

# Compendium of Anti-Corruption Prevention Systems for Public Sector and Law Enforcement Agencies

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APEC Anti-Corruption and Transparency Working Group

February 2026



**Asia-Pacific  
Economic Cooperation**





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# **Compendium of Anti-Corruption Prevention Systems for Public Sector and Law Enforcement Agencies**

**APEC Anti-Corruption and Transparency Working Group**

**February 2026**

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## Executive Summary

This Compendium provides a comprehensive review of anti-corruption prevention systems in the public sector and law enforcement agencies across APEC economies. It was developed using three complementary sources: a regional online survey (answered by 13 of 21 economies), a desk review of domestic frameworks, and the outcomes of a dedicated APEC workshop. Together, these inputs form a comparative reference for designing, implementing, and strengthening integrity frameworks and compliance programs across diverse contexts.

The findings show that most APEC economies have already established core elements of internal compliance, such as codes of conduct, whistleblower reporting channels, conflict-of-interest declarations, internal audits, and systematic ethics training in public sector entities. In many cases, these measures are accompanied by procurement policies, disciplinary mechanisms, and risk management tools, reflecting a commitment to embed integrity into everyday public management. Senior leadership engagement and the presence of compliance officers or units demonstrate that integrity is increasingly recognized as a strategic priority, not only a legal requirement.

At the same time, the Compendium identifies significant and recurring challenges. Implementation gaps are evident: while legal and institutional frameworks often exist on paper, enforcement is frequently hindered by limited resources, weak independence of oversight units, or fragmented coordination among agencies. Critical preventive mechanisms—such as third-party due diligence, background checks for sensitive positions, and systematic verification of conflict-of-interest declarations—remain underdeveloped across much of the region. Whistleblower protection, although widely recognized in principle, often falls short due to inadequate safeguards, low awareness, or cultural barriers that discourage reporting. Additionally, external stakeholder engagement, particularly with civil society and international organizations, is limited, which reduces transparency and opportunities for accountability.

Workshop discussions confirmed that many economies are moving from reactive, enforcement-based approaches toward preventive and systemic integrity models. This shift includes efforts to institutionalize integrity training, enhance whistleblower protection, and promote cross-agency collaboration. International documents, such as the UNCAC, OECD recommendations, and ISO compliance guidelines, are increasingly used as benchmarks to guide reforms and foster convergence across economies.

The Compendium concludes that APEC economies have made significant strides in developing strong institutional infrastructures for integrity. However, further progress will depend on strengthening preventive screening mechanisms, ensuring the independence and authority of compliance functions, expanding conflict-of-interest and risk management systems, and building stronger partnerships with external

stakeholders. By deepening peer learning and sharing best practices, APEC members can continue to raise awareness, harmonize approaches, and reinforce public trust in the integrity of their public sectors and law enforcement institutions.

## Description of the Project

Public enforcement agencies—such as anti-corruption authorities, prosecution offices, and specialized law enforcement units—are tasked with upholding integrity and enforcing the rule of law. Yet, these institutions are not immune to internal corruption risks, which can undermine investigations, erode public trust, and compromise the integrity of justice itself.

The rapid evolution of corruption schemes, combined with technological change, cross-border operations, and heightened public scrutiny, means prevention is no longer optional—it is a strategic necessity. Robust internal compliance frameworks, proactive risk assessment, and strong accountability mechanisms are essential to ensure these agencies maintain the credibility needed to perform their mandate.

In the current context of growing geopolitical complexity, strengthening prevention within enforcement bodies not only safeguards institutional integrity but also reinforces the foundations for fair, transparent, and inclusive growth across the Asia-Pacific region.

In 2007, under Australia’s leadership, APEC adopted the Conduct Principles for Public Officials and the Complementary Anti-Corruption Principles for the Public and Private Sectors. Sixteen years later, many economies have introduced criminal or administrative liability for legal persons, and anti-corruption compliance has expanded globally. Yet, anti-corruption law enforcement authorities themselves remain vulnerable to internal misconduct, underscoring the need for mechanisms to detect and address corruption within their own ranks, including among officials, prosecutors, and investigators.

Since the release of the 2007 principles, this specific issue has not been revisited. While the private sector has made significant advances in compliance systems and programs, the public sector must also establish its own robust compliance frameworks. Building on the Australian initiative, the Public Prosecutor’s Office of Chile has proposed an APEC-funded project to compile prevention and public integrity initiatives undertaken by anti-corruption agencies, prosecution offices, and law enforcement bodies across all APEC economies. Espacio Público, an independent research center in Chile, participated as a consultant on the project and collaborated with the Chilean Public Prosecutor’s Office in developing the methodology for the compilation, as well as in the implementation of all activities and stages of the project, as described below.

The *“Compendium of Anti-Corruption Prevention Systems for Public Sector and Law Enforcement Agencies”* builds on a three-part strategy: a desk study on compliance programs in the public sector, an online survey conducted across all 21 APEC economies, and a workshop that took place in Santiago, Chile, on 2-3 July 2025. The overarching goal is to identify and disseminate best practices in compliance and integrity within prosecution offices and law enforcement agencies.

The Desk study for the Compendium focused on researching different documents and compliance programs in the public sector, extracting best practices, and assessing the performance of those systems.

The online survey was designed to collect detailed information on the systems and practices established to prevent corruption and promote integrity within public institutions. Specifically, it focused on the efforts of anti-corruption agencies, prosecution offices, and law enforcement bodies across APEC economies. The survey covers key areas, including internal compliance systems, transparency and accountability measures, whistleblower protection, risk management practices, stakeholder involvement, and the presence of compliance officers or departments. It also examines due diligence procedures, conflict of interest management, procurement integrity, monitoring and sanctioning mechanisms, and mandatory anti-corruption training. The detailed responses provided a foundation for analyzing standard practices, identifying gaps, and supporting the development of stronger integrity frameworks within the public sector.

The workshop brought together representatives from the APEC public sector and law enforcement agencies, as well as international organizations, to share knowledge and experiences. The objectives of the workshop were to present the survey results, facilitate expert discussions on compliance and integrity models, and highlight best practices in the public sector. Participants from APEC economies showcased their institutional approaches, tools, and strategies for implementing compliance frameworks.

This Compendium of Anti-Corruption Prevention Systems seeks to provide APEC economies with a practical, evidence-based reference to strengthen their internal public compliance programs. By consolidating and sharing proven practices, it will enable anti-corruption agencies, prosecution offices, and law enforcement bodies to more effectively detect, investigate, and prosecute integrity violations committed by their officials. This resource will not only reduce a critical gap in public sector compliance but also foster a culture of integrity, enhance institutional credibility, and improve the overall effectiveness of anti-corruption enforcement across the region.

## Box 1. APEC Conduct Principles for Public Officials<sup>1</sup>

1. A public official shall respect and adhere to the Constitution or fundamental law and the laws and legal norms of his or her economy, including applicable codes of conduct.
2. A public official shall use his or her public position only in furtherance of the public interest and not for purposes of gaining an unwarranted advantage for himself or herself or for others.
3. A public official shall not solicit or receive, directly or indirectly, any gift, favor, or benefit in exchange for official action or inaction, or that may influence or appear to influence the exercise of his or her functions, duties, or judgment.
4. A public official shall protect and conserve public monies, property, and services and shall use these public resources for only authorized purposes.
5. A public official shall disclose information that is available to him or her by virtue of official position in accordance with the economy's applicable transparency norms, but should use such information only for authorized purposes.
6. A public official shall perform his or her duties with efficiency, integrity, fairness, and impartiality, including when performing a legitimate political or other activity.
7. A public official shall avoid taking any official actions that will affect his or her personal or family financial interests, or acquire any position or function, or have any financial, commercial, fiduciary, or other comparable interest that conflicts or may reasonably appear to conflict with his or her office, functions, and duties.
8. A public official shall respect and utilize established measures and systems designed to facilitate reporting acts of corruption to appropriate authorities and shall, if within his or her official responsibilities, hold others properly accountable for their actions.
9. A public official shall adhere to all requirements for reporting to appropriate authorities his or her outside activities, employment, financial investments and liabilities, assets, and gifts or benefits.

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<sup>1</sup> At the 14th APEC Economic Leaders' Meeting in Hanoi (2006), leaders reaffirmed their strong commitment to combating corruption and fostering a community built on integrity. That same year, APEC Ministers emphasized the importance of preventive measures and integrity systems, encouraging member economies to adopt codes of conduct aligned with the UN Convention Against Corruption. This Convention mandates promoting integrity, honesty, and responsibility among public officials, guiding the development of standards for ethical public service. Reflecting these principles and the UN International Code of Conduct for Public Officials, the APEC Anti-Corruption Task Force recommends that member economies establish or update their codes of conduct for public officials based on these foundational values.

10. A public official shall comply with measures established by law or administrative policies so that, after leaving an official position, he or she will not take improper advantage of that previous office.

Source: 15 years of Compilation APEC ACTWG <https://www.apec.org/docs/default-source/Groups/ACT/2019/15-Years-Compilation-APEC-ACTWG-20042019-finalversion.pdf>

## Methodology

The Compendium was developed using a combination of three data collection tools: an online survey, desk research, and a workshop with representatives from APEC economies.

### Online Survey

The primary data source was an online survey designed to collect detailed information on the internal mechanisms and practices adopted by law enforcement and public agencies across APEC economies to prevent and address corruption. The core sections of the survey examined the structure, procedures, and safeguards in place within the participating organizations, covering enforcement, prevention, oversight, and prosecution of integrity breaches and corruption-related offenses. The key focus areas were:

- Internal compliance systems, transparency, and accountability measures
- Whistleblower protection mechanisms and reporting channels
- Risk management practices and conflict-of-interest management
- Stakeholder involvement, including civil society engagement
- Procurement integrity, due diligence, and monitoring systems
- The role of compliance officers or departments
- Sanctioning mechanisms and mandatory anti-corruption training

The survey results provided the basis for analyzing standard practices, identifying gaps, and highlighting opportunities to strengthen integrity frameworks in the public sector. The survey was distributed on April 16, 2025, to the Anti-Corruption & Transparency Experts Working Group (ACTWG), which includes focal points from 21 APEC economies. In total, 13 economies submitted completed responses corresponding to:

Australia; Brunei Darussalam; Chile; People's Republic of China; Hong Kong, China; Indonesia; Japan; Malaysia; Peru; the Russian Federation; Chinese Taipei; Thailand; and Viet Nam.

Participating agencies correspond to the following categories:

<b>Category</b>	<b>Agency / Institution</b>	<b>Economy</b>
<b>Law Enforcement Agencies</b>	Australian Federal Police (AFP)	Australia
	Carabineros de Chile	Chile
	Policía de Investigaciones de Chile (PDI)	Chile
<b>Prosecution and Judicial Oversight Bodies</b>	Public Prosecutor's Office ( <i>Ministerio Público</i> )	Chile
<b>Specialized Anti-Corruption and Integrity Agencies</b>	Brunei Darussalam Anti-Corruption Bureau (ACB)	Brunei Darussalam
	National Commission of Supervision	People's Republic of China
	Independent Commission Against Corruption (ICAC)	Hong Kong, China
	Malaysian Anti-Corruption Commission (MACC)	Malaysia
	Agency Against Corruption, Ministry of Justice	Chinese Taipei
	Office of National Anti-Corruption Commission (NACC)	Thailand
<b>Government Ministries / Inspectorates</b>	Ministry of Foreign Affairs	Japan
	Secretariat of Public Integrity, Presidency of the Council of Ministers	Peru
	Ministry of Labour and Social Protection	The Russian Federation
	Viet Nam Department for International Cooperation, Government Inspectorate	Viet Nam

### **Desk Research**

Complementary desk research was conducted to review existing literature, policy documents, and legal frameworks relating to anti-corruption and law enforcement agencies integrity and compliance systems in APEC economies. Although the general desk research exercise was limited by the fact that relevant information was not readily accessible in the public domain, particularly concerning the compliance systems in place at the reporting entities, it helped contextualize the survey findings and identify relevant institutional practices and international guidelines.

## **Workshop**

A dedicated workshop was held to validate and enhance the survey and desk research findings. The workshop agenda featured presentations that provided a comprehensive overview of integrity issues by experts and representatives of international organizations, as well as presentations by representatives of various APEC agencies on their experiences in developing integrity models and compliance systems

Participants had the opportunity to share practical experiences, discuss emerging challenges, and make recommendations on how to improve integrity compliance systems in public institutions and law enforcement agencies. In addition to the host economy of the workshop (Chile), six economies participated in person at the event (People's Republic of China; Malaysia; Mexico; Peru; the Philippines; United States). Hong Kong, China was also able to participate via videoconference.

Presentations covered the following topics:

- APEC Economies: Tools and Challenges to Implementing Compliance Programs in their Agencies (Chile; Hong Kong, China; Malaysia; Mexico; Peru; the Philippines)
- From Corruption Scandals to Institutional Reforms: The Role of Presidential Commissions (Eduardo Engel, [President of Anticorruption Council](#)).
- The Prosecutor Under Investigation: Best Practices in the Prevention and Sanction of Corruption (UNODC)
- Integrity in Prosecution: A Review of International Documents
- The Management of Risk by Public Sector Entities
- Internal Corruption Whistleblower Channels and Protection of Informants
- Ethics Within the Organization
- Whistleblower Channels, Communication & Institutional Ethics
- Misconduct, Risk Assessment & Civil Society Engagement

These workshop outputs directly informed the drafting of this Compendium.

## **Data Analysis**

Data collected from the survey, supported by desk research and workshop discussions, were analyzed to evaluate the current state of anti-corruption compliance programs within law enforcement and public agencies across the APEC region.

## **Scope and limitations**

Although we acknowledge that compliance programs cover a variety of areas, including Data Protection, Environmental, and Information Security, the scope of this report is explicitly limited to Integrity Compliance.

## Box 2. APEC economies - collaborative framework

APEC economies have established a collaborative framework to combat corruption and enhance law enforcement through the **Anti-Corruption and Transparency Working Group (ACTWG)** and its subsidiary body, the **Network of Anti-Corruption Authorities and Law Enforcement Agencies (ACT-NET)**. ACT-NET serves as an informal platform facilitating cooperation among anti-corruption and law enforcement officials across APEC member economies. Its primary objectives include enhancing informal cross-border collaboration in investigating and prosecuting corruption, bribery, money laundering, and illicit trade, as well as identifying and recovering the proceeds of such crimes. Each APEC member economy designates a focal point - typically a domestic anti-corruption agency or law enforcement body - to participate in ACT-NET activities. These entities are responsible for implementing domestic anti-corruption measures and engaging in international cooperation through ACT-NET.

## PART I

### Integrity and Compliance in the Public Sector

In the public sector, Integrity systems serve as the overarching framework that encompasses a wide range of mechanisms, institutions, and cultural norms aimed at promoting ethical conduct, preventing corruption, and ensuring accountability.

Within this broader framework, compliance programs and functions represent a key operational component. They focus specifically on ensuring that public officials and agencies adhere to established laws, policies, and standards. Compliance structures are often formalized and rule-driven, dealing with issues such as internal audits, reporting channels, and codes of conduct. Compliance programs are most effective when they are embedded within a robust integrity culture, where values, ethics, and leadership reinforce and legitimize compliance efforts.

In short, integrity systems provide the strategic and cultural foundation, while compliance systems deliver the procedural enforcement mechanisms. Both are necessary: compliance ensures adherence to the rules, and integrity ensures those rules are embedded in a broader ethical commitment to public service and trust.

#### Compliance programs in public entities versus corporate compliance

While both the public and private sectors increasingly adopt similar compliance tools, such as ISO standards, risk assessments, whistleblower systems, and ethics training, their foundational goals and public expectations diverge significantly.

In the public sector, compliance is deeply rooted in the principle of accountability, protection of the public interest, and the need to safeguard citizen trust. Conversely, private sector compliance is typically driven by objectives such as risk management, business continuity, and reputation protection, and increasingly by a commitment to sustainability. Although methodologies are converging, the core motivations and accountability frameworks of each sector remain distinct.

