eGovernment (DiFi) corruption assessment tool.
- Assess how corruption can influence the efficiency and legitimacy of Host Nation government institutions, including defence and security forces;
- Identify the main actors in the operating environment and provide an overview of the local powerbrokers (i.e. traditional elites, heads of political parties, business elites, senior military leaders, warlords, etc.) and their structure (i.e. tribes or ethnicity);
- Identify actors that control government institutions as well as individuals and factions who are marginalised by the existing power structure:
 - Identify elites who control access to economic organisations. They are the ones likely to determine the rules of banking, business, who gets business licenses etc. They could range from ministries to local officials who may be susceptible to bribes in return for public services;
 - Identify elites who have geographic control and their interests and relationship with the central government;
 - Identify elites who control security organisations and access to justice (i.e. police, armed forces, prosecution, etc.) and understand which group is dominant or marginalised with particular organisations.
- Identify influential figures and institutions within civil society and the business community and analyse their respective backgrounds and potential interests;
- Develop a comprehensive understanding of the nature of organised crime and key criminal groups in the Host Nation;
- Identify and understand the perception of corruption among the population, including the institutions and actors seen as perpetrators of corruption (friendly and neutral forces to be included) and establish whether Host Nation

27 (Corruption Threats and International Missions: Practical Guidance for Leaders, 2016, p. 35)

28 (Corruption Threats and International Missions: Practical Guidance for Leaders, 2016, p. 35)

29 Information included below is best practice from (Corruption Threats and International Missions: Practical Guidance for Leaders, 2016, pp. 35-37)

30 (Anti-Corruption Toolkit, 2002, p. 18)

31 (Counter - and Anti - Corruption: Theory and Practice from NATO Operations, 2013)

32 (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014, pp. 11-12)

defence and security forces are associated with corrupt practices³³;

- Identify and understand reputational risks. Widespread corruption and state capture (i.e. *"the appropriation of state institutions for private enrichment"*) in the Host Nation can tarnish the missions' legitimacy, reputation and effectiveness, especially as missions usually need to maintain a relationship with the government. For example, UN missions have been criticised for supporting and partnering with corrupt regimes. Host Nation corruption also opens up opportunities for mission personnel to participate in corrupt activities. It requires a careful strategy to manage the implications, not only in terms of strategic communications, but also the balance between working with the government and pressuring it to improve governance.³⁴

Case Study: Transparency International on Corruption and UN Peace Operations

In 2015, the UN High-Level Independent Panel on Peace Operations concluded that a UN peace operation should ensure that its country analysis encompasses the dynamics and drivers of corruption, advocate for appropriate attention to corruption and provide political support to those providing technical assistance in that area.³⁵

However, Transparency International noted *"the recognition that corruption matters in peace operations has only selectively trickled down to the operational and tactical levels. There is no general UN Peacekeeping policy on tackling corruption as part of a mission and it is largely exempt from key documents. The UN's capstone doctrine, United Nations Peacekeeping Operations: Principles and Guidelines, only mentions corruption once, as a sector in the rule of law. Similarly, the DPKO [Department of Peacekeeping Operations] Planning Toolkit only refers to corruption six times in a 161-page document, again as a rule of law indicator [...] UN Infantry Battalion Manual, leaving a lot of ground uncovered. This means that even if effective measures are introduced in one of the missions, they might not necessarily be identified and passed on to others."*³⁶

Tool #3 – Knowledge database

The NATO Lessons Learned Portal includes metadata to be used for BI inputs, thus facilitating the retrieval of BI information. Additionally, NATO Headquarters (HQ) and Supreme Headquarters Allied Powers Europe (SHAPE) BI-related websites

support relevant information sharing and maintenance of institutional knowledge. In the project team's understanding, a specific BI database / portal should also be in place in operational HQs to support collection, storage, and sharing of BI information. During the Statement of Requirements (SOR) definition, availability of this database on the non-classified network could be considered in order to facilitate wider access to BI practitioners, outside of the operational HQ or NATO.

Tool #4 – Development of BI technical expertise

Relevant staff may wish to develop a cadre of expertise in organised crime, economics development, forensic accounting, policing and justice capacity building that ACO planning staff can draw upon. This may be achieved by:

- Developing knowledge of the dynamics of corruption in conflict settings by using multidisciplinary approaches. Ensure knowledge is shared throughout the organisation and with relevant external entities;
- Learning from others: bring in external expertise gained via conferences and good working relationships with academia and subject matter experts (SMEs);
- Directing existing analysts who have a technical background to solely be responsible for one of the topics mentioned above, as opposed to in addition to their current portfolio. For example, a few analysts could be responsible for tracking financial systems, processes and transactions, while others could be looking at police and justice capacity building only. Financial intelligence in particular could become an enabling capability for counter and anti-corruption activities.

Case Study: The Afghan Threat Finance Cell

On the issue of technical expertise and finance in particular, one of the lessons learned from the US experience with corruption in Afghanistan was that the United States (US) should develop a shared understanding of the nature and scope of corruption in a host country through political economy and network analyses. The Afghan Threat Finance Cell (ATFC), set up in late 2008, was arguably the first organisation to understand the nexus of corruption, criminality, narcotics, and the insurgency by tracking money flows and using network analyses. Its objective was to identify and help disrupt the material and financial funding streams that supported the Taliban and other terrorist organisations. The unit relied on technical expertise

33 (Corruption and Military Operations: A Note for Commanders, 2019, p. 4)

34 (Case Studies: Corruption and UN peace operations)

35 (Case Studies: Corruption and UN peace operations)

36 (Case Studies: Corruption and UN peace operations)



Afghan uniform police use sticks to eradicate a poppy field. The Afghan Threat Finance Cell identified narcotics including poppy – opium – production as one of the sources of financing for terrorism in Afghanistan.

Photo: Staff Sgt. Brian Ferguson, DVIDS

from the Defence, Justice and Treasury departments and communicated its findings across agencies in Kabul and Washington. As a result of the ATFC's and others' work, by 2009, US officials were increasingly concerned about the corruption threat and the need for strong anti-corruption efforts. This example was highlighted in the 2016 SIGAR Report.³⁷

- Identify, track, and provide analysis on initiatives in fragile states – and in neighbouring countries – that have been successful in addressing corrupt practices, such as aid conditionality, civil society strengthening, and transparency initiatives.³⁸

Tool #5 – Anti-corruption advisory group

One of the recommendations of the 2016 SIGAR Report was that key US government departments such as the Department of Defense (DoD), the State and the United States Agency for International Development (USAID) should each establish an Office for Anti-corruption to provide support, including advice on anti-corruption methods, programming and best practices for personnel in contingency operations.

An Anti-corruption Advisory Group could build a common understanding of corruption risks and threats to operations within ACO. This could be achieved via analytical collaboration, regular working group meetings and conferences involving BI practitioners, planners, policy personnel and academia. As per the above-mentioned recommendation, such an initiative could:

- Develop and share information on and assessments of the forms of Host Nation corruption that pose the most immediate, costly, and mission-critical threats;
- Collect and consolidate best practices and research in the field of anti-corruption, including diplomatic, legal and assistance tools;
- Provide operational and programmatic guidance to field staff;
- Coordinate anti-corruption policies, programmes, and practices with relevant interagency counterparts;

Tool #6 – Mission stakeholder matrix

The first steps towards combatting corruption in a post-conflict setting are most likely to be taken by external actors including international organisations, NGOs, or bilateral national donors working in the country. These stakeholders may be working according to guidelines published by the World Bank, the UN Office on Drugs and Crime (UNODC), or the Organisation for Economic Cooperation and Development (OECD), or may be following national legislation.³⁹

Cooperation and coordination with external actors in the area of operation could prove to be critical in collecting information and thus enhancing commanders' situational awareness and informing the overall corruption threat assessment.

Relevant staff may wish to consider: ⁴⁰

- Identifying other actors involved during military operations and their role in preventing corruption;
- Understanding mandates, roles, strengths and decision-making autonomy of other stakeholders in mission area;
- Understanding ways in which corruption undermines safety, security and trust of troops, the local population and other stakeholders in mission area;
- Understanding the demands and benefits of working with non-NATO entities (NNEs) to obtain unity of efforts within a comprehensive approach and implement BI activities;
- Understanding corruption risks associated with humanitarian crises.

37 (Corruption in Conflict: Lessons from the US Experience in Afghanistan, 2016, p. 76)

38 (Corruption in Conflict: Lessons from the US Experience in Afghanistan, 2016, p. 85)

39 (Boucher, Durch, Midyette, Rose, & Terry, 2007, p. 25)

40 (Good governance and Building Integrity in the defence and related security sector, Building Integrity Reference Curriculum, 2016, pp. 43-47)

3.2. Plan

3.2.1 Introduction

The success of Building Integrity (BI) efforts relies heavily on the adoption of a BI plan which is owned by leadership, and later implemented across all levels.

The adoption of a BI plan at the highest level recognises that BI efforts are important, and thus deserve to be staffed and resourced adequately. For this reason, the Plan key focus area of the Understand – Plan – Execute – Assess cycle is critical to the successful implementation of BI activities.

Based on the description of the Plan key focus area in the Military Concept for Building Integrity in Operations,⁴¹ the project team has identified several activities required for the implementation of the Concept. Each of these activities can be supported by several tools, adapted to the specificity of BI. These tools are presented below, based on their relevance for planning activities, as identified by the project team from best practices and lessons shared by other international actors involved in BI and anti-corruption efforts worldwide.

3.2.2 Identified BI Tools

Building Support

A BI plan needs the support of the political and military leadership of the Host Nation to be implemented successfully. Without this endorsement, BI activities are likely to be short-lived or ineffective. Obtaining broad support from key Host Nation leaders relies on their awareness and understanding of the benefits of BI activities for their country and community.

Tool #7 – Preparing a comprehensive awareness plan

The SOLLIMS⁴² paper on Building Stable Governance⁴³ notes that there is no significant economic and social progress without a safe and secure environment. This depends directly on the interaction with the local population and leaders, which requires coalition forces (already deployed or to be deployed) to gain comprehensive awareness of the local population and leaders during the planning of any operation. For this, a governance assessment plan and a comprehensive engagement strategy may help military commanders gain the influence/support of the local population and leaders. This

strategy can be sustained by building the capacity of the Host Nation's security forces. In this context, two key actions were identified for military and civilian personnel involved in an operation: (1) an appropriate vetting process (see more details in the vetting section of this Report) and (2) pre-deployment training on corruption risks along with periodic reminders about corruption awareness and reporting.

Tool #8 – Developing strategic communications

It is likely that some Host Nation officials or leaders from the defence sector will be reluctant to support reforms and change encouraged by BI actors in the region. The Centre for Integrity in the Defence Sector (CIDS)⁴⁴ advises to prepare for such rhetoric with a robust strategic communications plan, which addresses misconceptions, and effectively highlights and promotes the benefits of BI activities. Some of the key messages, which may be developed and could be integrated into the operation's Strategic Communications Strategy and the Public Affairs Plan, include the following key messages.

Key messages for Political Leadership:

- Corruption reduces public trust in the defence sector;
- Involvement in anti-corruption work (and the communication thereof) can strengthen public trust and may be used to build political credibility and support;
- Corruption wastes scarce resources. Improving integrity systems will save you money;
- Most international companies tend to avoid dealing with corrupt economies. Corruption therefore slows economic growth, development and investment;
- Corruption can intensify existing rifts between different groups or within society by favouring one group over another;
- Corruption can be an enabler of other key threats such as international and organised crime, terrorist activity, and illicit trafficking and smuggling of narcotics, people, and scarce resources;
- Corruption undermines the rule of law and fosters a culture of impunity.

Key messages for Military Leadership:

- Corruption reduces public trust in the armed forces, which

41 (Military Concept for Building Integrity in Operations, 2021)

42 The Stability Operations Lessons Learned and Information Management System (SOLLIMS) is an advanced knowledge management database serving the global Peace and Stability Operations (P&SO) community and providing an online environment for sharing information and lessons learned.

43 (Building Stable Governance, 2016)

44 (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014)

again will reduce the support for public spending in the defence sector;

- Corruption leads to the acquisition and utilisation of poorer quality equipment which can endanger the safety of troops and citizens;
- Corruption can reduce operational effectiveness and put soldiers' lives at risk;
- In international operations, funding meant for reconstruction can end up in the wrong hands, including the enemy's;
- A robust and transparent integrity system with committed leaders will motivate staff to support other defence reforms in the armed forces;
- Corruption undermines long-term stability;
- Preventing corruption could increase funds available to ministers and commanders and enable a lowering of taxes, better pay for military personnel, better or more equipment, higher pensions, etc.

Public Affairs Handbook

It is worth noting that strategic communications is a line of effort that is repeated throughout the different stages of an operation since support for BI activities will require raising awareness, and gaining and maintaining support from NATO, Allied and Host Nation actors.

To this end, BI practitioners may decide to implement the different communications activities foreseen in the NATO Allied Command Operations (ACO) and Allied Command Transformation (ACT) Public Affairs Handbook⁴⁵, which have already been aligned to the NATO Operations Planning Process. This Handbook is available publicly and provides numerous practical tools at strategic, operational and tactical levels for military personnel needing to engage in communication efforts.

Tool #9 – Holding workshops and courses

Training Host Nation officials on anti-corruption and building integrity topics, such as how a BI plan should be put together, allows for the earlier adoption of this plan once an operation is launched. This training can be delivered through both workshops and courses. Workshops allow for greater attention to be given to Host Nation officials, which gives NATO staff an

opportunity to gauge these officials' support for BI activities or lack thereof. A number of workshops delivered by Transparency International and NATO, such as Senior Leaders Day, are already available for this purpose. Meanwhile, courses involving a wide range of participants from different NATO and Partner Nations can be seen as less prescriptive and help build trust and mutual understanding, which will be essential to the operation going forward.

Strategy Development

A BI strategy can be drafted once an assessment of corruption risks has been completed, and at the same time as support from the Host Nation is being drummed up. This strategy should articulate the overall goal for BI and anti-corruption work in the operation. It sets the overall theme and goals of the BI initiative and can cover one to several years.

The BI plan, which is more detailed, takes its guidance from the BI strategy, which is typically approved by senior leadership. This is why it is advisable to start with the BI strategy in the planning phase.

This strategy can then be aligned to the specific operation's overarching Strategic Concept of Operations (CONOPS). Integrating the BI plan into the Command's Planning Process will help ensure that BI is considered a key contributing factor to the mission's success.

