



Sector-based Action Against Corruption

A Guide for Organisations and Professionals

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Transparency Task Force, May 2025

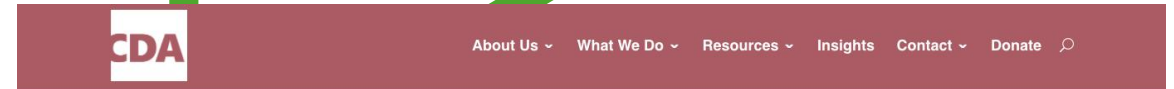
Genesis - 2017

Pyman – People working and researching in corruption (...) seem to like nothing more than to ‘admire the problem’

Heywood – The mismatch between the attention on corruption and our capacity to make a practical difference raises questions about what might be going wrong



Collaboration to develop a structured, well-founded approach that will help people in organisations – both public and private - identify, solve or reduce corruption problems



The Unhelpful Nature of Anti-Corruption Research; As seen by people trying to develop solutions

January 24, 2017 | Mark Pyman

Rethinking Corruption: Hocus-Pocus, Locus and Focus

PAUL M. HEYWOOD

Key features

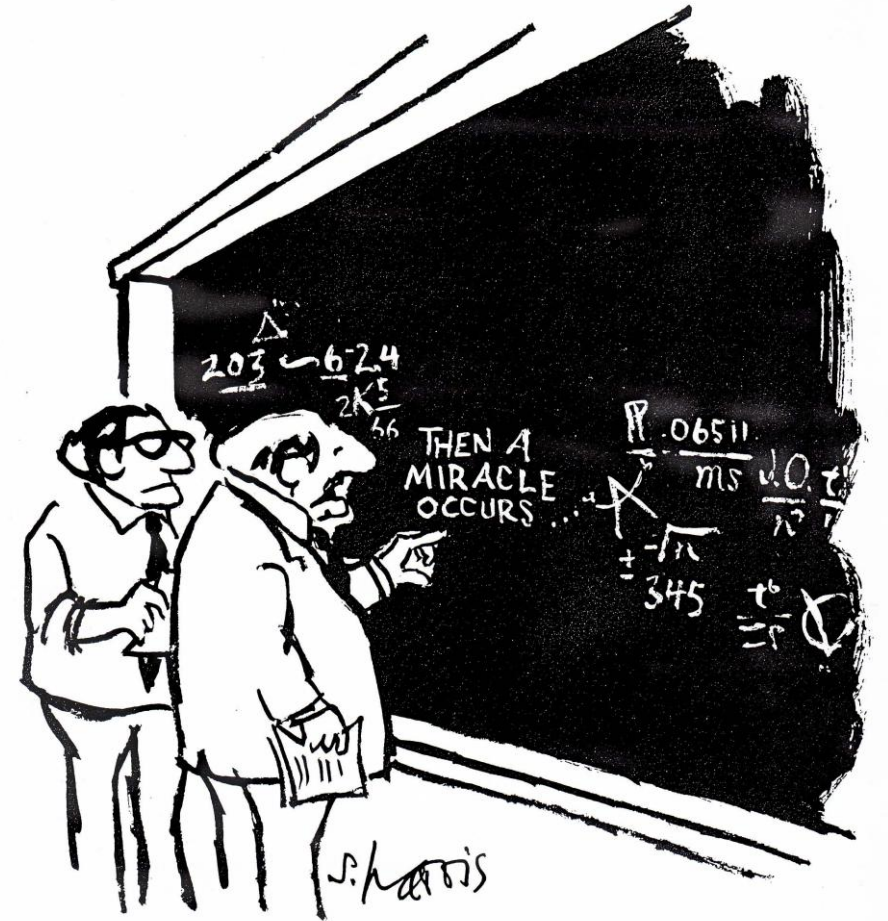
Aimed at those working within organisations, or leading them, or politically responsible for them – not AC professionals or auditors or accountants or civil society

Rejects archetypal top-down or technical approaches to reform, as well as reductionist understandings of corruption

Reflects distilled learning from several years of collaboration on the web-based resource CurbingCorruption.com

Explicitly practical:

- Simple ways to identify and discuss issues
- How to prioritise issues (and leave others)
- The 'what' and the 'how'
- How to address or limit opposition
- Change management
- How to select most prospective approach



"I THINK YOU SHOULD BE MORE EXPLICIT HERE IN STEP TWO."

