



Integrity Action Plan

A handbook for practitioners in defence and related security establishments – revised 2023





CONTENTS

1. INTRODUCTION	6
Growing concern over corruption.....	7
Integrity Action Plan – A step by step guide.....	8
2. GETTING STARTED	10
Assessing corruption risk in the defence and related security sector.....	11
Tailored assessment.....	14
Building political and military support	15
Political leadership.....	16
Military leadership	16
The need for a broad strategy	16
3. PLANNING PHASE	18
Top-level ownership	18
Choosing the right approach.....	19
Establishing a steering group	20
Establishing a working group.....	21
Finding the right people for the working group.....	21
Allocating resources and responsibilities	22
Timelines and milestones.....	22
Broader consultation.....	23
Communication strategy.....	23
Analysing risk factors.....	24

4. DRAFTING THE PLAN	26
Drafting the Integrity Action Plan	27
The action plan document.....	27
Main body of action plan	27
Areas to include in an Integrity Action Plan.....	30
5. IMPLEMENTING THE PLAN	32
From planning to implementation.....	33
Regular progress meetings and reporting.....	33
Communication.....	33
Managing the risk factors	34
Review and revision	34
6. EVALUATION	35
Evaluating and monitoring the results.....	35
Selecting indicators	36
Methods for long term monitoring through new assessments.....	37
Shared responsibility	38
Reporting & communication.....	38
List of references	39

PREFACE

It is our experience from working with many different organisations and nations that it is much easier to spot what needs to be reformed rather than to actually implement changes. Even the most ambitious plan can falter and lead to little change in real terms, because the ability to achieve the objectives is lacking, even if the intention was good. Effective implementation relies crucially on concrete and systematic action. Producing plans does not change much if they are not executed in full.

This handbook on Integrity Action Plans aims at helping practitioners in the defence and related security sector produce real and lasting change. It outlines how to assess corruption risks and address identified weaknesses and shortcomings. It emphasises the need for leadership and active support from the top in order to secure a clear mandate and how to tailor the chosen approach to the institutional context. The handbook guides you through all the necessary steps – from the planning stage to the actual drafting of the plan to practical implementation, monitoring and evaluation. This handbook was originally drafted based on the results of the Centre for Integrity in the Defence and related security sector's (CIDS) Building Integrity Conference *How to develop and implement an integrity plan*

in the defence and related security sector? arranged in 2014 where around 60 practitioners from 20 countries shared their ideas and experiences. Transparency International Defence & Security Programme (TI-DS), also contributed greatly to this handbook. TI-DS's substantial experience in integrity-building and anti-corruption work, including the drafting of integrity plans in a number of countries (often called anti-corruption plans or strategies), is unique. Based on our excellent and meaningful cooperation, CIDS and TI-DS have therefore decided to update this handbook together, based on the recent dynamic developments in the defence and related security sector. Our thanks go to Ara Marcen Naval and Michael Ofori-Mensah, TI-DS and Annette Hurum and Terje Haaverstad, CIDS for their careful revisions. We would also like to express our gratitude to Svein Eriksen, CIDS for his helpful contribution.

Even in a country like Norway which is generally known to have good governance and little corruption, risk factors need to be handled to ensure that personnel in the defence and related security sector – civilians as well as personnel in uniform – are aware of and adhere to the relevant rules and regulations. These are essential to safeguard good governance and integrity.

Leaders at all levels must provide guidance on ethical issues, including how to avoid conflicts of interest, and how to act in order to live up to high standards. This handbook is available as a tool to assist those who are endeavouring to promote good governance and integrity in their establishments. It should also be considered a valuable added resource to NATO's *Building Integrity Programme* and therefore useful to different countries after completing NATO's *Self-Assessment Questionnaire* and *Peer Review Process*, in order to help them embark on translating the resulting recommendations into action. In parallel it can be used to address weaknesses and shortcomings identified by TI-DSs *Government Defence Integrity Index (GDI)*.

Oslo, June 2023
Centre for Integrity in the Defence and related security sector

London, June 2023
Transparency International – Defence and Security



A photograph of a modern, multi-level staircase with a glass and metal railing system. The stairs are illuminated from below, creating a warm glow. A person in a red shirt is visible on one of the lower levels. The overall design is sleek and contemporary.

1. INTRODUCTION

This chapter shows:

- The impact of corruption in the defence and related security sector
- The need for an Integrity Action Plan and what it is
- Important steps in developing and implementing an Integrity Action Plan

Many senior defence officials, senior officers and ministers are aware of the corruption risks in defence and security related operations. Corruption erodes public trust while undue secrecy and corruption scandals further damage that trust. Corruption risks operational effectiveness and puts soldiers at risk if their equipment is inappropriate or faulty, or if the number of soldiers are not accurately accounted for. Corruption diminishes the ability of international efforts, including military operations and security assistance, to achieve sustainable security and governance-related goals. Since it reduces the ability of many states to respond adequately to insecurity, it also makes exit strategies based on handing over to competent host nation partners more difficult to achieve. Overall, corruption wastes money and resources, limits improvements in governance and security, and also contributes to instability and widespread societal grievances.

Until recently, senior officials and leaders in the defence and related security sector in most countries used to feel that corruption was something others had to tackle. Who those 'others' were, and what they could do about it, were questions quietly ignored. It is now commonly understood that whether corruption is allowed to undermine mission goals depends to a large extent on the senior leadership's awareness of its impact, and on his or her ability to prioritise and resource the efforts to mitigate it. Recent experiences from Afghanistan, Mali and Nigeria, for example, provide evidence of the effect of corruption on defence institutions. While there are several other cases of reported corruption in the defence and related security sector worldwide, there is very little scientific research and few specially designed instruments to help ministries and governments prevent and reduce the risk of corruption.

The Norwegian Centre for Integrity in the Defence and related security sector (CIDS) teamed up with Transparency International's Defence and Security Programme (TI-DS) to produce this handbook with a view to helping interested organisations and governments to develop an Integrity Action Plan to counter corruption and corruption risks in the defence and related security sector. The handbook draws on many years of practical experience of working alongside governments globally, and on ideas emerging from the CIDS' Building Integrity Conference, in Oslo March 2014. In addition to providing senior military and civilian personnel in ministries of defence and subordinate organisations with a practical tool, this handbook is also meant to be accessible to civil society and other stakeholders so they can assist in developing an Integrity Action Plan.

GROWING CONCERN OVER CORRUPTION

Corruption is always problematic. While corruption in every sector wastes resources and damages relations between the state and its citizens, corruption in the defence and security sector, has a particularly detrimental impact on states' ability to maintain peace and security. In the worst instances we see failure of international operations, military coups and ongoing violent insurgencies. The costs of this are borne first and foremost by ordinary people – that defence and related security sectors ironically are there to protect.

More specifically, corruption undermines states and the ability of states in four key ways.

1. First, it wastes resources that could be spent either on preparing armed forces to provide human and state security, or on other areas of government expenditure that could further development.
2. Second, it fuels conflict by diminishing trust in state

A STRATEGY IS A PLAN DESIGNED TO ACHIEVE A LONG-TERM OR OVERALL GOAL

AN ACTION PLAN DESCRIBES THE STEPS AND ACTIONS YOU HAVE TO TAKE TO ACHIEVE THE STRATEGY'S GOALS

AN INTEGRITY ACTION PLAN IS A TOOL TO DESIGN AND IMPLEMENT SPECIFIC MEASURES TO CORRECT IDENTIFIED RISKS OF CORRUPTION AND OTHER SHORTCOMINGS IN THE INTEGRITY SYSTEM. THROUGH A HOLISTIC AND SYSTEMATIC APPROACH, SPECIFIC MEASURES MAY BE TAILORED AND IMPLEMENTED IN A WAY THAT REINFORCES INTEGRITY AND REDUCES THE RISK OF CORRUPTION AND OTHER UNETHICAL BEHAVIOUR. THE AIM IS TO INSTITUTIONALISE HIGH ETHICAL STANDARDS AND PRINCIPLES OF GOOD GOVERNANCE, AS WELL AS ENHANCED INSTITUTIONAL RESILIENCE.

INTEGRITY IS THE QUALITY OF BEING GUIDED BY STRONG PRINCIPLES OR BEING FULLY OPERATIONAL, INTACT AND INTERNALLY CONSISTENT IN THE APPLICATION OF AGREED-UPON PRINCIPLES AND STANDARDS. INDIVIDUALS HAVE INTEGRITY IF THEY ARE DOING THEIR WORK HONESTLY, COMPETENTLY AND COMPLETELY. AT THE ORGANISATIONAL LEVEL, INTEGRITY SHOULD BE INSTITUTIONALISED BY EMBEDDING HIGH MORAL STANDARDS IN ORGANISATIONS, BUSINESSES AND PUBLIC OFFICES.

institutions, exacerbating societal divisions, and enabling arms flows to militia and extremist groups.

3. Third, corrupt militaries deprive countries of the ability to respond to a security crisis: corruption can lead to hollowed-out, inept armed forces that are not capable of providing security when it is most needed.

4. Fourth, corruption undermines international interventions aiming to restore stability and peace.

Politicians and military leaders are increasingly understanding that countering corruption should therefore be a critical priority for those concerned with security and defence issues.

FINANCIAL ENVIRONMENT. The global recession has had a severe impact on most nations, and governments have responded by cutting budgets and focusing on getting the best value for money. Financial concerns have made governments more aware of the importance of good governance in the defence and related security sector, but also underlined the fact that reduced waste due to corruption plays a key part of maintaining operational capability.