The early involvement of military BI in the planning process ensures required resources are incorporated into the mission service support requirements. These resources do not only include staffing but also transportation, security and access – resources which must typically be allocated or tasked to support operations.

Tool #10 – Directions and guidance

Besides engagements approval, the SOLLIMS⁴⁶ paper on Building Stable Governance⁴⁷ identifies that the military commander needs specific Direction and Guidance (D&G) in any format (e.g. Annex to Operations Plan (OPLAN); Operations Order (OPORD); Fragmentary Order (FRAGO) etc.) on the scope of the engagements. Depending on the type of operation, the same (Building Stable Governance, 2016) identifies the following aspects to be included in the D&G:

- Boundaries for the involvement of the military (coalition forces or Host Nation forces) in the provision of essential services and the framework of engagement with the Host

⁴⁵ (Allied Command Operations and Allied Command Transformation Public Affairs Handbook, 2020)

⁴⁶ The Stability Operations Lessons Learned & Information Management System (SOLLIMS) is an advanced knowledge management database serving the global Peace & Stability Operations (P&SO) community and providing an online environment for sharing information and lessons learned.

⁴⁷ (Building Stable Governance, 2016, p. 6)

Nation. These services could be: basic security; rule of law; economic governance; basic human services. All these services should be delivered without discrimination and in a transparent way.

- Stewardship of resources, explaining the way the military should contribute to bringing the security sector under accountable civilian control and democratic oversight, and how national/local resources are protected and transferred to responsible management.
- Approaches to political moderation and accountability, and military support to such efforts, to ensure peaceful debates and management of humanitarian, economic, security and other arising challenges
- Aspects relating to civil participation and empowerment by clarifying the extent to which the military are involved in ensuring that political diversity and civil society are present and protected.

Tool #11 – Contribute to existing NATO planning guidance

Transparency International advises NATO to make use of its existing planning process, and the tools associated with it, so corruption-related considerations can be embedded in the Operations Planning Process.

Transparency International provides an exhaustive list of elements to be considered when contributing to existing NATO planning guidance, which can be found on its website, and can prove a useful tool for BI planners⁴⁸.

The below-mentioned documents are some of the tools suggested for use by this non-governmental organisation (NGO).

Response Option Development

Injecting a building integrity 'angle' to the Strategic Planning Directive (SPD) and Military Response Options (MROs) will highlight the link between the success of the mission and how it can be endangered by corruption if this risk is not addressed early, coherently and consistently.

Military Response Options (MROs)

This document allows BI planners to identify the links between non-military factors and military outcomes (for example, the perception of impunity may undermine the support for the military, and pose a direct threat to forces on the ground). Planners should also determine (non) military strategic

objectives, and the possible unintended consequences/risks of military effects on governance and corruption (for example, the necessity to rely on proxy forces may inadvertently promote corruption as it did in Afghanistan in the late 2000s). Following this assessment, planners can provide a list of military response options for specific scenarios;

Strategic Planning Directive (SPD)

After carefully detailing BI-related Military Response Options, Transparency International advises BI planners to *"consider major corruption risks and options to mitigate them"*, thereby offering preventive or proactive options to attain BI objectives.⁴⁹

Strategic Plan Development

The Concept of Operations (CONOPS) and the Strategic Operational Plan (OPLAN) are two of NATO's key Strategic Plan Development tools which help ensure commitment from the highest levels of leadership.

Concept of Operations (CONOPS)

BI planners may wish to prepare a statement of requirements, i.e. a list of capabilities they will require in order to mitigate corruption risks and promote integrity, accountability and transparency. These requirements should address the potential threat posed by corruption risks in mission sustainment, and develop rules of engagement (ROEs) which map out the options for responding to corrupt behaviour within own forces and actors linked to NATO;

Strategic Operational Plan (OPLAN)

This plan is coordinated and submitted to the Military Committee for guidance, and to the NAC for approval. It is one of the tools that can be used to garner support and commitment from NATO and Allied top leadership. BI personnel are advised to keep their contributions to the Strategic Plan concise, relevant and directive. It should include the assessment criteria addressing the effectiveness of BI activities in an operation, among other elements.

SACEUR's Strategic Assessment (SSA)

As part of the development of a BI strategy, personnel may also be asked to contribute to SACEUR's Strategic Assessment (SSA). On the next page is a checklist of some of the elements that could be considered when preparing inputs for the SSA, based on Annex 3-C of the Military Planning Model for Public Affairs at the Strategic Level:

⁴⁸ (Interventions Anti-Corruption Guidance, 2021)

⁴⁹ (Interventions Anti-Corruption Guidance, 2021)

- Updating the BI staff estimate;
- Reviewing NATO political direction and guidance and policy statements;
- Developing a Strategic Appreciation of the situation/crisis (nature, scale and scope of the issues and analysis of the strategic environment): this information may have been gathered from tools in the earlier 'Understand' key focus area;
- Analysing the principal actors and their respective roles;
- Appreciating international interests and engagement (legal aspects, international interests and objectives, international commitments, information environment, objectives and desired end-state conditions);
- Determining implications for NATO, including potential strategic risks and threats;
- Appreciate potential strategic ends (including NATO end-state, strategic objectives and effects), ways and means
- Developing military consideration (applicability and use of military instruments and non-NATO interaction requirements);
- Coordinating and submitting the SSA to the Military Committee.

Establishing a Structure

Once a strategy has been articulated, the BI plan can be drilled down to set its overall structure, identifying priority areas, establishing a working structure with defined resources and responsibilities. At this stage, timelines can also be defined.

Tool #12 – Establishing a steering group

CIDS suggests that the responsibility for overseeing the progress of BI efforts should be held by a steering group of senior officers or officials, separate from those professionals drafting and implementing the BI plan. The steering group, because of its seniority, can also ensure proper coordination with other institutions or with other bodies within the organisation. According to CIDS, the steering group should appoint a BI working group and provide a clear mandate to its leader, providing them with the authority to implement the BI plan.

This recommendation is echoed in the 2016 SIGAR Report, which encourages the designation of a “*senior anti-corruption official to assist with strategic, operational and tactical planning at headquarters at the onset*” and “*ensure the development and*

*implementation of an integrated interagency anti-corruption throughout the duration of the contingency operation.”*⁵⁰

Tool #13 – Establishing a working group and defining mandates

Once a steering group has been established, CIDS suggests that a BI in Operations working group be set up. This group is not only responsible for planning BI activities but also for executing and monitoring them. It aims to ‘normalise’ BI activities, making use of existing chains of command, and creating standard operating procedures so that BI activities gain in consistency and regularity. This may also help prevent the loss of institutional memory due to staff rotation.

CIDS advises that all concerned sections, which may hold a stake in BI activities, be represented in the working group. This could include, for example, staff in charge of personnel, intelligence, training and exercises, Civil-Military Cooperation (CIMIC), Host Nation support or even legal, acquisition or public affairs. Each member of the group should have a clear mandate related to BI activities they can implement within their own areas.

For the working group to be motivated and successful, the following may be considered:

- Early meeting of all members to review the BI strategy, define roles and ensure a shared understanding of BI activities, their goals and importance for the mission;
- Agreement on the frequency and format of progress meetings to which all members of the working group should contribute;
- Acknowledgment and celebration of achievements, and review of the plan in light of progress to build on successes.

Tool #14 – Allocating resources and responsibilities

BI activities need to be coherent, regular and consistent for them to have any sustained impact, and this level of commitment requires financial resources and dedicated personnel.

The leader of the BI working group should thus communicate their need for financial resources and personnel to the steering group for early allocation. Once these resources have been allocated, the working group can assign roles to personnel that had not already been defined during the creation of the working group (e.g. project assistant, budget officer or BI subject matter expert).

50 (Reconstructing the Afghan National Defense and Security Forces: Lessons from US Experience in Afghanistan, 2016, p. 84)



Professional Security Education members from NATO Mission Iraq delivered a Building Integrity (BI) Train the Trainers programme for the Ministerial Training and Development Centre in March 2021. The Czech advisor from the Professional Security Education Division note on the occasion: “This was a true example of joint effort between Iraqis, NATO HQ and NATO Mission Iraq. We are reinforcing Iraqi capabilities, building integrity and improving the security sector.”

Photo: NATO Mission Iraq

Case Study: NATO Mission Iraq

In its communication to the project research team, the Building Integrity team at NATO Headquarters noted that sufficient staffing and continued commitment to BI efforts were key to the success of its activities, notably in relation to NATO Mission Iraq (NMI).

It highlighted that one of the main challenges the BI team faces is linked to the “rotation of personnel on a period of three or six months or a year in the best case, depending on the country filling the position” and “the associated risk of failure that Iraqis lose trust in our sustained commitment on BI”. The team said it mitigates this risk by “demonstrating the link between NATO Mission Iraq and NATO Headquarters which provides continuity”. However the short-term rotational nature of BI in Operations role was a clear concern.

Tool #15 – Agreeing on timelines and setting milestones

The timing of BI activities may determine their impact and eventual success.

In its communication to the project research team, the Building Integrity team at NATO Headquarters noted that poor timing could increase the risk of failure of BI activities.

It highlighted the “disparity between NMI timelines and the span of BI reforms” and “the associated risk of failure [by] forcing

BI reforms on Iraqi institutions without fostering their national ownership and commitment; without properly analysing their needs and respectively designing and adapting solutions to fit national needs”. While the BI team minimises this risk through consultations with NMI, the experience of the United States *US) forces in Afghanistan clearly show that failure to conduct BI activities at the right time may ultimately threaten the success of the mission.

As noted in the 2016 SIGAR Report⁵¹, “if the US had devoted more resources earlier on to understanding systematic corruption, it may have recognised the threat before corrupt networks became entrenched and much harder to tackle. It was not until 2010 that US agencies initiated systematic efforts to map corruption in, for example, Shafafiyat and to vet contractors [...] Although these efforts prevented some US contracts from going to malign actors, they proved too little, too late to dismantle corrupt networks.”

The example of Afghanistan clearly demonstrates that the timing of different BI activities throughout the phases of an operation is critical to their effectiveness. Developing a timeline and setting milestones also creates accountability and allows the working group to track progress and revise the BI plan as needed. When progress is observed at key milestones, it can also provide justification for further resources to be allocated to BI efforts.

CIDS suggests to use the below template, adjusting it as necessary, when planning BI efforts.



Figure 4: Building Integrity Timeline Template ⁵²

⁵¹ (Corruption in Conflict: Lessons from the US Experience in Afghanistan, 2016, p. 68)

⁵² (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014, p. 20)

Tool #16 – Implementing an ethics infrastructure/ capability

The implementation of ethics in an organisation requires the implementation of an appropriate infrastructure. This infrastructure is presented in further detail in Toolkit on Police Integrity and includes:

- a) Nomination of an 'ethics manager' and/or ethics adviser;
- b) Training ethics 'catalysts';
- c) Preparing a charter of values;
- d) Creating a code of conduct including a code of ethics and code of discipline;
- e) Designating an ethics officer;
- f) Creating ethical, monitoring, and oversight committees.

Tool #17 – Consultation and deconfliction

Broader consultation with relevant actors, such as civil society agencies, the security and defence industry, academia or non-profits, allow for synchronisation of efforts, not only to leverage the knowledge of these different actors but also to ensure there is no duplication of efforts, or that activities planned by BI personnel across these organisations do not create unintended consequences. Such early consultation also sets the tone for further cooperation and effective, consistent messaging across the BI community.

Tool #18 – Planning a communication strategy

Once support among Host Nation political and military leadership has been secured, the United Nations Office on Drugs and Crime (UNODC) recommends building support for anti-corruption efforts among the media and wider public to promote change and greater transparency, accountability and integrity. In its comprehensive guide⁵³, the UNODC provides a practical roadmap to planning a communication strategy (see image on following page).



Representatives from the US Embassy in Kabul and NATO (left) share a conversation with Safia Saddiqie (right), a famous Afghan writer and poet during a Shafafiyat-sponsored event in Kabul, Afghanistan, in 2012. Shafafiyat was an International Security Assistance Force (ISAF) agency which worked with community leaders to combat corruption from 2010 to 2014.

Photo: Resolute Support Flickr

"If the US had devoted more resources earlier on to understanding systematic corruption, it may have recognized the threat before corrupt networks became entrenched and much harder to tackle. It was not until 2010 that US agencies initiated systematic efforts to map corruption in, for example, Shafafiyat and to vet contractors [...] Although these efforts prevented some US contracts from going to malign actors, they proved too little, too late to dismantle corrupt networks."

2016 SIGAR Report

53 (Byrne, Arnold, & Nagano, 2010, p. 54)

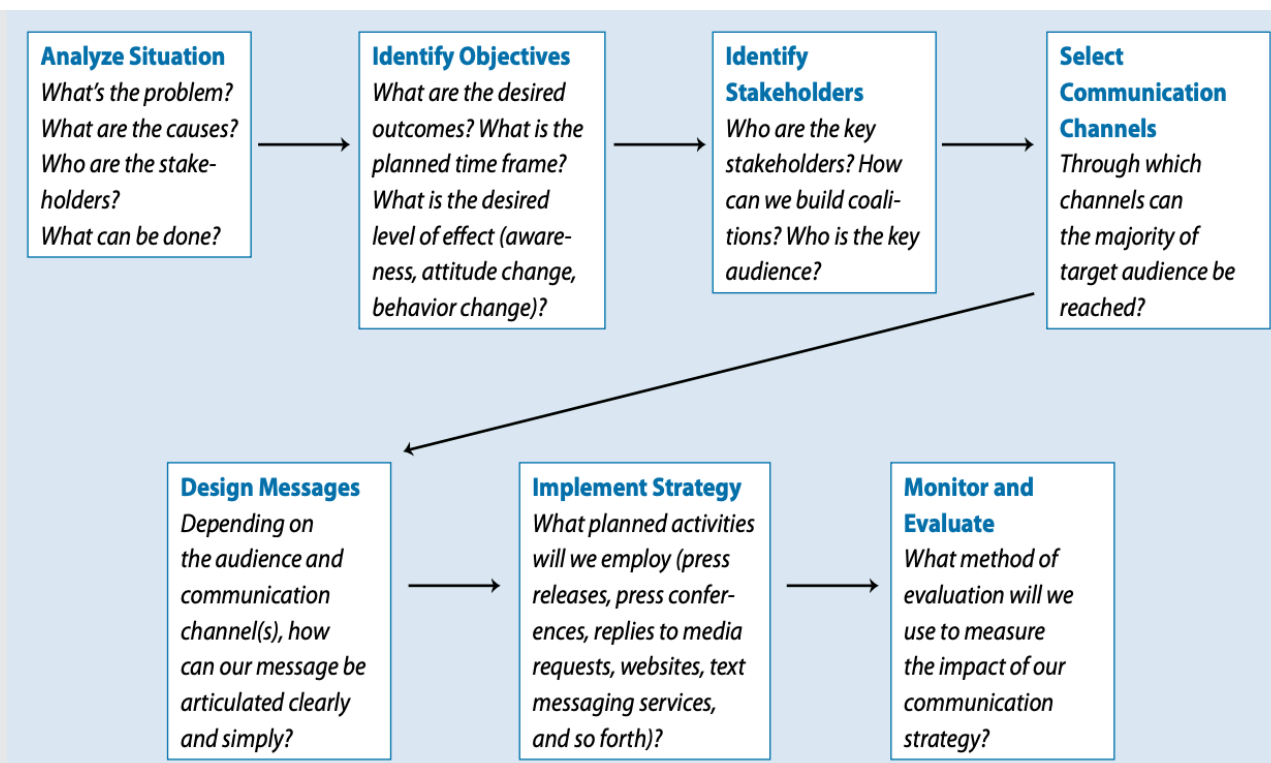


Figure 5: Planning a Communications Strategy (Byrne, Arnold, & Nagano, 2010)

The UNODC also provides checklists of communications activities worth undertaking to accomplish the following objectives:

- Build anti-corruption networks and coalitions within state institutions;
- Cultivate a culture of probity and accountability within public authorities;
- Raise issues on the public agenda;
- Support media and civil society campaigns to remove corrupt leaders;
- Get citizens to differentiate between real corruption and rumours of corruption;
- Change norms about everyday corruption by raising awareness;
- Tackle everyday corruption;
- Communicate around investigations.