The approach: SFRA

S Sector

F
Focus

Specific
corruption
issues

Analysis &
Context

Build Shared
understanding

R
Remediation

Broad framing

Detailed measures

A
Action

Feasible
Options

Challenge using 'Lenses'



The reform concept: move molehills, not mountains

Break big problems down into smaller, more manageable ones


Corruption is a management issue – addressing it needs to be embedded into professional training & organisational DNA

Michael Johnston:

'Telling people to forget about whole-country measurements and rankings and instead to focus on sectors and specific problems within them, is essential advice. My experience with a variety of audiences is that you can't tell people that sort of thing too often as, without constant prodding and reminders, they'll drift back towards more-corruption –vs-less-corruption – full-stop, and toward biting off the entire problem at once rather than breaking it down in [...] sectoral and operational ways'

Sectors - good locus for reform


Those working within sectors understand the issues, the language, the social norms, the political specificities, and the drivers of relevant corruption issues




They are what is sometimes termed an 'epistemic community'



Professionals in every sector believe they have unique expertise. They will not validate generic, cross-sectional approaches, incl. anti-corruption



Allows working with the grain and building a common understanding of corruption: where it matters and how it matters



Core corruption challenge: 'not my responsibility'

In the sector not cross-sector

Anti-corruption/ethics chief (45) in large health entity:

I am leaving the profession..

Disappointment with the professional calibre, stagnation, and unwillingness to innovate to solve real problems in anticorruption..

In practice it's the accountants and auditors who run the anticorruption show on the ground; they are not interested in efficacy, but in box-ticking compliance..

What is a sector?

Sectors are the individual structures and functions through which national life operates. Structures include the legislature, the judiciary, and the civil service.

Functions include public functions, such as health, education, policing, and public financial management; economic functions, such as agriculture, telecommunications, mining, construction, and shipping; and the multiple public-private functions that span both public and private, such as sport, infrastructure projects, tourism, and land management.

A sector comprises some or all the following: one or more professions, a government ministry, multiple government organisations and agencies, multiple commercial organisations, and the relevant industry associations; one or more multilateral organisations concerned with international application; and a functional or market regulatory authority.

Executive, Legislature & Politics

Office of President, Prime Minister
Parliament

Elections & Electoral Management
Political Parties
Legal Framework

Security & Public order

Judiciary and courts
Policing services
Law Enforcement
Prison Services
Prosecution
National Security
Borders, customs & immigration

Public services

Education & Higher Education
Health
Social Protection

Financial

Public Financial Management
Taxation

Central Bank operation
Financial & fiscal oversight
Banking
Investment Services
Insurance Services
Financial Services

Natural Resources

Climate & Environment
Agriculture
Fisheries; Forestry
Land
Mining & quarrying
Oil & Gas
Commodities trading
Wildlife

Utilities

Electricity & power
Construction & Public Works
Telecommunications
Water management & supply
Sanitation & Waste
Aviation
Land Transport; Shipping

Other commercial

Professional services (eg legal)
Real estate
Retail & Wholesale trade
Broadcasting & Media
Manufacturing - various

Sport

Sport associations
The Olympics

Military and Defence**Other government**

Foreign Affairs
International & Multilateral aid
State Owned Enterprises

Religious organisations**Culture, Heritage & Tourism****Voluntary sector****Horizontal sectors**

Civil service
Public procurement
Regional & Local government
Oversight entities
*(incl. Supreme Audit, Anti-Corruption
Agencies, Ombudsman, Civil Society)*

Focus

- Disaggregate specific corruption issues and problems
- Avoid generalities and concentrate on matters that can be clearly identified and potentially addressed
- Consider using or building typologies of corruption in sectors
- Examples here from health and police sectors

HEALTH FUNCTIONS	16. Inappropriate professional accreditation 17. Expert-bias in complaints procedures 18. Improper inducements for conferences, research, placements 19. Fake workshops & fake per-diems 20. Discrimination against groups 21. Undeclared or tolerated conflicts of interest 22. Fake reimbursement claims	31. Legal parallel trade in drugs 32. Overly high pricing on non-medical products 33. Inadequate control of non-intervention studies 34. Improper benefits from companies 35. Improper acceptance of donated devices 36. Improper research, trial & marketing practices by companies
LEADERSHIP & GOVERNANCE	23. Substandard, falsified medicines 24. Inappropriate approval of products 25. Inappropriate product quality, inspection 26. Private sector collusion in markets 27. Corruption in new product R&D 28. Companies 'gaming' the system 29. Theft and diversion of products 30. Re-packaging of non-sterile and expired product	HEALTH FINANCING 37. Corruption in health insurance 38. Corruption in procurement 39. Complex & opaque tendering procedures 40. Decentralised procurement that enables corruption 41. Donor collusion in corruption 42. Corrupt invoicing by suppliers
HEALTH WORKFORCE	MEDICAL PRODUCTS, VACCINES & DEVICES	HEALTH INFO SYSTEMS Not usually a source of corruption types