#### Box 3. Comparison Between Public Sector and Private Sector Compliance

Aspect	Public Sector Compliance	Private Sector Compliance
Primary Goal	Ensure public trust, uphold lawfulness, protect public resources, and serve the public interest.	Protect business interests, ensure profitability, and meet the expectations of shareholders and stakeholders.
Key Drivers	UNCAC, OECD Public Integrity Recommendation, domestic public service laws, ISO 37001/37301 adapted to public needs.	Anti-bribery laws (FCPA, UK Bribery Act), ISO 37001/37301, corporate governance regulations, industry standards.

Aspect	Public Sector Compliance	Private Sector Compliance
<b>Obligations</b>	Driven by <b>constitutional mandates</b> , administrative law, and political accountability.	Driven by <b>corporate law</b> , commercial contracts, financial regulations, and market requirements.
<b>Accountability</b>	Citizens, parliaments, courts, media. Political and public scrutiny.	Shareholders, boards, investors, regulators, clients. Commercial and legal scrutiny.
<b>Transparency Requirements</b>	Very high — public records, open procurement, mandatory disclosure (e.g., budgets, decisions).	Variable — depends on the jurisdiction; typically, this includes financial reporting, anti-corruption policies, and due diligence.
<b>Whistleblower Protection</b>	Strong emphasis, often legally mandated. Whistleblowers play a vital role in detecting the misuse of public resources.	Increasingly important, but protections vary. Often tied to employment law and corporate ethics programs.
<b>Risk Profile</b>	Corruption, abuse of power, procurement fraud, and political interference.	Bribery, fraud, money laundering, antitrust violations, and sanctions evasion.
<b>Cultural Expectations</b>	Higher ethical standards require that decisions align with public service values, such as impartiality, fairness, and equity.	Ethical standards are essential, but business competition and profitability pressures are stronger drivers of change.
<b>Enforcement Bodies</b>	Internal audits, anticorruption agencies, ombudsman, courts.	Compliance departments, external auditors, and regulators (e.g., SEC, FCA).

Across the globe, public sector integrity systems vary widely in their structure, emphasis, and implementation. These systems can broadly be understood through two strategic approaches:

1. Values-Based Systems, which emphasize ethics, public service values, and institutional culture as key drivers of integrity, and
2. Legalistic or Rule-Based Systems, which rely on codified rules, enforcement mechanisms, and formal compliance structures to deter misconduct.

**Values-based systems** prioritize a holistic approach, encompassing ethical principles, public service values, society, organizational culture, accountability, and transparency as the foundation for fostering integrity. They aim to build internal motivation and long-term commitment to ethical behavior among public servants. In contrast, **legalistic or rule-based systems** rely primarily on detailed regulations, formal compliance frameworks, and enforcement mechanisms to prevent and address misconduct.

#### Box 4. Values & Rules-Based Integrity Systems

##### Values-Based Integrity Systems (OECD Economies)

Focus on promoting ethical culture, integrity standards, and prevention over punishment.

##### Examples:

**The Netherlands:** Integrates integrity into HR, leadership development, and daily operations.

**Canada:** The Federal Values and Ethics Code for the Public Sector is mandatory for all employees.

**Tools:** Public service values, codes of conduct, integrity officers, and whistleblower protection.

##### Legalistic & Rule-Based Compliance Systems

**Key Features:** Strong emphasis on laws, regulations, and formal sanctions.

##### Examples:

**The United States** Office of Government Ethics oversees conflicts of interest, financial disclosures, and training.

**France:** Haute Autorité pour la Transparence de la Vie Publique ensures transparency in assets and interest declarations.

**Tools:** Detailed legal frameworks, centralized ethics agencies, and administrative sanctions.

While this distinction helps understand institutional emphasis, it is important to note that in practice, most integrity systems incorporate elements of both approaches. For example, a certain economy may promote public service values and ethics training (values-based) while simultaneously enforcing legal codes and conducting audits (rule-based). What varies is the relative weight or emphasis placed on each of them. This blended reality reflects the need for both cultural reinforcement and regulatory accountability in achieving robust and sustainable integrity in the public sector.

#### Box 5. Integrity Trends in the Public Sector

##### Some Trends to Ensure Integrity in the Public Sector

In recent years, economies have generally made significant strides in enhancing integrity and ethical standards across the public sector. Moving beyond traditional, reactive anti-corruption efforts, there is a clear shift toward comprehensive, proactive integrity systems embedded in governance structures<sup>2</sup>. This transformation is characterized by the adoption of values-based frameworks, the establishment of institutional mechanisms for oversight, and the integration of integrity principles into everyday public management practices. From leveraging data and risk-based approaches to promoting transparency, professionalizing the civil service, and strengthening enforcement, these trends reflect a broader commitment to restoring public trust, ensuring ethical conduct, and safeguarding accountability in an increasingly complex and interconnected governance landscape.

In OECD economies, the main trends to ensure effective integrity compliance in the public sector are:

**A shift toward a Public Integrity System going beyond solely anti-corruption measures.** Economies are moving from reactive anti-corruption measures to proactive integrity systems.

<sup>2</sup> OECD Recommendation on Public Integrity (2017); OECD Public Integrity Handbook (2020)

Emphasis on values-based governance, not just legal compliance. Integration of integrity into strategic decision-making and public management systems.

**Strengthened Integrity Frameworks.** Central integrity bodies or coordination units are established to oversee ethics, transparency, and the prevention of corruption.

**Use of Public Integrity Indicators & Risk-Based Approaches.** Economies apply integrity indicators (e.g., OECD's Public Integrity Indicators) to benchmark and evaluate performance. Integrity policies are increasingly risk-based, identifying high-risk areas like procurement, lobbying, and political finance.

**Greater Transparency and Open Government.** Increasing use of open data and digital platforms for declarations of interest, government spending, and lobbying activities. Promoting citizen oversight through access to information and participatory tools.

**Professionalization and Training.** Mandatory integrity training for civil servants, tailored by role and risk level. Development of integrity competencies as part of professional development and performance evaluation.

**Whistleblower Protection and Reporting Mechanisms.** Stronger protections for whistleblowers and confidential reporting channels. OECD economies are adopting or aligning with OECD Whistleblower Protection Principles.

**Integrity in Public Procurement.** Introduction of integrity pacts, e-procurement, and blacklisting of corrupt suppliers. Real-time monitoring systems to detect irregularities and conflicts of interest.

**Stronger Enforcement and Sanctions.** Strengthened sanctions for ethics violations: fines, dismissal, criminal prosecution<sup>3</sup>. Increased capacity for internal audit, ethics investigations, and external oversight.

**Data-Driven Integrity Management.** Economies are developing data analytics tools to detect fraud, conflicts of interest, or unethical behavior. Use of AI and machine learning for anomaly detection in areas like procurement and hiring.

**International Collaboration and Peer Reviews.** Economies engage in peer learning, technical support, and sharing of best practices through the OECD Integrity Review Program and the Anti-Corruption Network.

## International Standards, Regulation of Integrity & Compliance in the Public Sector

International integrity standards were not always designed as explicit anti-corruption instruments; however, there is no doubt that they play an essential role in guiding the ethical conduct of public officials and strengthening accountability in public institutions. While many take the form of *soft law*—normative guidelines without binding legal force—they often draw legitimacy from *hard law* commitments. To better understand how these

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<sup>3</sup> Examples of **Disciplinary Sanctions (Administrative)**. Imposed internally by public sector entities or civil service commissions for violations of ethics codes or compliance rules.

- **Dismissal / Termination of employment.** e.g., Chile; Republic of Korea; UK Civil Service
- **Suspension or salary reduction.** e.g., Canada; Republic of Korea,
- **Public reprimands or formal warnings.** e.g., Canada (Conflict of Interest and Ethics Commissioner), UK (Civil Service Code)

principles interact in practice, the following section presents a schematic explanation of the three key levels that sustain integrity in the public sector: international documents and guidelines, domestic legislation, and agencies' internal regulations, such as ethics codes.

**International documents and guidelines** are crucial for developing effective integrity frameworks and anti-corruption prevention systems within the public sector and law enforcement agencies. These instruments offer globally recognized components that public entities, including law enforcement agencies, should consider promoting transparency, accountability, and ethical conduct within their own anti-corruption and integrity systems. By aligning with these documents, agencies not only strengthen internal governance but also boost public trust.

#### A. **UNCAC (United Nations Convention Against Corruption) 2004**<sup>4</sup>

UNCAC stresses a **systematic approach** to protecting public sector integrity by embedding safeguards at every stage — from recruitment to performance monitoring — and through the promotion of ethical behavior standards. Articles 6 and 36 emphasize the need for preventive anti-corruption bodies and law enforcement with integrity and accountability mechanisms.

According to Article 7 of the United Nations Convention against Corruption (UNCAC), States must ensure that their public services are subject to safeguards promoting integrity, transparency, and accountability among civil servants. This includes:

- **Hiring based on merit and efficiency**, ensuring that recruitment, retention, and promotion are based on objective criteria like merit, equity, and aptitude.
- **Codes of conduct** for public officials (**Article 8**) — setting ethical standards and behaviours expected of public servants.
- **Declaration of assets** and interests, and mechanisms for disciplinary measures when integrity is breached.
- **Public financial management** and **public procurement processes** must be transparent and accountable to minimize corruption risks (**Article 9**).
- **Judiciary and prosecutorial integrity** are especially emphasized under **Article 11**, ensuring these bodies are independent and act with integrity.

Descriptive Section	Details
<b>Legal Basis / Origin</b>	Adopted by the United Nations General Assembly (Resolution 58/4, 2003); entered into force in 2005.
<b>Objective and Principles</b>	Promote and strengthen measures to prevent and combat corruption more efficiently and effectively, promoting integrity, accountability, and the proper management of public affairs and property.

<sup>4</sup> [UNCAC Full Text](#)

Descriptive Section	Details
<b>Target Audience</b>	Primarily focused on the public sector (governments, law enforcement, and anticorruption bodies); also addresses private sector responsibilities.
<b>Mandatory vs Voluntary</b>	Mandatory for State Parties that ratify the Convention; obligations to establish and maintain anticorruption bodies and enforcement mechanisms.
<b>Internal Compliance Measures Required</b>	
<ul style="list-style-type: none"> <li>▪ <b>Code of conduct</b></li> </ul>	Yes – Promote integrity, honesty, and responsibility among public officials (Article 8).
<ul style="list-style-type: none"> <li>▪ <b>Whistleblower mechanisms</b></li> </ul>	Yes – Measures to protect reporting persons and encourage reporting (Articles 8 & 33).
<ul style="list-style-type: none"> <li>▪ <b>Internal audit</b></li> </ul>	Indirectly – Strengthening of internal controls in public administration (Article 9).
<ul style="list-style-type: none"> <li>▪ <b>Risk assessments</b></li> </ul>	Implied – Establish preventive policies based on risks (Article 5).
<ul style="list-style-type: none"> <li>▪ <b>Ethics and compliance officers</b></li> </ul>	Implied – Establish independent anticorruption bodies with appropriate staff (Article 6).
<b>Monitoring and Enforcement Mechanisms</b>	Mechanism for the Review of Implementation of the UNCAC (self-assessments, peer reviews); emphasis on both preventive bodies (Article 6) and law enforcement bodies (Article 36).

## B. OECD Recommendation on Public Integrity (2017)

<https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0435>

Adopted by the OECD Council in January 2017, the Recommendation on Public Integrity replaces the 1998 ethics guidelines. It provides a comprehensive blueprint for building a risk-based, strategic public integrity system, focusing on three pillars: **System, Culture, and Accountability**. Recognizing that corruption undermines trust, widens inequality, and damages well-being, the Recommendation shifts away from rule-heavy compliance approaches towards promoting a culture of integrity across all sectors of society, including legislative, judicial bodies, and local governments. It emphasizes that combating corruption necessitates a comprehensive understanding of its full complexity—not just bribery, but also embezzlement, the misuse of information, and the abuse of power. Importantly, it emphasizes that transparency must be paired with robust scrutiny and accountability mechanisms to be truly effective.

Descriptive Section	Details
<b>Legal Basis / Origin</b>	Adopted by the OECD Council on 26 January 2017; OECD/LEGAL/0435.

Descriptive Section	Details
<b>Objective and Principles</b>	Develop a robust and comprehensive public integrity system by fostering a culture of integrity, implementing risk-based internal controls, and ensuring accountability.
<b>Target Audience</b>	Public sector institutions, government agencies, and oversight bodies.
<b>Mandatory vs Voluntary</b>	Voluntary acts as a guideline for OECD members and interested economies.
<b>Internal Compliance Measures Required</b>	
<ul style="list-style-type: none"> <li>▪ <b>Code of conduct</b></li> </ul>	Yes – Advocates for clear standards of conduct and integrity for public officials.
<ul style="list-style-type: none"> <li>▪ <b>Whistleblower mechanisms</b></li> </ul>	Yes – Recommends establishing protection systems for whistleblowers.
<ul style="list-style-type: none"> <li>▪ <b>Internal audit</b></li> </ul>	Yes – Encourages a strong internal audit function integrated into integrity systems.
<ul style="list-style-type: none"> <li>▪ <b>Risk assessments</b></li> </ul>	Yes – Promotes risk-based approaches to prioritize integrity controls.
<ul style="list-style-type: none"> <li>▪ <b>Ethics and compliance officers</b></li> </ul>	Yes – Recommends designating officials responsible for integrity within organizations.
<b>Monitoring and Enforcement Mechanisms</b>	Integrity monitoring frameworks, external independent scrutiny, reporting obligations, and enforcement actions against breaches.

### C. ISO 37301:2021 – Compliance Management Systems

ISO 37301 is a global standard that guides organizations in establishing, developing, implementing, evaluating, maintaining, and continually improving an effective and responsive Compliance Management System (CMS). It is designed to help organizations comply with legal requirements, regulatory obligations, and ethical standards, while promoting a culture of integrity and good governance. By implementing ISO 37301, organizations can better manage compliance risks, strengthen their governance structures, and safeguard their reputation.

Unlike ISO 37001, which targets anti-bribery measures explicitly, ISO 37301 addresses a broader range of compliance topics across various operational contexts.

Descriptive Section	Details
<b>Legal Basis / Origin</b>	An International Standard developed by the International Organization for Standardization (ISO) was published in 2021.

Descriptive Section	Details
	It replaces ISO 19600:2014 (which was a guidance standard) and establishes certifiable requirements.
<b>Objective and Principles</b>	Establish, develop, implement, evaluate, maintain, and improve an effective compliance management system to ensure organizations meet legal, regulatory, and ethical obligations. Based on principles of integrity, good governance, proportionality, transparency, and sustainability.
<b>Target Audience</b>	All types of organizations: public sector, private sector, NGOs, multinationals, and small and medium-sized enterprises (SMEs).
<b>Mandatory vs Voluntary</b>	Voluntary – Organizations can choose to implement and seek certification to demonstrate their commitment to compliance.
<b>Internal Compliance Measures Required</b>	
▪ <b>Code of conduct</b>	Yes – Organizations must develop and maintain a code of conduct and policies that promote a culture of compliance.
▪ <b>Whistleblower mechanisms</b>	Yes – Confidential and accessible reporting mechanisms must be in place, with protection for whistleblowers.
▪ <b>Internal audit</b>	Yes – Regular compliance audits, monitoring, and evaluations must be conducted to verify effectiveness.
▪ <b>Risk assessments</b>	Yes – Organizations are required to perform regular compliance risk assessments, covering both internal and external risks.
▪ <b>Ethics and compliance officers</b>	Yes – The appointment of a compliance officer (or a designated function) who is independent, has authority, and has access to top management is mandatory.
<b>Monitoring and Enforcement Mechanisms</b>	Ongoing monitoring, periodic reviews, internal and external audits, disciplinary actions for non-compliance, and continual improvement cycles.

#### **D. OECD Guidelines for Managing Conflict of Interest in the Public Service (2003)**

The OECD Guidelines for Managing Conflict of Interest in the Public Service provide the first international benchmark in this field. They help the government review and modernize its conflict-of-interest policies in the public sector.