These checklists provide valuable reference material for those in charge of BI communications efforts and strategic communications planning.

Drafting a BI Plan

Tool #19 – Preparing BI action plan

According to CIDS, a BI action plan:

- Provides introduction to the plan and why it is needed;
- Lays out how the plan is related to the strategy, goals and objectives;
- Identifies who is responsible for each level and area;
- Outlines objectives for each level and area;
- Flags risks and challenges which may impact the success of BI activities;
- Determines mechanisms for coordination and broader consultation;
- Elaborates the BI communications strategy;
- Suggests mechanisms for evaluation and monitoring.

Three examples of action plan templates are provided in CIDS' Integrity Action Plan Handbook⁵⁴

⁵⁴ (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014, pp. 24-26)

Tool #20 – Addressing risks by mitigation planning

BI activities can be impacted by a change in context, for example elections or the sudden loss of financial support. For this reason, mitigation planning should also be addressed when preparing a BI action plan. Such a mitigation plan should identify some of the likely risks which may impact BI efforts. It may assess their level of impact (there may be a considerable risk of government change, for example, but the impact on NATO BI activities may be minimal), and prioritise the mitigation actions which can be taken by the mission to ensure that anti-corruption efforts do not lose support or momentum. During progress report meetings, this mitigation plan can be updated as risks emerge, to ensure that BI staff are constantly prepared to react to their changing environment.

Tool #21 – Defining 'good enough'

According to Building Stable Governance⁵⁵, the involvement of coalition forces in BI and anti-corruption efforts is limited in time. Therefore, defining what is 'good enough' for military involvement is very much dependent on the end-state strategic criteria and objectives determined by both Host Nation and intervening states/actors. These may include the dynamics influencing the conflict (peaceful or violent); transitioning efforts from military to civilian control; the level of maturity of Host Nation security forces and their adherence to integrity, transparency, and accountability principles. Therefore, defining 'good enough' for military involvement during planning activities appears more suited to sustaining a desirable level of achievement over a longer period, than defining an 'end-state' for BI that cannot be properly controlled once this end-state has been achieved.

Planning for Monitoring

Tool #22 – Accountability criteria

Expanding on the details presented in Building Stable Governance,⁵⁶ it is the project team's understanding that military commanders need indicators and criteria to establish the accountability of Host Nation security forces in case repression or non-adherence to democratic values occurs. Based on these indicators and criteria, military commanders can initiate actions to hold accountable respective parts of the Host Nation security forces that are moving away from democracy and exercise pressure on them to return to upholding democratic values. Accountability actions should be provided in a wider multinational and multi-actor framework.

Tool #23 – Establishing oversight mechanisms

While internal progress reports on BI activities are useful for NATO BI staff, external monitoring strengthens the credibility of these activities and helps to ensure transparency and impartiality. It can also provide an independent, third-party perspective which is often more welcome/convincing for a Host Nation than that of a NATO or Allied actor.

For this reason, BI planners may wish to consider establishing external and internal oversight mechanisms where reporting (whistleblowing) is supported and legally protected.

Internally, these efforts could include:

- Establishing oversight mechanisms for internal activities in support of the Host Nation's security sector;
- Establishing contracting guidance and vetting procedures;
- Promoting Human Resources management and system improvements with the establishment, and strengthening of audit structures;
- Providing transparent budgeting and asset declarations.

Externally, these efforts could include supporting the following measures:

- The establishment of anti-corruption or ombudsman structures;
- The Host government's ratification of international anti-corruption conventions and streamlining in local legislations;
- Host government institutions' efforts to strengthen investigation and prosecution measures to counter corruption, including as part of defence and related security sector reform.

It is worth noting that once a plan for these oversight mechanisms has been elaborated, this tool should be implemented in a manner that is adapted to the context of the operation. Practical implementation lessons and best practices are provided in detail in the Execute and Assess key focus areas, for [Tools #37, #45, #46 and #56](#).

⁵⁵ (Building Stable Governance, 2016, pp. 34-36)

⁵⁶ (Building Stable Governance, 2016, p. 9)

3.3. Execute

3.3.1 Introduction

The 'Execute' key focus area of the Understand – Plan – Execute – Assess Framework is critical to the implementation of the Military Concept for Building Integrity in Operations⁵⁷. It represents a catalyst for all the efforts invested in the other three key focus areas of the Building Integrity (BI) in Operations Framework that should ensure the application of the three founding principles: integrity, transparency and accountability.

Based on the description of the Execute key focus area, included in the Military Concept for Building Integrity in Operations, the project team has identified several activities required for the implementation of the concept. Each of these activities can be supported by several tools, adapted to the specificity of BI. The tools described below, have been identified by the project team based on BI-related best practices and lessons shared by other international organisations involved in BI and anti-corruption efforts worldwide.

3.3.2 Identified BI Tools

Engage with Host Government Institutions

Military commanders⁵⁸ are expected to engage with the host government's institutions from the early stages of an operation. This engagement supports political actors and is based on prior political guidance / approval. The project team has identified the following tools that could support this type of engagement.

Tool #24 – Strengthening parliamentary development

As part of the wider international and political support, military personnel can provide assistance in the development of the legislation relevant to the security sector. According to Building Stable Governance (2016, p. 14), which highlights the Afghanistan experience, this assistance and support can include the prioritisation of laws and tailored training ahead of key legislative activities. To this end, several aspects should be considered, including: formal training seminars for Members of Parliament on topics relevant to their respective roles; specific training for secretariat and assistant personnel; the provision of electronic templates, forms, checklists to be used in support of workflow; organisational and individual periodic performance evaluations; as well as assessment and improvement solutions/ support for job-based skills.

Tool #25 – Support citizens – government trusted relationship

In fragile states, building a trusted relationship between the government and its citizens plays an important role in maintaining state stability. The fight against corruption is one critical element for this stability and military forces can help to monitor, support, and entrust governmental actions according to pre-defined plans approved by political bodies and coordinated with other actors (e.g. international organisations, donors). According to Building Stable Governance (2016, pp. 29-33), which notes the experience in Sierra Leone, some of the military contributions that can support a trusted relationship could include the following:

- Considering anti-corruption not only in connection to institutional reforms but also to real life situations such as: socio-economic issues impacting livelihoods, land issues, displacement/refugees, health concerns, etc.;
- Identifying and supporting formal and informal channels of communication between the citizens and the government, including open platforms for communication between citizens and elected representatives to ensure transparency, accountability, and responsiveness to citizens' concerns;
- Providing donors with areas of concern where political-economic analysis should benefit citizens rather than using generic templates. Providing also periodic feedback on the programme's success and assessing trends concerning the relationship between citizens and the government relationship considering indicators such as tensions, protests, etc.

Tool #26 – Considering alternative conduits for security/military assistance as temporary measures

When corruption in the Host Nation's armed forces is known/ perceived to be widespread (especially as it relates to resource diversion and asset management) alternative ways of providing security/military assistance could be explored. For example, in some contexts, civil society organisations and volunteers could be used as conduits of such assistance (see Transparency International case study on security assistance to Ukraine)⁵⁹. While effective in reducing short-term corruption risks, such measures should only be considered as temporary solutions.

Tool #27 – Key leaders engagement matrix

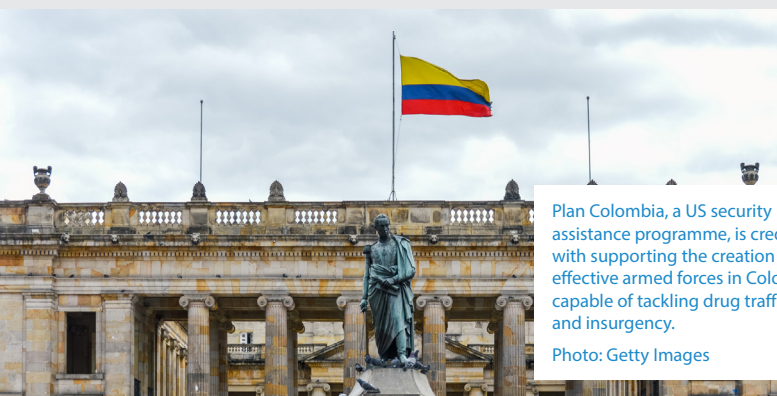
The project team identified several similar activities conducted by NATO and other international organisations (e.g. in Strategic Communications; Information Operations domains) from where different tools can be adopted in support of BI. As such,

⁵⁷ (Military Concept for Building Integrity in Operations, 2021)

⁵⁸ In the context of this Report, the project team use the term "military commander" to refer to any of Mission Commander; Force Commander; Operational Commander; or any commander at any level who employs his/her personnel to implement BI.

⁵⁹ (Making the system work: security assistance to Ukraine, 2014-2017)

the project team identified the Key Leaders Engagement matrix as a suitable tool to avoid competing agendas with Host Nation's efforts for BI. A potential way to employ this tool is to use a checklist of activities under coalition force responsibility and determine which of them could lead to potential overlaps with the Host Nation or other international actors. After identification of overlaps, planning meetings (bilateral; multilateral) or workshops/working groups are required. Based on the results, key messages and points of de-conflictions should be identified. These points become the agenda for high-level meeting(s) for de-conflicting competing agendas. Statements from donors or from oversight committees/bodies could be considered in support of clarifying the situation.



Case Study: Plan Colombia

The Transparency International case study on US assistance to Colombia showed that recipient nation initiative and ownership were crucial to the eventual success of Plan Colombia. The engagement and coordination between Host Nation institutions and the assisting entities proved effective, due to a commonality of interests and Colombia's commitment to absorb the assistance and push through the necessary institutional reforms. It has been one of the most important safeguards against corruption and waste of funds.

In Colombia, the US found a partner committed to the implementation of reforms, and to making changes that would enable it to use US assistance more effectively. While the political and material impact of US assistance did create perceived problems for Colombia's national sovereignty, overall, the host and donor nations largely shared the same goals and were prepared to make sacrifices to achieve them. As one former official put it: *"In Colombia, we found a partner that truly wanted this. We gave strong technical and financial support, but at the end of the day it was the Colombians that put in the bulk of the blood and treasure."*⁶⁰

Coordination with the International Community

Coordination with the international community is a critical element for the success of BI in Operations, especially for BI efforts in support of the Host Nation. Several references indicate that staff-level coordination proved to be very effective (see section on Kosovo Force vetting), not only to share expertise but also to de-conflict different BI activities. However, formal engagements and programmes at the highest level are seen as a suitable framework to coordinate the implementation of BI in Operations. The project team identified the following tools as being relevant for this activity.

Tool #28 – Donor pressure for systemic reform to improve Host Nation governance/curb corruption

As the Transparency International case study on Ukraine argues, *"anti-corruption, transparency and accountability reforms can be particularly challenging in a conflict environment, when it can be easier to argue that national security considerations require a cloak of secrecy over the defence sector, especially in terms of procurement. (...). Excessive secrecy and over-classification, which can facilitate corruption and inefficiency, can pose major threats to national security. Finding an appropriate balance between transparency and national security concerns not only helps build public trust in institutions, but also helps push for greater efficiency and capacity."*

While the Host Nation's will to reform is indispensable for progress to occur, international donor pressure – a combination of political support, expertise, and conditionality – can help maintain Host Nation momentum for reform and push for improvements in defence governance. In the case of Ukraine, for example, donor efforts to set standards for tracking and reporting on donated materiel led to changes at the operational and tactical levels⁶¹

Tool #29 – Applying conditionality

Security/military assistance donors – especially the United States (US) – have pushed for improvements in Host Nation tracking and monitoring systems that ensure security assistance reach the intended recipients. In some cases, delivery of such assistance was delayed until required conditions were implemented. In the case of US security assistance to Ukraine in 2016-2018, Congress officially tied the delivery of security assistance to progress in governance and institution-building, including via the adoption of specific framework legislation to improve civilian control of the armed forces, tackling corruption and improving defence policy and planning processes.

60 Francisco Mora, former US Deputy Assistant Secretary of Defense for the Western Hemisphere, 2009-2013, quoted in (Corruption and Plan Colombia: The Missing Link, 2019)

61 (Making the system work: security assistance to Ukraine, 2014-2017)

Tying international funding to improvements in governance was also used in the latter stages of the Afghanistan intervention to push for government reforms. After 2014 the US Combined Security Transition Command-Afghanistan (CSTC-A) used 'commitment letters' – documents setting out the conditions that Afghan institutions had to meet to receive tranches of funds or resources such as weapons, vehicles, or fuel to prompt compliance and foster self-reliance and long-term planning. A Transparency International study quoted evidence that conditionality and commitment letters can improve the performance of Afghan institutions, if only by small amounts. In 2016, US Department of Defense (DoD) reporting indicates slight improvement in conditions being met by Afghan authorities, from 60% to 66% within one quarter.