POLICY	PERSONNEL	BEHAVIOUR & OPERATIONS
1. Bias in domestic policing strategies 2. Improper allocation and distribution of funds 3. Political interference 4. Influence of interest groups 5. Penetration by organised crime 6. Reaching performance targets 7. Purposefully weak oversight	13. Poor leadership behaviour 14. Nepotism in payroll, promotions, appointments 15. Theft from salary chain 16. Weak values and standards 17. Criminal activities 18. Personal problems (drugs, gambling, being blackmailed..) 19. False personal asset declarations 20. Biased rotations	24. Evidence tampering or theft 25. Small bribes from public 26. Uncontrolled operational independence 27. 'Noble cause' 28. Levying illegal fines 29. Disclosure of privileged information 30. Misuse of informants 31. Discriminating behaviour 32. Extortion 33. Lack of officer identification 34. Inaction due to 'Bonds of loyalty'
FINANCE	PROCUREMENT	
8. Improper asset disposals 9. Purposefully weak financial control 10. Illegal private activity 11. Providing private security 12. Facilitation payments	21. Bias in technical requirements 22. Improper contract award or delivery 23. Misuse of confidential tenders	

Analyse and quantify specific issues

- Use available sector-specific lists of issues (e.g. from CurbingCorruption.com)
- Use existing methodologies, such as:
 - Vulnerability to Corruption Analysis (VCA)
 - Public Expenditure Tracking Surveys (PETS)
 - World Bank Governance and Anti-Corruption Diagnostics
 - Quantitative Service Delivery Surveys (QSDS)
- Political Economy Analysis
 - Several guides available

Example

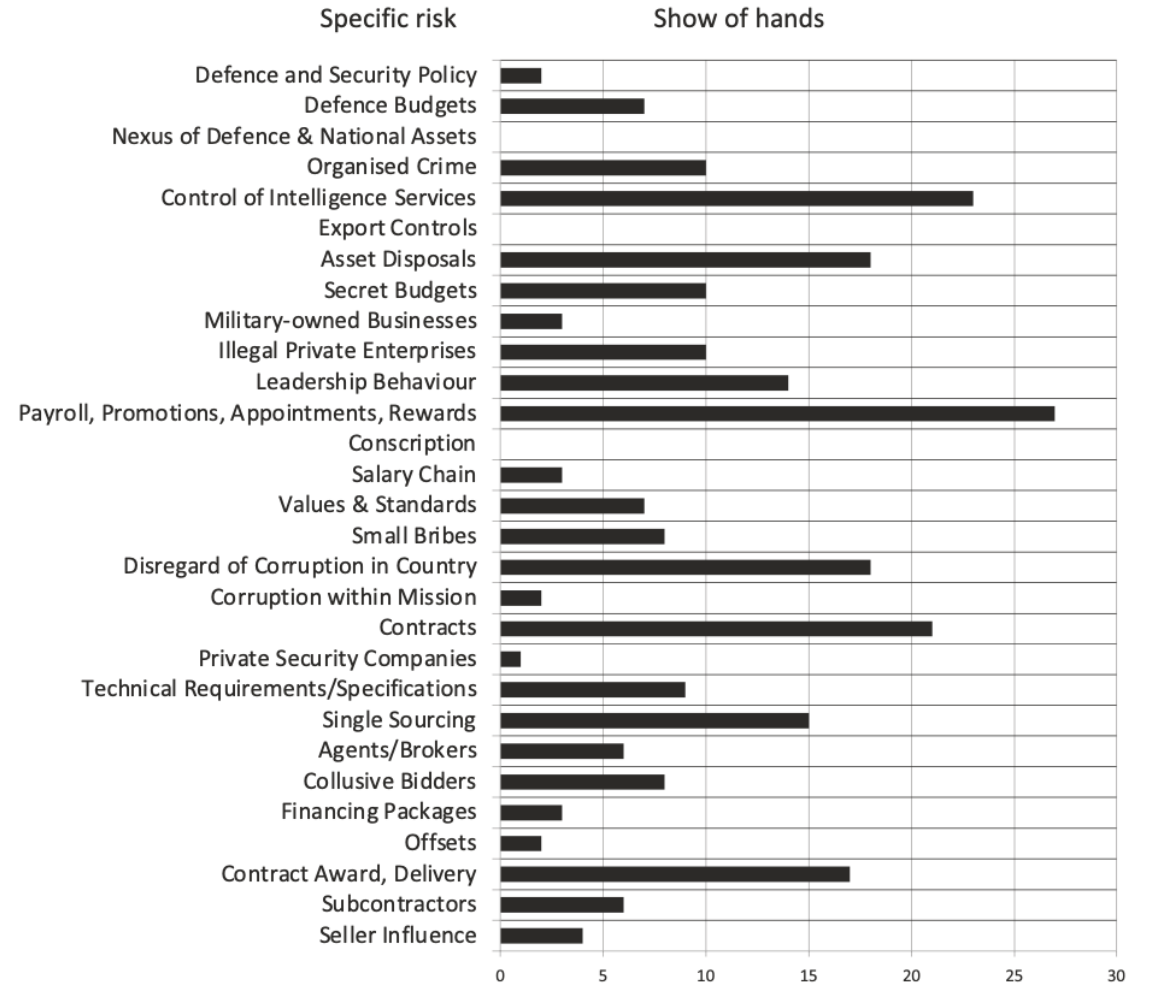
The MEC's VCA on education (MEC [2017](#)):