Descriptive Section	Details
<b>Legal Basis / Origin</b>	OECD Recommendation adopted in 2003; OECD/LEGAL/0316.
<b>Objective and Principles</b>	Provide a framework for identifying, managing, and preventing conflict of interest situations to safeguard the integrity of public decision-making.

Descriptive Section	Details
Target Audience	Public sector institutions, particularly government officials and managers.
Mandatory vs Voluntary	Voluntary guidelines to assist economies in developing or modernizing their policies.
Internal Compliance Measures Required	
<ul style="list-style-type: none"> <li>▪ Code of conduct</li> </ul>	Yes – Encourages the development of codes of conduct addressing conflicts of interest.
<ul style="list-style-type: none"> <li>▪ Whistleblower mechanisms</li> </ul>	Indirect – Focuses more on disclosure systems and reporting conflicts rather than general whistleblowing.
<ul style="list-style-type: none"> <li>▪ Internal audit</li> </ul>	Encouraged – Integrity reviews and audits to identify conflict risks.
<ul style="list-style-type: none"> <li>▪ Risk assessments</li> </ul>	Yes – Promote proactive identification of conflict-prone areas and activities.
<ul style="list-style-type: none"> <li>▪ Ethics and compliance officers</li> </ul>	Recommended – Appointment of officers or committees to oversee conflict of interest management.
Monitoring and Enforcement Mechanisms	Monitoring systems for disclosure of interests, sanctions for breaches, regular audits, and reporting obligations.

**E. OECD Principles for Integrity in Public Procurement (2009)**  
[www.oecd.org/gov/ethics/48994520.pdf](http://www.oecd.org/gov/ethics/48994520.pdf)

The *OECD Principles for Integrity in Public Procurement* are a ground-breaking instrument that promotes good governance in the entire procurement cycle, from needs assessment to contract management. Based on acknowledged good practices in OECD and non-member economies, they represent a significant step forward. They provide guidance for the implementation of international legal instruments developed within the framework of the OECD, as well as other organizations such as the United Nations, the World Trade Organization, and the European Union.

Descriptive Section	Details
Legal Basis / Origin	Developed by the Organization for Economic Co-operation and Development (OECD), adopted in 2009.
Objective and Principles	Strengthen integrity, enhance transparency, promote fair competition, and prevent corruption throughout the public procurement cycle.
Target Audience	Public sector procurement agencies, policymakers, regulatory bodies, and auditors.
Mandatory vs Voluntary	Voluntary; serves as international best practice and policy guidance.
Internal Compliance Measures Required	

Descriptive Section	Details
▪ <b>Code of conduct</b>	Yes – Recommends developing clear codes of conduct for procurement officials to manage conflicts of interest.
▪ <b>Whistleblower mechanisms</b>	Yes – Encourages protection for whistleblowers and reporting systems to detect misconduct.
▪ <b>Internal audit</b>	Yes – Promotes strengthening internal control systems and audits focused on procurement processes.
▪ <b>Risk assessments</b>	Yes – Recommends systematic risk analysis to detect corruption vulnerabilities in procurement.
▪ <b>Ethics and compliance officers</b>	Indirectly – Supports the designation of responsible officials for compliance and ethics oversight within procurement bodies.
<b>Monitoring and Enforcement Mechanisms</b>	Internal controls, external audits, public disclosure, grievance mechanisms, and sanctions for misconduct.

## F. ISO 37001:2025 – Anti-Bribery Management Systems

### [ISO 37001 Overview](#)

Provides requirements and guidance for establishing, implementing, maintaining, and improving an anti-bribery compliance program within an organization. ISO 37001 applies to **any organization, regardless of its size or sector, including entities in the public, private, and not-for-profit sectors that wish to combat bribery proactively.**

Descriptive Section	Details
<b>Legal Basis / Origin</b>	An International Standard published by the International Organization for Standardization (ISO) in 2025, updating the 2016 version.
<b>Objective and Principles</b>	Help organizations prevent, detect, and respond to bribery by establishing an effective anti-bribery management system based on risk management and continuous improvement.
<b>Target Audience</b>	Public sector, private sector (including corporations and SMEs), non-profit organizations, multinationals, and state-owned enterprises.
<b>Mandatory vs Voluntary</b>	Voluntary – Organizations can seek certification to demonstrate their commitment to anti-bribery practices.
<b>Internal Compliance Measures Required</b>	
▪ <b>Code of conduct</b>	Yes – Organizations must implement and enforce an anti-bribery policy, along with related codes of conduct.
▪ <b>Whistleblower mechanisms</b>	Yes – Confidential reporting channels must be established and protected against retaliation.
▪ <b>Internal audit</b>	Yes – Internal controls, auditing, and monitoring processes are required to evaluate the effectiveness of the system.

<b>Descriptive Section</b>	<b>Details</b>
<ul style="list-style-type: none"> <li>▪ <b>Risk assessments</b></li> </ul>	Yes – Organizations must conduct regular bribery risk assessments and update mitigation measures.
<ul style="list-style-type: none"> <li>▪ <b>Ethics and compliance officers</b></li> </ul>	Yes – Appointment of a compliance function with sufficient independence and resources to oversee anti-bribery efforts is mandatory.
<b>Monitoring and Enforcement Mechanisms</b>	Internal reviews, independent audits, management reviews, and corrective actions, as well as external certification bodies, verify ongoing compliance.

### **G. UNODC (United Nations Office on Drugs and Crime). Handbook on Police Accountability, Oversight and Integrity.**

[https://www.unodc.org/pdf/criminal\\_justice/Handbook\\_on\\_police\\_Accountability\\_Oversight\\_and\\_Integrity.pdf](https://www.unodc.org/pdf/criminal_justice/Handbook_on_police_Accountability_Oversight_and_Integrity.pdf)

Focuses on internal controls, compliance functions, and integrity promotion in law enforcement (Police)

<b>Descriptive Section</b>	<b>Details</b>
<b>Legal Basis / Origin</b>	Published by the United Nations Office on Drugs and Crime (UNODC), 2011.
<b>Objective and Principles</b>	Strengthen police integrity, prevent misconduct, and promote accountability and oversight mechanisms within law enforcement agencies.
<b>Target Audience</b>	Law enforcement agencies, police forces, oversight bodies, policymakers, and civil society organizations.
<b>Mandatory vs Voluntary</b>	Non-binding; provides guidance and best practices for economies to adopt or adapt voluntarily.
<b>Internal Compliance Measures Required</b>	
<ul style="list-style-type: none"> <li>▪ <b>Code of conduct</b></li> </ul>	Yes – Promotion and implementation of codes of ethics and standards of conduct for police officers.
<ul style="list-style-type: none"> <li>▪ <b>Whistleblower mechanisms</b></li> </ul>	Yes – Encourages establishment of confidential reporting channels and protection for whistleblowers.
<ul style="list-style-type: none"> <li>▪ <b>Internal audit</b></li> </ul>	Yes – Internal inspection units or professional standards units are recommended to oversee police behavior.
<ul style="list-style-type: none"> <li>▪ <b>Risk assessments</b></li> </ul>	Yes – Encourages identifying areas of high corruption risk within police organizations.
<ul style="list-style-type: none"> <li>▪ <b>Ethics and compliance officers</b></li> </ul>	Yes – Recommends internal disciplinary and integrity units with specialized staff.
<b>Monitoring and Enforcement Mechanisms</b>	Internal investigations units, independent oversight bodies (such as ombudsperson offices or civilian review boards), complaint mechanisms, and disciplinary procedures.

## H. OECD Guidelines for assessing the quality of internal control systems (2019) and the COSO Internal Control - Integrated Framework<sup>5</sup>

The OECD Guidelines provide detailed instructions on how to develop internal control in public sector organizations and assess the quality of existing systems. They are intended to guide ministries of finance and public sector managers in EU candidate economies and potential candidates. Still, they could also be used by other administrations interested in assessing or improving their management and control systems.

COSO, which refers to the Committee of Sponsoring Organizations of the Treadway Commission, is a private-sector initiative that provides a comprehensive framework for internal control, corporate risk management, and fraud deterrence. The COSO Internal Control - Integrated Framework was originally issued in 1992 and refreshed in 2013 (ICIF-2013 or Framework).

This framework is designed to help organizations, including those in the public sector, establish effective internal control systems to achieve their objectives and ensure the reliability of information (financial and any other information). It also helps them comply with laws and regulations. Its structured approach helps organizations integrate risk oversight into daily operations and long-term strategy.

Benefits for public sector entities:

1. **Standardization and Efficiency:** COSO promotes consistent processes and centralized data management, improving operational efficiency and reducing risks through standardized controls.
2. **Proactive Risk Management:** It helps organizations anticipate and mitigate emerging risks—such as cybersecurity threats—by embedding risk awareness and preventive measures into decision-making.

Key limitations<sup>6</sup>:

1. **Implementation Challenges:** COSO's broad and conceptual nature offers limited practical guidance for implementation, particularly for organizations without mature risk management systems.
2. **Structural Rigidity:** Its prescriptive framework can make it difficult for organizations with overlapping or hybrid functions to apply it flexibly.
3. **Limited Public Sector Adaptation:** The COSO Framework remains an essential reference for internal control and governance reform, but its **effectiveness**

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<sup>5</sup> In 2023, COSO issued supplemental guidance for organizations to achieve effective internal control over sustainability reporting (ICSR), using the globally recognized COSO Internal Control-Integrated Framework (ICIF).

<sup>6</sup> Interesting analysis in: *Is the COSO model really applicable to public management?*

<https://asocex.es/wp-content/uploads/2022/11/4.-Jose-Miguel-Gonzalez-Tallon.pdf#:~:text=The%20main%20conclusion%20proposed%20is%20that%20the,of%20something%20as%20complex%20as%20public%20management.>

<https://asocex.es/wp-content/uploads/2022/11/4.-Jose-Miguel-Gonzalez-Tallon.pdf#:~:text=The%20main%20conclusion%20proposed%20is%20that%20the,of%20something%20as%20complex%20as%20public%20management.>

**depends on substantial adaptation** to the specific constraints, objectives, and accountability structures of public institutions, especially within the complexities of the public sector

Box 6. **Comparative Overview of International Compliance Documents and Frameworks**

Standard / Law	Scope	Key Internal Compliance Elements	Specific Focus for Law Enforcement / Anticorruption Agencies	Reference in Document
<b>UNCAC (United Nations Convention Against Corruption)</b>	Global, public and private sectors	<ul style="list-style-type: none"> <li>- Preventive policies</li> <li>- Independent anticorruption bodies</li> <li>- Internal audits</li> <li>- Compliance programs</li> <li>- Codes of conduct</li> </ul>	<b>Foundational and mandatory</b> for compliance structures in law enforcement/anticorruption agencies	<b>Chapter II (Arts. 5–14); Chapter III</b>
<b>OECD Recommendation on Public Integrity (2017)</b>	Public sector integrity	<ul style="list-style-type: none"> <li>- <b>OECD</b> Integrity systems</li> <li>- Risk management</li> <li>- Conduct frameworks</li> </ul>	<b>Broad public sector relevance</b> (covers law enforcement bodies)	<b>Principles 1–3, 5–7</b>
<b>ISO 37001:2025 Anti-Bribery Management Systems</b>	Public/private sector organizations	<ul style="list-style-type: none"> <li>- Anti-bribery policies</li> <li>- Risk assessment</li> <li>- Monitoring and internal investigations</li> </ul>	<b>Provides a certifiable compliance framework</b> for agencies	<b>Clauses 4–10</b> (esp. 5 & 8)
<b>OECD Guidelines for Managing Conflict of Interest in Public Service</b>	Public service conflict of interest	<ul style="list-style-type: none"> <li>- Prevention systems</li> <li>- Reporting mechanisms</li> <li>- Sanctions for violations</li> </ul>	<b>Very important for internal personnel conduct in law enforcement</b>	<b>Part II: Guidelines 1–8</b>
<b>OECD Principles for Integrity in Public Procurement (2009)</b>	Public procurement	<ul style="list-style-type: none"> <li>- Procurement integrity</li> <li>- Monitoring and control</li> </ul>	<b>Moderate relevance</b> , mostly procurement-side risks for law enforcement	<b>Principles 5–6</b>
<b>UNODC Handbook on Police Accountability, Oversight, and Integrity</b>	Police and law enforcement	<ul style="list-style-type: none"> <li>- Internal controls</li> <li>- Integrity promotion</li> <li>- Whistleblower protections</li> </ul>	Specifically tailored for law enforcement compliance	<b>Chapter 2 &amp; Chapter 4</b>

Standard / Law	Scope	Key Internal Compliance Elements	Specific Focus for Law Enforcement / Anticorruption Agencies	Reference in Document
<b>COSO Internal Control – Integrated Framework</b>	Public and private sector entities	<ul style="list-style-type: none"> <li>- Risk assessment</li> <li>- Control activities</li> <li>- Monitoring &amp; governance</li> </ul>	Broadly applicable; adaptable for law enforcement entities	<b>Principles 1–17 across five components</b>
<b>OECD Guidelines for Assessing the Quality of Internal Control Systems (2019)</b>	Public sector organizations	<ul style="list-style-type: none"> <li>- Internal audit</li> <li>- Risk-based controls</li> <li>- Performance monitoring</li> </ul>	Indirectly applicable; supports public sector integrity management	<b>Sections 2 &amp; 3</b>
<b>APEC Conduct Principles for Public Officials and Complementary Anti-Corruption Principles for the Public and Private Sectors</b>	Public officials and private sector stakeholders	<ul style="list-style-type: none"> <li>- Ethical conduct</li> <li>- Conflict of interest</li> <li>- Anti-corruption collaboration</li> <li>- Integrity standards</li> </ul>	Provides foundational ethical standards applicable to law enforcement and public service more broadly	<b>Full document (non-chaptered) – principles-based</b>

**Domestic Laws** (e.g., anti-corruption, administrative procedures). Domestic laws play a critical role in regulating compliance within the public sector. These legal frameworks are designed to prevent and sanction corruption, abuse of power, and conflicts of interest, while promoting transparency, accountability, and public trust. They also serve to embed integrity into the core of public administration, influencing areas such as human resources, public procurement, and financial management. Notably, domestic compliance laws are frequently developed in line with international documents and best practices, such as those previously mentioned. By aligning domestic regulations with these international norms, governments not only strengthen their institutional integrity but also contribute to broader goals of global governance, international cooperation, and public sector reform.

**Internal Regulations and Ethics Codes.** These instruments translate broad legal and ethical obligations into concrete, organization-specific rules that public officials are required to follow. Internal regulations typically include detailed procedures on conflict of interest, financial disclosures, gifts and hospitality, and disciplinary actions. Ethics codes, meanwhile, articulate core values such as integrity, impartiality, transparency, and accountability, thereby fostering a culture of ethical conduct within institutions. Together, they ensure that compliance is not merely reactive or punitive but embedded in the daily operations and expectations of public service.

## Core Elements & Policies of a Credible and Effective<sup>7</sup> Compliance Program

A compliance program is a framework of practices tailored to an organization's size, resources, and specific risks. While every organization can benefit from having such a program, it does not mean they should all adopt the same approach. Having said that, we will selectively examine a few key elements of compliance programs that may be particularly relevant to the effectiveness of compliance policies. That said, even the strongest compliance program cannot eliminate all risks of illegal activity or unethical behaviour. Problems may still arise, and if not addressed, they can result in penalties, damage to reputation, and disruptions to operations.

Compliance program elements and policies are intrinsically linked; policies define the organization's guidelines and rules for legal and ethical conduct, while program elements are the processes, controls, and systems that ensure those policies are effectively implemented, monitored, communicated, and enforced throughout the organization. Policies provide the necessary framework, while program elements are the machinery that makes those policies functional and effective in maintaining compliance.