POLITICAL ENVIRONMENT. Corruption and other unethical behaviour erode the public's trust in the armed forces, and in some cases can undermine the government itself. Large-scale corruption will evoke public indignation, and may lead to social unrest and revolts. In recent years, senior defence leaders have realised the importance of building integrity and facilitating good governance in the defence and related security sector to maintaining public trust and shoring up the defence budget.

OPERATIONAL ENVIRONMENT. Around the late 2000s, NATO and partner nations learned that huge amounts of money were being lost in Afghanistan because of systemic corruption.¹ Until that point, military and political officials seemingly turned a blind eye to the local corruption as a way of doing business. As a result, money flowing into the country was often channelled not to those who needed it most, but to criminal patronage networks, including the adversary.

The conflict was obviously being funded in part by coalition and donor money. In response, COMISAF issued in 2010 an "Anti-Corruption Guidance" in support of ISAF Strategic Campaign Objective. Corruption had become a strategic challenge.

With global defence budgets estimated at over two trillion dollars, and a loss estimated at 20 per cent due to corruption, governments realise that in any future operational engagements corruption risks will have to be addressed prior to, during and post deployment.² Clearly, the deployed forces will need awareness training, the proper tools and other mechanisms in order to prevent, identify and, if necessary, combat corruption.

INTEGRITY ACTION PLAN – A STEP BY STEP GUIDE

Defence ministries and establishments are slowly coming to realise that corruption can be addressed and minimised. But they need benchmarks and guidance. They need to know what it is that characterises a robust integrity system in the defence and related security sector. Who and what should an Integrity Action Plan target? Where are the good practices that can be studied and emulated? This handbook will answer all these questions, step by step.

An Integrity Action Plan aims to improve standards of integrity through transparency, accountability and counter-corruption (TACC) measures.

TRANSPARENCY. Transparency in the defence and related security sector is a complex issue. It is a key pillar of good governance that is instrumental for monitoring and oversight and to detect wrongdoing.

Secrecy/classification despite being justified in some few instances for highly sensitive information essential for national or operational security, the use of unnecessary classification provides the ideal cover for corruption, as evidence is shielded from the public and oversight bodies. Transparent practice includes holding meetings that are open to the public and the media, providing easy access to documents, plans, and budgets that can be reviewed by anyone, and allowing discussion of Bills and legislation.

ACCOUNTABILITY. Accountability means people will be held responsible for their actions and how they perform their duties. It also includes the responsibility for money or other entrusted property. Accountability involves having control and verification systems in place, and, if necessary, the ability to arrest, prosecute and convict offenders for illegal or corrupt behaviour. All personnel must be held accountable under the law regardless of rank, status and office.

COUNTERING CORRUPTION. Counter-corruption measures include preventative actions that reduce the incentives and opportunities for corruption and other unethical behaviour to occur. The bulk of an Integrity Action Plan will revolve around such preventative measures. Counter-corruption can also include the pro-active enforcement of rules. It includes control, oversight and investigation of suspected corrupt activities and individuals, as well as prosecution by a legal authority. It is important to note that law enforcement relies on, and is inherently linked to, an effective legal system and an independent judiciary.

An Integrity Action Plan involves several stages, each of which we will go through in the following chapters.

Step 1. Assessing risks. The first step is to make an accurate assessment of the corruption risks within the defence and related security sector, and the political, social, economic and legal environment in which the sector operates. An assessment is a comprehensive analysis that identifies strengths and weaknesses in the integrity system. Questions to ask include whether national legislation and other institutional controls are sufficient and effective. What is the public's perception of the government's willingness to fight corruption? How well do public officials (military or civilian) understand the relevant rules and regulations, and do they have the necessary tools to implement and enforce to these rules?

Step 2. Strategy development. The results of the assessment will then be used as a basis to draft a strategy. The strategy articulates the overall goal for counter-corruption work in the defence and related security sector. The strategy should be synchronised with

other existing strategies set forth government-wide or in other ministries and organisations.

Step 3. Planning phase. In the planning phase we select our approach, set priorities, establish a steering group and working structure, allocate resources and responsibilities, set timelines and consult with civil society organisations.

Step 4. Drafting phase. After completing the planning phase, it is time to start drafting the Integrity Action Plan. The plan describes in detail how to reach the strategic goals, including who does what, what resources are required and the timeline.

Step 5. Implementation. In the implementation phase we set the various reforms and activities specified in the Integrity Action Plan in motion. The time-frame for this phase will depend on the complexity of the Integrity Action Plan, but usually last from 6 months to 3-4 years.

Step 6. Evaluation. The monitoring of activities and evaluation of results are essential to find out whether the plan has succeeded and the goals have been reached. A systematic evaluation allows us to assess the degree of success and impact of the reforms and actions on the target groups. This can be done either as a direct follow-up to implementation, or by carrying out a new comprehensive assessment to identify progress.

Model: Integrity action plan stages



Corruption can be defined as the 'abuse of entrusted power for private gain'. This definition includes an element of subversion, or the illegitimate use of resources meant for a particular purpose. It involves a benefit that is illegitimately obtained, and harm caused to those deprived of a benefit they were entitled to. Corruption is more than money changing hands. It can present in the form of favouritism, nepotism, sectarianism; bribery, including extortion, and fraud, ranging from diversion and embezzlement of funds to electoral fraud.

Understanding the wide scope of corruption and putting adequate mitigating measures in place is crucial to build resilience and integrity.

2. GETTING STARTED

CORRUPTION IS

DEFINED AS THE ABUSE OF ENTRUSTED POWER FOR PRIVATE GAIN.

CORRUPTION RISK

REFERS TO THE DEGREE OF PROBABILITY THAT CORRUPTION WILL OCCUR WITHIN A CERTAIN AREA OR ACTIVITY, AND THE POTENTIAL COST ASSOCIATED WITH THAT CORRUPTION. IT THUS REFLECTS THE PROBABILITY THAT SUCH LOSSES, WHETHER MONETARY, SOCIAL, OR POLITICAL, CAN ARISE; AND REFLECTS THE DEGREE OF SUCH COST WHEN IT OCCURS.

This chapter shows:

- How to assess and analyse corruption risks
- What tools are available for assessing corruption risks in the defence and related security sector
- How to build political and military support
- The need for a broad strategy
- How to link the integrity plan to the political context

Prior to developing an Integrity Action Plan, and in order to focus its efforts, the MoD or other major defence and/or security organisations must identify the most at-risk areas. Measuring corruption, of course, is notoriously challenging. Corruption is complex and secretive and no single instrument can measure corruption exhaustively. Corruption is more than people passing envelopes full of money as personal bribes; it also includes redirecting funds from contracts into personal accounts, theft and resale of defence supplies on the black market, and the use of secret budgets to hide illicit expenditure. Corruption also comprises unethical behaviour among personnel, and the misuse of position and rank, including abuse of power for political gain. People frequently act corruptly because the systems that are meant to prevent them are either weak or non-existent. It is also a question of leadership and how strongly ethical standards that may prevent corruption are institutionally embedded.

ASSESSING CORRUPTION RISK IN THE DEFENCE AND RELATED SECURITY SECTOR

To learn where the gaps are, i.e. where to target measures, defence ministries etc must conduct a thorough review, asking how and why corruption may affect their defence and related security sector. In fact, it is critical to highlight that even where the necessary legal provisions may be in place, often there may be clear implementation gaps between formal provisions and their roll out in practice.

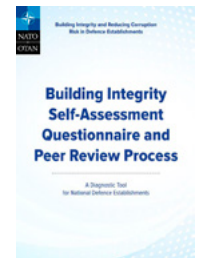
THE NEED FOR EVIDENCE-BASED POLICIES³

Several tools can assist officials in assessing the level of corruption risk within the defence

The NATO Building Integrity (BI) Self-Assessment Questionnaire is

NATO's diagnostic tool designed to help national institutions across the defence and related security sector to assess good governance and the management of resources. The NATO BI Self-Assessment Questionnaire consists of a series of questions focusing on eight functional areas, ranging from the scope of democratic control and engagement, to procurement, as well as planning and budgeting procedures. This tool which was initially developed by NATO and TI-DSP in 2008, was revised in 2014 with the participation of a few Allies. The review of the completed NATO BI Self-Assessment Questionnaire is conducted by the NATO HQ/BI Team that includes a first analysis of the replies to the Questionnaire and Peer Review Visit(s) based on which NATO BI provides recommendations for strengthening integrity and good governance. The participation in the NATO BI Process is demand-driven on a voluntary basis.

The Government Defence Integrity Index (GDI) provides a framework of good practice that promotes accountable, transparent, and responsible governance in national defence establishments. Produced by Transparency International - Defence & Security (TI-DS), the GDI recognises that corruption within



EFFECTIVE ANTI-CORRUPTION RESPONSES CANNOT BE DESIGNED WITHOUT A THOROUGH ASSESSMENT OF THE PROBLEM: CORRUPTION IS A SYMPTOM OF INEFFECTIVENESS OF INSTITUTIONS, SYSTEM GAPS OR FAILURES. PROPER DIAGNOSTIC RESEARCH IS NEEDED TO IDENTIFY AND UNDERSTAND THE SPREAD OR CONCENTRATION OF CORRUPTION WITHIN A SYSTEM (A SINGLE ORGANIZATION OR A SYSTEM OF ORGANIZATIONS), THE SPECIFIC FORMS THAT IT TAKES, AND THE VULNERABILITY OF SYSTEMS AND PROCESSES TO CORRUPTION.