- The analysis covered the whole of the Education Ministry, not just a sub-section.
- Work was based on an analytical set of the 36 education-specific corruption issues.
- The analysis was founded on a wide range of interviews, with segmentation of the target population, conducted with communities in the provinces as well as with central, provincial and district government.
- The analysis included a review of the written processes and relevant laws, to judge the extent of differences in practice.
- The active engagement of the Minister of Education right from the beginning was essential. Without this the assessment could not proceed.
- An active and extensive quarterly follow up over 18 months, with visits to the provinces, active engagement of local stakeholders and publication of findings.

Build shared understanding

- ‘Sense-making’: process by which people develop shared understanding of their collective experience
- Management team members have very different understandings of ‘corruption’ as it relates to their sector
- Group discussion of a one-page list of the corruption issues is transformative
- Peer voting to identify core issues is similarly powerful. Use closed voting in sensitive or hierarchical settings

BOTSWANA – PEER VOTING ON DEFENCE CORRUPTION RISKS



Remediation

- Two dimensions:
 - Broad framing – explores political context, judgement, sequencing of changes
 - Detailed improvement measures – specific options that can be explored, either individually or in combination
- Purpose of remediation is to generate plausible possibilities for action, not to take specific decisions – that comes later

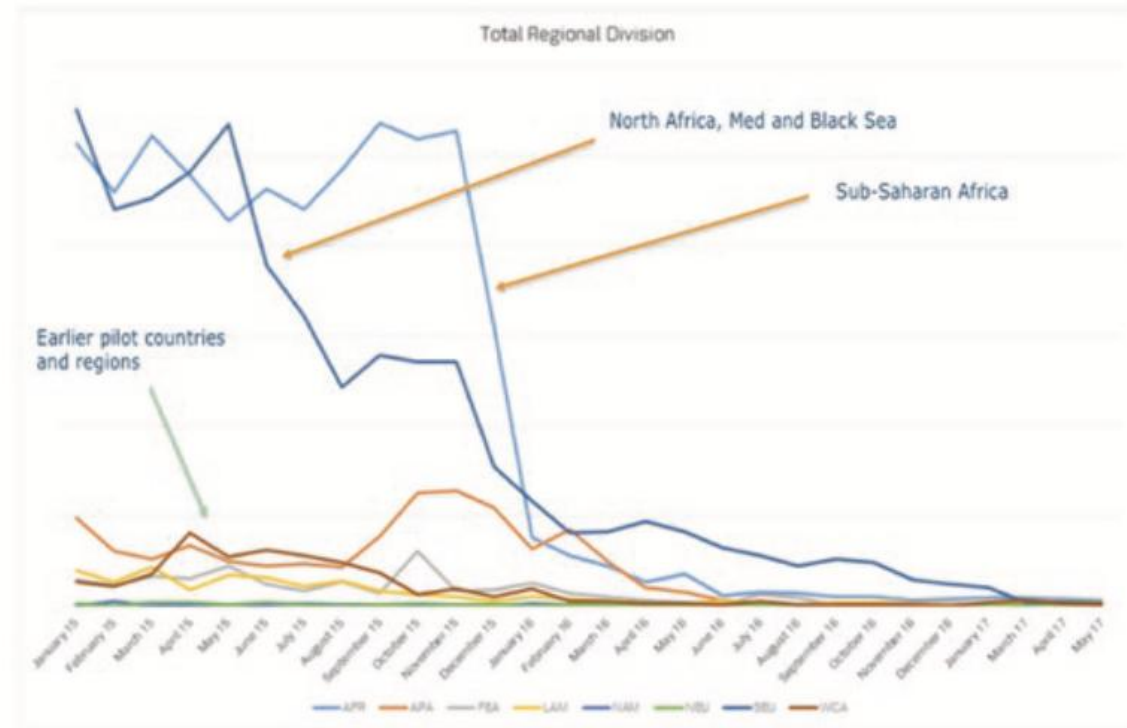


Remediation: broad framing

- Objective is to take account of how local political circumstances can be navigated to allow best chance of delivering change
- Nine strategy options:
 - Single issue
 - Broad front
 - Narrow front
 - Radical change
 - Low profile
 - Multi-party collaboration
 - Bundling
 - Signature issue
 - Keeping-up hope

Single issue example - Maersk

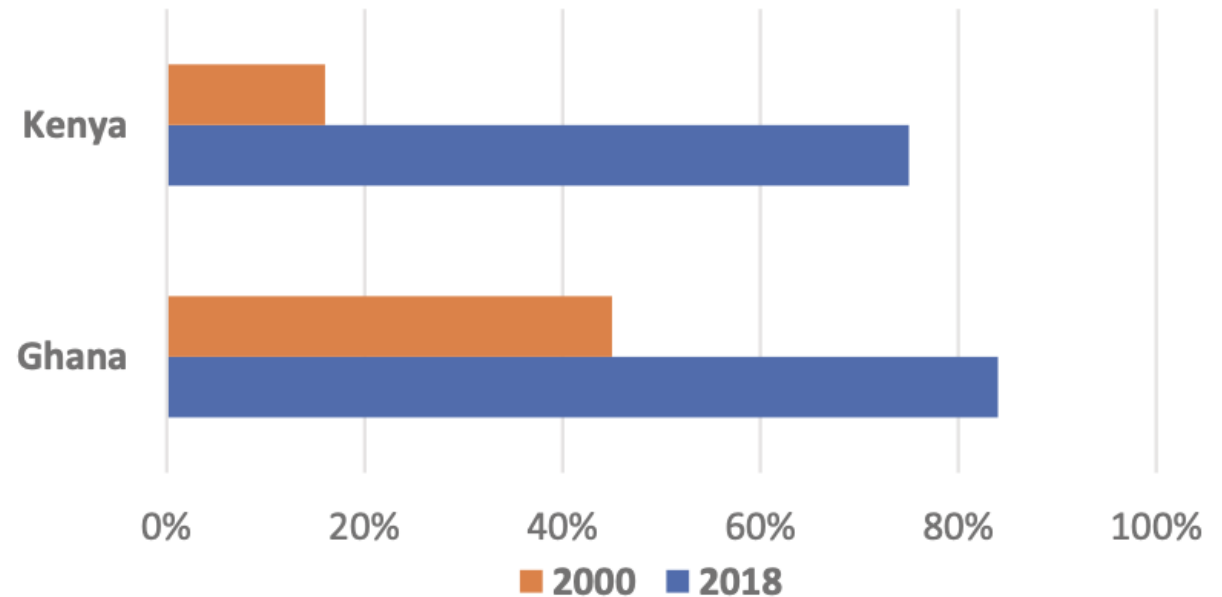
In December 2015 we reached a tipping point – our strategy worked



Narrow front example: electricity in Kenya and Ghana

Example

Improvement of electricity access in Kenya and Ghana. Both countries' electricity companies are perceived by the public as being systemically corrupt, yet the electricity access rate has risen spectacularly, as shown in Fig. 6.2, following a series of 'problem-solving' measures, focused on improving access to electricity through reducing corruption constraints.