### Box 7. Elements of a Compliance Program

#### 1. **Written policies and procedures**

Standards of Conduct Guide

Ethics policy

#### 2. **A compliance officer and a compliance committee**

Compliance Advisory Committee

#### 3. **Conducting effective compliance training and education**

#### 4. **Developing effective lines of communication**

Hotline

#### 5. **Conducting internal monitoring and auditing**

Internal Audits

Compliance Inspections

Peer Reviews

External Audits, Reviews, and Inspections

#### 6. **Enforcing standards through well-publicized disciplinary guidelines**

Consequences are levied consistently regardless of the employee's status within the organization. Enforcement consistent with appropriate disciplinary action

#### 7. **Responding promptly to detected problems and undertaking corrective action**

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<sup>7</sup> The US sentencing Guidelines contain detailed guidance from the Sentencing Commission on what it means to have an "effective" compliance and ethics program. This guidance, contained in chapter 8 of the *Guidelines Manual*, is used by hundreds of companies to design and implement their compliance programs and is also the standard used by many government agencies to evaluate company compliance and ethics programs.

Source: [https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2022/20220829\\_Organizational-Guidelines.pdf?utm\\_source=chatgpt.com](https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2022/20220829_Organizational-Guidelines.pdf?utm_source=chatgpt.com)

Internationally, organizations like the **OECD, UN, and World Bank** reference these principles for integrity and anti-corruption documents in the public sector.

By using a structured framework as a reference point, policymakers, auditors, and integrity professionals can identify strengths, gaps, and areas for improvement in their own systems. It also facilitates the sharing of best practices, fosters alignment with international documents, and supports the development of more coherent and effective compliance strategies. Ultimately, benchmarking against these components helps ensure that public sector institutions maintain high levels of integrity, accountability, and performance in diverse governance contexts.

An effective compliance framework does not always require a large or formal department, but it does require accountability<sup>8</sup>. Someone must be clearly responsible for overseeing compliance, empowered with the authority to enforce regulations, and equipped with the resources to implement and monitor the program effectively. Without this, any compliance program risks being symbolic rather than functional.

The Survey shows that nearly all respondents reported having a **formal internal compliance program, crime prevention system, or similar mechanism** in place to address misconduct risks.

Common features include: Ethics Code or Guidelines / Code of Conduct / or similar; merit-based hiring and anti-nepotism measures; whistleblowers or reporting channel; asset and/or conflict of interest declarations or similar; regular compliance training and awareness programs; training covering misconducts and anti-Corruption and anti-Bribery risks; measures to reinforce transparency and accountability, among others.

<sup>8</sup> U.S. Sentencing Guidelines §8B2.1 (Effective Compliance and Ethics Program) notes that organizational compliance effectiveness depends on *due diligence and promotion of an ethical culture*, not on the size or formality of the compliance unit. *Reference: United States Sentencing Commission, U.S. Sentencing Guidelines Manual §8B2.1(b)(2)(C) and Commentary (2023).*

ISO 37301:2021 – Compliance Management Systems. Emphasizes that compliance systems should be *proportionate to the organization’s size, structure, nature, and complexity*—but must clearly define roles, responsibilities, and accountability. *Reference: ISO 37301:2021, Clause 4.2 (“Understanding the needs and expectations of stakeholders”) and Clause 5.3 (“Organizational roles, responsibilities and authorities”).*

OECD Recommendation for Further Combating Bribery (2021) / Good Practice Guidance on Internal Controls, Ethics and Compliance states that *even small or less formal organizations* should have clear accountability mechanisms and management oversight for compliance, appropriate to their risk profile.

*Reference: OECD, Good Practice Guidance on Internal Controls, Ethics, and Compliance, Annex II (2021).*

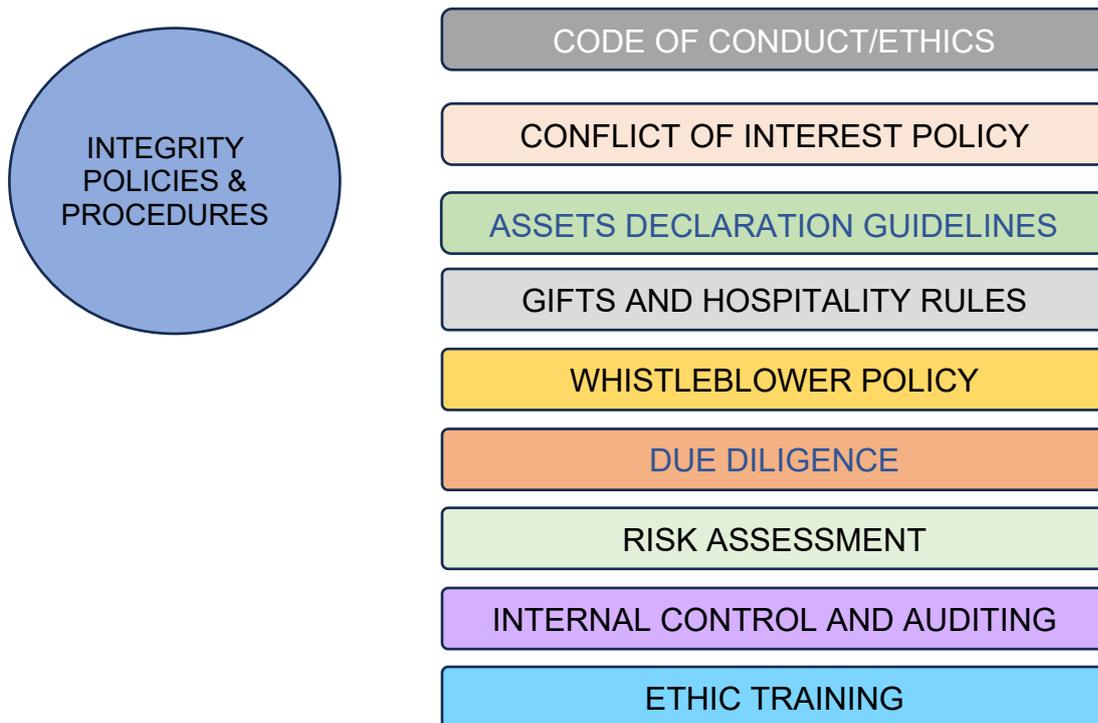
COSO Internal Control—Integrated Framework (2013) highlights that effective internal control depends on *clear accountability and oversight* at all levels, regardless of organizational size or structure.

*Reference: COSO, Internal Control—Integrated Framework, Principle 5 and Principle 14 (2013).*

However, fewer than half of the entities responding to the survey reported having dedicated compliance officers or units, mechanisms to regularly assess the effectiveness of their compliance programs, and sanctions linked directly to breaches of integrity policies.

## Integrity Policies & Procedures

**Integrity policies & procedures** establish the internal rules, ethical standards, and operational safeguards that guide the daily conduct of public officials and employees. They are designed to ensure that decisions and actions are made in the best interest of the institution and the public it serves, free from conflicts of interest or undue influence. By setting clear expectations for behavior, outlining consequences for misconduct, and promoting transparency, these policies help prevent corruption and misconduct before they occur.



A **Code of Conduct or Ethics**<sup>9</sup> sets the tone, reminding staff of the values of professionalism, respect, and integrity that guide their work. Codes of ethics do not mean progress if they remain only as a file without actual application. Publishing the organization’s code of conduct on its official website enables third parties, including

<sup>9</sup> While often used interchangeably, a code of ethics and a code of conduct serve distinct, though complementary, purposes within an organization or profession. In essence, a **code of ethics is a set of guiding principles**, while a **code of conduct is a set of specific rules**. It translates the ethical values into actionable and enforceable standards.

suppliers, service providers, and society in general, to clearly recognize and align with the organization's values and expectations.

**Conflict of Interest policy**, supported by declarations of interest, ensures that personal ties or benefits never interfere with official duties or decisions.

**Asset declaration rules**: Conflict of interest and asset declaration policies are widely recognized tools for promoting integrity, as reflected in OECD and UNODC guidelines. They help detect potential corruption risks before they materialize, particularly in roles with decision-making authority.

**Gift and hospitality guidelines** typically establish monetary limits on gift values, require reporting and approval for significant expenditures, and stipulate that hospitality must align with legitimate business purposes and not create obligations for the recipient.

**Reporting Channels and Whistleblower Protection**. International documents, such as the UN Convention against Corruption (UNCAC) and the G20 High-Level Principles on Whistleblower Protection, recommend robust, confidential, and accessible channels for reporting misconduct, accompanied by legal safeguards to protect whistleblowers from retaliation. In law enforcement agencies, such protections are critical to ensure that internal corruption can be reported without fear, fostering a culture of transparency.

The survey indicates that most **APEC economies that responded have established internal reporting channels, usually through secure email systems, dedicated hotlines, or physical complaint offices**. However, the effectiveness of these mechanisms remains a key area for review. Further attention is particularly needed to ensure that whistleblower systems within enforcement agencies provide robust protections, enable truly anonymous reporting, and include procedures for keeping whistleblowers informed on the follow-up and outcome of their reports.

**Due diligence**: A key element of good corporate governance, enabling the assessment and mitigation of risk. In addition to private entities, the compliance leader should ensure that particular care is taken with business relationships, procurement, and contracts to avoid conflicts of interest, bribery, corruption, and a perception of impropriety.

**Risk assessment**: Effective corruption prevention requires proactive risk identification and early detection systems. International models, such as the World Bank's Fraud and Corruption Risk Framework, recommend regular risk mapping, data-driven analysis, and integration of risk assessments into operational planning. For public sector enforcement bodies, targeted risk assessments can identify vulnerabilities in procurement, case handling, and personnel management.

The survey indicates that while **70% of economies that responded conduct periodic risk assessments**, the scope and methodology of these assessments vary significantly across them. Some economies use fundamental checklists, while others employ

advanced data analytics to monitor anomalies in case assignment or financial transactions.

**Internal controls and regular audits.** Internal control mechanisms and regular audits are fundamental for detecting irregularities. Internal control is an integral part of entity risk management.

According to the INTOSAI Guidelines for Internal Control Standards in the Public Sector,<sup>10</sup> internal control provides an overarching conceptual framework through which an entity can be managed to achieve its objectives. Internal auditors examine and contribute to the ongoing effectiveness of the internal control system through their evaluations and recommendations, thereby playing a significant role in effective internal control. External auditors audit specific government organizations in some economies. They and their professional bodies should provide advice and recommendations on internal control.

The Survey indicates that most **economies reported having some form of internal control system**, often embedded within their broader public financial management framework. However, dedicated internal audit units within enforcement agencies are less common, present in just over half of respondents. Some economies conduct regular internal audits of sensitive processes, such as procurement, case assignment, and evidence handling.

**Ethics Training Programs:** Sustainable integrity systems depend on ongoing professional development. The UNCAC underscores the importance of specialized training in ethics, compliance, investigative integrity, and corruption risk management. Such training should be accessible to all personnel levels, from senior leadership to frontline staff. Regular ethics and capacity-building programs not only reinforce knowledge of rules but also foster an understanding of their purpose and practical application, particularly in complex ethical situations. By raising awareness of specific corruption risks, such as procurement fraud, conflicts of interest, and political interference, training equips public officials to recognize vulnerabilities and respond effectively.

Survey results show that **integrity and ethics training is provided** in the majority of economies that responded, but frequency and scope vary widely. While some agencies offer mandatory annual training, others rely on ad hoc sessions or induction programs

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<sup>10</sup> INTOSAI (2007): Guide to Internal Control Standards for the Public Sector - Additional Information on Entity Risk Management. [https://www.issai.org/wp-content/uploads/2019/08/intosai\\_gov\\_9100\\_e.pdf](https://www.issai.org/wp-content/uploads/2019/08/intosai_gov_9100_e.pdf)

for new staff. Topics most often covered include codes of conduct, conflict of interest, and case management ethics.

To ensure rules are followed and the compliance program is not just symbolic or theoretical, but credible and effective in preventing and addressing misconduct, monitoring and enforcement mechanisms, such as Internal reviews and disciplinary processes., Investigative protocols for misconduct, as well as external oversight by audit courts, ombudspersons, or civil society, should be in place. All the above are supported by:

- Leadership commitment to integrity and ethical governance.
- Integration of compliance into daily operations.
- Coordination among the different relevant departments.
- Leadership commitment to integrity and ethical governance.

In this sense, the compliance area must have sufficient autonomy to carry out its functions on an ongoing basis, with objectivity, impartiality, and independence. It must also have the necessary human, financial, and technological resources to perform its work. Generally, the main person responsible for this area is the compliance officer.

Survey findings indicate that senior management plays a leading role in designing and implementing measures against internal corruption and misconduct, demonstrating a strong top-level commitment.

In many institutions, **compliance officers** and employees at all levels are also involved, reflecting an internal, whole-of-organization approach.

By contrast, **external actors**—such as consultants, civil society, or international organizations—are less frequently engaged. Expanding their role could further strengthen **transparency, accountability, and credibility** in anti-corruption efforts.

#### Box 8. Internal Compliance Mapping

Compliance Component	Description	Referenced Documents / Laws	Implementation Guidance
<b>Top-Level Commitment</b>	Senior management responsibility and accountability	ISO 37001, OECD	CEO/Board-led compliance tone, resource allocation, and regular compliance review
<b>Code of Conduct &amp; Ethics</b>	Sets the tone at the top, outlining acceptable behavior and integrity values	UNCAC, ISO 37001	Regular updates, management endorsement, broad dissemination, and training
<b>Risk Assessment</b>	Periodic evaluation of corruption and fraud risks	ISO 37001, OECD Guidelines for Public	Risk register, heat maps, targeted mitigation plans

Compliance Component	Description	Referenced Documents / Laws	Implementation Guidance
		Integrity, COSO Framework	
<b>Third-Party Due Diligence</b>	Screening and monitoring vendors, contractors, and partners	UNCAC, OECD, ISO 37001, World Bank Integrity Guidelines	Background checks, risk scoring, contract clauses
<b>Internal Controls</b>	Financial and operational safeguards to detect and prevent misconduct	COSO Framework	Segregation of duties, audit trails, approvals, and reconciliations
<b>Whistleblower Mechanisms</b>	Confidential reporting channels for suspected misconduct	OECD, UNCAC, EU Whistleblower Directive	Anonymous hotlines, non-retaliation policies, and independent investigations
<b>Monitoring &amp; Auditing</b>	Ongoing review of compliance effectiveness	ISO 37001	Internal audit plans, compliance dashboards, and root cause analysis
<b>Training &amp; Awareness</b>	Education programs on integrity, compliance, and reporting obligations	ISO 37001	Induction training, refresher courses, e-learning tools
<b>Corrective Measures</b>	Disciplinary action, remediation, and process redesign after breaches	OECD Anti-Bribery, ISO 37001	Sanction matrix, case tracking, reform of high-risk processes

## Specificities of Compliance Programs in Law Enforcement Agencies

Compliance programs in **prosecutor agencies and police institutions should be tailored to their specific functions, and increasingly**, they are. While they may draw on general compliance frameworks (like COSO or ISO 37001), effective programs should be tailored to the **unique risks, mandates, and ethical obligations** of these entities. These institutions are held to higher standards of integrity due to their power and public trust responsibilities.

Both institutions face **function-specific risks**:

**Prosecutors** face risks related to abuse of prosecutorial discretion, case manipulation, conflict of interest, or undue influence, among others.

To identify vulnerabilities that could expose the institution to integrity risks, the **Chilean Prosecutor's Office conducted a risk assessment** through structured interviews with regional management teams. The assessment focused on administrative, disciplinary, and preventive aspects of internal operations, aiming to detect patterns or conditions that might facilitate misconduct or criminal behavior. The main findings are summarized in Box 9 below, highlighting the key institutional and individual risk factors identified.