However, for conditionality to work, significant buy-in from both donor and recipient governments is essential. It requires the Afghan government to implement their commitments and the US government to hold them accountable when they do not. This, in turn, requires the willingness to admit failure or slow progress as and where it happens. The National Academy of Public Administration noted that political pressures and fears of destroying or undoing progress can serve as a motivation to keep aid flowing, despite failure to comply with or meet agreed conditions. In Afghanistan, the DoD Inspector General reported in 2016 that the CSTC-A's ability to develop the capacity of the ministries was limited because CSTC-A officials failed to enforce the conditions, and were reluctant to let recipient institutions fail. Similarly, the head of the Shafafiyat Task Force commented that while conditionality had potential, it required tight coordination between donors and, above all, willingness to acknowledge that things were not going well to start with. Without a common understanding of what progress looked like and what needed to be done to push for it, donors could be played off against each other and conditionality would not work.⁶²

The use of conditionality in the implementation of Plan Colombia created pressure to address corruption and human rights abuses in Colombian defence and security forces. The Plan also provided political 'cover' for Host Nation reformers wishing to tackle embedded interests and practices that enabled corruption. At the same time, a key lesson learned from US assistance to Colombia is that while conditionality can and does work, withholding resources from defence and security forces affected by corruption is not always the right move. In the case of Colombia, one of the key drivers of corrupt ties between the armed forces, paramilitary groups, and drug traffickers was the pre-existing domestic shortage of resources and political support for the military, which left the armed forces exposed to pressure from illegal groups.

More support, training and equipment was in this case a better response than cutting off support entirely.⁶³

Prioritisation of Efforts

Tool #30 – Defining 'conflict of interest'

According to the United Nations Development Programme, (2021, p. 32), conflict of interest was always assessed as an element that could lead to corruption, bias, misunderstanding, poor quality of goods and services, and work inefficiency or tensions. Having a clear definition for conflict of interest is another tool that could be employed during appointment, promotion, reward, hiring or procurement processes. Recusal, withdrawal, or 'ring-fencing' by a third party (e.g. supervisor panel, lawyers) are instruments that could address conflicts of interest.

Tool #31 – Due diligence practice

During procurement processes, relevant members of coalition forces should use due diligence as a tool that could help them ensure that a proper contracting framework is followed and the right providers are chosen. Due diligence should be applied in addition to a vetting mechanism and should provide information on the person/company concerned, including *"their background and qualifications, legal history, financial stability, business sustainability, respect for human rights, environmental considerations, and operational capabilities"*.⁶⁴

Tool #32 – Self-assessment practice

Each individual and section/unit involved in implementing BI in Operations or exposed to BI risks can consider conducting a self-assessment based on a standard criteria associated with applicable questions. Examples of questions are available for consideration in the NATO Building Integrity in Operations Handbook⁶⁵ and DCAF Toolkit on Policy Integrity.

Tool #33 – Define methods for tackling corruption and inappropriate behaviour

According to the Toolkit on Police Integrity (2019, pp. 33-36), there are several methods which were successfully applied in tackling police corruption and inappropriate behaviour. These methods fall under three categories: legal, administrative and educational.

To this end, the following described methods have the potential to support the implementation of the Military Concept for BI in Operations with regards to Host

62 (Afghanistan: Corruption and the making of the warlords)

63 (Corruption and Plan Colombia: The Missing Link, 2019)

64 The tool is presented in (United Nations Development Programme, 2021, p. 26)

65 (NATO Building Integrity in Operations ACO Handbook, 2020, p. Annex E)

Nation security forces.

Legal

The legal methods that could be considered from a BI perspective are as follows:

- Punishment: personnel engaging in corruption activities and/or inappropriate behaviour should be punished and widely publicised (exceptions should be clearly defined). 'Naming and shaming' will prove to other members of the force that inappropriate behaviour is always addressed;
- Improving legislation / regulatory framework: the instructions, orders, documents, etc. describe clearly what the corruption and inappropriate behaviour are. A periodic review/update mechanism is in place to ensure that any confusion or grey areas are addressed.

Administrative

The administrative methods that could be considered from a BI perspective are as follows:

- Recruitment: The Job description for the posts exposed to BI risks includes requirements on experience, personality, physical skills (e.g. reaction times), mental and psychological skills, etc. and the selection can include integrity tests to ensure the appointment of the right personnel. Similar tests can be conducted also periodically while on the job.
- Rotation: the length of post assignment is determined in advance in order to ensure continuity, organisational knowledge but at the same time avoid permanence on post and building questionable procurement networks.
- Working conditions: benefits may be considered in addition to the salary for posts exposed to BI risks in order to avoid any interest for additional sources of income.
- Gender and national balance: diversity aspects, including gender and nationality, should be emphasised to ensure different views are taken into consideration regarding potential corruption risks or inappropriate behaviour.
- Risk and opportunity assessments: recruitment, procurement, and service supplies are the most exposed areas to corruption; assessments should be conducted periodically to identify risks (and mitigations) as well as opportunities (and rewards).
- Use of new technologies: whenever appropriate, periodic audit of relevant activities using specific application / software looking at financial and procurement data as

well as the use of various surveillance systems (e.g. CCTV) could be considered. The use of new technologies should be in line with the applicable data protection and security regulations.

- Code of conduct: a code of conduct is developed and includes core values across the ethics, moral, legal spectrum, and any subsequent consequences for breaking it. It was proven that codes of conduct can support an anti-corruption culture and discourage bad behaviours and punishments. The Toolkit on Police Integrity⁶⁶ highlights an example of a Code of Conduct for Police which includes:
 - *"General aspects: Loyalty, integrity, responsibility, impartiality, transparency, availability, openness and human dignity.*
 - *Behaviour related aspects: Performance of duties with probity; Donations, rewards, favours, privileges, gifts (acceptance, payment); Conflicts of interest (sponsoring); Incompatibilities (performance of another function); Interference in non-profit activities (recommending a person); Obtaining or attempting to obtain an undue advantage for a person in one's custody; Proper use of public resources in and in connection with the fair and impartial application of the law; Performance of functions; Leaving the public service (a former public official should not use or disclose confidential information acquired by him/her as a public official unless lawfully authorised to do so); The abuse of authority or power; Information management (boundary between professional and private life); Declaration of one's assets; Political and public neutrality; The prohibition for a law enforcement officer to act as such when he/she is not on duty, when he/she is physically outside his/her geographical jurisdiction or within the framework of legal cases that he/she is not empowered to deal with; The requirement that some sensitive tasks, should be systematically carried out in the presence of witnesses and, if possible, audio-visually recorded."*⁶⁷

Educational

The educational methods that could be considered from a BI perspective are as follows:

- Seminars: seminars involving personnel filling posts exposed to BI risks are conducted regularly to raise awareness of corruption, of what is not acceptable and what has changed. These seminars are in addition to pre-deployment training and any other specific education courses.
- Campaigns: periodic information campaigns (ads; leaflets

⁶⁶ (Toolkit on Police Integrity, 2019)

⁶⁷ The suggested content for Code of Conduct is presented in (Toolkit on Police Integrity, 2019, p. 70)

etc.) on corruption, anti-corruption efforts and BI are conducted for own forces to raise their awareness and to be able to promote BI values during their engagement with the Host Nation population, institutions, and security forces. Lessons identified⁶⁸ show that the use of terminology is very important; for example, 'integrity programmes' are perceived as having a more positive connotation than 'anti-corruption programmes'. On the other hand, other subject matter experts (SMEs) consider that using the term 'building integrity' is correct from a political and diplomatic perspective in defining efforts to support NATO Members and partners. It is worth noting that when looking to the impact of corruption on and from military operations the term building integrity does not seem entirely appropriate, for the following reasons:

- It doesn't define what needs to be considered and done by the military;
- It is not consistent with the direct military approach and may discourage support from the operational community.

As such, BI experts interviewed by the project team argued that clearer terminology should be used for the military. In this context, the term 'Transparency, Accountability and Countering Corruption (TACC)' seems to be more appropriate because it defines clearly what needs to be done by the military: be transparent, be accountable and counter corruption when confronted with it.

- Role modelling: Leadership and senior staff provide educational sessions periodically, share their own experience, and act as role models for junior staff.

Subject Matter Expertise

Given that BI is a relatively new area, there is a shortage of BI SMEs within military organisations. Several lessons were identified in the Toolkit on Police Integrity (2019, p. 142) in support of developing such expertise, as summarised below.

Tool #34 – Building Integrity experts network

BI expertise is limited not only within NATO but also on the workforce market. Therefore, the development of an extended network of experts from NATO, Allies, partners, international organisations, industry and academia could be a suitable tool to address immediate requirements in the BI area. This network could be built by designated personnel at NATO Headquarters (HQ) and/or Supreme Headquarters Allied Powers Europe (SHAPE), recorded on a BI platform (e.g. database; portal) and connected periodically via email exchanges, meetings,

conferences etc. Involvement in various research papers and projects is recommended to operationalise the network and maintain the interest of members. A payment system (for deliverables – e.g. contracting services) and a reward mechanism (for contributions – e.g. certificates, access for free to different events) could be considered.

Tool #35 – Training approach

Lessons identified showed that BI training should be tailored to trainees and institutional objectives. Also, experience showed that training objectives must not be too ambitious: the important thing is to raise awareness of ethics among the force members by introducing them to the different modes of social regulation that govern their work (a course on the notions of democracy and values) and giving them the necessary tools to resolve ethical dilemmas arising in their daily operations (decision making). A third type of training focusing on the notion of power and authority is also important for senior officers, who will be frequently required to assert their authority in conditions where that authority is likely to be called into question.

Tool #36 – Training on corruption cultural dynamics (national/regional/local)

According to Building Stable Governance,⁶⁹ whenever stability, integrity, and legitimacy of national governments are in question, military personnel may be required to support regional/local governance established according to the understanding of the local population. Therefore it was identified that, in addition to pre-deployment training, tailored, on job training for involved personnel should provide insights on how to establish regional/local governance, understanding local culture, historical animosities, as well as the boundaries between corruption and tradition, and how all these tie into the upper level of governance.

Tool #37 – Involving third-party

It is important to secure a strong commitment from management, reflected on the ground through recognition of the need for change, an acknowledgement of the problems and a formal commitment to new types of management approaches. This is critical to building awareness of internal corruption risks and status during the execution of an operation. To this end, a third party (assistance of a specialist in ethics) who can assist with the implementation of changes in an organisation was identified as a best practice for two reasons:

- Representatives of the institution can often lack the necessary legitimacy to impose changes;

⁶⁸ (Toolkit on Police Integrity, 2019, p. 51)

⁶⁹ (Building Stable Governance, 2016, p. 9)

- An outside / independent perspective is important in order to overcome the normative blindness: firstly, by establishing the legitimacy of the individuals leading the ethical efforts within the institution, and secondly by giving institutional leaders the critical distance they need to reflect on and understand their work over time.

Tool #38 – Apply training methods

According to the DCAF Toolkit on Police Integrity,⁷⁰ several training methods were presented as suitable for police forces and, in the project team's understanding could be applied also for BI in Operations: lectures, focussed group discussions; plenary panels, poster presentations; case studies; role play; simulations; tactical decisions-games / scenario based trainings; brainstorming; seminars; communication packages (both internal and external).

Tool #39 – Training opportunities

Training is critical for the development of significant expertise within NATO that can support the implementation of BI in Operations. The following two examples were shared as best practices in support of training trainers and subject matter experts in the BI field:

- *Training Manual on Police Integrity*:⁷¹ this manual details - by module, lesson, timing, objectives, methods, and evaluation - the relevant BI content for police forces training. It has a significant potential to be reviewed and adapted to operational needs and it provides learning content that can be delivered either online, resident, or blended frameworks. The structure of the training is presented below:

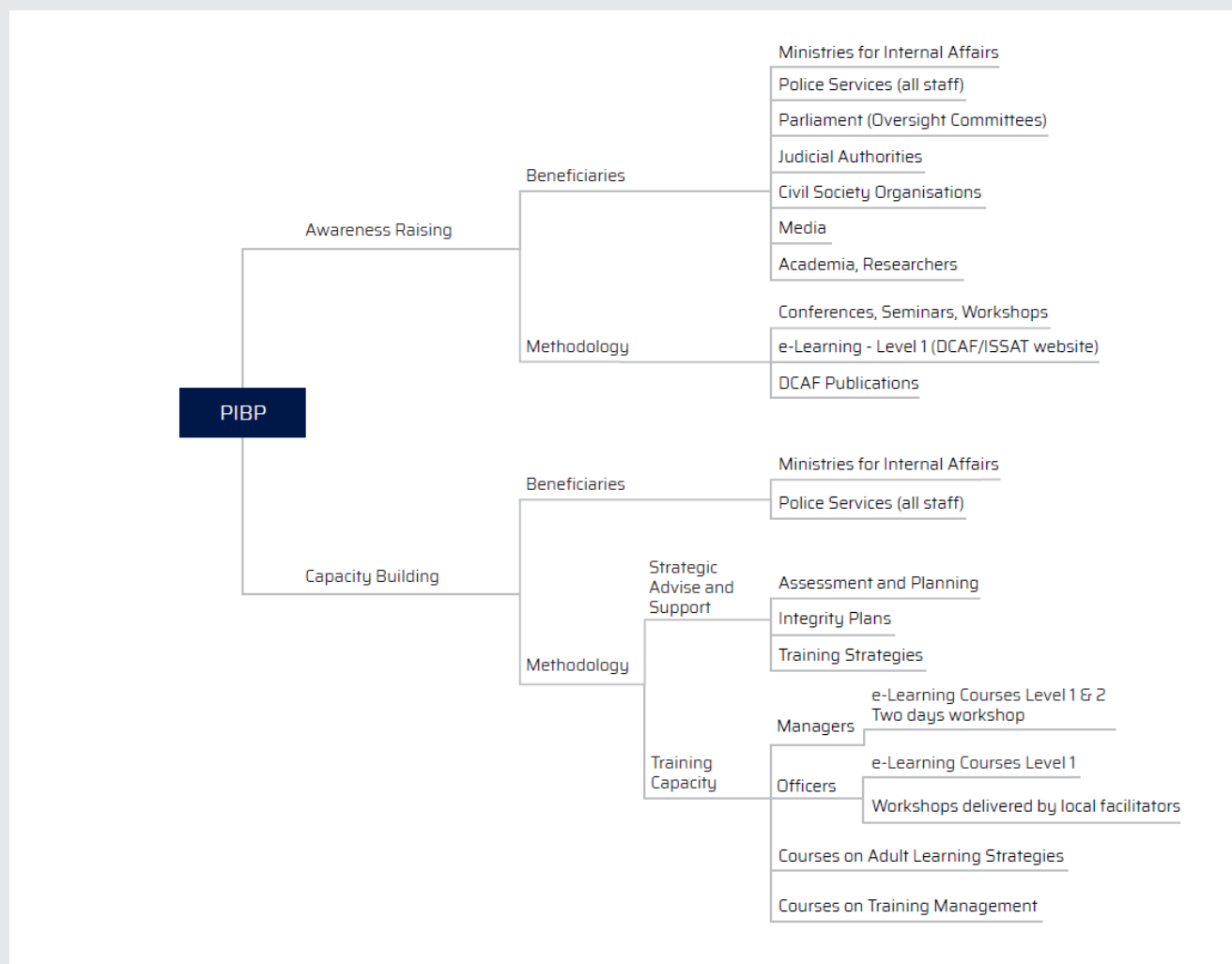


Figure 6: Training Structure for Police Integrity

⁷⁰ (Toolkit on Police Integrity, 2019, pp. 285-294)

⁷¹ (Training Manual on Police Integrity, 2015)

- *The International Anti-corruption Academy*:⁷² this international organisation, formally recognised in 2011, promotes the prevention and countering of corruption, through training programmes such as: Master degrees in anti-corruption studies; the International anti-corruption summer Academy; short-term training and seminars (independent or in partnership with other organisations); tailor-made training. This organisation qualifies as a suitable option for BI training for NATO members.