Example

US state ballots on anti-corruption 2018. There has been surprising progress with anti-corruption ballots in the USA at state level, even during the Presidency of Donald Trump and in strongly Republican states. The bundling strategy included placing a balance of different items on the ballot paper (up to 8), some appealing more to the left, others appealing more to the right. The language varied, depending on the state. In Alaska, the answer was focused on integrity ('Alaskans for integrity'), but in other states it was best to call the message anti-corruption directly, because conservatives preferred this to 'campaign reform', which was seen as left-wing phrasing. Local activist NGOs like the 'Badass grandmas' of North Dakota gave the campaign a real sense of being locally owned and non-political (Forbes.com [2019](#)).

Bundling example - US state ballots

Remediation: detailed improvement measures

Aims to address two common mistakes about anti-corruption measures:

- Thinking that anti-corruption is about *consequences* of corruption through punishing wrong-doing, although more effective to focus on *prevention*
- Thinking that solutions lie exclusively with 'authorities': external bodies like police, judiciary or internal bodies like auditors, compliance teams

Remediation – eight improvement categories

Functional
measures

People-
centred
measures

Monitoring
measures

Justice and
rule of law
measures

Transparency
measures

Integrity-
related
measures

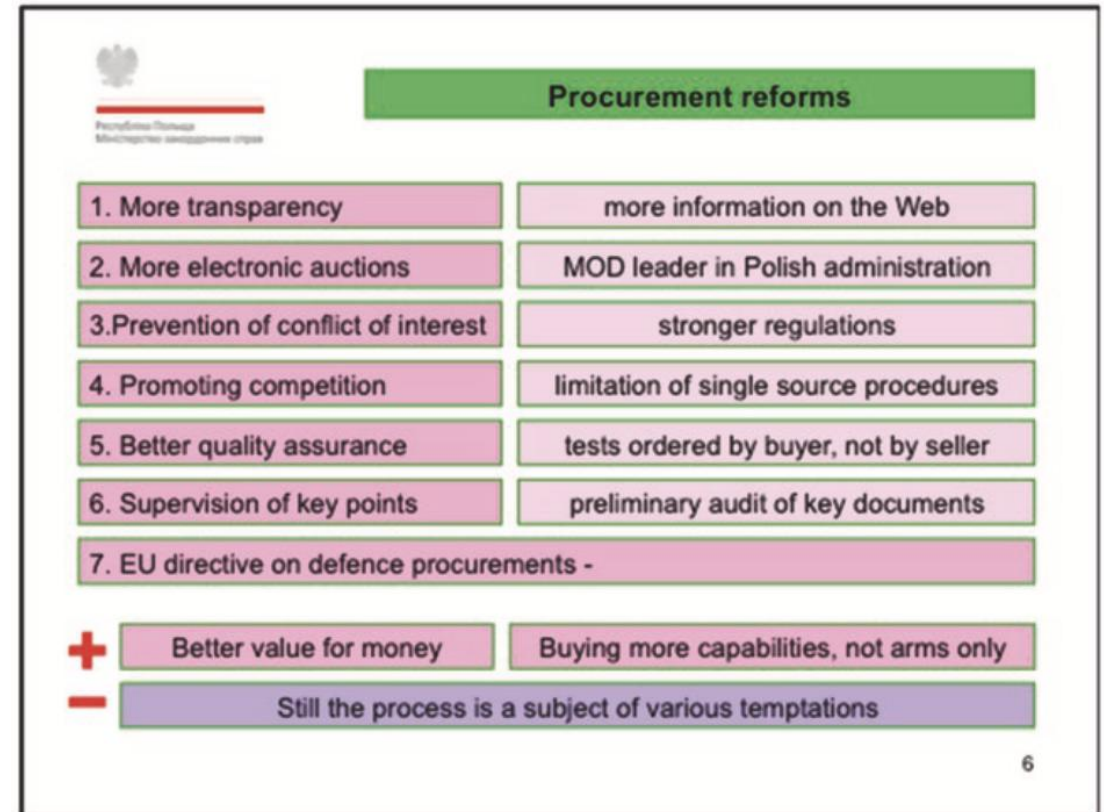
Civil society
measures

Incentives-
based
measures

Example – integrity improvement measures

- Improve quality of management cadre
- Consider how national religious authorities can have impact
- Establish integrity or transparency unit within organisation
- Set up 'ad hoc' integrity committee
- Set out integrity framework for organisation
- Train leadership in integrity and anti-corruption
- Extend integrity/anti-corruption awareness-raising training more widely
- Conduct ethical/integrity surveys of staff and use results
- Consider radical change to personnel
- Introduce integrity via media
- Review effectiveness of integrity standards and codes of conduct
- Review and call out conflicts of interest
- Ask stakeholders about 'fairness' as basis for solving corruption issues
- Make building integrity a key part of strategy alongside fighting corruption