## Box 9. Risk Assessment Process and Main Findings on Misconduct Risks<sup>11</sup>

### **Risk Assessment Process**

Interviews were conducted with regional management teams to gather information covering the following aspects:

- Administrative complaints
- Internal investigations (summary inquiries)
- Criminal complaints
- Disciplinary or repressive measures
- Preventive measures

### **Main Findings: Risk Factors for Misconduct or Criminal Behavior**

#### **1. Internal Procedures**

- Secret or restricted information: improper access or unauthorized disclosure
- Information stored in digital systems: data manipulation, false or incomplete information, lack of traceability
- Seized items in evidentiary custody: theft, alteration, or improper use; incomplete registration may lead to invalidation of items in custody
- Procurement and acquisitions: exposure to procurement-related risks and conflicts of interest

#### **2. Substantive Aspects of Prosecutorial Work**

- Lack of consistency in applying operational criteria, e.g.:
  - Definition and use of Deferred Prosecution Agreements (DPA) and Non-Prosecution Agreements (NPA)
  - Configuration of precautionary measures
  - Application of mitigating and aggravating circumstances
- Challenges in supervising areas of prosecutorial discretion, including:
  - Requalification of offenses
  - Excessive proximity to other actors in the criminal process

#### **3. Staff's External or Private Behaviors**

- Limited knowledge of the staff's financial and asset situation
- Potential use of institutional position for personal benefit
- Risky relationships or activities outside the institution

This exercise carried out by the Chilean Public Prosecutor's Office identified areas for improvement, particularly in the field of training, specifically in behaviors that are incompatible with integrity and in the correct use of IT tools, in the need for centralized decision-making and control systems for critical areas, in improving the traceability and reportability of digital systems, and the standardization of criteria for action in discretionary areas of prosecutorial decision-making.

**Police** agencies face as well risks of corruption and misconduct, such as excessive use of force, evidence tampering, unlawful detention, and corruption in investigations. Not all police agencies face the same integrity challenges; however, it is important that these specific risks are identified and managed, either internally, by an oversight organization,

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<sup>11</sup> Information extracted from the Prosecutor presentation at the Workshop that took place in Santiago - Chile on July 2025.

or both. For example, the Independent Broad-based Anti-corruption Commission (IBAC)<sup>12</sup> of Victoria (Australia) identified<sup>13</sup> strategic areas of focus to guide IBAC's work to prevent and expose public sector corruption and police misconduct. It also exposes what the agency describes as enduring risks of corruption and misconduct in the police sector:

- Excessive use of force.
- Favoritism, including poorly managed conflicts of interest. IBAC has repeatedly identified issues with the proper identification and management of conflicts of interest by Victoria Police employees, including through reviews of Victoria Police's internal investigations into complaints. These can undermine confidence in the investigation and therefore in the police.
- Inaction, including obscuring behaviors such as failure to investigate or report colleagues' misconduct or lying to protect a colleague.
- Organized crime infiltration of police or police having friendships or other associations with criminals.
- Use of illicit drugs exposes officers to blackmail and compromise.
- Misuse of resources, particularly the unauthorized access and disclosure of police information for personal benefit.
- Predatory behavior or other abuses of position for a sexual purpose, and sexual harassment.
- Bullying and harassment.

**Box 10. Summary of Entry Points to Reduce Police Corruption<sup>14</sup>**

<b>Entry Point</b>	<b>Description</b>
Internal Affairs Units	Internal investigative structures to detect misconduct.
Professional Ethics & Training	Regular training to instill and reinforce integrity values.
External Oversight	Involvement of civil society or independent bodies to monitor and hold the police accountable.
Monitoring & Adaptive Reform	Ongoing evaluation and flexible response to improve reform effectiveness.
Undercover Integrity Testing	Conduct covert assessments to detect corruption.
Sequenced Reforms	Implement steps in logical order for sustainable results.

The entry points align with U4's recommendations on making anti-corruption efforts in police forces more strategic, sustainable, and context-appropriate.

<sup>12</sup> IBAC is responsible for preventing and exposing public sector corruption and police misconduct in Victoria. <https://www.ibac.vic.gov.au/about-us>

<sup>13</sup> IBAC's Annual Plan 2023/24. <https://www.ibac.vic.gov.au/about-us>

<sup>14</sup> Based on U4 Expert Response Insights.

## The Importance of Compliance Management in the Public Sector

Compliance management is a cornerstone of good governance in the public sector. It strengthens accountability and sustains citizens' trust in the delivery of public services. Public confidence depends on the assurance that government agencies act with integrity, transparency, and respect for the rule of law.

Equally important, compliance safeguards public resources. Government entities are entrusted with managing funds, assets, and sensitive information on behalf of citizens. Effective compliance frameworks ensure that these resources are used responsibly, efficiently, and for their intended purposes—protecting taxpayers' interests and minimizing opportunities for misuse or waste.

Finally, compliance management helps prevent costly legal, financial, and reputational risks. Failure to adhere to regulations and policies can result in lawsuits, penalties, and a loss of credibility. By embedding compliance into daily operations, public sector organizations not only mitigate these risks but also reinforce a culture of integrity and continuous improvement.

## PART II.

### UNODC Approach to Judicial and Prosecutorial Integrity

Judicial integrity is a **cornerstone of the rule of law**, ensuring the right to a fair trial and maintaining public trust in justice systems. Judicial integrity, particularly within prosecutorial institutions, is vital to upholding the rule of law and public trust. Prosecutors wield significant discretionary power, and without oversight, this can expose institutions to corruption, abuse, and external influence.

#### Corruption Risks in Prosecutorial Institutions

- **Excessive Concentration of Power:** Broad prosecutorial discretion can lead to selective or politically motivated decisions.
- **Lack of Oversight Mechanisms:** Weak or absent internal/external controls allow misconduct to go unpunished.
- **External Pressures:** Political, economic, or criminal actors may unduly influence prosecutorial decisions.
- **Permissive Organizational Culture:** Tolerance of favoritism, silence, or informal networks discourages accountability.

To address the risks of excessive power concentration, weak oversight, and external influence within prosecutorial institutions, UNODC emphasizes the importance of strong preventive frameworks. Merit-based recruitment and transparent career progression processes, such as Uruguay's competitive examinations and background checks, help ensure integrity from the outset. These measures are complemented by compulsory ethics training, which should go beyond abstract rules and instead use practical case scenarios to strengthen ethical reasoning in daily work. Clear and widely disseminated codes of conduct, supported by independent ethics committees like France's *Conseil de Déontologie*, guide officials when facing dilemmas and reinforce standards of integrity.

Transparency also plays a central role. Mechanisms such as asset and interest declarations, as practiced in Spain, where prosecutors file comprehensive disclosures, promote accountability and reduce the risk of conflicts of interest. Internal audits and risk assessments further strengthen prevention by identifying and addressing patterns of misconduct, thereby enhancing the effectiveness of prevention measures. Examples include Chile's rotating audit practices and Peru's adoption of ISO 37001 certification for anti-bribery management systems.

On the accountability side, UNODC highlights the importance of impartial disciplinary systems. Independent investigative units help ensure integrity in internal inquiries, while clear and transparent due process guarantees fairness and protects rights of appeal. Sanctions should be proportionate, ranging from formal warnings to dismissal or prosecution, thereby reinforcing deterrence without undermining justice. Finally, whistleblower protection is critical. Confidential reporting channels, coupled with anti-

retaliation safeguards and external oversight, as illustrated by Italy’s anonymous reporting platform managed by ANAC, create the trust necessary for individuals to come forward and expose wrongdoing.

Together, these measures form an integrated approach to strengthening prosecutorial integrity, ensuring both prevention and accountability in line with UNODC’s global guidelines.

#### UNODC Guidance on Judicial Conduct

UNODC underscores the adoption of **Codes of Judicial Conduct** as a key safeguard. The Guide on Developing and Implementing Codes of Judicial Conduct provides:

**“How”**: practical steps for drafting, approving, and enforcing a code, including oversight mechanisms.

**“What”**: substantive content based on the Bangalore Principles and good practices from domestic and regional experiences.



## A Review of Investigative Procedures in International Development Organizations

### Corruption as a Development Concern

Corruption is widely recognized as a significant obstacle to economic growth, sustainable development, and public trust. It undermines policy effectiveness, weakens institutions, distorts public resource allocation, and erodes confidence in both domestic and international governance structures. **The World Bank** adopted a set of Anti-Corruption Guidelines<sup>15</sup> to institutionalize its approach to combating corruption, which identifies specific wrongful behaviors known as **“prohibited practices”**:

- **Fraud** – misrepresentation or omission of facts for undue benefit.

<sup>15</sup> [documents.worldbank.org/en/publication/documents-reports/documentdetail/551241468161367060/guidelines-on-preventing-and-combating-fraud-and-corruption-in-projects-financed-by-ibrd-loans-and-ida-credits-and-grants](https://documents.worldbank.org/en/publication/documents-reports/documentdetail/551241468161367060/guidelines-on-preventing-and-combating-fraud-and-corruption-in-projects-financed-by-ibrd-loans-and-ida-credits-and-grants)

- **Collusion** – an arrangement between parties to improperly influence outcomes.
- **Corruption** – offering, giving, receiving, or soliciting anything of value to influence actions.
- **Coercion** – impairing or harming others to improperly influence participation.
- **Obstruction** – deliberately impeding investigation or audit processes.

Investigations are conducted by the World Bank’s **Integrity Vice Presidency (INT)**, which examines allegations, carries out field visits, and refers cases to the Office of Sanctions and Debarment (OSD) before submitting them to the Sanctions Board. Penalties may include **debarment** (exclusion from bidding on World Bank contracts for a specific period), conditional release, and cross-debarment in coordination with other multilateral development banks (if sanctioned for one year or more). These measures have established some deterrence while promoting remediation through corporate compliance programs, which INT also monitors.

**The World Bank's Integrity Compliance Guidelines**<sup>16</sup> outline the steps institutions should take to design and implement effective integrity compliance programs.

Descriptive Section	Details
<b>Legal Basis / Origin</b>	Issued by the World Bank’s Integrity Vice Presidency (INT); applies to entities subject to sanctions for fraud or corruption under the Bank’s sanctions system.
<b>Objective and Principles</b>	To help sanctioned entities develop and implement effective integrity compliance programs to prevent and detect misconduct. It focuses on integrity, accountability, and remediation.
<b>Target Audience</b>	Primarily sanctioned firms and individuals; also, applicable more broadly to firms seeking best practices in anti-corruption compliance.
<b>Mandatory vs. Voluntary</b>	Mandatory for sanctioned entities seeking release from sanctions; voluntary for others as a benchmark for good compliance practices.
<b>Internal Compliance Measures Required</b>	Code of Conduct / Ethics - Whistleblower mechanisms - Independent compliance function - Risk-based controls and due diligence - Third-party management - Training and communication - Investigation and response protocols - Periodic review and improvement
<b>Monitoring and Enforcement Mechanisms</b>	The World Bank may appoint a compliance monitor or require periodic reporting; INT evaluates implementation and effectiveness as part of the sanction release review process.

<sup>16</sup> <https://thedocs.worldbank.org/en/doc/06476894a15cd4d6115605e0a8903f4c-0090012011/original/Summary-of-WBG-Integrity-Compliance-Guidelines.pdf>

The World Bank’s Anti-Corruption Guidelines also incorporate **11 Principles of Integrity Compliance**, which are widely adopted by international organizations to guide private companies and institutions toward ethical conduct.

<b>Principle</b>	<b>Brief Explanation</b>
<b>1. Prohibition of Misconduct</b>	Organizations must have an explicit, public ban on fraud, corruption, collusion, and coercive practices, embedded in codes of conduct and reinforced with guidance, especially in high-risk areas.
<b>2. Responsibility</b>	Integrity depends on a culture of accountability at all levels. Leadership (boards, senior management) must actively support compliance, while individuals and compliance officers ensure implementation with adequate authority and resources.
<b>3. Program Initiation, Risk Assessment &amp; Reviews</b>	Programs should begin with a risk assessment tailored to the organization’s size, sector, and geography, and should be regularly updated. Continuous monitoring, feedback, and corrective measures ensure effectiveness over time.
<b>4. Internal Policies</b>	Policies must clearly outline the values and procedures for preventing and addressing misconduct. This includes vetting employees, restricting roles for former officials, controlling gifts and political contributions, prohibiting facilitation payments, keeping accurate records, and preventing fraud.
<b>5. Business Partners</b>	Organizations should conduct due diligence on agents, contractors, and suppliers, communicate compliance expectations, require reciprocal commitments, properly document relationships, ensure fair remuneration, and monitor partners’ conduct.
<b>6. Internal Controls</b>	Strong financial and organizational controls must be in place to prevent misuse of funds or records. This includes accurate bookkeeping, independent audits, contractual clauses on misconduct, and decision-making processes appropriate to risk levels.
<b>7. Training &amp; Communication</b>	Regular training and communication are essential. All staff, as well as relevant business partners, should understand their compliance obligations, particularly those in high-risk roles. Training effectiveness must be assessed.
<b>8. Incentives &amp; Disciplinary Measures</b>	Integrity should be reinforced through incentives for ethical behavior and sanctions for violations. Employees should never be penalized for refusing to engage in misconduct, even if it results in lost business.
<b>9. Reporting &amp; Whistleblowing</b>	Employees and partners must have safe, confidential, and accessible channels to report concerns. Whistleblowers should be protected from retaliation, and periodic certifications should be used to confirm compliance with integrity standards.

Principle	Brief Explanation
<b>10. Remediation of Misconduct</b>	When misconduct occurs, organizations must investigate promptly, take corrective action, and implement preventive measures to avoid recurrence.
<b>11. Collective Action</b>	Organizations should contribute to raising industry-wide integrity standards by collaborating with business groups, civil society, and international forums, sharing best practices, and promoting good governance.

The framework emphasizes that compliance is not just about deterrence, but about fostering a sustainable organizational culture of ethics and accountability.

Integrity units have become a central component of international organizations and financial institutions. Their primary functions include:

- Investigating allegations of fraud, corruption, and misconduct.
- Supporting accountability through transparent reporting and sanctioning mechanisms.
- Collaborating across organizations to harmonize standards and share best practices.

The United Nations, in particular, has expanded investigative offices across its agencies. However, several systemic challenges remain:

- Fragmentation of responsibilities across multiple entities.
- Inconsistent investigative standards and professional benchmarks.
- Resource constraints limit training and operational capacity.
- Limited cross-agency coordination.

To address these gaps, reforms are being pursued to harmonize investigative guidelines, build professional standards, expand training opportunities, and strengthen inter-agency cooperation.

The Conference of International Investigators (CII) is a global forum that brings together investigators from multilateral institutions, the UN system, and international organizations. CII plays a pivotal role in:

- Developing uniform investigative guidelines.
- Serving as a platform for knowledge-sharing and professional development.
- Enhancing consistency in investigative practices across organizations.
- Promoting integrity and ethical standards in international public service.

## Building Trust from Within – Compliance Systems in selected APEC public sector/ Law Enforcement Agencies

### Australia<sup>17</sup>

Australia has a multi-agency framework at the federal level to regulate public sector integrity, focusing on preventing, detecting, and investigating corruption, including through bodies such as the National Anti-Corruption Commission (NACC), established under the *National Anti-Corruption Commission Act 2023*. The NACC investigates and reports on serious or systemic corrupt conduct in the Australian Government public sector. Anti-corruption enforcement involves a partnership between the NACC and the Australian Federal Police (AFP).

Key instruments include the **Public Interest Disclosure Act 2013**, which promotes accountability through explicit rules and principles for whistleblowing, and the **Commonwealth Fraud and Corruption Control Framework 2024**<sup>18</sup>, which sets out measures to address integrity risks in public financial management and reduce fraud across the public sector.

The **Australian Federal Police (AFP)** plays a central role in law enforcement and prosecution. Internally, it has a comprehensive framework for integrity compliance. This framework combines internal controls, ethical guidelines, and external oversight mechanisms to safeguard against corruption, misconduct, and conflicts of interest.

The AFP has a **formal compliance program** supported by the **AFP Integrity Framework**, which incorporates core values, a Code of Conduct, and a Professional Standards Framework. These establish clear behavioral expectations and guide ethical decision-making, resource management, and compliance with legislative and policy requirements. Key measures include:

- Ethical guidelines, codes of conduct, and internal control systems.
- Dedicated compliance departments and officers;
- Regular audits are used to detect irregularities.
- Systematic corruption risk management, supported by internal policies;
- Complaint handling processes provide for safe, secure, confidential and anonymous reporting options;
- Mandatory induction and yearly integrity/ethics training for all staff, covering all levels of the organization.
- Complaint Management and Consequences. The structured complaint management process is utilized to investigate allegations of misconduct. Personnel are also

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<sup>17</sup> Information Source: Survey responses, OECD 2024 Outlook, & AFP web Page

<sup>18</sup> [Commonwealth Fraud and Corruption Control Framework 2024 | Commonwealth Fraud Prevention Centre](#)

required to submit Integrity Reports for issues not covered under security vetting or complaints. Breaches of integrity or professional standards can limit an individual's suitability for their role or result in termination.