“An assessment is a comprehensive analysis that identifies strengths and weaknesses in the integrity system”

defence institutions limits a country’s ability to defend itself and weakens its public institutions. The GDI is premised on the idea that better institutional controls reduce the risk of corruption. It is thus a comprehensive assessment of defence integrity, which the index defines as institutional resilience against corruption in the defence and related security sector.

It is important to note that the GDI is not a measurement of corruption. It is not concerned with measuring the amount of funds that are lost, identifying corrupt actors, or estimating the perceptions of corruption by the general public. The GDI is a measure of defence governance within a country. In this regard, it assesses the quality of mechanisms used to manage corruption risk – and evaluates the factors that are understood to facilitate corruption, together with the dynamics that provide an environment in which corruption can flourish unchecked.

RISK AREAS

The index is organised into five main risk areas: *polycymaking and political affairs; finances; personnel management; military operations; and procurement*. Within these risk areas, the GDI identifies 29 corruption risks specific to the defence and security sector. The GDI is further organised into 77 main questions, which are broken down into 212 indicators. In order to provide a broad and comprehensive reflection of these risk areas, the GDI assesses both legal frameworks (*de jure*) and implementation (*de facto*), as well as resources and outcomes.

Indicator scores are aggregated using a simple aggregation method (no weighting) to determine the 77 question scores, the risk area scores, and the overall country score. Overall scores are then assigned to a band from A (very low corruption risk/ very robust institutional resilience to corruption) to F (critical corruption risk/ limited to no institutional resilience to corruption, which is intended to reflect the level of **corruption risk** (*not levels of corruption*) in defence and related security sector institutions and practices.



GDI Diagram with key risk areas

Q No. of Questions Total 77
I No. of Indicators Total 212



As a rigorous evidence-based assessment of the institutional controls of a country's defence and related security sector, the GDI has a crucial role to play in driving global defence reform and improving defence governance. The Index is a useful tool for governments seeking to improve their integrity protocols. It is also a platform to share good practice with civil society, oversight institutions, international organisations, and the media- identifying where they need to push for change in the sector. Additionally, TI-DS has developed a range of tools to assist defence organisations reduce the risk of corruption through a variety of steps, including the 'Interventions Anti-Corruption Guidance'. For more information, visit [TI-DS's website](#).

The former Norwegian Agency for Public Management and Government (Difi) developed a comprehensive tool to identify the risks of corruption/unethical behaviour in defence and related security sector institutions. The Difi assessment tool with benchmarks which has now been adopted by CIDS as part of Criteria for Good Governance is based on a total of 260 questions, covering nine topical areas: parliamentary oversight, anti-corruption policies, specialised anti-corruption bodies, conflicts of interest, freedom of access to information and transparency of defence budgets, internal and external audit, ombudsman institutions, public procurement and asset disposal, and human resources management. The benchmark guidelines



use the standards embedded in a large number of international conventions and agreements as the basis for assessing the status of a given country's integrity system. Thus, the assessment allows us to evaluate the extent to which these standards are institutionalised in the country in question. Based on those findings, it is possible to identify major gaps between the normative standards and their actual extent of institutionalisation and implementation; and propose measures to address these shortcomings.

TAILORED ASSESSMENT

If the above tools do not suffice for an accurate assessment of the integrity system and the corruption risks in particular parts of the defence or security sector, it may be necessary to conduct a specifically tailored assessment. This should be carefully developed in consultation with anti-corruption and defence experts, drawing on external expertise from both international organisations and civil society when possible.

When assessing the integrity system of a particular defence and related security sector there are three levels that should be examined:

- Individuals – Are individuals properly trained, are they held to account, are they performing their work competently, honestly and completely? What kind of values and standards are instilled within the personnel, and how are they recruited and paid?

A study carried out by CIDS shows that corrupt acts occur when illegal orders are given and carried out. Such orders are usually given by a minister or other high-ranking decision-makers. They are carried out by officials at lower levels. It is not easy, but neither is it impossible to map such conditions.

- Processes – What risks are accounted for in processes such as salary disbursements, contracting or other handling of money and assets? Is there a whistle-blower protection scheme? If so, how does it work?
- Organisation – How well is the organisation structured and how are the leaders appointed at different levels? What are the legal powers and constraints of the organisation, and how does it interact with external bodies?
- Legal frameworks - Adequate legislation is a necessary, but not a sufficient condition for removing corruption risks. Many of the so-called transition states have administrations with a distinctly law-centred orientation. This means that if a particular procedure is not explicitly legally prescribed, it will fail to be applied. On the other hand, there is also widespread experience that adequate laws are inadequately implemented

An honest and valid assessment needs the support of the leadership and should be carried out objectively.

In the early stages of developing an Integrity Action Plan, and while conducting an assessment of corruption risk, we need to make note of the various contextual factors likely to compound corruption or indeed impact any potential actions we undertake as part of the integrity plan. It is particularly important to conduct a stakeholder analysis and a power analysis to examine the varying interests at play. By identifying at an early stage the individuals or groups that are likely to affect or be affected by the Integrity Action Plan, it is easier to address and involve them later in the process. When we develop an Integrity Action Plan we need to look at what are considered standards or 'good practices' in other countries and adapt them to the local context.

DOMESTIC POLITICAL DIMENSIONS. To what extent are corruption and integrity a topic of conversation and discussable in the country? Could anti-corruption efforts be hijacked for political purposes and used as a means to isolate specific people, political groupings, or civil society organisations? How is politics linked to business interests? A major problem in many countries is that the state's administrative and financial resources are not seen as a means to achieve the common good, but as sources of enrichment for individuals and groups, i.e. political parties.

INTERNATIONAL DIMENSIONS. Corrupt activities may be linked to relationships with other governments, political actors, private interests, criminal elements or safe havens. Corruption in one country or within a specific sector may have links to international criminal networks.

CIVIL SOCIETY. Beyond using the technical measurements set forth in indices such as Transparency International's Government Defence Integrity Index, also engage with civil society organisations to understand the level of public trust and with other governmental organisations to ascertain intra-governmental trust and relations. Public support of anti-corruption efforts is key to maintaining momentum and developing sustainable forms of democratic accountability.

Rationale for Programme. We have to appraise the rationale for developing the action plan. In this we need to check whether the programme was initiated following a change of government, as an internally driven reform agenda, is it being used to demonstrate change to the international community, or are there other reasons? Understanding short and long term commitment to introduce changes are important. Institutions should take the opportunity to build on high political will and institutionalise necessary reforms before the political will to produce real change disappears.

BUILDING POLITICAL AND MILITARY SUPPORT

Building support for reforms among both the political and military leadership is an essential part of the initial phase. In order to obtain broad support, key leaders need to understand the actual impact of corruption on the defence and related security sector. One way to raise awareness and understanding among the leadership is to initiate a high-level internal workshop where top officials can develop a common understanding of how corruption risks should be faced and the best means of addressing them.

Expertise from relevant international organisations, together with lessons learned from similar reform efforts in other countries, may help in communicating the reality that corruption is inherently a political and economic challenge worldwide. Both NATO and Transparency International offer various courses and workshops on these issues, like the Senior Leaders Day.

During this process of awareness-raising, there may be resistance from certain members or groups within the establishment. Some officials will contend that there is no need for an Integrity Action Plan in the first place, or they will argue that the existing plans of the various departments are sufficient. However, experience shows that such approaches are inadequate. Corruption cuts across organisations and requires a holistic approach in order to deliver genuine change. It is crucial to gain the support of all levels for the suggested changes and reforms. Resistance from officials at all levels should not be underestimated, and it is therefore important to introduce a robust, strategic communications and training programme early in the process. Some of the following arguments may help you convince leaders in your organisation that an Integrity Action Plan is a good idea.

WE ARE UNITED IN OUR COMMITMENT TO DEMOCRACY, INDIVIDUAL LIBERTY, HUMAN RIGHTS, AND THE RULE OF LAW. WE ADHERE TO INTERNATIONAL LAW AND TO THE PURPOSES AND PRINCIPLES OF THE CHARTER OF THE UNITED NATIONS. WE ARE COMMITTED TO UPHOLDING THE RULES-BASED INTERNATIONAL ORDER.

NATO MADRID SUMMIT
DECLARATION, 29 JUNE 2022



POLITICAL LEADERSHIP

- Corruption reduces public trust in the defence and related security sector and more widely the whole public administration.
- International organizations such as NATO and the EU are trust-based organizations. Without confidence that all member states do their utmost to promote and defend the organizations' missions and values, these organizations cannot function properly
- Involvement in counter-corruption work (and the communication thereof) can strengthen public trust and may be used to build political credibility and support
- Corruption wastes scarce resources. Improving the integrity systems will save you money
- International companies tend to avoid corrupt economies. Corruption therefore slows economic growth, development and investment⁴
- Corruption can intensify existing rifts between different groups or within society by favouring one group over another
- Corruption can facilitate other key threats such as international and organised crime, terrorist activity and illicit trafficking and smuggling of narcotics, people, and scarce resources
- Corruption undermines democracy, and the rule of law and fosters a culture of impunity

MILITARY LEADERSHIP

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

THE NEED FOR A BROAD STRATEGY

All too frequently anti-corruption efforts are the result of uncoordinated, ad-hoc initiatives.⁵ This sort of piecemeal approach can be detrimental to anti-corruption work and even broader governance and defence reform. The defence and security sector should not be considered as an isolated island. Without the entire state apparatus, including e.g. prosecution services and courts, adequately functioning, it is difficult to fight corruption in the defence and security establishments. The ad-hoc approach usually stems from actors feeling under pressure to do something rather than nothing. But the fight against corruption requires a well thought-out, comprehensive, strategic plan.⁶ The development of an Integrity Action Plan should be aligned with other anti-corruption efforts in all parts of the government. Clearly, as corruption has no respect for organisational and functional boundaries, corruption and unethical behaviour cannot be effectively combated by isolated anti-corruption measures. Lasting progress can only be achieved by improving the framework of public governance in a country. Reforms of security institutions should be seen in a wider reform perspective that includes appropriate anti-corruption mechanisms in the different civilian policy sectors. But the reform process needs to start somewhere, and the hierarchical and disciplined nature of defence institutions make them a suitable place to start.