EULEX police officer distributing leaflets and fact sheets on the EU and EULEX in Kosovo.

Photo: European Union Flickr

Tool #40 – Trainings/workshops and induction training⁷³

The European Union Rule of Law Mission in Kosovo (EULEX) Human Resources Office (HRO) in cooperation with relevant specialists from the Financial Unit and internal auditors organised over the years numerous training sessions and workshops where staff members were explained, in more detail, the various rules, obligations and reporting procedures for corruption. In September and October 2019 HRO conducted several training sessions on Prevention of Corruption and Fraud. These training courses were tailored for vulnerable units (Medical, Finance, Security, HR) and for line managers. During these half-day courses, staff members learned how to identify red flags related to corruption and fraud and how to address these situations. They also learned to identify conflicts of interest and how to report them. Finally, they learned how to avoid that their legal and legitimate actions are perceived as corrupted, since perception of corruption could jeopardise the EULEX reputation.

Furthermore, since autumn 2019 the induction training for all new EULEX members includes a module on Prevention of Discrimination, Harassment, Abuse of Power etc. Staff members learn that various situations can be perceived differently by people. Attendees are requested to participate in exercises

which help enhance an individual's ability to empathise. Furthermore, they learn about the Mission's bystander approach: *"do not look away, but step up if you see something"*.

Moreover, in 2020, HRO launched a training exercise during which all staff members had to pass the newly implemented Code of Conduct e-course, provided by The Civilian Planning and Conduct Capability. Since then, everyone who joins the Mission is required to pass the e-course prior to his/her arrival to the Mission.

Selection of Personnel

Tool #41 – Local hiring / recruitment

According to Building Stable Governance (2016, p. 28), the military commander who conducts or supports the conduct of recruitment should ensure that the process aligns with integrity, transparency, and accountability principles in order to avoid cronyism, nepotism, patronage, and other forms of favouritism or harmful practices. As such, merit-based recruitment should be introduced from the early stages. Additionally, it is important to establish/rebuild the social and/or military ranking of qualified personnel by remedying skills deficits and knowledge gaps as well as by restoring integrity, ethics, and professional conduct.

The same reference mentions the requirement for diversity and inclusion (e.g. gender, ethnicity, religion, etc.) to be considered when selecting personnel. This will ensure diverse participation, inclusive decision-making, reconciliation and social cohesion, and proactive peacebuilding.

Finally, since the reliance on foreign aid and technical assistance for post-conflict countries/regions is limited in time, the coalition forces can support the Host Nation security forces to develop pay management and incentive systems to attract the requisite personnel without overtaxing the budget and for an effective and transparent budget execution.

UN experiences in Bosnia and Herzegovina strongly suggest that recruitment and monitoring of personnel performance could be key to improving standards of behaviour, and that integrity standards and operational procedures among troop contributing nations can translate into improved performance during operations.⁷⁴ It could thus be worthwhile for Troop Contributing Countries (TCCs) to design systems in which performance and conduct of officers deployed abroad would be subject to evaluations and would have an impact on their future careers. The UN could, explore options to press for implementation of better recruitment standards, better

⁷² Details about the academy are presented in (Handbook on Combating Corruption, 2016)

⁷³ This tool is identified in the Best Practices shared by the EULEX Chief of Staff via email on 24 February 2021, following to the NEDP12 BI team's Request for Information

⁷⁴ (Case Studies: Corruption and UN peace operations)

monitoring, and a more effective sanction system.

One option is through centralised pre-deployment training for all troops, and through putting in place mission-wide monitoring and investigative systems.

Tool #42 – Vetting mechanisms

In the project team's understanding, the military commander who conducts or supports the conduct of vetting should be specifically tasked and explained the extent of his/her freedom of engagement and coordination with partner nations/ organisations or other international actors acting in the area of operations.

Based on this task/objective, specific Statement of Requirements (SOR) for a vetting capability within the force should be addressed; for example, Force Vetting Unit (FVU) in KFOR. According to the Post Mission and Lessons Learned Report – Force Vetting Unit 2008 – 2013,⁷⁵ the KFOR experience showed that the FVU should be allowed enough time to *“recruit vetting SMEs, design relevant technical processes, to train the implementers, and resources and tools to deliver the mission.”*⁷⁶ A NATO Vetting Standard that directs BI elements to be considered during the vetting process should be in place. Whenever specific procedures are required and are not covered by the NATO regulatory framework, the military commander should be authorised to implement best practices from other nations/organisations.

When the military commander has 'executive authority' over the local/regional/national security forces of the Host Nation, LEGAD resources should be available to support/advise when vetting mechanisms face challenges due to conflict with the Host Nation's laws.⁷⁷

The review of best practices and lessons learned from other NATO missions and operations should be a mandatory tool during the FVU set-up in order to identify applicable frameworks in the area of operations. This was not the case for KFOR where it took two years to identify the vetting model applied by the NATO Advisory Team in Bosnia and Herzegovina.⁷⁸

As such, members of the FVU should consider BI aspects and adapt in order to meet the operational and cultural needs. With regards to the candidates, the FVU should act with a 'do not harm' mindset. With regards to their own integrity, the FVU members should be trained and adhere to the following widely-recognised principles: 'Authorised; Justified;

Accountable; Proportionate, Auditable; and Necessary”.⁷⁹



The Building Integrity (BI) in Peace Support Operations Course conducted at the Peace Support Operations Training Centre (PSOTC) in Sarajevo, Bosnia and Herzegovina, is aimed at promoting good practice, countering different types of corruption that undermine the success of multinational Support Operations (PSO). The PSOTC has been involved in the NATO Building Integrity initiative since 2008 when the first integrity course was completed.

Photo: NATO Bosnia Herzegovina Flickr

Interaction with other actors in the area of operations is critical for a successful vetting process, avoiding political pressure. According to (NATO - Kosovo Force (KFOR), 2013),⁸⁰ KFOR FVU established a network at staff level and formalised the interaction with four groups of actors through agreements and Memoranda of Understanding, as follows:

- International community;
- Host Nation institutions;
- NATO intelligence assets;
- Financial institutions.

Although, for several reasons, KFOR withdrew from the Disciplinary Board of the Host Nation security forces, representation on this board was identified as a suitable tool to ensure integrity and transparency of disciplinary measures as well as discharge of personnel.

FVU should elaborate plans for supporting the establishment and development of a Host Nation vetting unit, its training, transition and transfer of responsibilities.

⁷⁵ (NATO - Kosovo Force (KFOR), 2013)

⁷⁶ The finding is presented in (NATO - Kosovo Force (KFOR), 2013, p. 3)

⁷⁷ (NATO - Kosovo Force (KFOR), 2013, p. 5)

⁷⁸ (NATO - Kosovo Force (KFOR), 2013, p. 36)

⁷⁹ The principles are presented in (NATO - Kosovo Force (KFOR), 2013, p. 6)

⁸⁰ (NATO - Kosovo Force (KFOR), 2013, p. 8)

Tool #43 – Providing communication platforms

Freedom of speech and access to factual information are critical elements for building integrity efforts, to avoid misinformation and influencing the population's will during elections, and supporting their adherence to security stability after the elections. As such, as highlighted in Building Stable Governance,⁸¹ military personnel should be ready to support, enable, or provide accessible communication means/platforms in all spoken languages, at local/regional/national level. This would help overcome any adversary actions and promote equality and respect. These platforms should also be used by the military commander to conduct information campaigns regarding anti-corruption efforts and any positive concrete outcomes for the population, resulting from these efforts.

Monitoring and Reporting Corruption Incidents

Tool #44 – Establishing a monitoring mechanism

In the project team's understanding, for any support provided and for any area of responsibility given to the military commander in relation to the Host Nation's organisations, a monitoring mechanism should be in place. This should include sectors/areas to be monitored, officers in charge, standards, tracking activities, workflows, reporting templates and timelines.



During a meeting with NATO Secretary General Jens Stoltenberg in November 2019, President of Ukraine Volodymyr Zelenskyy noted that Ukrainian authorities were implementing "serious structural reforms, strengthening of democratic institutions and the rule of law, as well as the modernisation of the security and defense sector".

Photo: Official website of the President of Ukraine

Tool #45 – Investing in monitoring and oversight

A combination of donor programming and pressure to improve recipient capability to track security/military assistance (e.g. equipment) can deliver improvements. For example, in Ukraine, US State Department and Department of Defense end-user monitoring and verification programmes (Blue Lantern and Golden Sentry) enabled monitoring of the location and usage

of items provided through assistance programmes. These were complemented by Host Nation reforms increasing monitoring and tracking capabilities, and decreasing risk of corruption and diversion.⁸²

Donor-operated end-user monitoring systems need to be complemented by robust Host Nation internal processes that allow for real-time tracking of security assistance materiel. To help reduce the risk of misuse and diversion of security assistance, US officials have pressured Ukraine's Ministry of Defence (MoD) to adopt policies, procedures (incl. record-keeping, and physical safeguards (such as appropriate storage facilities) that successfully helped reduce misuse and diversion.

Furthermore, an MoD Internal Audit (IA) unit supported by the international community was set up to identify and mitigate corruption risks affecting deployed units.⁸³ It focused on areas identified as posing particular corruption risks to the armed forces: public procurement, disposal of military assets, personnel salaries and allowances, usage and repair of weapons and military equipment, management of property and military housing. IA personnel – deployed to conflict areas insofar as possible – have introduced:

- New risk management methodologies that include corruption risks in addition to fraud and financial irregularities;
- Audits of regulatory compliance with international regulations and practices;
- IT audits;
- A focus on the identification of 'red flags', or indicators, that can signal problems with field procurement or personnel issues;
- Training, including pre-deployment training, to those about to deploy and those who are likely to carry out procurement in a conflict zone.

The high costs of the US missions in Iraq and Afghanistan, as well as the billions of dollars spent on reconstruction in both countries, prompted the creation in the US of standing Inspector General offices dedicated to overseeing the expenditure of all funds – from development to military. For instance, the Special Inspector General for Afghanistan Reconstruction (SIGAR) has thus had oversight over US spending within the International Security Assistance Force (ISAF), Operation Enduring Freedom (OEF), and development projects in the country, and has had preventive, audit and investigative powers. By mid-2017, after nine years of existence, SIGAR reported that its investigations have brought about 112

81 (Building Stable Governance, 2016, p. 9)

82 (Making the system work: security assistance to Ukraine, 2014-2017)

83 (Making the system work: security assistance to Ukraine, 2014-2017)

criminal convictions and about 1.1 billion USD in criminal fines, forfeitures, recoveries of costs through settlements and US government cost savings.⁸⁴

In Colombia, the sustained, long-term presence of US personnel in Colombian bases appeared to have acted as a safeguard against corruption risks. Officers and non-commissioned officers were present in the Colombian Defence Ministry and embedded in certain brigades in the field. During earlier phases of Plan Colombia, the Embassy's Military Group had presence in practically every region, helping the armed forces with procurement, maintenance and training. The presence of these advisers, US officials claim, helped to raise standards: US personnel are obliged to report on any wrongdoing they see, which can lead to those implicated being relieved of their duties. In a diplomatic cable setting out the lessons learned from Plan Colombia, Ambassador William Brownfield noted that embedding personnel in host country institutions 'provides subtle early leverage over US assistance programmes'.⁸⁵

All transfers of equipment under Plan Colombia involved an agreement setting out the requirements for how it will be used, as well as arrangements for End-User Monitoring (EUM). This covered US processes to track where the equipment is and how it is being used. Dedicated teams of US personnel checked Plan Colombia equipment, carrying out serial number inventories, and ensuring that all equipment remains with the units it was assigned to. US-provided equipment can only be transferred, sold, or destroyed under the agreed terms, and disposal of sensitive materiel had to be authorised and observed by a US representative. These ongoing EUM processes were complemented by spot checks carried out by audit teams.⁸⁶

Tool #46 – Cooperation with civil society: whistleblowing and monitoring

According to a Transparency International case study on Afghanistan, among a number of civil society organisations reporting on corruption in the country, the work of Integrity Watch Afghanistan (IWA) in monitoring reconstruction projects improved project outcomes, empowered local communities to demand that government institutions respect their obligations, and built links between the communities and the elites in the Afghan government. IWA trained community representatives to monitor projects funded and implemented by US forces, including roads, bridges and Afghan National Defence and Security Forces (ANDSF) facilities. Its previous advocacy has led to the International Security Assistance Force (ISAF) adopting

a policy of transparency in contracting (subject to security concerns), which in turn enabled community oversight over military-funded projects. With community involvement came better buy-in from local communities and greater likelihood that objectives related to peace and security could be achieved.