- Conflicts of interest are managed through mandatory disclosure requirements, background checks for sensitive roles, and dedicated policies.
- The AFP also applies mandatory drug testing, alongside other preventive measures, to uphold standards of professionalism and public trust.
- The AFP also enforces a procurement policy to ensure integrity in contracting.

Strong external oversight mechanisms reinforce the AFP's integrity framework:

- The **National Anti-Corruption Commission (NACC)**, which replaced the Australian Commission for Law Enforcement Integrity (ACLEI), investigates allegations of serious and systemic corruption in the public sector, including the AFP.
- The **Commonwealth Ombudsman**, which can investigate complaints against the AFP and undertake monitoring to ensure lawful use of powers. Its findings are reported to Parliament.
- The **Parliamentary Joint Committee on Law Enforcement** monitors and reviews the performance by the AFP of its functions.
- **Integrity testing operations**, enabled by the Law Enforcement Integrity Legislation Amendment Act 2012, assess staff integrity through simulated or controlled situations.

## Brunei Darussalam<sup>19</sup>

In Brunei Darussalam, the primary institution responsible for combating corruption is the **Anti-Corruption Bureau (ACB)**, which plays a dual role in both enforcement and prevention. The ACB leads investigations, enforces anti-corruption legislation, and implements preventive measures to promote transparency and accountability in public administration. No other specialized anti-corruption bodies or agencies operate in parallel, making the ACB the central authority for corruption prevention and enforcement.

An internal compliance program is under development to strengthen integrity standards and prevent misconduct. Current measures in place include:

- **External audits**, conducted to ensure financial accountability;
- **Asset and conflict of interest declarations**; and
- **Background checks** are a standard hiring procedure.

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<sup>19</sup> Information Source: Survey responses

A **whistleblowing channel** is available for both internal and external reporting of suspected misconduct.

Although the institution does not yet have a systematic and regular approach to corruption risk management, senior management is actively involved in designing and implementing existing safeguards. Conflicts of interest are addressed through mandatory disclosure requirements, and a procurement policy is in place to ensure integrity and prevent misconduct in contracting processes.

**Oversight & Accountability.** The effectiveness of anti-corruption measures is monitored primarily through **regular internal audits**. Disciplinary bodies, procedures, and sanctions are established to deal with internal cases of misconduct.

**Training & Awareness.** All staff receive **mandatory induction training** on measures to prevent corruption and misconduct upon joining the organization. Additionally, there are ongoing integrity and ethics training programs that cover all staff levels, including specialized training tailored to specific **risk areas**.

## Canada<sup>20</sup>

Canada does not operate under a single, centralized anti-corruption strategy. Instead, it relies on a combination of specialized institutions, legislation, and oversight tools to address corruption risks and strengthen integrity across the public sector. Instead, responsibilities are distributed across a range of independent and specialized bodies:

- The Priorities and Planning Sector (TBS) manages MAF processes.
- The Commissioner of Lobbying ensures transparency and ethical standards in federal lobbying.
- The Office of the Conflict of Interest and Ethics Commissioner supports elected and appointed officials in preventing and managing conflicts of interest.
- The Public Sector Integrity Commissioner handles disclosures of wrongdoing and protects whistleblowers from reprisal.
- The Information Commissioner oversees access to information rights.
- The Chief Electoral Officer of Canada regulates political financing.
- The Internal Audit Sector of the Office of the Comptroller General (TBS) sets and manages internal audit policy.

A key instrument is the **Management and Accountability Framework (MAF)**, overseen by the **Treasury Board Secretariat (TBS)**, which ensures that federal departments and agencies are well managed and accountable. Complementing this, several legislative pillars form Canada's integrity system, including the **Financial Administration Act**, the **Lobbying Act**, the **Conflict of Interest Act**, the **Canada Elections**

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<sup>20</sup> Information Source: Web Information and OECD 2024 Outlook

Act, the Public Servants Disclosure Protection Act, the Criminal Code, and the Access to Information Act.

## Chile<sup>21</sup>

In December 2023, Chile adopted its first **National Strategy on Public Integrity 2023–2033**, approved by the Secretary General of the Presidency. The strategy is structured around five pillars: civil service, public resources, transparency, politics, and the private sector. Each pillar sets out specific objectives to strengthen integrity and foster a culture of ethical conduct throughout society.

Chile's integrity and anti-corruption system is supported by a wide network of institutions governed by both constitutional and legal provisions. Among those with constitutional standing and autonomy are the Judiciary, the Public Prosecutor's Office (PPO), and the Office of the Comptroller General of the Republic (CGR). Other key institutions, such as the Transparency Council, the Financial Market Commission, the Civil Service, and the Financial Analysis Unit, operate under specific legal mandates. Together, these entities form the institutional backbone of Chile's integrity framework.

Chile's **Public Prosecutor's Office (PPO)** has a core prosecutorial function and is currently developing a formal internal integrity compliance system. Its **Strategic Plan 2024–2031** emphasizes intelligence-led prosecution, the protection of victims and witnesses, and the strengthening of institutional teams. A strong focus is placed on risk prevention, resilience, and safeguarding stakeholders.

A pending bill in Congress is expected to reinforce the PPO's internal governance by establishing an Integrity and Internal Audit Division and introducing the compliance function reporting directly to the National Prosecutor. The compliance framework is designed to align with international best practices, such as COSO ERM, and will encompass risk identification, policy development, accountability, and continuous monitoring. As part of this effort, the PPO has developed a customized Integrity Risk Matrix, created through strategic alignment, interviews, workshops, and document analysis. This matrix maps corruption risks across different stages of the criminal process, assessing their likelihood, impact, and the effectiveness of existing controls.

To safeguard integrity and accountability, the **Office of the Comptroller General of the Republic (CGR)** plays a central role in internal control and risk management within Chile's public sector. Its government internal audit objectives focus on promoting integrity, strengthening internal control systems, improving risk management processes, and ensuring follow-up on high-criticality findings. To support these goals, the CGR

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<sup>21</sup> Information Source: Survey Responses, General web Information & workshop presentations

established an Internal Audit Coordination Unit in 2024 to provide technical oversight and strengthen internal audit functions across public institutions.

Chile implements a broader internal control framework for public entities to reinforce risk management and mitigation by covering risk assessment, communication, and monitoring. It clearly defines the responsibilities of management, employees, and internal auditors.

## People's Republic of China<sup>22</sup>

The **National Commission of Supervision (NSC)**, established in March 2018 under the **Supervision Law of the People's Republic of China**, consolidates anti-corruption powers previously spread across multiple agencies. It serves as the Economy's central anti-corruption authority, with a mandate focused primarily on **enforcement**. Police authorities complement this role by addressing bribery in the private sector.

**The National Commission of Supervision (NSC)** operates within a comprehensive integrity framework designed to prevent, detect, and sanction internal corruption and misconduct. Institutional integrity is governed by a code of ethics and conduct, which sets expectations for employee behavior. When suspected cases of corruption or misconduct are reported, the information is transferred to a dedicated department for review and handling.

The NSC's compliance system incorporates multiple safeguards. These include transparency measures such as the disclosure of financial statements, procurement contracts, and other key data.

The framework also emphasizes audits and investigations through external audits, risk management mechanisms, and specialized investigative units. Human resources safeguards such as merit-based recruitment, promotion systems, measures to prevent favoritism and nepotism, mandatory background checks, and third-party due diligence procedures reinforce integrity in staffing. Whistleblower protections guarantee safe and confidential reporting channels, while asset and conflict-of-interest declarations help detect and prevent abuse of office. Compliance officers form part of the organizational structure, ensuring adherence to legal requirements, internal policies, and ethical standards.

Finally, regular training programs strengthen awareness of anti-corruption, anti-bribery, and professional ethics across all staff levels.

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<sup>22</sup> Information Source: Survey responses

## Hong Kong, China<sup>23</sup>

The **Independent Commission Against Corruption (ICAC)** is the sole body responsible for combating corruption in Hong Kong, China, with a comprehensive, multipurpose mandate. Its strategy is built on a three-pronged approach that integrates **investigation** through its Operations Department, **systemic prevention** via the Corruption Prevention Department, and **community education** led by the Community Relations Department. This model is anchored in a strong legal framework and supported by citizen-led advisory committees that provide independent oversight and ensure checks and balances.

ICAC fosters a culture of integrity through leadership commitment initiatives, capacity-building seminars, and the dissemination of practical resources such as corruption prevention guides and sample codes of conduct. To adapt to modern challenges, it emphasizes continuous improvement and technology integration, including the development of frameworks such as *InTECHgrity*, which embeds corruption controls into digital government systems.

The ICAC's compliance framework combines crime prevention, internal controls, and risk management. Its integrity system is grounded in ethical guidelines, a code of conduct, and dedicated compliance structures, including a compliance unit with clear reporting lines through supervisors, designated officers, or departmental heads. Transparency is promoted through the public disclosure of financial statements, procurement contracts, and other key data, while accountability is reinforced by independent oversight, parliamentary review, external audits, and engagement with civil society.

Safeguards such as merit-based hiring, anti-nepotism measures, background checks, third-party due diligence, and conflict-of-interest declarations further strengthen institutional integrity. A safe and confidential whistleblowing and advisory channel is available to both internal and external stakeholders, streamlining the reporting process and providing protection for whistleblowers.

Integrity training is mandatory for all staff and embedded in both induction and continuous professional development. Serving officers are also provided with various opportunities for professional growth and encouraged to adopt a lifelong learning attitude, striving for excellence in both personal and professional pursuits. Training

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<sup>23</sup> Source of information: Workshop presentation and survey responses

encompasses all staff levels, with specialized modules tailored to high-risk areas, including anti-corruption, anti-bribery, and professional ethics.

The Hong Kong International Academy Against Corruption (HKIAAC), accredited at Qualifications Framework (QF) Level 5—equivalent to a local bachelor’s degree—offers the Professional Diploma in Anti-corruption (PDA) to strengthen ICAC officers’ professionalism. This 20-week program provides comprehensive training on anti-corruption regimes, bribery laws, investigation techniques, financial forensics, prevention strategies, and public education, complemented by practical modules such as physical training and firearms use. New officers also receive leadership and management training, ensuring they are equipped with the skills and competencies needed to combat corruption effectively.

ICAC’s internal controls ensure accountability at all levels and units with impartial oversight from external parties or, when required, the Department of Justice.

## Indonesia<sup>24</sup>

Indonesia adopts a multifaceted approach to strengthening public sector integrity, with efforts centered on institutional reform, bureaucratic modernization, and active public participation. Its legal framework criminalizes bribery, abuse of power, and other corrupt acts, providing the foundation for robust anti-corruption policies. A key policy driver is the **National Strategy for Corruption Prevention (Stranas PK)**, which establishes an integrated, broad system to prevent and combat corruption.

Government reforms emphasize improved governance and better delivery of public services. Notable initiatives include the **Integrity Zone Program**, which encourages government agencies to become certified “corruption-free regions” through integrity-building measures, and a suite of **e-government systems** designed to enhance transparency in services, budget planning, and procurement.

At the institutional level, the **Corruption Eradication Commission (KPK)** plays a central role. As an independent and powerful agency, the KPK investigates, prosecutes, and prevents corruption, with a particular focus on high-profile cases involving public officials. It works closely with the **Indonesian National Police** and the **Attorney General’s Office** to strengthen law enforcement. The KPK fosters a culture of integrity through education and outreach. One example is the **Professional with Integrity (Profit) Movement**, which promotes ethical business practices and encourages private-sector actors to adopt integrity systems.

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<sup>24</sup> Information sources: Survey responses & web research including KPK web page

To expand its reach, the KPK has developed the Certified Integrity Officer (CIO) program, which trains experts to establish organizational integrity systems in accordance with domestic standards. These integrity builders serve as focal points for preventing corruption in government, business, and other sectors, thereby amplifying the impact of the KPK's mission.

Internally, its employees—including the Board of Supervisors, leaders, and staff—are bound by a **Code of Ethics and Code of Conduct**, which serve as guiding principles for professional behavior, integrity, and accountability both inside the institution and in public life. These codes reflect the Commission's commitment to embedding shared values into daily operations.

The **KPK's internal compliance and integrity program** provides another layer of safeguards. It combines robust internal controls, transparency mechanisms, and systematic risk management. To ensure accountability, regular internal audits, open reporting systems, and a secure whistleblowing channel are in place. A dedicated compliance department, supported by management and staff at all levels, oversees policy implementation. Specific measures address conflicts of interest, procurement integrity, and third-party due diligence.

Capacity building is equally prioritized. Integrity and ethics training is mandatory for all staff, beginning at recruitment and reinforced through regular programs. Large-scale training initiatives in 2022–2023, followed by compulsory e-learning modules, ensure that staff continuously engage with evolving standards of integrity.

## Japan<sup>25</sup>

In Japan, responsibility for anti-corruption efforts is shared among several institutions, including the Ministry of Justice, the Ministry of Foreign Affairs, and the National Police Agency. At the central government level, strategic objectives have been adopted to mitigate public integrity risks, particularly in the area of public procurement. The National Public Service Ethics Board oversees potential conflicts of interest among civil servants, while the Ministry of Internal Affairs supervises political finance. The Digital Agency is tasked with open data policy, providing datasets on consolidated legislation, government agendas, and cabinet meeting minutes. Although the government collects salaries, asset declarations, and interest disclosures for judges and senior civil servants, these are not made publicly available. Japan does not have a central government body

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<sup>25</sup> Information sources: Survey & web research including OECD Anti-Corruption and Integrity Outlook: Country Fact Sheet 2024.

responsible for monitoring lobbying, nor does it operate a central harmonization unit for internal control and internal audit.

Regarding the Ministry of Foreign Affairs, the organization has established a formal internal compliance framework that includes elements such as regular internal audits to detect irregularities, ethical guidelines and codes of conduct, risk management mechanisms, internal investigative units, and ongoing compliance training and awareness programs. Moral behavior is incentivized and rewarded, while misconduct is subject to sanctions. Human resource practices emphasize merit-based hiring and promotion, with measures in place to prevent favoritism and nepotism. The Ministry also operates a safe, secure, and confidential reporting channel (whistleblowing mechanism) for staff members to use internally. However, it does not currently apply a systematic or regular approach to corruption risk management, nor does it maintain a dedicated compliance department. Instead, safeguards against corruption and misconduct are designed and implemented jointly by senior management and compliance officers. Anticorruption measures specifically address conflicts of interest through dedicated policies, guidelines, and targeted training for employees.

## Republic of Korea<sup>26</sup>

In the Republic of Korea, the **Prosecutors' Office** and the **police** are the two leading agencies responsible for prosecuting corruption, each equipped with specialized investigative units dedicated to handling corruption cases. Additionally, the Anti-Corruption and Civil Rights Commission (ACRC) plays a crucial role in receiving reports and complaints filed by whistleblowers and the public, and oversees access to public information through the Information Disclosure Council. Meanwhile, the National Election Commission is responsible for monitoring political finance.

In line with the **Act on the Prevention of Corruption**, aimed at strengthening ethics in public service, the ACRC distributed the Integrity and Ethics Compliance Program Guideline for Public Institutions in 2022. This guideline applies to state-owned companies, quasi-government agencies, and local public bodies, encouraging them to prevent and mitigate corruption risks.

The ACRC also enacted the **Code of Conduct for Public Officials** in 2003, providing ethical guidance for public servants. Public sector agencies subsequently introduced their own codes of conduct based on this model. The ACRC monitors compliance with these codes and investigates violations by public employees.

The ACRC further promotes compliance by trialing the **K-Compliance Program (K-CP)**, providing education and training, and publishing monthly "Integrity and Ethical

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<sup>26</sup> Information Source: ACRC Web page and the 2024 OECD Country Outlook

Management Briefs.” It also supports public institutions in aligning their practices with the integrity efforts indicator of the **Public Institutions Comprehensive Integrity Assessment**.