Prior to embarking upon specific reforms as embodied in an Integrity Action Plan, defence and security establishments are advised to develop a defence-wide anti-corruption strategy to frame the specific actions emanating from a broader approach. This strategy should synchronise with any existing government-wide, ministerial or organisational strategies.

AN INTEGRATED STRATEGY. To effectively close whatever loop holes corruption profits from, we need a comprehensive Integrity Action Plan design. Corruption risks can be found in a variety of different departments, processes and institutions. To tackle the problem locally or develop individual anti-corruption measures in each department is not enough. To systematically reduce the risk of corruption, the plan needs to be approached consistently by all involved departments, with separate efforts coalescing into one overall plan.

BE AS CLEAR AND PRECISE AS POSSIBLE. As stated above, a strategy is a plan designed to achieve a long-term or overall goal. The goals should be articulated in a clear and precise manner so that they are easily understood by everyone involved, at all levels. The strategy should be stated in a language that is simple and easily communicable.

SET YOUR SCOPE EARLY ON. The scope of the strategy depends on the approach chosen. For example, for a narrow strategy focused on just three principal areas of action, the goal could be as simple as “Improving the integrity system in the Ministry of Defence and Armed Forces by implementing better procedures for procurement, strengthening the personnel policy and implementing an ethical code of conduct for all employees”.



3. PLANNING PHASE

This chapter shows:

- This chapter shows:
- Different approaches
- How to establish a steering group
- How to set priorities
- How to establish a working structure
- Allocation of resources and personnel
- Setting timelines
- How to conduct broader consultations
- How to plan a communications strategy

TOP-LEVEL OWNERSHIP

Now that the assessment has been completed, it is time to proceed to the planning phase.

Planning cannot start before it has been determined who will lead the development of the strategy and later design of the action plan. It is essential that the integrity initiative is seen to be led from the top. On a sensitive subject like integrity and anti-corruption, staff, officers and troops will be watching carefully to see how thoroughly the initiative is really owned by the leadership. There will be very limited support for

the integrity plan if the reform initiatives are perceived to focus solely on those at the bottom rather than also addressing corruption risks at the highest levels.

A senior sponsor can be anyone with the power to instigate change. This person can be an individual, such as a defence minister, chief of defence staff, an MoD secretary general, or the chief of the general staff. Equally, it could be an MoD or military top leadership group, as represented by the chair of that group. Whoever it is, that person becomes the embodiment of the commitment of the organisation to the plan. They need to speak about it regularly, both internally

and externally, and demonstrate in their actions the reality, substance and permanence of the initiative.

CHOOSING THE RIGHT APPROACH

Because countries differ so markedly, each one has to tailor its anti-corruption approach to fit its own situation. The list below shows the eight different types of approaches that have been adopted by various countries. Choosing between them is the single biggest strategic choice of the entire process. Different approaches can be used in combination.

1. Narrow focus
2. Broad focus
3. External focus
4. Internal focus
5. Integrity building through training
6. Punitive approach
7. Disciplinary approach
8. External oversight

1. NARROW FOCUS

The first strategic choice when designing an action plan is to decide whether to go for a narrow or a broad focus. A narrow focus may be most appropriate when the identified corruption risks are concentrated in a limited number of areas. Alternatively, if the corruption problems range broad and deep, it makes sense to focus initially on just a few of the main problems so as to be able to demonstrate progress. In one such example where much of the most significant abuse was in the procurement of national defence equipment services, it would benefit the credibility of the leadership if it could show it could tackle and resolve this particular problem first, and then move on to others later. A second, but quite different, example is where we face a wide range of known corruption problems, but the corruption issues are so sensitive that the only way for the people executing the plan to gain momentum is to focus on one of the more resolvable issues, for example the training of senior officers in good conduct.

2. BROAD FOCUS

A broad approach requires a comprehensive plan for the entire defence and related security sector. This is the sensible approach when the defence leadership wants to flag it as one of their main priorities, and a central pillar of their programme of institutional strengthening. It would also be the right approach when the risk of corruption is pervasive or compromises several levels and areas, and the leadership feels sufficiently confident to push through comprehensive reforms. One example of this approach is the action plan developed by the North Macedonian Ministry of Defence – which wanted to make progress on a broad front. In other situations, countries receiving significant amounts of technical assistance from international donors may want to use this support to make progress in all the principal problem areas.

3. INTERNAL

Another strategic choice is whether to focus on high profile reforms that are visible to the public or reforms relating to the internal institutional strengthening of the ministry of defence and the military. Internal reforms, such as improving integrity in high value procurement activity, may be very significant financially but are unlikely to be very visible externally.

4. EXTERNAL

Usually, externally visible reforms – e.g. stopping the practice of taking bribes at checkpoints – are much less significant financially but may have a bigger effect on public opinion and public support of the military or security forces.

5. INTEGRITY-BUILDING FOCUS

A further strategic choice involves finding the balance between integrity-building efforts, such as the training of personnel and facilitating counter-corruption controls. Integrity building measures are less contentious politically, and fall in line with the values of civilian and military personnel. They thus tend to be popular with the military, and can serve as one way of rallying support for the action plan. A focus on training can also be the right approach when there is little or no

top-level buy-in on countering corruption, but where there is none the less enthusiasm for reform at the middle level and downwards.

6. TAKING ACTION AGAINST CORRUPT DEFENCE OFFICIALS

Most Integrity Action Plans do not prioritise actions against corrupt officials. This is partly because it is difficult to prosecute senior officers or senior staff in legal environments that may be fragile and politicised, and/or the prosecuting environment is used as a political tool. Furthermore, the judiciary will normally involve tasks belonging to institutions outside the defence sector. The part of punitive action in an Integrity Action Plan may therefore be limited to bringing cases of suspected corruption or fraud to the attention of the police or other external agency for investigation and potential prosecution.

However, if cases of corruption are so visible and/or egregious that an anti-corruption plan would not have credibility unless active measures were being taken against the offending individual, punitive action should be a component of the action plan. A quote from the German scholar M. Rainer Lepsius may be appropriate here:

“It is not the corruption of individuals that reduces trust in institutions, but rather the acceptance and tacit approval of these individuals. Corruption that is publicly debated and institutionally sanctioned strengthens the institutional order. It is not the misbehaviour of institutions’ representatives, but rather the estimated number of unreported cases, adaption to this number, and erosion of the willingness to sanction that compromise trust in the institution”.

7. FOCUS ON INTERNAL DISCIPLINE

This is a less visible version of the prosecution approach. In one example, in which a large number of officers from the rank of colonel upwards were known to be abusing the system, requiring a group of officers to make strong asset declarations proved an effective way of showing reduced tolerance for this behaviour without going the extra step to prosecution. Or it might be an idea to give the Inspector General and

his department more independence, authority and competence as a way of strengthening internal integrity across the military and in the ministry. Focusing on internal discipline is, in most cases, a successful approach. However, it must be checked on regularly, be controllable and applicable to all groups of personnel.

8. FOCUS ON EXTERNAL CONTROL AND OVERSIGHT

A final strategic choice is whether to strengthen the credibility of anti-corruption initiatives by working with external bodies, such as civil society organisations, think tanks, parliamentary defence committees, as well as supreme audit institutions in the monitoring and evaluation of the plan. Most ministries of defence may be inclined to make this an internal reform. This may well be the correct choice, but there are advantages to external control and monitoring, notably that it may provide a stronger push for change and strengthen the credibility of the reforms. Furthermore, external monitoring allows for the use of external benchmarks to credibly demonstrate successful implementation of the plan both nationally and internationally, and to the government as well as the public.

The chosen approach may of course combine several elements from the above list.

ESTABLISHING A STEERING GROUP

In parallel with the planning process described above, there is a need to establish a steering group. It will be in charge of reaching the goals of the anti-corruption strategy and Integrity Action Plan. The steering group should consist of senior officials overseeing the drafting and subsequent implementation of the action plan. The steering group should be headed either by a senior military officer or ministerial official in order to ensure delivery and sufficient coordination across institutional and organisational boundaries. The steering group then appoints a working group and a leader of the working group.

Important: the steering group appoints a working group leader with a clear mandate to lead on the Integrity Action Plan

THE LEADER OF THE WORKING GROUP HAS OVERALL RESPONSIBILITY FOR THE PLANNING, EXECUTION, MONITORING, CONTROL AND CLOSURE OF THE PROJECT. THE WORKING GROUP LEADER REPORTS BACK TO THE STEERING GROUP



ESTABLISHING A WORKING GROUP

The work of implementing and monitoring the Integrity Action Plan can be done by a working group as a part time or full time activity. Alternatively, it can be mainstreamed into the procedures of relevant departments. Choosing which structure to use will depend on the local setting, organisational structure and scope of the action plan.