Participation of civil society in monitoring and oversight is the flip side of transparency. While availability of data itself does not improve outcomes, the work of organisations, which make use of that data, can help achieve better outcomes. According to the TI study, in order for civil society to be effectively involved, however, the following conditions need to be fulfilled:⁸⁷

- Collective engagement from communities and monitors, creating pressure on government institutions and enabling involvement from the monitors;
- Buy-in from government institutions financing the projects;
- Monitor expertise and sense of collective engagement;
- Internal reporting.⁸⁸

Tool #47 – Reporting mechanisms

Some internal reporting mechanisms were identified as best practices by EULEX and have the potential to be adjusted / adopted to the specifics of a military operation. These mechanisms include:

- *EULEX Corruption Watchdog Application*: EULEX features on its Intranet page a link to the Corruption Watchdog application where staff members can report possible incidents of corruption they may encounter while on duty, related to Kosovo's rule of law institutions or the Mission itself. Although very rarely received, in case of a complaint a notification is sent to the Head of Mission Office, and to the Special Assistant of the Deputy Head of Mission.
- *Corruption drop box*: EULEX has on its premises a drop box where staff members can drop off complaints, if any, to raise concerns about corruption or irregularities. It is checked periodically, however, complaints are seldom received. The Deputy Head of Mission deals with the complaints.
- *European Anti-Fraud Office (OLAF)*: EU staff members have an obligation to report possible cases of fraud, corruption, other illegal activity, or professional conduct which may

84 (Briefing for Policy Makers - Corruption: Lessons from the international mission in Afghanistan, 2015)

85 (Corruption and Plan Colombia: The Missing Link, 2019)

86 (Corruption and Plan Colombia: The Missing Link, 2019)

87 (Afghanistan: Corruption and the making of the warlords)

88 This tool is identified in the Best Practices shared by the EULEX Chief of Staff via email on 24 February 2021, following to the NEDP12 BI Team's Request for Information

constitute a serious failure to comply with the obligations of EU staff members. The report can be submitted either to a member of management (see the mechanisms above) or to OLAF directly.

Tool #48 – Address internal vulnerabilities

According to the Toolkit on Police Integrity (2019), any organisation has its own vulnerabilities to corruption. These vulnerabilities should be assessed by understanding the interdependence between the main elements of the organisation and the possibilities they create for corruption. An assessment tool of these vulnerabilities is presented as best practice in (oolkit on Police Integrity (2019, p. 109 (table 6)). The tool details an organisation's vulnerabilities, their potential consequences that could lead to corruption, and the organisational actions and freedoms for the following areas: environment; definition of corruption; values; strategy; structures; system of authority; human resources; control; communication; culture; personnel.

Tool #49 – Internal control

The Toolkit on Police Integrity (2019) also emphasises that internal control within an organisation can ensure that BI measures are effective and that there is willingness inside the organisation to change and adhere to BI principles. The use of checklists is a common practice when evaluating the existing internal control. It should address the most problematic areas in relation to BI and anti-corruption and its effective use will strengthen controls, improve compliance and reduce the risk of corruption within the force. Several questions⁸⁹ that can be considered in the checklist, are presented in Annex B.

Tool #50 – Reporting and transparency

The work of oversight bodies should be transparent to the public. Their activities should be regularly recorded and published along with the status of their investigations. The Toolkit on Police Integrity (2019, p. 195) notes that the following recommendations are designed to enhance the transparency of oversight bodies and strengthen their reporting:

Regular reporting: The oversight body should publish at least an annual or biannual report with comprehensive details on its activities and findings. *"It also should engage in ongoing communication strategies such as maintaining a website and organising awareness raising and training sessions."*

Audit information: *"The oversight body should demonstrate its transparency by making available publicly audit information such as its annual budget and expenditures".*

Tool #51 – Periodic Mission Review (PMR)

In the project team's understanding, the military commander can include a specific section / annex on BI efforts, progress, and incidents in relation to the Periodic Mission Review. Whenever required, ad-hoc reports can be provided to higher HQs providing details on specific incidents or achievements. BI can also be included as an agenda point in debriefings or periodic updates of the higher echelon. Finally, internal security and human resources reports can be required in order to diagnose the BI status of the coalition forces.

3.3.3 Wider Applicable Tools Relevant for BI

The United Nations Anti-corruption Toolkit⁹⁰ published in 2004 by the UN Office on Drugs and Crime (UNDOC), as part of the Global Programme Against Corruption, contains a detailed set of specific tools for assessing the nature and extent of corruption, for deterring, preventing and combatting corruption, and for integrating the information and experience gained into successful national anti-corruption strategies.

There are 44 tools within the toolkit, which provide information about the conditions under which a particular programme will or will not work and how these various tools can be adapted or modified to suit the circumstances in which they are likely to be used. These tools are grouped in seven categories, as presented in Annex C, and are exemplified with several case studies emphasising their success and relevance. In the project team's understanding, depending on the specifics of the operation and the mission of the military commander, these tools have the potential to inform and support (directly or in a broader context) the implementation of BI in Operations.

⁸⁹ The questions included in the checklist are presented in (Toolkit on Police Integrity, 2019, pp. 170-171)

⁹⁰ (The United Nations Anti-Corruption Toolkit, 2004)

3.4. Assess

3.4.1 Introduction

The overall aim of the Assessment part is two-fold:

Firstly, to monitor and evaluate how successful Building Integrity (BI) and anti-corruption efforts are. It is for this reason that one of the project team's suggestions for the Understand key focus area - of the BI in Operations Framework - was to develop baselines of local corruption dynamics in a particular area of interest before it becomes an area of operation. These, in turn, could provide a benchmark against which changes and progress can be measured.

Secondly, to develop conclusions and recommendations for improving BI in Operations plans and implementation, as clearly stated in the Military Concept for Building Integrity in Operations.

Anti-corruption practitioners have been facing challenges when measuring changes in corruption levels and evaluating whether BI/anti-corruption efforts are successful. According to a member of the BI team at NATO Headquarters, *"the challenges for assessing progress on BI are similar to the assessment of any other reforms in the area of development and good governance. They are related to the long duration of such reforms which makes it hard to demonstrate change over a shorter period of time"*.

According to the U4 Anti-Corruption Resource Centre and the United Kingdom (UK) Department of International Development (DFID), *"corruption is a broad concept with various manifestations (bribery, facilitation payments, embezzlement, fraud, extortion, favoritism, etc.) in different sectors (health, education, water, etc.) and in various central government processes (procurement, taxation, recruitment, etc.). As a result, the data collected will arguably never be comprehensive enough to fully diagnose the spectrum of corrupt behaviour. Therefore, the task at hand is not to measure corruption levels broadly but to identify specific corruption problems and measure changes in the relevant sectors, institutions, or processes. There are no quick fixes; good measurement requires robust data, systematically and consistently collected over time."*⁹¹

In light of these considerations, and based on identified BI practices and lessons learned from other international entities involved in BI and anti-corruption efforts worldwide, the project team has selected the following BI tools that could be employed during the overall Assessment key focus area of the BI in Operations Framework.

3.4.2 Identified BI Tools

Tool #52 – Evaluation and monitoring checklist

According to the Centre for Integrity in the Defence Sector (CIDS) and Transparency International, the following checklist should be in place when undergoing evaluation and monitoring of BI efforts:⁹²

- Define the objective of the evaluation and how and when to do it;
- Develop the theory of change;
- Determine data sources for your indicators, baseline and target activities, personnel and outcomes;
- Determine who will conduct data collection and reporting;
- Determine which indicators should be monitored over time, and when it should be done;
- Set reporting timelines and requirements;
- Define communication (i.e. who reports to whom).

Tool #53 – Proxy indicators

According to the U4 Anti-Corruption Resource Centre and the UK DFID, proxy indicators could be employed to address the challenge of measuring the progress and/or success of anti-corruption efforts. Proxy indicators are considered alternatives to 'direct' indicators, which can measure the phenomenon under study in a direct way, but may be difficult to operationalise or require overly costly data collection.⁹³

Proxy indicators should maintain similar characteristics to direct indicators in the sense that they should be specific, measurable, attainable, relevant, time-bound (SMART) or clear, relevant, economic, adequate, monitorable (CREAM). Equally, they should not be static, but should be reassessed periodically to ensure that they accurately reflect local conditions.

Below are some of the concrete examples recommended by the U4 and DFID brief⁹⁴:

- The fact that it takes 254 steps and two years to get a building permit may be a key proxy indicator for corruption, even beyond the construction sector. Benchmarks have to be carefully established: in the case of the permit, the goal should not be to arrive at one step and instant issuance. As progress is made towards benchmarks, new proxy indicators

91 (Johnson & Mason, 2013, p. 5)

92 (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014, p. 33)

93 (Johnson & Mason, 2013, p. 1)

94 (Johnson & Mason, 2013, pp. 3-4)

become more important. The trade-off for short-term utility and policy relevance can therefore be inability to track progress using the same indicator over long periods of time. However, the type of proxy indicators proposed would be an improvement for short- to-medium term measurement;

- An example to consider is whether measures of social trust in public institutions (particularly service delivery institutions) are linked to, and reflect, changing levels of corruption in those institutions;
- Another would be the linkage between levels of tax compliance and corruption levels. A proxy indicator for payroll fraud in the civil service could be the number of ghost workers. Randomly assigned audits could provide an estimate of levels of fraud and embezzlement;
- An indicator of patronage in some countries could be how many senior civil servants change jobs after a change in government.

The idea behind this tool is to “shift the focus from standardised, cross-country indices aimed at measuring corruption levels on a national scale towards more bespoke, problem-oriented indicators that allow for short- to medium-term measurement of progress”.⁹⁵

Tool #54 – Change and performance indicators

In the Integrity Action Plan Handbook, CIDS and Transparency International state that measurable indicators of change are needed when measuring the success of relevant efforts. Of note, measuring behavioural change is often difficult and indicators are likely to be defined in terms of actions taken, knowledge acquired and attitude changes.

In this regard, relevant staff may wish to ask the following questions:

- Are the actions in accordance with the rules, and are the prescribed procedures being followed?
- Are new or modified organisational arrangements properly understood and seen as authoritative guidelines?
- Have previously identified risks of corruption been

sufficiently mitigated, especially in high-risk areas?⁹⁶

Additionally, relevant staff may wish to consider:

- Monitoring certain indicators, including attitudes, ethical standards of staff, for a longer period of time; other indicators such as enactments of certain laws or ratification of a certain convention may not require as much;
- Linking indicators with suitable data sources that can be used as valid indicators.

Example: For measuring sufficient knowledge of new rules and procedures, the amount of training might serve as a general indicator. However, to gain a more in-depth understanding of the impact of such training, relevant staff may wish to develop surveys that can gather information about attitudes and behavioural shifts before and after the training has been conducted⁹⁷.

Figure 7: Measuring the impact of Building Integrity activities ⁹⁸

Objective	Activities	Indicators	Means of Verification	Assumption
To improve understanding of corruption and its impact on defence	Training courses on building integrity	Number of students Number of students who agree or strongly agree that they have an improved understanding of the subject	Surveys conducted at the end of the course	Willingness by course participants to learn new ideas
The defence budget is publicly available and accessible	Capacity building with MoD staff and parliamentarians; website development; joint working group on budget transparency	Publication of the budget on the MoD website; discussions with civil society on the budget	Quarterly report from MoD and parliament; website verification	Favourable legal environment on freedom of information, open government data, etc.

Similarly, the Geneva Centre for Security Sector Governance (DCAF) has suggested employing performance indicators to understand the suitability of overall BI efforts. In the project team’s understanding, the reports providing detail on corruption incidents will not only support situational awareness, but also help evaluate the level of implementation of BI activities in operations. As such, several performance indicators can be defined that will support the understanding of the suitability of BI efforts invested. According to the Toolkit on Police Integrity (2019, p. 73), two types of indicators can be identified:

- **Results indicators:** providing information about the change of behaviour resulting from the implementation of the

95 (Johnson & Mason, 2013, p. 5)
 96 (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014, p. 32)
 97 (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014, p. 33)
 98 (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014)

output;

- **Satisfaction indicators:** These are aimed at surveying the opinion of force members or the public on the activities and/or the performance delivered.

The example in the table below⁹⁹ provides a way to employ performance indicators.¹⁰⁰

Output	Outcome (results)	Outcome (satisfaction)
Number of hours devoted to corruption themes in training.	Percentage of disciplinary cases related to corruption.	Percentage of members of the public who trust coalition force members (or Host Nation security forces).
Number of messages on the topic delivered externally and internally in a certain period of time.	Number of complaints filed against coalition force members (or Host Nation security forces).	What is the public perception of integrity (internally and externally) for coalition force members (or Host Nation security forces).
Number of rules that have been modified to prevent corruption.	Number of criminal convictions against coalition force members (or Host Nation security forces).	

Figure 8: Example of performance indicators

Tool #55 – Long-term monitoring through new assessments

CIDS and Transparency International recommend that relevant staff ensure that, for long-term monitoring, they use the same corruption assessment methods employed at the very beginning, when understanding the corruption risks in a particular Area of Interest (AOI).¹⁰¹

For example, if the initial assessment – part of Understand – was based on Transparency International's Government Defence Anti-Corruption Index, then the next version of the index should be used to check where objectives have been met and where new efforts are needed. Since this particular index will be issued every two years, it can track progress over several years.

Tool #56 – Independent/external assessment

One of the initiatives developed in Afghanistan was to enlist the help of independent experts to assist with monitoring and evaluation of anti-corruption efforts. This may have application elsewhere, as highlighted by Transparency International - Defence and Security Programme in their Lessons from the International Mission in Afghanistan Briefing.



The independent joint anti-corruption Monitoring and Evaluation Committee (MEC) released the End-State Assessment of implementation of its anti-corruption recommendations in Afghanistan in December 2020.