Korea has also developed strong whistleblower protection mechanisms under the **Public Interest Whistleblower Protection Act**. The ACRC ensures confidentiality for whistleblowers and provides relief funds to cover damages such as medical costs or relocation. Whistleblowers may also be rewarded—sometimes with significant financial compensation and coverage of legal fees—if their disclosures lead to revenue recovery or broader public interest benefits.

The **Board of Audit and Inspection (BAI)** serves as the supreme audit institution, evaluating the internal audit practices of the public sector.

## Malaysia<sup>27</sup>

Malaysia's public sector integrity and anti-corruption framework for internal compliance is built on the National Anti-Corruption Strategy (NACS), which evolved from the National Anti-Corruption Plan (NACP). This strategy emphasizes building an ethical culture and strong governance through adherence to the Malaysian Anti-Corruption Act of 2009 and the Whistleblower Protection Act 2010, along with corporate integrity toolkits like CISM. Key components include implementing integrity action plans, conducting risk assessments, promoting ethical behaviour, ensuring leadership commitment, and establishing robust accountability and enforcement mechanisms.

The Malaysian Anti-Corruption Commission (MACC) has a comprehensive compliance and integrity framework implemented since its establishment as an independent body in 2009. The MACC's strategy utilizes a multi-layered system of checks and balances to ensure its accountability and professionalism. This includes robust external oversight from five independent committees, such as the Anti-Corruption Advisory Board and the Complaints Committee, which are composed of professionals and distinguished individuals who monitor the agency's functions and review complaints against its officers. In the case of political appointees, their advisory role is limited to avoid conflicts of interest.

Internally, the Integrity and Compliance Division fosters an ethical culture through training, ensures adherence to the code of conduct, and manages disciplinary matters. These efforts are further guided by formal risk assessments and an internal Anti-Corruption Plan, all aimed at strengthening public trust and positioning the MACC as a law enforcement agency with high integrity.

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<sup>27</sup> Information Source: Survey responses, Workshop presentation, web information

The collaboration with the private sector occurs through voluntary workshops, methods for measuring impact (including media analysis and public surveys), and lessons learned from the 2009 corruption scandal that led to the creation of MACC.

The **Malaysia Anti-Corruption Academy (MACA)** is responsible for managing training programmes to enhance the competency and professionalism of MACC officers and staff. MACA is also responsible for providing training programmes in various fields, such as investigation, prosecution, intelligence, prevention, consultancy, and management. The Academy is implementing new strategies to address digital corruption, including AI pilots and partnerships with the tech industry to develop secure reporting systems and predictive data analytics.

## Mexico<sup>28</sup>

At the center of Mexico's institutional framework is the **Anti-Corruption and Good Governance Ministry**, which acts as the leading coordinating authority of the National Anticorruption Strategy (NAS) within the federal executive branch. Its mission is to provide cross-governmental guidance, technical support and policy alignment, promoting a shift from a predominantly punitive and reactive approach toward a comprehensive one focused on prevention, integrity and good governance, emphasizing the professionalization of public service, proactive transparency and access to information, civil society and private sector engagement, whistle-blower empowerment, and accountability through effective administrative investigations and enforcement, always within its legal competences.

The Ministry also prioritizes **modernizing procurement**, supported by new legislation that promotes fair pricing, transparency, domestic content requirements, as well as social enterprises and MSME's participation in public procurement. In parallel, Mexico advances **business integrity and ethical lobbying** through initiatives, like the shift from the public procurement platform: CompraNet to Compras MX; this platform is aligned to the new Mexican Public Procurement Law, posted on Mexico's Official Gazette on 16 April 2025. This law is tailored to current international sustainable standards as well as Mexico's governmental needs.

Mexico has further consolidated specialized oversight bodies and control mechanisms across key areas, including political finance supervision by the National Electoral Institute, conflicts of interest within the judiciary, through the Judiciary Council's Comptroller, and internal control within the executive branch, where the Ministry of Anti-Corruption and Good Governance also serves as the federal harmonization authority for internal control and internal audit systems. While there is no current regulation for

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<sup>28</sup> Information Source: Workshop presentation

lobbying, the Ministry of Anti-Corruption and Good Governance also contributes to integrity and transparency in this area through preventive policies and institutional oversight consistent with its mandate.

As a result of this transition, the Ministry of Anti-Corruption and Good Governance now serves as the Executive branch's auditing authority and a constituent member of the National Anti-Corruption System (SNA). Supported by and coordinated with the Superior Audit Office of the Federation, which functions as a pivotal player in enhancing fiscal oversight and public accountability, strengthening the NAS's within the National Anticorruption Policy.

## New Zealand<sup>29</sup>

New Zealand's public sector integrity approach is based on a multi-agency system focusing on preventing corruption, promoting transparency, and upholding accountability. Rather than relying on a single body, New Zealand distributes responsibilities across several institutions, supported by a strong legal framework and culture of ethical leadership.

New Zealand's integrity system prioritizes prevention over reaction, with efforts guided by the National Counter-Fraud and Corruption Strategy. This strategy supports transparency, addresses emerging risks such as digital economy fraud, and fosters a culture of ethics through pilot projects, assessments, and continuous improvement.

Key institutions and oversight mechanisms are the **Te Kawa Mataaho Public Service Commission**, which provides system-level leadership on integrity, accountability, and transparency, supporting agencies with integrity frameworks and multi-year action plans. The **Auditor-General and Audit New Zealand** deliver independent assurance and guidance, while the **Ombudsman** reinforces accountability through oversight and enforcement. The **New Zealand Police** and the **Serious Fraud Office (SFO)** handle the investigation and prosecution of fraud and corruption, with the **judiciary** providing ultimate legal oversight.

The legal foundation of the integrity system is the **Public Service Act 2020**, which enshrines principles such as political neutrality, merit-based appointments, open government, and stewardship. It is complemented by the **Standards of Integrity and Conduct (the Code)**, issued by the Public Service Commissioner, which sets ethical expectations for all public servants. Agencies are required to develop their own supplementary codes and internal policies to address specific risks, integrate ethical standards into daily operations, and strengthen their internal compliance systems.

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<sup>29</sup> Information Source: Web research

The system operates by embedding integrity into everyday public service practice, promoted through leadership, values-based culture, and capacity-building initiatives. Standards are set through the Code and agency-specific policies, while breaches are managed through established employment and disciplinary processes. Robust reporting mechanisms and whistleblower protections ensure staff can safely report misconduct without fear of reprisal. Investigations of wrongdoing are conducted at the agency level, with oversight provided by the Auditor-General and other external bodies.

Periodic **National Integrity System Assessments** provide an additional tool for identifying strengths and weaknesses and ensuring that reforms remain practical and forward-looking.

### Papua New Guinea<sup>30</sup>

Papua New Guinea has a system for integrity and anti-corruption that combines institutional, legal, and civil society efforts. The **Public Services Commission (PSC)** has introduced its own Anti-Corruption and Integrity Strategy (2022–2025), which is aligned with the National Anti-Corruption Plan of Action (2020–2025). The strategy focuses on strengthening institutions, leadership, and oversight. The PSC promotes integrity through partnerships with organizations such as Transparency International PNG and UNDP, internal audits to ensure compliance with financial regulations, and initiatives like the “Phones Against Corruption” program. Complementing this, the **Interim Independent Commission Against Corruption (ICAC)** is in the process of becoming fully operational under the Organic Law on the Independent Commission Against Corruption, with a mandate to investigate, prevent, and prosecute corrupt activities. Once established, the ICAC will act as the primary watchdog, working alongside existing institutions such as the Royal Papua New Guinea Constabulary, fraud units, the Office of the Public Prosecutor, and Task Force Sweep, a multi-agency group that coordinates anti-corruption enforcement. These initiatives are supported by the broader National Anti-Corruption Strategy 2010–2030 and depend on active civil society participation, which helps monitor transparency, advocate for reforms, and promote a culture of anti-corruption within the public sector.

### Peru<sup>31</sup>

Peru’s institutional architecture for combating corruption and promoting integrity comprises a set of oversight, prosecutorial, and transparency bodies. The Comptroller General’s Office, the Anti-Corruption Prosecutor’s Office, specialised prosecutorial

<sup>30</sup> Information Source: Web research

<sup>31</sup> Information Source: Workshop presentation and survey responses

units, and anti-corruption courts collaborate to ensure oversight and control over the use of public resources, while advancing accountability through investigations and judicial enforcement.

Complementing these functions are institutions specifically dedicated to integrity and transparency. The Secretariat of Public Integrity (Secretaría de Integridad Pública, SIP), the National Authority for Transparency and Access to Public Information (Autoridad Nacional de Transparencia y Acceso a la Información Pública, ANTAIP), and the Tribunal of Transparency and Access to Public Information (Tribunal de Transparencia y Acceso a la Información Pública, TTAIP) promote preventive policies, safeguard the right of access to information, and strengthen public trust in government institutions.

The SIP is responsible for implementing the National Integrity and Anti-Corruption Policy, which is currently under review and update. At the same time, the ANTAIP and the TTAIP protect the right to access public information. These efforts have been complemented by the establishment of the **Integrity Model (Modelo de Integridad)** and the creation of digital tools to support them, (Supreme Decree No. 148-2024-PCM, which approves the Integrity Model to strengthen the capacity for prevention and response to corruption in public sector entities), which entails, among others, the implementation and exercise of the integrity function through the deployment of Institutional Integrity Offices (Oficinas de Integridad Institucional) in all public entities in the economy to fulfil the role of Institutional Integrity Managers

The **Public Prosecutor's Office** of Peru has developed an **Institutional Integrity Program** aimed at reinforcing ethics and preventing corruption, aligned with OECD standards. The program focuses on addressing institutional gaps in ethical culture, transparency, whistleblower protection, and risk management. It outlines five main objectives: strengthening ethical culture, enhancing transparency, mitigating corruption risks, institutionalizing reporting channels, and ensuring continuous improvement. The integrity model comprises nine core components, including leadership commitment, internal controls, training, and disciplinary measures. Some challenges for the program are the absence of a structured compliance program, institutional resistance to change, lack of specialized personnel, limited resources, poor interoperability with other institutions, and a weak culture of impact evaluation.

## The Philippines <sup>32</sup>

The **Office of the Ombudsman** is the economy's leading anti-corruption agency. It develops a multi-faceted approach to uphold integrity and accountability, both externally and among its staff, through several key mechanisms, including the Ombudsman Internal Affairs Board (IAB), which investigates complaints against its personnel and

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<sup>32</sup> Information Source: Workshop presentation

aims to inculcate among them a faithful and unwavering observance of the Code of Conduct. Additionally, the Committee on Decorum and Investigation (CODI) handles complaints of explicit sexual harassment, ensuring a gender-sensitive and confidential process.

Beyond these specialized bodies, the Office of the Ombudsman integrates integrity measures into core operational functions, such as Human Resources, Procurement, and Financial Management. This includes adhering to merit-based hiring, transparent procurement processes via PhilGEPS, and conducting internal financial audits.

The Office also prioritizes continuous compliance training through programs such as the Seminar on Integrity, Transparency, and Accountability in Public Service (ITAPS) and the Anti-Corruption Laws Seminar (ACLS). Furthermore, it actively engages in risk assessment exercises, notably through the Integrity Management Program (IMP), to identify and mitigate vulnerabilities to corruption. The Philippines emphasized capacity-building initiatives, including basic and advanced training (ITAPS, ACLS), as well as the creation of dedicated internal units to strengthen verification processes.

### **The Russian Federation<sup>33</sup>**

Russia's main anti-corruption architecture is grounded in a series of presidential decrees and federal legislation. 2008 Federal Law No. 273-FZ on Combating Corruption, the 2010 National Anti-Corruption Strategy and multiannual National Anti-Corruption Plans collectively guide public sector policy and prevention efforts. These strategic documents prioritize eliminating the root causes of corruption through institutional reform, the development of standards, and the establishment of enforcement mechanisms across all levels of government.

The Russian Federation has an important institutional system for preventing and combating corruption that consists of different entities and bodies entrusted with anti-corruption functions.

The Anti-Corruption Council under the President of the Russian Federation monitors the implementation of the measures foreseen by the National Anti-Corruption Plans at the federal level and coordinates the activities undertaken by public bodies aimed at putting the State anti-corruption policy into practice. The Council is headed by the President of the Russian Federation.

The anti-corruption functions within the Executive Office of the President of the Russian Federation are fulfilled by the Civil Service, Personnel and Anti-Corruption Directorate of the President of the Russian Federation. It ensures that the Anti-Corruption Council

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<sup>33</sup> Information Source: Web Information and Survey responses

under the President of the Russian Federation and the presidium of the Council are operational and monitors compliance of the national senior officials with the anti-corruption standards.

The prosecutorial bodies are responsible for coordinating the anti-corruption activities of law enforcement bodies in order to ensure systematic work in this area. The list of main law enforcement bodies responsible for detecting corruption crimes includes the Ministry of Internal Affairs of the Russian Federation and the Federal Security Service of the Russian Federation, while the investigation of these crimes rests with the Investigative Committee of the Russian Federation.

In fulfilling corruption prevention functions, prosecutors also, within dedicated anti-corruption divisions, carry out the verifications of enforcement of anti-corruption legislation in federal and regional authorities and local self-government bodies, as well as in organizations, including those subordinate to them, on a regular basis.

Additionally, corruption prevention functions are implemented by the anti-corruption divisions, commissions, and bodies at the federal, regional and municipal levels. In particular, each body has an officer or division responsible for preventing corruption offences. The anti-corruption officer/division is directly responsible for implementing a set of anti-corruption mechanisms, including compliance with the anti-corruption standards and imposition of liability in case of a failure, organization of anti-corruption training, etc.

In order to prevent manifestations of corruption and improve legislative activities, the prosecutorial bodies and the Ministry of Justice of the Russian Federation conduct anti-corruption analysis of legal acts and draft legal acts with a view to excluding corruption-generating factors, i.e., the provisions that are favourable to corruption, from them.

The Ministry of Labour and Social Protection of the Russian Federation is a federal executive body entitled to issue guidance concerning the implementation of anti-corruption legislation. The Ministry has issued the recommendations aimed at implementing a set of anti-corruption mechanisms regarding, *inter alia*: (1) the procedure for conducting corruption risk assessment; (2) compliance with the anti-corruption standards, including the obligations to declare income, expenses, property and property-related obligations, and the obligation to prevent and manage conflicts of interest; (3) prevention of corruption in procurement; (4) compliance with the ethics standards with the aim to counter corruption and other offences; (5) planning of anti-corruption work in public bodies; (6) protection of the persons reporting the facts of corruption that come to their knowledge; (7) administration of different channels for receiving the reports on facts of corruption; (8) anti-corruption awareness-raising and promotion of anti-corruption standards in society.

The official website of the Ministry of Labour and Social Protection of the Russian Federation contains anti-corruption guidance adopted by the presidium of the Anti-

Corruption Council under the President of the Russian Federation and the guidance issued by the Ministry. Furthermore, the Ministry organizes professional training for the members of the divisions for preventing and combating corruption of federal public bodies on a systematic basis.

## Singapore<sup>34</sup>

Singapore's public sector integrity framework rests on a combination of strong institutions, rigorous laws, and a culture of ethical governance. At its core is the Corrupt Practices Investigation Bureau (CPIB), an autonomous agency reporting directly to the Prime Minister, empowered to investigate corruption.

The legal foundation is provided by the Prevention of Corruption Act (PCA), complemented by other statutes. A distinctive feature of the PCA is the presumption of corruption: if a public official is found in possession of wealth that exceeds their known income, the burden of proof shifts to the official to demonstrate that the assets were obtained lawfully. This provision ensures corruption remains a high-risk, low-rewarded activity.

To further reduce incentives for corruption, Singapore maintains a system of competitive public sector salaries, ensuring that employees are well-compensated. Remuneration for public officials is benchmarked against top private sector roles, ensuring fair compensation that both attracts talent and upholds integrity by reducing the temptation of illicit gains.

Meritocracy is another cornerstone of Singapore's governance model. Recruitment, promotion, and policymaking are based on performance and capability rather than patronage. This system is reinforced by the Public Service Commission and the Civil Service College, which strengthen accountability, ethical standards, and continuous learning.