Poland defence procurement reform:



The SFRA Matrix

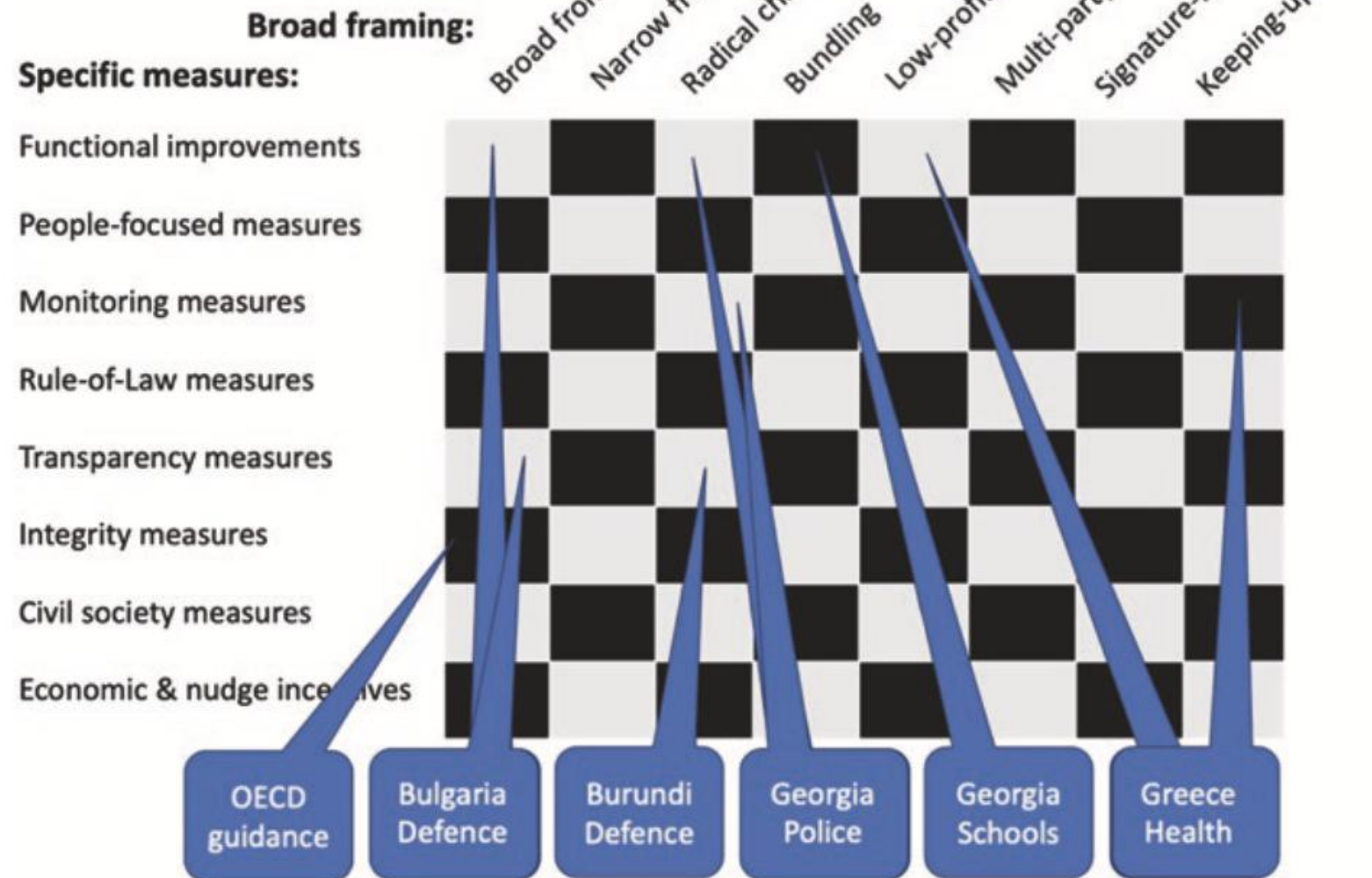


Fig. 8.2 The SFRA matrix, showing the options being proposed or implemented from sector reforms discussed in the text

Lenses: scrutinise and challenge options

Core challenges to consider:


- How do you present and frame the approach
- How complex is it
- How resilient is it to contestation
- Who wins and who loses
- How aligned is it with other approaches