It is important that the leader of the working group is fully committed to the work, and has a clear mandate from the steering group. The steering group explains the full extent of leader's responsibilities and powers, and gives him/her the authority to put the plan in motion.

If choosing a broad approach, i.e. by developing an action plan for the entire defence and related security sector including the MoD, armed forces, procurement agency, secret services etc., we would need a full time working group consisting of members drawn from different parts of the defence establishment. The benefits of this organisational structure are that the members of the working group can concentrate all their time and energy on the project, and the group leader will have a well-defined leadership role.

If choosing a narrow approach and the action plan is addressing a certain department only, it might be feasible to appoint a project leader within or with good knowledge of that organisational unit and to mainstream the work within the day-to-day business. Mainstreaming the action plan into existing work streams can be advantageous since it will utilise already-existing chains of command, allow for quick decision-making, and facilitate knowledge-sharing and supervision. As a generality, we recommend that the project leader and at least some of the working group members work on a full time basis for an appropriate period of time to ensure consistency and institutional memory throughout the lifetime of the implementation period.

FINDING THE RIGHT PEOPLE FOR THE WORKING GROUP

The leader of the working group will need to find the right people with the right expertise and qualifications to be part of the group. The working group should consist of dedicated personnel, and include both civilian and military personnel. If the integrity plan encompasses the entire defence and related security sector, all relevant institutions such as the ministry of defence, armed forces, secret services, border control, procurement agencies, education services, etc. should be represented on the team. At a minimum, there should be one representative from each affected agency. If the Integrity Action Plan only concentrates on the MoD or a particular defence institution, the team will need to have representatives from all the departments in that institution. The composition of the working group will require careful consideration and need to be assembled according to the specific context of the given organisation.

Once working group members are chosen the leader should present his nominees to the steering group for approval. Working group members should be well informed with ongoing efforts related to anti-corruption and integrity building. It is important that all members of the group are passionate about and committed to taking part in and leading the reform process. These members will all be 'reform agents' and

MAKE SURE THAT SUFFICIENT RESOURCES ARE ALLOCATED, BOTH IN TERMS OF FINANCIAL RESOURCES AND IN TERMS OF PERSONNEL

it is therefore crucial they have credibility and act as good role models within their organisation.

Before the working group starts to draft the action plan, the working group leader needs to ensure that all members of the group have understood their mandate and respective tasks. One way to ensure this is to organise a 'kick-off' event for the whole team. This is a good way for the working group to get together and mark the beginning of the project. It is also a good opportunity to present and discuss the anti-corruption strategy and the goals and priorities of the action plan. A shared understanding of these elements is essential. The 'kick-off' event should ensure such a common understanding at the outset. Involving all members as early as possible will also bring a sense of ownership of the work ahead for all those involved.

CONSIDER:

- A kick-off event serves as the starting point for the entire working group and should create a shared understanding of the project
- Well-informed personnel are more motivated and contribute more to the project
- Create a safe and comfortable working environment but expect and make room for disagreements and possible conflicts
- The working group should meet regularly and submit regularly progress reports to the various stakeholders
- Celebrate milestones and build on successes

ALLOCATING RESOURCES AND RESPONSIBILITIES

For an action plan to be successful it is critical to have sufficient resources, both in terms of financial resources, manpower, and other necessary resources. It does not cost a lot to develop an integrity plan, and its implementation is first and foremost dependent on the people involved in it. Activities should therefore be based on a clear mandate and capacities of designated staff, well-suited for the job. Nevertheless, the steering group needs to allocate sufficient resources in the initial planning phase, and the leader of the working group needs to communicate personnel and resource needs.

It is also critical that the working group assign responsibilities internally. Some of the roles may include, but are not limited to: project assistant, budget and financial officer, subject matter expert, or communication manager.

TIMELINES AND MILESTONES

To combat corruption and build integrity as an aspect of promoting good governance will take time. Nonetheless, the plan needs to show progress over shorter timeframes. Setting a realistic timeline will help identify important milestones, deadlines and what resources are needed along the way. The action plan should include a clear timeline. When should the action plan be implemented? What are the important milestones? Generally, the head of the working group must try and avoid adjusting the timeline too frequently. Timelines focus and stimulate effort. However, there needs to be a degree of flexibility to account for last-minute changes, new requirements or unforeseen obstacles.

The following is one possible template for the timetable:

PLANNING ACTIVITIES:

Month 0-1:

- Leadership discussion to determine the need for an anti-corruption strategy and action plan
- Development of strategy

Months 1-3:

- Setting up steering group, choosing the approach

Months 4-9

- Establish working group, preparing a risk analysis and drafting the action plan

Months 10-21:

- Implementation and follow-up

Month 21-30:

- Evaluation and monitoring

BROADER CONSULTATION

Consulting with and involving a broad range of stakeholders from the earliest stage of the project phase is highly recommended. The action plan should be developed in consultation with relevant civil society actors and others such as the defence and security industry. Consulting with NGOs, academia, anti-corruption agencies, as well as regional and international organisations, can add valuable input to the process. For instance, civil society organisations will normally possess invaluable knowledge about how corruption affects people's lives, while academia can provide knowledge-based information and relevant research.⁷

COMMUNICATION STRATEGY

Communication is a key success factor of any action plan. Both internal and external communication should be integral to the planning and implementation process. The leader of the working group should be responsible for internal communication within the working group, as well as to the steering group. It is essential that members of the working and steering groups stay well informed about the action plan and its implementation throughout the process. This will not only ensure better coordination of activities, it will also create a greater sense of ownership, and allow for open discussions and revision of on the ongoing work. When informing the defence organisation(s) as such, it would be wise to use existing channels of internal communication, such as intranet or newsletters.

As for external communication, this should be the responsibility of the leader of the steering group, or someone representing the top-level leadership of the affected organisation. Preferably, the minister of defence, chief of defence or secretary general at the MoD should communicate anti-corruption efforts to the public. Clearly, it is important to prepare the message and information in close collaboration with the leader of the working group and/or steering group. To ensure a consistent and coherent message, it is also useful to involve professional personnel from the communication unit. External communication, in particular, should be coordinated and consistent with the MoD's general communication strategy and the activities of the MoD's and armed forces' daily communication work. Inconsistent messages, or even conflicting messages, may undermine the progress of the Integrity Action Plan.

Careful consideration should be taken in regard to *who* should be informed (e.g. media, civil society organisations, international organisations) and *how* to present the information. Make a communication plan if feasible. One way of informing the public is to organise press briefings. Other means of communication include newsletters (either electronically or on paper) or the Internet. If suitable, use current websites such as the ministry of defence or armed forces'

website. If this is not feasible, consider establishing an independent website or blog to provide updated information. Communication via social media could also be an effective tool, but make sure this is aligned with the general strategy of the government and MoD. Communicating with external bodies such as the media and civil society will help you get your message across and build momentum. It should, however, be done carefully. Beware promising results it may prove difficult to deliver.

Over the last couple of decades, governments and international organisations around the world have learned to appreciate that their ability to execute their policies and to reach their goals, among other things, depends on the dynamics in the cognitive and physical societal spaces in which they operate.

Hence, we offer to apply to these challenges the strategic communications (StratCom) as a holistic view on national strategy, and strategic goals achieved through means and efforts with verifiable communicative value.

The awareness and recognition of the value of verbal and non-verbal communication as well as understanding communication through policies, actions and abstention allows governments to be strategic and efficient in achieving their national goals. This, however, requires the presence of the following elements:

Awareness of the processes and dynamics in the information environment, including the ability to segment and differentiate audiences by information consumption habits, to identify different information platforms and channels, as well as actors in the information environment and their motivation.

Awareness of national strategy, based on values and goals uniting and binding society - including the constitutional premise, what the country stands for, what the values and pillars are that the government's institutions are expected to protect, and that civic groups are ready to stand for.

Awareness of the communicative value of government policies and societal processes, including the organisation of communication work in public institutions, attention devoted to communicating government policies, resources invested and the processes established.

Determination to align all the efforts with communicative value for reaching the overarching goal, including the political priority assigned to the application and execution of a strategic communications mindset, as well as involvement and cooperation of all the relevant government agencies, raising awareness on the role individual institutions and their actions of communicative value play in achieving the overarching goal.

Ability to lead the alignment and coordination process, including a legitimate authority at the strategic level providing guidance through a strategic communication framework with a clearly defined and widely or nationally agreed strategic goal and well-established coordination processes and instruments that allow for the practical alignment of these efforts.

ANALYSING RISK FACTORS

Managing risk factors is essential to the success of an action plan. Risk management can mitigate the impact of the obstacles and challenges arising during the implementation phase. In order to be prepared for such events, we need to make an assessment of such risks before we start implementing the plan. Discuss with the team the potential risks and events that could affect each member's specific tasks and timelines. Articulating clearly the nature of the risks, is a crucial step to adopt risk mitigating measures. It is also key that cross-cutting issues such as gender analysis and environmental risks are given due consideration.

What could damage or delay the process? Looking at some of the recent experience of work on Integrity Action Plans, risk factors include

- Elections
- Changes of government
- Changes of prioritisation within the top leadership
- Senior officials see the plan mainly as window dressing
- Spending too much time on one objective at the cost of another
- Resources prove insufficient or funds are withdrawn
- Friction in decision processes
- Implementation depends too heavily on developments in areas outside the control of the defence and related security sector such as legislation, judiciary capacity, education and schooling, etc.
- Other unexpected events (e.g. sickness among staff)

4. DRAFTING THE PLAN



This chapter shows:

- How to draft an Integrity Action Plan
- Which areas to include in the plan
- Examples of action plans

DRAFTING THE INTEGRITY ACTION PLAN

Now that the planning phase is done, it is time to start drafting the action plan document. Before reaching this step, a series of important elements have to be in place:

- A risk assessment has identified gaps /shortfalls
- The approach has been decided upon
- The priorities have been stated
- The steering group has been appointed and working structure established
- Resources have been allocated
- Responsibilities are delegated and clear
- Timelines are set

When all these steps have been carried out, the working group can start drafting the action plan document. The plan will then be sent to the steering group for approval.