The Singapore Public Service operates under a Code of Conduct that demands integrity, transparency, and incorruptibility from all officers. Administrative rules and processes are regularly reviewed to close loopholes and improve efficiency, reducing opportunities for corruption. As part of its investigative role, CPIB also conducts procedural reviews to highlight systemic vulnerabilities that could be exploited, ensuring that institutions evolve in accordance with emerging risks.

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<sup>34</sup> Information Source: CPIB web page and internet info

The Agency Against Corruption (AAC) of the Ministry of Justice is the primary institution responsible for anti-corruption in Chinese Taipei. It works alongside other key bodies such as the **Ministry of Justice Investigation Bureau (MJIB)**, conducts corruption-related investigations and houses a Civil Service Ethics Office, the **Prosecutors' Offices**, including the Supreme Prosecutors Office, Chinese Taipei High Prosecutors Office (and its Taichung, Tainan, Kaohsiung, Hualien branches), the Kinmen Branch of the Fuchien High Prosecutors Office, as well as all district prosecutor's offices. Together, these institutions form a multi-purpose integrity framework that integrates law enforcement, prevention, oversight, and prosecution.

The AAC maintains a formal internal compliance program. Its safeguards include a comprehensive internal control system with regular audits to detect irregularities, along with transparency and accountability mechanisms such as open reporting systems for financial transactions and the public disclosure of financial statements, procurement contracts, and other critical data. Ethical guidelines, codes of conduct, and integrity standards are established and enforced, while independent oversight is exercised through parliamentary and ombudsperson channels.

Civil society engagement is promoted through public hearings, consultations, and cooperation with international organizations, and accountability is further reinforced by external audits. Human resources safeguards include merit-based hiring and promotions, anti-nepotism measures, and mandatory background checks. The AAC also ensures the availability of whistleblowing and reporting channels for both internal and external reporting, as well as compulsory conflict-of-interest disclosures and asset declarations.

Misconduct is addressed through clear disciplinary bodies, procedures, and sanctions. The Inspection Office of the AAC, together with stationed inspectors and concurrent ethics personnel from Government Employee Ethics Units, handles inspection duties and jointly implements discipline inspection mechanisms for the operations of integrity officers.

Additionally, each year, the MJIB conducts investigations into long-serving personnel in positions with corruption risks and collects quantitative data for integrity evaluations. Personnel with potential corruption risks are categorized by risk levels, monitored accordingly, and provided with appropriate guidance and preventive measures.

Oversight is reinforced by the Bureau of Internal Audit and stationed inspectors in government agencies, supported by the Inspection Office of the AAC.

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<sup>35</sup> Information Source: Information from the survey

Integrity training is mandatory for all personnel and systematically integrated into induction and ongoing professional development.

Training occurs regularly (every 1–2 weeks for AAC staff) and covers all staff levels, with specialized modules for high-risk positions.

## Thailand<sup>36</sup>

The **National Anti-Corruption Commission (NACC)** is the competent authority in Thailand responsible for law enforcement, prevention, oversight, and prosecution of corruption. Along with the NACC, other agencies support the integrity system, including the **Anti-Money Laundering Office (AMLO)**, which handles money laundering and terrorism financing; the **Comptroller General's Department (CGD)**, which promotes transparency in public procurement; the **Public Sector Anti-Corruption Commission (PACC)**; and the **Office of the Civil Service Commission (OCSC)**, which enforces ethical standards for public officials.

The NACC has developed a formal internal compliance framework and system, coordinated across relevant departments, to safeguard against corruption and misconduct and to incorporate multiple mechanisms. These include the adoption of ethical guidelines, a code of conduct, internal regulations, and transparency measures such as the public disclosure of financial statements and procurement contracts. Independent oversight is provided through external audits, parliamentary review, and civil society engagement mechanisms, including consultations and international reviews.

The NACC has established disciplinary bodies and procedures to address cases of misconduct. Human resource safeguards—such as merit-based recruitment, measures against nepotism, mandatory background checks, and third-party due diligence—help reinforce integrity in staffing and organizational practices.

The NACC operates a secure and confidential whistleblowing channel accessible to both internal and external stakeholders. Reports received are managed under a formal investigative process. In terms of corruption risk management, the institution follows a systematic and regular approach, guided by risk maps, risk assessments, proactive monitoring, and promotes collaborative initiatives with other public agencies.

Integrity measures implementation involves senior management, employees at all levels, external consultants, civil society organizations, and international partners such as the United Nations Office on Drugs and Crime (UNODC).

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<sup>36</sup> Information Source: Survey responses

To monitor the effectiveness of its compliance system, the NACC has a dedicated **Bureau of Internal Audit**, ensuring adherence to internal policies, regulations, and domestic laws. Anti-corruption measures also address conflicts of interest through mandatory disclosure requirements, background checks for sensitive positions, regular audits, specific policies and guidelines, and targeted training programs for employees.

The NACC enforces a mandatory induction program for all incoming personnel, ensuring early awareness of compliance standards and regulations. Beyond induction, ongoing integrity and ethics training is provided for all staff levels. Training sessions are conducted every one to two weeks, allowing officers from all regions and ranks to participate.

### United States<sup>37</sup>

The **Office of Government Ethics** oversees the executive branch ethics program, which is responsible for preventing and resolving financial conflicts of interest. The Office of Management and Budget is responsible for internal control policy, in consultation with the Government Accountability Office, the supreme audit institution. The **Department of Justice** is responsible for criminal matters related to the financing of political parties and election campaigns, as well as the enforcement component of anti-corruption. The Department of Justice also supervises the Foreign Agents Registration Act (FARA), while the House Committee on Ethics and the Senate Select Committee on Ethics supervise compliance with the Lobbying Disclosure Act (LDA) and conflict-of-interest requirements for members of Congress. Finally, a supervisory body responsible for public information issues is established, and both the Department of Justice's Office of Information Policy and the National Archives and Records Administration's Office of Government Information Services are responsible for ensuring compliance with the Access to Information law.

### Viet Nam<sup>38</sup>

In Viet Nam, anti-corruption and anti-bribery are primarily regulated by the **Law on Anti-Corruption (2018)**, which replaced the 2005 law. This legislation sets out general provisions for preventing, detecting, and combating corruption in both the public and private sectors, complemented by the Penal Code. The Anti-Corruption Law also

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<sup>37</sup> Information Source: Information extracted from OECD Anti-Corruption and Integrity Outlook: Country Fact Sheet 2024

<sup>38</sup> Information Source: Survey responses & [www.thanhtra.gov.vn](http://www.thanhtra.gov.vn)

functions as a code of conduct for officials, public employees, and other individuals entrusted with state power.

Whistleblower protections are provided under the **Law on Denunciations (2018)** and the **Law on Criminal Procedure (2015)**. These laws safeguard whistleblowers' identities and protect them from retaliation. The Anti-Corruption Law further addresses conflicts of interest by requiring office holders to report conflicts, third parties to notify managers, and managers to act when integrity is compromised. These provisions are primarily applied to public companies and specific non-state organizations, although their application in the broader private sector remains limited.

Responsibility for anti-corruption lies with all public agencies across administrative levels, supported by specialized bodies, including:

- The **Anti-Corruption Bureau** under the Government Inspectorate,
- The **Bureau for Investigation of Corruption, Economic, and Smuggling Crimes** under the Ministry of Public Security, and
- The **Department for Prosecuting Economic and Corruption Crimes** under the Supreme People's Procuracy.

The **Government Inspectorate** has a formal compliance program and applies a wide range of measures to prevent and address corruption and misconduct. These include:

- Transparency and accountability mechanisms (e.g., open reporting of financial transactions, disclosure of procurement contracts, and publication of financial statements);
- Codes of ethics and conduct, with clear rules rewarding ethical behaviour and sanctioning misconduct;
- External audits and regulatory compliance reviews;
- Merit-based hiring and promotion policies with safeguards against favouritism and nepotism;
- Whistleblowing channels (safe, secure, and confidential, for internal use only);
- Conflict of interest and asset declaration requirements;
- Regular compliance training and awareness programs, including anti-corruption and anti-bribery content; and
- Background checks are part of the recruitment process.

The institution has regulations that define prohibited acts for inspectors during the performance of their duties, which function as part of its corruption risk management framework. Senior management and employees at all levels are actively involved in implementing these safeguards, although there is no dedicated compliance department or officer.

Conflicts of interest are addressed through mandatory disclosures, dedicated policies and guidelines, and employee training. A procurement policy is in place with provisions to prevent misconduct, and the effectiveness of anti-corruption measures is monitored through external audits. Cases of misconduct are handled by disciplinary bodies that follow clear procedures and impose appropriate sanctions.

Finally, all incoming personnel receive mandatory induction training on integrity and anti-corruption measures, while ongoing ethics and integrity training is compulsory for staff at all levels. Integrity modules are incorporated into the regular professional training curricula for inspectors and public servants.

## PART III

### Key Findings and Challenges

The process of compiling the Compendium—through research, survey, and workshop—has provided a deeper understanding of integrity and compliance practices across APEC economies, while also highlighting key strengths in this area.

A shared strength among economies is a commitment to transparency and accountability, embedded in integrity frameworks, anti-corruption regulations, and compliance systems. Many APEC economies emphasize the importance of clear ethical standards and codes of conduct for public officials, thereby reinforcing trust in public institutions.

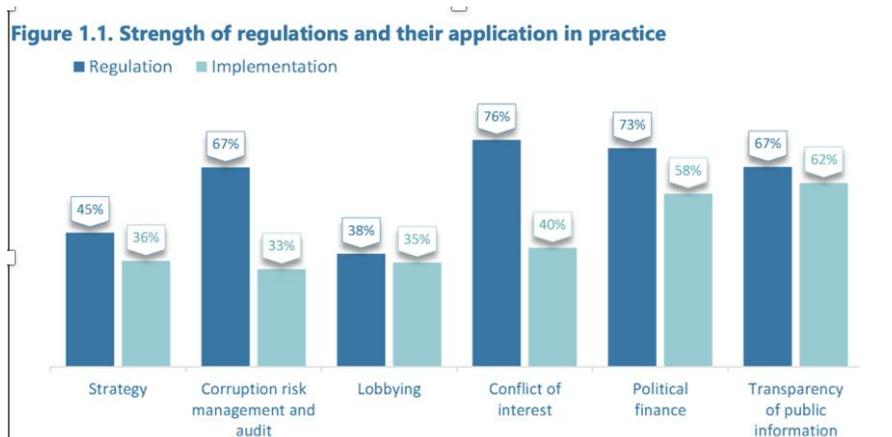
Another positive aspect is the institutionalization of preventive measures to reduce opportunities for corruption and misconduct. These include conflict-of-interest rules, asset declarations, and standardized procurement policies.

Several economies also demonstrate a proactive approach to compliance by establishing dedicated integrity or compliance units within public sector entities. These units are often supported by regular training programs that raise awareness and strengthen the capacity of public servants and law enforcement personnel. The integration of technology into compliance systems—such as digital reporting mechanisms and e-procurement platforms—has further enhanced monitoring while reducing human discretion, a common source of corruption risks.

Cross-border cooperation within APEC is also a notable achievement. Economies benefit from sharing experiences, exchanging best practices, and engaging in peer learning, which has helped refine domestic frameworks.

Nonetheless, persistent challenges continue to undermine effectiveness. At the systemic level, these include **unclear or inconsistent legal definitions of corruption**, gaps in oversight, and concerns regarding the powers, independence, and resources of anti-corruption agencies. Such institutional shortcomings contribute to **low public confidence** that corruption will be adequately detected and sanctioned.

A particularly pressing challenge is the **implementation gap**. While many economies have developed regulations and frameworks, enforcement remains weak due to insufficient resources, limited political will, weak or non-existent enforcement mechanisms, and gaps in technical capacity. Governments often focus on tracking inputs—such as the number of audits conducted or training sessions delivered—rather than measuring their actual impact on reducing misconduct or strengthening accountability.



**How to read:** As measured against OECD standards on conflict of interest, OECD economies fulfil on average 76% of criteria for regulations and 40% for implementation.  
 Source: OECD (2024), OECD Public Integrity Indicators Database

**Whistleblower protection** also remains fragile. Legal safeguards are often inadequate, anonymity is not fully guaranteed, and cultural reluctance to report wrongdoing persists. Even where reporting channels exist, awareness among staff tends to be low, and their confidence in the credibility of these channels is limited. Similarly, **training programs** face significant constraints, including a shortage of specialized trainers, limited resources for sustained delivery, and inadequate evaluation mechanisms to assess their effectiveness.

**Risk assessments**, though increasingly adopted, are often undermined by a lack of technical expertise, poor integration of IT tools, and weak follow-up once risks are identified. Preventive tools—such as third-party due diligence, background checks, and conflict-of-interest management—remain underdeveloped in many economies, especially in high-risk areas like public procurement and law enforcement.

Persistent weaknesses are also evident in **audit and oversight** systems. Internal audit units often lack independence and adequate operational coverage, while follow-up on audit recommendations remains inconsistent. At a broader level, fragmented mandates and limited cross-agency collaboration continue to undermine **coordinated integrity strategies** within institutions.

Ultimately, achieving long-term cultural change within public institutions remains one of the most significant challenges. Especially in politicized or decentralized systems, integrity norms are not yet fully internalized, making it more challenging to establish a culture of accountability and transparency.

## Recommendations

Based on the comparative analysis and survey findings, it is recommended that APEC economies prioritize reinforcing preventive measures, strengthening institutional independence, and fostering a culture of integrity.

A priority is to address **underdeveloped areas of legal and regulatory frameworks**. This includes adopting clear and consistent definitions of corruption, introducing or improving lobbying regulations, in line with domestic legal frameworks, and institutionalizing preventive screening tools, such as third-party due diligence and background checks for sensitive roles.

One of the core elements is establishing rules and regulations to improve the code of conduct of public employees. The top leaders should show strong determination and lead by example in following these rules and regulations. The awareness of the public employees should also be built and enhanced that public power should only be used for the welfare of the people.

Expanding **whistleblower protection** is also crucial for building trust and enhancing the use of reporting channels. Stronger legal safeguards, guaranteed anonymity, and targeted awareness campaigns can help ensure staff confidence in these mechanisms.

At the implementation level, **oversight and accountability systems** must be enhanced. Audit units should be granted greater independence, broader operational coverage, and access to digital tools that improve efficiency and enable systematic follow-up on recommendations.

Similarly, **risk** assessments at the agency (Specialized Anti-Corruption body, Police Force, Prosecutor, etc.) level should be generalized and strengthened through analytical methodologies, IT integration, and consistent monitoring of identified risks.

Given increasing scrutiny and evolving guidelines, ensuring regulatory and integrity compliance is a core challenge for public sector organizations. Building on existing progress in compliance units, all public sector entities should designate a **compliance officer or unit** with clearly defined responsibilities, senior-level reporting lines, and sufficient resources to implement, monitor, and enforce integrity policies - such as conflict of interest management through sworn declarations, audits, and tailored guidance.

Capacity-building also **requires institutionalized training programs** that are regular, well-resourced, and systematically evaluated. Leveraging online platforms and practical case studies can increase their long-term impact, while awareness campaigns should ensure that staff clearly understand the available protections and their compliance responsibilities.

Finally, long-term progress will depend on **collaboration and cultural change**. Cross-agency coordination and engagement with external stakeholders, such as civil society and international organizations, can enhance transparency and foster public trust. Embedding integrity norms into the daily operations and values of public institutions will

be key to achieving a sustainable cultural change. Continued peer learning will further reinforce collective efforts to prevent and combat corruption.

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Annex:

Link with complete results from the survey:

[https://docs.google.com/spreadsheets/d/1tbgNfXtH\\_yL-rWME1UHbfgP9bKShjs5RGouW9LCTSC8/edit?gid=2140256516#gid=2140256516](https://docs.google.com/spreadsheets/d/1tbgNfXtH_yL-rWME1UHbfgP9bKShjs5RGouW9LCTSC8/edit?gid=2140256516#gid=2140256516)