Photo: @MEC_Afghanistan Twitter

Case Study:

The independent joint anti-corruption Monitoring and Evaluation Committee (MEC)

The MEC was created in 2010 after the need for independent monitoring and evaluation of anti-corruption efforts in Afghanistan was identified at the London and Kabul international conferences. The MEC independently monitors and evaluates national and international efforts to fight corruption in Afghanistan. It reports to the president, parliament, public, and the international community. The Committee consists of six senior anti-corruption experts – three internationals and three Afghans – selected through a nomination process implemented by the international community and the Afghan government. The Chairmanship of the Committee alternates between an Afghan and an international appointee on a six-month basis. The MEC's terms of reference include the following mandates: develop anti-corruption recommendations and benchmarks; monitor and evaluate the government's and the international community's efforts to fight corruption; report to the president, parliament, public and the international community. Every six months, the MEC submits a report of its assessments and findings of the agreed-upon benchmarks to the president, parliament, and people of Afghanistan through the media.¹⁰²

99 Adapted from (Toolkit on Police Integrity, 2019, p. 73 Box 5)

100 (Toolkit on Police Integrity, 2019, p. 73)

101 (Integrity Action Plan: A Handbook for Practitioners in Defence Establishments, 2014, p. 33)

102 (Briefing for Policy Makers - Corruption: Lessons from the international mission in Afghanistan, 2015, p. 7)

Case Study: The combined joint inter-agency Task Force Shafafiyat

Task Force Shafafiyat was set up in Afghanistan, following the realisation among the international military and civilian leaders that corruption was a major operational factor in the campaign, but one that the International Security Assistance Force (ISAF) was not well set up to understand or address. Its broad mandate was to build ISAF awareness of the corruption issues in the country and to lead ISAF's counter-corruption work in Afghanistan. The Task Force's performance was reviewed twice by Transparency International UK, in 2012 and 2013. According to Transparency International, *"it had been well received among Afghan civil society groups, especially as part of its mission was to assist in making the Afghan Ministry of Defence and Ministry of Interior more open to outside scrutiny."*¹⁰³

Tool #57 – Evaluation and performance methodology

During the evaluation of a Host Nation's security forces, apart from tangible aspects such as recruitment, training, and equipment, subjective factors, including corruption, should also be assessed. This was not the case in ISAF and, according to the 2016 SIGAR Report¹⁰⁴, corruption, malign influence, and dependency undermined the readiness and battlefield performance of the Afghan forces, leading to acknowledging corruption as a critical threat to US objectives in Afghanistan.

It is the project team's understanding that by considering corruption factors and anti-corruption measures, some of the tools used by the US have the potential to support an adequate assessment of the BI status within a Host Nation's security forces. These tools were the following:

- **Tool #58 – Capability Milestones rating system (CM) until 2010;**
- **Tool #59 – Commander's Unit Assessment Tool (CUAT) until 2013;**
- **Tool #60 – Regional ANDSF Assessment Report (RASR) until 2015;**
- **Tool #61 – Monthly ANDSF Assessment Report (MAAR) after 2015.**

Given some documented shortfalls relating to these tools, a more in-depth review and adaptation of these tools for potential use in support of BI in Operations is required. A short

description of the tools is presented below, while more details are available on Lessons from US Experience in Afghanistan (2016, pp. 51-54):

- **CM:** This tool was based on a rating system with four levels reflecting the ability of the force to conduct its mission independently or with international force assistance. It led to inconsistencies, especially because getting high ratings resulted in losing mentoring and international assistance support.
- **CUAT:** This assessment framework was more detailed and included both qualitative and quantitative components. This tool, which was applied separately for the Ministry of Defence and the Ministry of Interior, also led to some inconsistencies since it depended on rating definitions, which were changed over time; however, the evaluators/assessors were not trained, thus different evaluations.
- **RASR:** This tool included seven rating levels and became classified. It allowed for a more targeted assessment and more consistency. Sufficient instructions were provided for its implementation and a quality control check was implemented.
- **MAAR:** After the 2014 security transfer, a broad assessment framework for the entire Resolute Support Mission was adopted. It included eight essential functions measured on a five-point scale. However, the tool remained problematic since the evaluation / assessment was made only at Armed Forces and Police Force Headquarters level and not for the entire security forces (at all levels), thus creating the risk to misinform on the real situation.

Finally, The 2016 SIGAR Report¹⁰⁵ recommends to use **Tool #62 - Periodic reporting**, as a main tool for the Department of Defense (DoD) to report to Congress the assessment on the Security Sector Assistance (SSA) objectives as well as an evaluation of the Host Nation's political, social, economic, diplomatic, and historical context. This tool would support shaping security sector requirements, including BI aspects, and appropriately aligning DoD activities with long-term US funding, serve the congressional oversight, and improve transparency. The assessments should include different courses of action for SSA missions based on (1) the political strategy, (2) the military capacity, (3) the impact that improving a partner nation's operational and governing capabilities has on long-term sustainability, and (4) any dependency concerns. The inputs in this tool should come from the State, Justice, and the Intelligence community. In support of this tool, independent, third party assessments should be requested to ensure 'group think' and 'mirror imaging' issues are identified and mitigated.

103 (Corruption Threats and International Missions: Practical Guidance for Leaders, 2016, p. 33)

104 (Reconstructing the Afghan National Defense and Security Forces: Lessons from US Experience in Afghanistan, 2016, p. XV)

105 (Reconstructing the Afghan National Defense and Security Forces: Lessons from US Experience in Afghanistan, 2016, p. 187)



"Corruption has been a staple of development debates since the mid 1990s. Its corrosive effects are well documented: deep-rooted corruption prevents inclusive economic growth, diverts aid and subverts international development aid. But an equally important consequence of widespread corruption is far less recognised and far less studied: its impact on national and international security. This is why corruption matters to NATO."

Dr Karolina MacLachlan, Regional Programme Manager Europe for
Transparency International - Defence and Security
NATO Review, December 2018

Photo: NATO Flickr

4. Key Findings

Following the research, analysis and further consideration of the most significant tools relevant for the implementation of Building Integrity (BI) in Operations, the project team highlights the following key findings:

1. BI tools are relevant for both the Host Nation's defence and related security sector, and NATO/coalition forces. Indeed, leading by example is key to the credibility of NATO/coalition forces;
2. Military commanders have several opportunities to influence and enhance BI efforts within the Host Nation's defence and related security sector during the conduct of an operation. However, the extent of their authority must be clarified prior to deployment in the area of operations;
3. Overall, many tools' applicability depends on the type, objectives and context of mission/operation (e.g. capacity building, peacekeeping, crisis management etc.) For example, BI-related objectives may feature within a training mission or a capacity building initiative where there usually is a high level of engagement with the Host Nation. This may not be the case during a crisis response operation, where corruption is likely to be identified as a potential significant risk that can undermine the mission, as opposed to its objectives;
4. There are several case studies on the implementation of BI in different recipient countries that highlight various best practices and lessons learned in reducing corruption. However, they present mainly a political perspective on BI practices at governmental level, as opposed to a military perspective on BI practices in operations and missions;
5. BI tools are meant to be implemented from the onset of an operation. For this reason, education and training is a discipline that should be taken into consideration in all phases of an operation - whether it is creating a suitable pool of BI experts, pre- and post-deployment training, or subsequent training of local security forces. Moreover, continuous assessment of BI efforts should lead to adjustments and tailoring of these specific BI tools, including through education and training;
6. Through its research, the project team has identified potential opportunities to leverage existing NATO analytical processes and planning models to enhance BI efforts; for instance, the integration of BI elements within the Knowledge Development process, or the applicability of models like Public Affairs planning since both these lines of efforts are key in all stages of an operation, and are already associated with efficient practices and tools;
7. Involving a third party in the monitoring and assessment of BI efforts in operations is recommended for two different reasons; firstly, to understand the potential corruption risks and vulnerabilities within NATO/coalition forces; and secondly, to understand the real success and impact of BI efforts for the recipient entities/Host Nation. Therefore, the project team would argue that the involvement of external entities ensures efficient planning and employment of BI resources in support of the desired end-state;
8. There is limited awareness and common understanding of BI within NATO, which may be linked to limited knowledge of the terminology associated with it, among other factors. The term 'Building Integrity', while appropriate in a political and diplomatic setting, may be too broad to be associated with military efforts to prevent and counter corruption, and increase transparency and accountability at an operational level;
9. One of the main apparent obstacles to the successful implementation of BI in Operations is the scarcity of subject matter experts with operational knowledge, as evidenced in NATO Mission Iraq. The short rotational nature of BI in Operations positions and the few full-time roles dedicated to this topic may hinder the progress of BI efforts in the medium-term, and pose a threat to the success of the mission in the long-term. The shortage of advisors who provide continuity to the overall BI effort may make it impossible to guarantee the frequency and consistency of BI activities over the duration of the mission or operation. This, in turn, could affect the credibility of NATO among the international community and within the Host Nation, having a detrimental impact on the desired end-state. To ensure operation/mission success, NATO may wish to consider making a more substantial investment in BI expertise and developing an innovative and comprehensive approach to addressing corruption within the Host Nation's defence and related security sector.

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6. Annexes

6.1. Annex A - Glossary of Acronyms

ACO	Allied Command Operations
ACT	Allied Command Transformation
ANDSF	Afghan National Defense and Security Forces
ATFC	Afghan Threat Finance Cell
AOI	Area of Interest
ASG	Assistant Secretary General
BI	Building Integrity
BIIO	Building Integrity in Operations
C3	Consultation, Command and Control
CCTV	Close-circuit television
CIDS	Centre for Integrity in the Defence Sector
CIMIC	Civil-Military Cooperation
CM	Capability Milestones
CONOPS	Concept of Operations
COPD	Comprehensive Operations Planning Directive
CREAM	Clear, Relevant, Economic, Adequate, Monitorable
CSTC-A	Combined Security Transition Command-Afghanistan
CUAT	Commander's Unit Assessment Tool
D&G	Directions & Guidance
DCAF	Democratic Control of Armed Forces, known as the Geneva Centre for Security Sector Governance
DFID	Department of International Development
DiFi	The Norwegian Agency for Public Management and eGovernment
DOD	Department of Defense
DOTMLPFI	Doctrine, Organisation, Training, Materiel, Leadership, Personnel, and Facilities
DPKO	Department of Peacekeeping Operations
EU	European Union
EULEX	European Union Rule of Law Mission in Kosovo
EUM	End-User Monitoring
FRAGO	Fragmentary Order
FVU	Force Vetting Unit

HQ	Headquarter
HR	Human Resources
HRM	Human Resources Management
HRO	Human Resources Office
HS	Horizon Scanning
IA	Internal Audit
IC	International Community
IO	International Organisation
INFOOPS	Information Operations
ISAF	International Security Assistance Force
I&W	Indications and Warning
IWA	Integrity Watch Afghanistan
KFOR	Kosovo Force
LEGAD	Legal Adviser
MAAR	Monthly ANDSF Assessment Report
MEC	Monitoring and Evaluation Committee
MLA	Mutual Legal Assistance
MOD	Ministry of Defence
MRO	Military Response Options
NAC	North Atlantic Council
NEDP	NATO Executive Development Programme
NGO	Non-Governmental Organisation
NHQ	NATO Headquarters
NNE	Non-NATO Entities
OECD	Organisation for Economic Cooperation and Development
OEF	Operation Enduring Freedom
OLAF	European Anti-Fraud Office
OPLAN	Operations Plan
OPORD	Operations Order
OPP	Operations Planning Process
OSCE	Organization for Security and Co-Operation in Europe
PESTL	Political, Economic, Social, Technological, Legal
PMESII	Political, Military, Economic, Social, Infrastructure, Information
POC	Points of Contacts

P&SO	Peace & Stability Operations
RASR	Regional ANDSF Assessment Report
SAQ	Self-Assessment Questionnaire
SHAPE	Supreme Headquarters Allied Power Europe
SIGAR	Special Inspector General for Afghanistan Reconstruction
SMART	Specific, Measurable, Attainable, Relevant, Time-bound
SME	Subject Matter Expert
SOLLIMS	Stability Operations Lessons Learned & Information Management System
SOR	Statement of Requirements
SPD	Strategic Planning Directive
SSA	Security Sector Assistance
SSA	SACEUR's Strategic Assessment
STRATCOM	Strategic Communication
TI	Transparency International
TCC	Troops Contributing Countries
U4	Anti-Corruption Resource Centre (Norway)
UN	United Nations
UNDOC	UN Office on Drugs and Crime
US	United States
USAID	United States Agency for International Development
VUCA	Volatile, Uncertain, Complex, Ambiguous

6.2. Annex B - Interview Questions from Police Integrity Toolkit

Introduction

The following questions¹⁰⁶ are identified in (Toolkit on Police Integrity, 2019) as suitable to be included in a checklist relating to Internal Control:

General Questions

- Have management established a mission statement, set goals and developed plans to meet their objectives?
- Are the performance targets realistic and achievable?
- Are there policies or principles established in the HQ regarding internal controls?
- Are the leadership, staff, and support personnel familiar with these policies and principles?
- Do the management set an example of high integrity and ethical behaviour?
- Is there a code of conduct specifically for the military or a general code for government employees?
- Is the code of conduct reinforced by training, top-down communications and requirements for periodic written statements of compliance from key employees?
- Do management demonstrate the importance of integrity and ethical values to personnel and are they familiar with the code of ethics, if it exists?
- Are plans and performance periodically assessed?
- Is ethics integrated ('woven into') the criteria used to evaluate individual and police unit performance?
- Do management react appropriately when receiving bad news from subordinates / units?
- Are job descriptions, operational procedures and support procedures updated?
- Does employee morale appear to be at an acceptable level?
- Are there time, tools and resources to accomplish the mission and objectives effectively?

Questions Related to Monitoring

- Do management routinely monitor control in the process of running the operations?
- Do management clearly assign responsibilities for training and monitoring of internal controls?

Questions Related to Operations

- Are there policies and routines established for operations?
- Have these policies and routines been distributed among the individuals operating in this area?
- Have the individuals operating in this area been informed of policies and trained in routines?

Questions Related to Internal Audit

- Does the internal auditing have the complete support of top management?
- Is the organisational relationship between internal auditing and senior executives in the organisation appropriate?
- Are internal audit reports covering the right subjects, distributed to the right people and acted upon in a timely manner?
- Do the key audit executives possess an appropriate level of expertise?

Questions Related to Human Resource Management (HRM)

- Are there policies and routines established for HRM?
- Have these policies and routines been distributed among the individuals working with HRM issues?
- Have the individuals working with HRM issues been informed on the policies and trained in the routines?
- Are the appropriate criminal background checks being performed when required by position?
- Are duties related to processing and approving personnel actions segregated?
- Are performance evaluations conducted by immediate supervisors and submitted to the personnel or HRM

106 The questions included in the checklist are presented in (Toolkit on Police Integrity, 2019, pp. 170-171)

department on a timely basis?

- Are procedures in place to ensure reporting of outside employment activities, and any potential conflicts of interest?

Questions Related to Payroll

- Are there policies and routines established in the area of payroll?
- Have these policies and routines been distributed among the individuals working with payroll issues?
- Have the individuals working with payroll issues been informed on the policies and trained in the routines?
- Are the duties of approving job actions and time separated from the duties of distribution of pay cheques and payment into salary accounts?
- Are time and labour entries approved by direct managers to ensure that worked hours correspond to paid hours?
- Do management review and sign the final pay list to ensure that personnel are paid according to wage contracts and terminated employees are not paid?