THE ACTION PLAN DOCUMENT

The action plan document needs to explain why the plan meets a defined need, the linkages between these needs and the overall anti-corruption strategy, the chosen approach and why the specific areas of priority in the plan were selected. Additionally, the plan should describe specific objectives of the selected areas of reform, the steps to be taken in each area, a timeline and milestones. The action plan should be a road map signalling what to do, why, and in what order, and provide guidance on how to proceed – especially with contentious issues and sensitive areas.

The action plan document needs to be written in a way that is easily accessible to a wide audience of

different stakeholders. The following elements, which were described in the previous chapters, may help you structure the document.

1. Introduction to the plan and why it is needed
2. How it relates to the strategy, the overall goal and prioritised areas
3. Who is responsible at each level (top leadership, steering group, working group)
4. Specific objectives for each area
5. Risks and challenges
6. Mechanisms for coordination and broader consultation
7. Communication strategy
8. Mechanisms for evaluation and monitoring
9. Main body of action plan (see examples of different matrixes below)

MAIN BODY OF ACTION PLAN

The main body of the action plan describes in detail how to reach the goals set out in the strategy. There are different ways of designing the matrix and various templates to be used. Generally, the action plan should include information on

- What actions are to be taken
- Responsibility (i.e. who will carry out the various action items)
- Resources (i.e. funding, manpower)
- Timeline

Note that the action plan should be as specific as possible. The action items should describe the activity that will be undertaken. As seen in the example below, there could be more than one activity connected to each objective. Replacement of responsibility is essential, as is setting a deadline. Accurate time estimation

may prove difficult, and we often underestimate the time needed to complete the various steps. Therefore, try to calculate for unexpected events and high priority demands, which may affect the deadline.

EXAMPLES

1. INTEGRITY ACTION PLAN TEMPLATE

Area	Objective	Action	Responsibility	Resources	Time
Personnel	Strengthen meritocratic HRM arrangements in MoD	Produce handbook of HRM containing relevant legislation, guidelines and procedures. Hardcopy and softcopy	A. Johnson, MoD	HR department MoD Costs: (layout, printing hardcopy) EUR 1500	1 September 2023
Personnel	Strengthen HRM arrangements in MoD	Provide training sessions for HR personnel. 3 x 1 day workshops	M. Olson. MoD	HR department MoD Costs: (external trainer, facilities, refreshments for participants) EUR 2000	1 December 2023
Procurement	More transparent procurement processes	Disclose all defence purchases in reports and online. Publish yearly plans for future defence purchases	G. Jefferson at the Procurement Department, MoD	Procurement agency	15 September 2023
Finance	Reinforce internal audit training in MoD	Train and educate MoD auditors to internationally accredited standards. Provide training to 30 auditors per year, based on 4 x 2 days workshops	T. Adams	Internal audit department MoD. Costs: (external international trainers, education material, facilities) EUR 8000 per year	1 January 2025
Operations	Include section on corruption in the Joint Military Doctrine	Establish working group to draft text proposal. Implementation in next Joint Operational Doctrine (issued 15 Jan 2016)	B. Wilson to lead working group.	National Defence Academy and Joint Doctrine Center	15 Jan 2024
Operations	Introduce corruption as topic in pre-deployment training for military commanders	Develop one day module focusing on anti-corruption and integrity in military operations	R. Watson at National Defence Academy	National Defence Academy, TI UK, NATO, PSOTC Sarajevo	1 August 2023

THE DEVELOPMENT OF THE INTEGRITY PLAN OF THE MINISTRY OF DEFENCE OF NORTH MACEDONIA

INITIAL STEPS

For the development of the Plan, a methodology was defined and adopted by the Ministry of Defence. The methodology adopted guided the work of the development of the Plan. The 2014 publication of CIDS and of the Transparency International titled “Integrity Action Plan - A handbook for practitioners in defence establishments” was used as a guideline in the process of the development of the Plan. The MoD analysed the implementation of the previous Integrity Plan of the Ministry and the Army of North Macedonia 2016-2019. The results of this analysis were starting points for the development of the new Integrity Plan for the MoD.

CIDS assisted the MoD of North Macedonia with analysing the implementation of the previous Integrity Plan for the MoD and the armed forces 2016-2019. This analysis was the starting point for the development of a new Integrity Plan.

PREPARATION OF THE INTEGRITY PLAN

The following steps were followed when drafting the Integrity Plan 2021-2024:

- a. Compilation and review of sources to be used when drafting the new Integrity Plan. The sources included relevant legislation (laws, bylaws, manuals, guides), government strategies, reports, and other documents.
- b. Conduct of Corruption risk analysis. The risk analysis was guided by the CIDS’ publication titled “Criteria for good governance in the defence and related security sector: International standards and principles”.
- c. Design of activities and their monitoring – A matrix for activities and a Matrix for monitoring the implementation of the activities were developed.
- d. Consultation with internal and external stakeholders, government authorities, civil society, media, academia, private sector, and others)

- e. Formal adoption of the Integrity Plan 2021-2024. The MoD Working Group held a formal session where it finalized the text and later submitted it to the Minister of Defence for its adoption. The Plan was approved in August 2021 by the Minister of Defence. Once the plan was adopted, it was printed and published in the website of the MoD in both Macedonian and English. <https://mod.gov.mk/inc/uploads/2021/09/Integrity-Plan-2021-2024-eng.pdf>.
- f. Reporting on the implementation of the plan is done by means of a specific matrix that was included the plan. Implementation reports are updated every six months and published on the MoD website (www.mod.gov.mk.) in the section dedicated to Building Integrity.

ORGANIZATION OF THE WORK WITH THE INTEGRITY PLAN

A Working Group was formed that was responsible for concrete activities in the direction of the development of the Integrity Plan. The Working Group convened at least once per month. The Group had the following composition: A senior MoD staff member (Chair); an MoD staff member responsible for drafting and coordinating inputs (Secretary); and civilian and military personnel from relevant departments such as human resources, procurement, internal control/audit, inspectorate, freedom to access the public information, etc (Members). The Working Group had the following mandate: development of the integrity plan including the coordination of the institutional efforts for its development; analysis of the inputs provided by the Ministry of Defence departments and by other experts; overall responsibility for organising awareness-raising activities in the Ministry of Defence.

THE GOALS OF THE INTEGRITY PLAN

The Plan identified and addressed corruption risks in 6 functional areas, including in human resource management, conflicts of interest, international missions and operations, public procurement, asset management and internal control. It is action oriented and for this purpose it is accompanied by an action plan of 38

activities with deadlines and with clear allocations of responsibilities. In terms of hierarchy of goals, the Plan has set the following three levels of goals: a. Level 1: Overarching Vision of the Plan. b. Level 2: Five strategic goals considering the six functional areas

AREAS TO INCLUDE IN AN INTEGRITY ACTION PLAN

POLITICAL

- Facilitate parliamentary oversight of the defence budget (including secret items) and debate of defence and security policy
- Public access to information on defence and security policy
- Public access to defence budgets, revenues and expenditure
- Openness towards civil society and inclusion of civil society in debates on policy
- Control and oversight of secret services
- Control of and oversight of arms deals/transfers
- National anti-corruption laws and policy
- Ratification of international conventions⁸
- Anti-corruption policy in defence and security institutions

FINANCE

- Planning and budgeting
- Financial management
- Transparency concerning defence budgets
- Rules and regulations on secret budgets
- Off-budget items
- Internal and external audit
- Inspector generals
- Beneficial ownership and military-owned businesses
- Acquisition planning process
- Legal framework and procedures on asset disposals
- Limited, well-justified secret spending
- Strong audit, including on secret programmes
- Strong controls over asset disposals
- Regulations on the classification of information
- No or highly transparent commercial businesses

PERSONNEL

- General Human Resource Management arrangements, especially the extent to which meritocratic HRM is promoted and protected in legislation and in actual HRM practices
- Regulations pertaining to payroll, promotions, appointments, rewards
- Arrangements for security clearance, risks of abuse
- Code of conduct
- Conflicts of interest
- Training on anti-corruption, ethics and integrity within professional development programmes
- Rules on gifts and hospitality
- System for whistle-blowing and protection of whistle-blowers
- Ombudsman institution
- Prosecution and disciplinary mechanisms
- Visible leadership commitment
- Clear standards for personnel
- Regular training
- Robust payroll systems
- Systems for reporting wrongdoing
- Robust appointments and promotions

OPERATIONS

- Military doctrine addressing corruption and integrity in operations
- Pre-deployment training on corruption issues at all levels
- Training of anti-corruption advisors for operations and peacekeeping missions
- Incorporation of corruption risk into security assistance programmes and capacity building activities
- Guidance and staff training on addressing corruption risks in contracting and procurement in operations
- Policy and guidance on the use of private military- and security contractors

PROCUREMENT

- Legal framework on public procurement
- Legal framework on defence procurement
- Procurement procedure manual
- Transparency of procurement law and regulation
- Procurement oversight mechanisms
- Tendering/tender boards
- Transparent and competitive bidding processes
- Training for procurement personnel
- Offset contracts
- Requirements concerning sub-contractors
- Mechanisms to regulate contact with business and industry
- Mechanisms which enable companies to complain about perceived malpractices.