This allows for easier assessment of which options are more realistic than others





Ten lenses

- Dialectical lens
 - Branding lens
 - Politics and power lens
 - Timeframe lens
 - Skill and motivation lens
 - Plan and programme lens
 - Multiple-paths-to-reform lens
 - Government alignment lens
 - International lens
 - Sequencing lens
- 

Example – dialectical lens

- Preventive strategy or disciplining strategy
- Incremental progress or large-scale change
- Prioritise fighting corruption or building integrity
- Focus on routine day-to-day or high-level corruption
- Engage the public or keep reforms private and expectations low
- Narrow or broad focus
- Substantive reforms or giving people hope
- Substantive reforms or improving monitoring
- Improving service delivery or saving money

Example – politics and power lens

- Look at winners and losers from different options
- Look at how ‘political will’ might vary between options
- Look at how national regime type might favour some options over others
- Look at how sectoral industry structures favour one option over another
- Look at whether major disturbance to social equilibrium might favour one option over others
- Test the options against sources of advantage
- Compare different sources of power in each option

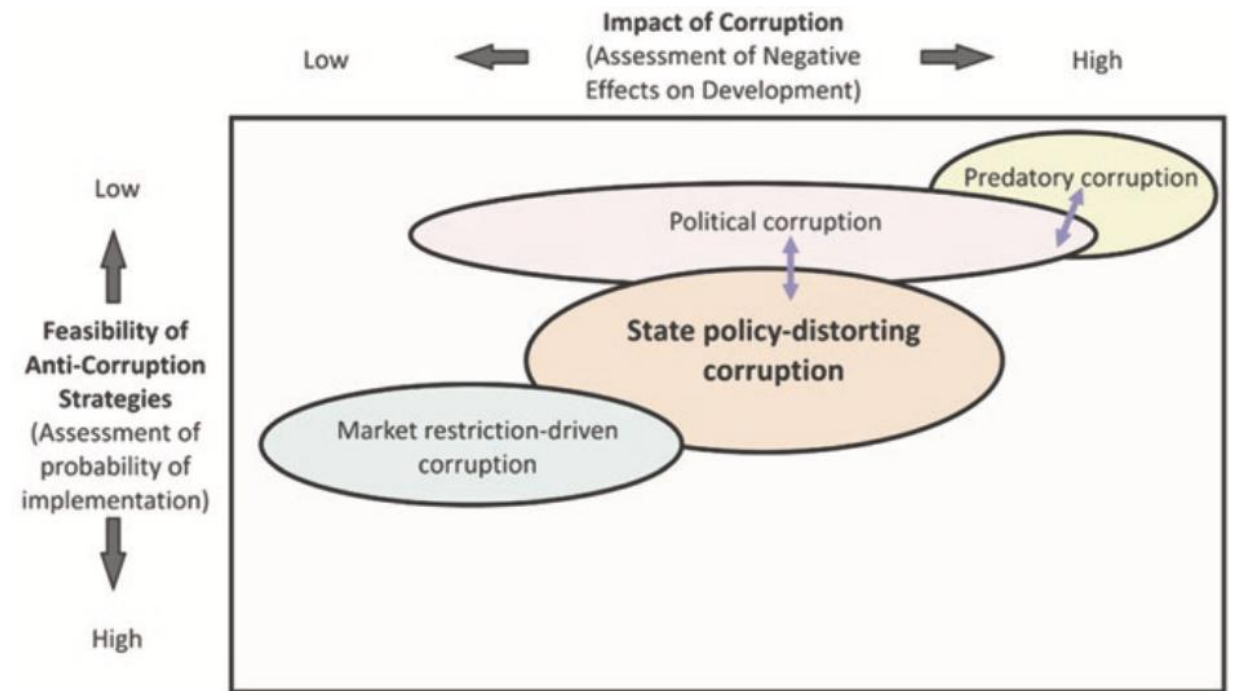


Fig. 8.3 Feasibility and impact of anti-corruption from Khan et al. [2016](#)

Key reflection

To recast larger problems into smaller, less arousing ones, people can identify a series of controllable opportunities of modest size that produce visible results and can be gathered into synoptic solutions. This strategy of small wins addresses social problems by working directly on their construction and indirectly on their resolution. Problems are constructed to stabilise arousal at moderate intensities where its contribution to performance of complex tasks is most beneficial. (Weick 1984: 40)



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Thank you, hope you enjoyed it!

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