6.3. Annex C - Wider Applicable Tools with BI Relevance

Introduction

The tools presented below are part of the United Nations Anti-corruption Toolkit¹⁰⁷ developed as part of the Global Programme Against Corruption. These tools are the result of an in-depth analysis of the best practices, lessons, and shortfalls identified in 40 case studies relating to anti-corruption. The tools are grouped in seven categories, based on their applicability.

Assessment of Corruption and of Institutional Capabilities Against Corruption

The tools under this category support setting clear and realistic goals for impact-oriented elements and strategies. These tools are:

Tool #1 Assessing the nature and extent of corruption: It describes specific data collection methods, including surveys, interviews, desk reviews, case studies, and other means, that can be used to gather information about corruption. This data supports quantitative assessments (for extent) and qualitative assessments (for nature). Such assessments are used to develop and refine specific measures (e.g. adjust codes of conduct); subjective effects (e.g. threats to the personnel refusing corruption); objective and subjective perspectives on the reality and perception of corruption.

Tool #2 Assessment of institutional capacities and responses to corruption: This tool is applied similar to Tool 1 but the data is used to assess the institutions' capacities.

Institution Building

The tools under this category support the building of effective institutions. These tools are:

Tool #3 Specialised anti-corruption agencies: In case such agencies exist, the military commander should coordinate with them.

Tool #4 Auditors and audit institutions: It deals with the auditing process, outlining the purposes of audits and what they are expected to achieve within legal and financial areas, ensuring conformity with established standards or reviewing the performance of institutions and individuals. The scope of audits, the qualifications of auditors, and the transparency of audit reports are critical.

Tool #5 The ombudsman: In case such tool exists, the military

commander should coordinate with them as appropriate.

Tool #6 Strengthening judicial institutions: Among other activities, this tool includes efforts at integrity building and education about the nature and extent of corruption and the establishment of adequate accountability structures.

Tool #7 Civil service reform to strengthen service delivery: whenever elements of this tool (e.g. strategic framework; reform programmes; access to information and disclosure rules etc.) are relevant for / applicable to the Host Nation security forces, the military commander can consider these efforts within its building integrity mandate.

Tool #8 Codes and standards of conduct: this tool comprehensively examines additional rules that might be applied to key public sector groups, such as police and law enforcement officials; members of legislative bodies and other elected officials and judicial officers, including judges; military forces; media domain.

Tool #9 National anti-corruption commissions and similar bodies: this tool distinguishes between an anti-corruption agency and a national anti-corruption commission. While the former is a standing body established to implement and administer prevention and enforcement elements of a national strategy, the latter is a standing or ad hoc body designed to develop, launch, implement and monitor the strategy itself.

Tool #10 National integrity and action-planning meetings: this tool involves a large group of stakeholders at meetings or 'workshops' to develop a consensual understanding, both of procedural and substantive nature, of the types, levels, locations, causes and remedies for corruption. Such meetings should occur at different phases during the development, implementation and evaluation of an anti-corruption strategy.

Tool #11 Anti-corruption action plans: this tool sets clear goals, timelines and sequencing for the achievement of specific goals. A national plan is likely to be an extensive document providing detailed coverage of all segments of Government and society, encompassing five substantive issues: awareness-raising, institution building, prevention, anti-corruption legislation, and enforcement and monitoring.

Tool #12 Strengthening local governments: this tool offers suggestions on how to adapt national tools and institutions for local use, how to facilitate vertical and horizontal integration of local efforts and encourage public participation.

Tool #13 Legislatures and their efforts against corruption: this tool discusses ways in which legislatures can strengthen their role in areas that are critical to combatting corruption. Anti-corruption efforts in legislative bodies may be directed at the institutions themselves or at individual members. Accountability of

107 (The United Nations Anti-Corruption Toolkit, 2004)

members may be set down by codes of conduct covering, inter alia, conduct of election campaigns, or they may cover rules of participation in legislative functions. A disciplinary mechanism can be instituted to investigate complaints and enforce disciplinary action where necessary. This tool also outlines ways in which transparency and accountability can be implemented (e.g. use of the committee system which distributes subject matter between many committees, some with overlapping functions and responsibilities). Open access to information and sittings, media transmissions of parliamentary proceedings, modern technological aids, such as web sites, and publications are among the transparency structures cited by this tool.

Situational Prevention

The tools under this category support the efforts in various institutional areas to prevent corruption. These tools are:

Tool #14 Disclosure of assets and liabilities by public officials: This tool describes ways of increasing transparency with respect to the assets and liabilities of public officials, their family members, relatives, and associates, in order to deter illicit enrichment from sources such as bribery or investments made with insider knowledge.

Tool #15 Authority to monitor public sector contracts: Creation of such authority may help monitoring relevant activities in the defence/security sector especially given the fact that, more recently, dubious practices within international agencies and non-governmental organisations that have resulted in aid not being maximised have come under scrutiny.

Tool #16 Curbing corruption in the procurement process: This tool discusses a number of methods for getting to control what is seen as the most common form of public corruption. One of most relevant methods discussed is the 'islands of integrity' from Transparency International which considers the pressures to engage in corruption arising mainly from concerns that competitors will do so. As such, the method argues that if an island of integrity can be created by ensuring that a particular agency, department, segment of Government or transaction is not corrupt, then competitors can be secure in the knowledge that refraining from corrupt practices themselves will not put them at a disadvantage.

Tool #17 Integrity pacts: This tool is similar to 'islands of integrity' but focused on specific contracts or transactions rather than ongoing institutional arrangements.

Tool #18 Reducing procedural complexity: This tool outlines ways in which excessive administrative complexity (which is a significant enabler for corruption), can be reduced. Since bureaucracy is linked to internal resistance, reforms should aim also for employees buy-in in the effort.

Tool #19 Reducing and structuring discretion: This tool sets

out a method for structuring discretionary powers to ensure that they are limited only to what is necessary to a given administrative function.

Tool #20 Results- or fact-based management: This tool aims to increase overall accountability and make it more difficult for corruption to thrive. Results based management, also known as fact-based management, sets clear goals for achievement as well as criteria and processes for assessing if goals have been achieved. Such systems therefore function as both a management system and as a performance-reporting system.

Tool #21 Using positive incentives to improve employee culture and motivation: this tool provides an overview of the types of incentives that can be offered as well as the linkages that should be made between incentives and other reforms, such as reducing the number of employees to perform the work more successfully. Availability of financial resources to provide the positive incentives to carry out reforms may be limited so that involving aid donors would be required.

Social Prevention

The tools under this category support transparency and citizen involvement in preventing corruption. Although these tools do not seem as having immediate usability for the military commander, they have the potential to support the overall mission of the military commander. These tools are:

Tool #22 Access to information: This tool refers to laws on access to information and the four methods to enforce transparency in Government: publish an annual statement of its operations; a legally enforceable right of access to documented information; the right of an individual to amend any information relating to him/herself that is incomplete or incorrect; and the establishment of independent bodies for appeal where access is denied. The need for confidentiality in certain matters does, however, entitle a Government to withhold certain information.

Tool #23 Mobilising civil society through public education and awareness-raising measures: This tool presents the essentials of an awareness-raising programme and its desired impact. It describes how public trust can be won and subsequently managed in efforts against systemic corruption. New institutions, such as anti-corruption commissions, ombudsman offices and telephone 'hotlines' can provide citizens with easier access to credible new institutions for their grievances. The use of the internet may be limited to some population segments so traditional media play an important role. The tool also underlines the importance of public education. The public should learn not to pay bribes, to report corrupt incidents to the authorities, not to sell their vote, and to teach their children the right values.

Tool #24 Media training and investigative journalism: This tool

presents how to strengthen the credibility, integrity and capability of the media to provide unbiased and responsible broadcast of corruption cases and anti-corruption initiatives.

Tool #25 Social control mechanisms: This tool explains mechanisms that help Governments work more efficiently and helps society participate more fully in building an environment where there is equitable and sustainable growth, leading to timely and cost-effective service delivery to the public. Civic projects using social control boards have been successfully implemented in Venezuela and Paraguay.

Tool #26 Public complaints mechanisms: This tool refers to the means available for the population to report against corruption, clarifications required on defining what to be reported as well as the reporting procedures. Additionally, advertising these means/mechanisms to the population is critical.

Tool #27 Citizens' charters: This tool covers the concept of citizens' charters and shows how they operate in the United Kingdom. Citizens' charters set down standards regarding quality, timeliness, cost, integrity, and coverage of public services as the standard that users can reasonably expect and against which performance should be measured.

Enforcement

The tools under this category support enforcing integrity; transparency and accountability. These tools are:

Tool #28 Guidelines for successful investigations into corruption: This tool sets out general guidelines for the law enforcement community for investigating corruption. It details also a range of investigative techniques that have proved highly effective in the investigation of widespread, large-scale corruption cases, among financial investigations into suspected corrupt individuals are often the most direct and successful method of proving criminal acts.

Tool #29 Financial investigations and the monitoring of assets: This tool deals with financial investigations that can be used as a starting point for further investigations or as back-up evidence for corruption allegations. It also reviews evaluation of key lifestyle indicators, the screening individuals under suspicion as well as those with whom they have strong ties (e.g. spouses and family members) and discusses alternative sources of information such as public registers and contracts. It also considers the difficulties of obtaining foreign assistance in identifying and recovering stolen assets if there is no mutual legal assistance treaty in place.

Tool #30 Integrity testing: This tool provides a description of the activities that comprise integrity testing, a procedure used to determine whether a public servant or branch of Government engages in corrupt practices and thereby increases the

perceived risk for corrupt officials of being detected.

Tool #31 Electronic surveillance operations: This tool presents all information gathering by use of electronic means, both covert activities such as wire-tapping, video recording or eavesdropping and consensual recording where at least one of the parties knows and has consented to the conversation or activity being recorded.

Anti-Corruption Legislation

The tools under this category support the development of a legal framework dealing with corruption. Although these tools do not appear as having immediate usability for the military commander, they are relevant to understand the overall legal framework in which the military commander operates. These tools are:

Tool #32 International and regional legal instruments: This tool provides an overview of the international and regional instruments (e.g. conventions, declarations) and documents in place against corruption or containing anti-corruption provisions.

Tool #33 National legal instruments: This tool considers the ways in which national laws sanction corruption and related acts and the difficulties of defining certain behaviours (e.g. favouritism, nepotism, conflict of interest and contributions to political parties) as corruption and thus devising suitable sanctions against them.

Tool #34 Dealing with the past: amnesty and other alternatives: This tool details how amnesty is applied in order to ensure compliance with newly created laws by removing the burden of the past and allowing everyone to concentrate on the present and future.

Tool #35 Standards to prevent and control the laundering of corruption proceeds: This tool describes the regulatory approach, specifically the 'Know Your Customer' Rule that aims to prevent financial institutions doing business with unknown customers. It sets out the implications of the 'due diligence' rules that have been promoted at the international and national levels for some time and urges revision of existing 'Red Flag' catalogues under which financial institutions are obliged to pay special attention to all complex, unusual transactions. Bank personnel acting as whistleblowers should be accorded protection and noncomplying institutions and operators should be identified. Criminal law sanctions are also considered.

Tool #36 Meeting the Burden of Proof (forthcoming): This tool puts forward an argument for easing the burden of proof necessary to convict corrupt individuals and sets out a number of ways in which this may be achieved (e.g. increasing the significance of circumstantial evidence; criminalising the possession of

inexplicable wealth; confiscation of inexplicable wealth; instituting a property penalty and other measures to remove illegally earned goods; and allowing for civil or administrative confiscation or disciplinary action as an alternative to criminal proceedings).

Tool #37 Whistleblower protection: This tool refers to the laws that provide protection for those who, in good faith, report cases of maladministration, corruption and other illicit behaviour within their organisation. The law has to provide a mechanism that allows the institution to deal with the content of the message and not the messenger, even if the message of the whistleblower proves false or the whistleblower was breaking the law by breaching confidentiality. The only onus on the whistleblower should be that he or she acted in good faith and was not making false allegations. Thus, protection should be accorded, as well as compensation should victimisation or retaliation occur. To ensure effective implementation of whistleblower legislation, people or institutions that receive disclosures must be trained in dealing with whistleblowers to ensure that they last the distance during what, for many, can be a highly stressful, drawn-out and complex process.

Tool #38 Service delivery surveys (SDSs): These surveys were designed to build capacity while accumulating accurate, detailed and 'actionable' data rapidly and at low cost. Representative samples of communities are selected in which a baseline of service coverage, impact and costs is established via a household survey on use of services, levels of satisfaction, bribes paid and suggestions for change. Typically, the production of actionable results from design stage to reporting takes 8 weeks. SDSs effectively give the community a voice and reveal options for the achievement of goals rather than underscoring deficiencies.

Monitoring and Evaluation

The tools under this category support monitoring and evaluating maturity and trust of different national sectors. Whenever required, the military commander can provide data and can support with SMEs the monitoring and evaluation conducted by other international organisations or by the Host Nation's specialised institutions. These tools are:

Tool #39 United Nations country assessments: This tool provides a description of the methodology used and the advantages of such assessments.

Tool #40 Mirror statistics as an investigative and preventive tool: This tool aims to uncover the levels of corruption by assessing secondary indicators such as the extent of the grey sector of an economy, which includes such commodities as illegally imported cigarettes, liquor and such items. The tool describes also two methods to estimate the size of the grey economy by using mirror statistics and shows how information thus obtained can be used as an investigative tool and as a

preventive tool.

International Legal Cooperation

The tools under this category support transnational efforts in combatting corruption. Similarly to anti-corruption legislation tools, these tools do not appear as having immediate usability for the military commander, but whenever required the military commander can provide required data and inputs to the entitled authorities. These tools are:

Tool #41 Measurable Performance Indicators for Judiciary: This tool provides, based on agreed reform objectives, the key reform measures and measurable performance indicators, allowing the establishment of a baseline against which progress could be measured.

Tool #42 Extradition: This tool gives an overview of extradition, extraditable offences, bars to extradition and the procedural issues concerned.

Tool #43 Recovery of illegal funds: This tool looks both at reasons hindering repatriation and solutions to recovery problems.

Tool #44 Mutual legal assistance (MLA): This tool gives an overview of a United Nations expert working group meeting, including its work strands/headings to facilitate the providing of effective mutual legal assistance.

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