The image is a composite of two photographs. The top half shows a modern building with a glass facade and a dark metal frame, set against a clear blue sky. The bottom half shows a close-up of a brick wall with a pattern of larger, darker bricks interspersed with smaller, lighter ones. A green horizontal bar is overlaid on the top half of the image, containing the text '5. IMPLEMENTING THE PLAN' in white, bold, sans-serif font.

5. IMPLEMENTING THE PLAN

This chapter shows:

- How to move from the planning to the implementation phase
- Procedures for meeting and reporting
- Communication
- Managing risk factors
- Review and revision mechanisms

FROM PLANNING TO IMPLEMENTATION

After completing the planning process and the action plan has been produced, we move to the implementation phase. During this phase a broad range of activities will be carried out in different agencies and departments. If the action plan has been drafted in a clear and precise manner, everyone involved will be aware of their tasks and responsibilities. However, activities have to be coordinated, checked and reported to the right individuals. The leader of the working group shoulders a great responsibility in the implementation phase. Whether the strategic goals are reached will depend on the success of the implementation and post-implementation phases. Below you will find some important elements to bear in mind when implementing the plan.

REGULAR PROGRESS MEETINGS AND REPORTING

The leader of the working group is responsible for organising regular meetings to ascertain progress. The frequency of the meetings will depend on the scope of the Integrity Action Plan. If the timeline is short, progress meetings could take place weekly. In other cases, meetings once or twice a month may be sufficient. The purpose of the progress meetings is to report on activities as they are executed, and allow for the staff responsible for those activities to discuss and exchange lessons learned. In this way, all members of the working group will know what the others are doing, how well the plan is progressing and have an opportunity to resolve challenges in a coordinated manner. These meetings

are also a forum to discuss and analyse achievements and potential problem areas.

The leader of the working group reports back to the steering group regularly on progress during the implementation phase. Make sure to establish good routines for these meetings, and try to keep the meetings simple and short. One example of an agenda could be:

1. Status (i.e. where do we stand and what are some recent achievements)
2. Challenges
3. Measures to meet challenges
4. Risks
5. Any other business

REMEMBER:

- Distribute the action plan in writing to all members, with names attached to specific tasks
- Display the action plan prominently
- Keep it updated and alive with the leader of the working group as responsible
- Make sure timelines are clear and realistic
- Make sure that monitoring includes mechanisms for feedback, adjustment of the plan, and updating

COMMUNICATION

It is important to keep the wider defence establishment aware of the ongoing efforts with respect to building integrity. Building internal support through an internal strategic communications campaign will prove useful when engaging with the various departments that are highlighted and expected to deliver in the action plan. In

addition, it can increase motivation and lets staff know that this is something the leadership, and the defence establishment as a whole, takes seriously.

The working group should also look to develop an external-facing communications campaign. This can assist in building support and trust between the public and the defence establishment. In one case, a defence establishment established a Citizen Reception Office within the MoD which could accommodate any queries from the public on issues related to corruption and integrity. It is important, however, that the public affairs or communications staff involved is realistic in their messaging as challenges, delays and an inability to meet established targets could harm the legitimacy and success of building integrity efforts in the eyes of the public. For instance, if a hotline for corruption has been set up, and the defence establishment lacks the resources or authority to deal with the complaints, the public may see this new tool as a broken promise.

MANAGING THE RISK FACTORS

The term risk management refers to the practice of identifying potential risks in advance, analysing them and taking precautionary steps to reduce the risk during the project.

Some of the risk factors during implementation are elections and changes of government, change of prioritisation within the leadership, insufficient resources allocated to the project, lack of competency with those meant to implement it or other external developments influencing the progress. Other risk factors could include spending too much time on one objective at the cost of another, which will impact the timeline and progress. There could also be friction in decision processes within the steering group, or implementation may rely too heavily on developments in areas beyond the control of the defence and related security sector, such as legislation, judiciary capacity, or external education and training.

As discussed in chapter 3, risk factors should be identified early on in the planning phase. However, these risks need to be actively managed throughout the entire process. Risk management requires the identification, assessment and prioritisation of risks.

Risks are sometimes unavoidable, in which case the best the leader of the working group can do is to work with their team to minimise the threat. For instance, a sudden change in political leadership could stall reform efforts. While the working group leader will not be able to change the political situation, they can put plans in place to sustain the momentum of reform by reinforcing the activities of middle management.

REVIEW AND REVISION

If unexpected events occur, as they probably will, you must have plans in place to continuously discuss and review the context and accommodate the course of action or deal with change while not losing sight of the original objectives. Try to remain flexible and allow for the necessary degree of change in the project. Incidents such as a change of government or other complicating events may represent unforeseen obstacles to the original timeline. Try not to see these changes as game-stoppers, but use the opportunity to adapt and revise the plan according to the transformed circumstances, building on practical experience already obtained and to acknowledge process and successes and build from there.

Adopt a mechanism to routinely review progress. For very comprehensive action plans involving many institutions, designated independent government officials may review progress in terms of defined milestones. The results of internal reviews should be discussed by the steering group which then reports to the top leadership.

External/independent reviews are useful in order to encourage transparency. This may mean bringing in independent anti-corruption experts as well as members of civil society. The scope of these reviews and audits, the qualifications of reviewers or auditors, and the transparency of audit reports are critical.

The results of such reviews should be made public whenever possible.

Read more about evaluation and monitoring in the following chapter.

There is, in general, a need to create a culture of probity and accountability within all the staff. Everyone needs to feel responsible and accountable for the success of the whole process, not least the implementation

6. EVALUATION

This chapter shows:

- Why evaluation and monitoring is important
- How to select indicators
- Methods for long term monitoring
- Reporting and communication

EVALUATING AND MONITORING THE RESULTS

It may prove useful to distinguish between reviewing and adapting the action plan during the implementation phase, and evaluating and monitoring the results produced by the plan. Evaluation can help establish whether the plan's goals of reducing corruption and vulnerability to corruption have been reached. One way to evaluate the results of the action plan is to carry out a new assessment of corruption risks (possibly using one of the tools mentioned in Chapter 2) and compare that outcome with the previous assessments. A new assessment should probably be carried out at least six months or more after the implementation of the action plan has been concluded.

Monitoring involves checking the results produced

by the plan over time, in order to determine whether the results are lasting and whether they change over time, either by becoming weaker or stronger. Below are some factors to consider when monitoring the plan. Developing a comprehensive approach to the issue of evaluation is time well spent.

Integrity of Effort. To earnestly tackle the issue of corruption, defence establishments must track their success in creating change. The defence establishment must review past efforts and track how they have contributed to achieving the objectives set out by the anti-corruption strategies and Integrity Action Plan. This may entail dealing with sensitive issues, conflicts of interest, uncovering un-ethical behaviour, organisational friction, and sometimes even threats to individuals. A solid evaluation process will determine whether there was consistency of actions, values,

ASSESSMENT FOCUS: INSTITUTIONALISATION AND INTERNALISATION OF NORMATIVE STANDARDS⁹

THE LEGAL FRAMEWORK,

I.E., TO WHAT EXTENT ARE THE NORMATIVE STANDARDS REGARDING THE CHOSEN DOMAINS OF INTEGRITY-BUILDING MECHANISMS REFLECTED IN DOMESTIC LEGISLATION? AND HOW HAVE THEY BEEN IMPLEMENTED?

ADMINISTRATIVE

ARRANGEMENTS, I.E., DO THE NORMATIVE STANDARDS ACTUALLY INFLUENCE ORGANISATIONAL ARRANGEMENTS, WORK PRACTICES AND STAFFING PATTERNS, AND IF SO, TO WHAT EXTENT AND IN WHAT WAYS?

INTERNALISATION OF THE NORMATIVE STANDARDS, I.E., THE EXTENT TO WHICH THE NORMATIVE STANDARDS ARE KNOWN, UNDERSTOOD, AND ACCEPTED

methods, measures, principles and expectations, and to determine how that consistency, or lack thereof, influenced the outcomes.

Optimal Impact- effect. There are boundless examples of anti-corruption institutions and efforts that were set-up only to result in lip-service and few tangible actions. Perceived failure of an anti-corruption body, or even of an Integrity Action Plan, can seriously and negatively harm public perceptions of the defence establishment. Awareness of this factor must be exercised at all times. Institutional friction and personal unwillingness to acknowledge and rectify poor conduct can be overcome by unity of effort. The defence establishment should ensure cohesion between how the plan is communicated, how its independence is exercised, stand firm on the principle of no impunity, and obtain the support of recognised and agreed civil society institutions.

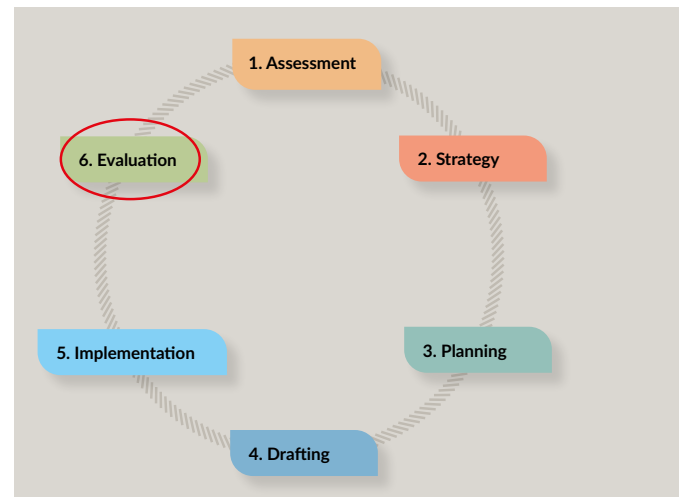
Countering Spoilers. In particularly subversive environments where corruption is more endemic, it can be difficult to counter corruption and build integrity. Malicious individuals or groups can take counter measures to neutralise integrity-building efforts. Reviewing what works and what doesn't is one way the defence establishment can protect itself from such hazards to the reform process. Evaluating how spoilers were dealt with during the implementation phase is an important lesson to take forward.

When evaluating the effects of the Integrity Action Plan, it is important to connect individual behaviour with the strategic objectives, linking day-to-day job handling in the MoD or other defence institutions with the desired change. The evaluation will therefore have to be done at different levels, from tracking detailed contract vetting procedures, to monitoring human resource management. You should be able to identify possible performance gaps between what ought to be produced according to relevant rules and procedures, and what is being produced in practice.

If a serious gap is detected, it is important to determine whether it is a result of lack of training or insufficient information, or whether there is a wilful neglect of the existing rules and procedures. In the latter case, there may be a need for disciplinary action,

a transfer to other responsibilities, or dismissal. The message from the top should be clear and consistent: spoilers will not be tolerated.

Evaluating the results of the action plan and monitoring whether these results are lasting over time, or whether they tend to fade, represent crucial lessons learned in terms of how to conduct future integrity building measures. If we take a look at the model of the Integrity Action Plan stages, as presented in chapter 1, we find the evaluation stage leads us back to the first step – assessment. Carrying out a new assessment will help identify the changes that have been achieved and the shortcomings in the integrity system that need to be addressed through a follow-up action plan.



SELECTING INDICATORS

How do we know whether the implementation of the action plan has been successful or not? In measuring the success of various reforms, we need to have, from the start, the necessary measurable indicators of change. It is frequently difficult to measure behavioural change and indicators will therefore often be defined in terms of actions taken, knowledge acquired and attitudes changed. Are the actions in accordance with the rules, and are the prescribed procedures being followed? Are new or modified organisational arrangements properly understood and seen as

authoritative guidelines? And especially in high-risk areas: have previously identified risks of corruption been sufficiently mitigated?

Some indicators may be monitored for a longer period of time (attitudes, ethical standards of staff), whereas others (enactments of certain laws or ratification of a certain convention) may not require as much. When selecting indicators, make sure to link them up with suitable data sources which can be used as valid indicators. For instance, for measuring sufficient

knowledge of new rules and procedures, the amount of training (e.g. whether all staff has been trained through relevant courses) might serve as a general indicator. To gain a more in-depth understanding of the impact of such training, you may want to develop surveys that can gather information about attitudes and behavioural shifts before and after the training has been conducted.

EXAMPLE: MEASURING IMPACT

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

PLANNING FOR EVALUATION AND MONITORING:

1. Define the objective of the evaluation, and how and when to do it
2. Develop your theory of change
3. Determine your data sources for your indicators, your baseline and your target activities, personnel and outcomes
4. Determine who will conduct data collection and reporting
5. Determine which indicators should be monitored over time, and when it should be done
6. Set reporting timelines and requirements
7. Define your communication – who reports to whom?

METHODS FOR LONG TERM MONITORING THROUGH NEW ASSESSMENTS

In chapter 2 we presented three different tools which could be used to assess corruption risk in the defence and security sector. They are the NATO Building Integrity Self-Assessment Questionnaire; Transparency International's Government Defence Integrity Index (GDI); and the CIDS document "Criteria for Good Governance" For long-term monitoring, make sure you use the same assessment method to systematically identify the effects of the integrity plan. If the is based on Transparency International's Government Defence Integrity Index, then use the next version of the index to check where you succeeded and where new efforts are needed. Since this index, based on independent external evaluation, will be issued every five years, it can track progress over several years.

SHARED RESPONSIBILITY

Usually, several individuals, departments and institutions will be involved in the preparation, implementation and evaluation phases of an Integrity Action Plan. Typically, no one person will be 'responsible' for all three. Most action plans involve groups, teams, or whole networks of colleagues and this complexity means there is a big chance that no one takes full ownership of the overall results. Ideally, the top leadership should take ownership of the project, but leaders have many other responsibilities and little time to actively investigate the concrete results of the action plan. This is particularly true if some of the objectives are not reached, or only partly reached. That means that for the entire defence and related security sector, or within each major defence institution, there should be a specific unit or team to continue monitoring the integrity system. Such a unit or team may also assume responsibility for organising a new comprehensive assessment once the time is right, and to organise a new action plan to address remaining corruption risks. Their tasks will also include collecting supporting documents as evidence of change and will, therefore, require a great deal of coordination with the other groups and individuals involved in the implementation phase of the action plan.

REPORTING & COMMUNICATION

Ensure that mechanisms are in place to allow for necessary communication between those involved in the evaluation and monitoring processes and the members of the action plan's working and steering groups. Such communication may prove particularly valuable in order to establish valid lessons learned, what worked well, what worked less well, and what did not work at all. Information to and communication with external partners, civil society organisations, and media, should continue once the action plan has been fully implemented and the results and practical impact have been evaluated.

CLOSING REMARKS

The defence and security communities are now recognising that building integrity is a priority for both peace and security. Institutional resilience is a fundamental part of this. By developing accountable, transparent, and responsible defence institutions, defence actors will be better prepared to address the security challenges. Understanding the wide scope of corruption risks and mapping out their own vulnerabilities and those of the host nation is a crucial step to tailor measures to counter those risks. This handbook is a useful roadmap for defence practitioners to devise action plans seeking to improve their integrity protocols and strengthen defence governance practices and arguably, to improve the preparedness to tackle the complex security challenges that are common today.

LIST OF REFERENCES

- 1 Tisdall, S. (2009, December 18). Corruption at heart of Afghan state. The Guardian. Retrieved from <http://www.theguardian.com/commentisfree/2009/dec/18/afghanistan-corruption>; Capaccio, T. (2014, April 30). Afghanistan Corruption Fostered by U.S., Pentagon Finds. Bloomberg. Retrieved from <http://www.bloomberg.com/news/2014-04-29/afghanistan-corruption-fostered-by-u-s-pentagon-found.html>
- 2 Transparency International. Corruption by topic, defence and security. Retrieved from http://www.transparency.org/topic/detail/defence_security
- 3 UNDP. (2011). Practitioners' Guide: Capacity Assessment of Anti-Corruption Agencies, 71. Retrieved from <http://www.undp.org/content/undp/en/home/librarypage/democratic-governance/anti-corruption/Guide-to-Capacity-Assessment-of-ACAs/>
- 4 Mauro, P. (1995). Corruption and growth. *The quarterly journal of economics*, 681-712.
- 5 Coonjohn, J. J. & Lodin, A. (2014). Developing a Strategic Implementation Plan for Anti-Corruption. Retrieved from http://www.jjcoonjohn.com/pdf/Strategic_Implementation_Plan.pdf
- 6 Kwok, T. M. (2005). Formulating an effective anti-corruption strategy – the experience of Hong Kong ICAC. Resource material Series, (69).
- 7 See for instance
OECD (2003). Fighting Corruption. What role for civil society? The experience of the OECD. Retrieved from <http://www.oecd.org/daf/anti-bribery/anti-briberyconvention/19567549>.; Abbas, T. & Wawro, L. (2014). Defence and security programme unveiling the 'shadow world': Civil society engagement and public control of the defence sector. In Eduardo Bohórquez and Nora Etxaniz (eds.), *A new generation of public control*. Mexico: Transparencia Mexicana.
- 8 E.g. the EU, OECD, the Council of Europe, OSCE, the UN, the International Parliamentary Union.
- 9 Based on Difi Criteria for Good Governance in the Defence Sector. International Standards and Principles. (forthcoming).
- 10 Transparency International, Defence & Security. Methods Paper: Government Defence Integrity Index. London: Transparency International UK, 2020.



While there are innumerable cases of reported corruption in the defence and related security sector worldwide, there is very little scientific research and few specially designed instruments to help ministries and governments prevent and reduce the risk of corruption. This updated handbook aims at helping practitioners in defence and security establishments produce real and lasting change by developing an Integrity Action Plan. The book will guide you through all the necessary steps – from the planning stage to the actual drafting of the plan to practical implementation, monitoring and evaluation.

In addition to providing senior military and civilian personnel in ministries of defence and subordinate defence institutions as well as security-related institutions with a practical tool, this handbook is also accessible to civil society and other stakeholders so they can assist in developing an Integrity Action Plan. The handbook has been produced and edited by the Norwegian Centre for Integrity in the Defence and related security sector in collaboration with Transparency International Defence & Security.

Published by: The Centre for Integrity in the Defence and related security sector and Transparency International
Contributor: CIDS and Transparency International
Defence and Security

All photos: Norwegian Armed Forces
(Stian Lysberg Solum, Torgeir Haugeard, Taral Jansen, Torbjørn Kjøsvoold, Terje Haaverstad and Håvard Madsbakken)

Design: Melkeveien designkontor
Print: Norwegian Government Security and Service
Organisation 12/2014 – Impression 250



CENTRE FOR INTEGRITY
IN THE DEFENCE SECTOR

CIDS.no



TRANSPARENCY
INTERNATIONAL
Defence & Security

ti-defence.org/

