

# **PREVENTING CORRUPTION ON ROAD PROJECTS**

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## **ABSTRACT**

Corruption in the financing, procurement, construction and maintenance of roads is probably the greatest obstacle to the development of an adequate and safe road network in developing countries.

Corruption on road projects has both a human and economic cost. It is also damaging to the project, and to the companies and individuals involved on the project. Leakage from corruption on road projects is estimated at between 5% and 20% of transaction costs in corrupt countries.

Road projects are prone to corruption due to a number of factors, including: contractual structure; diversity of skills; the size, uniqueness, complexity and length of road projects; concealed work; lack of transparency; extent of government involvement; and acceptance of the status quo.

Corruption is difficult to prevent and uncover as it is concealed. Payments are often made through intermediaries. False documentation hides corrupt payments. Defective work is covered over.

Corruption on road projects can be prevented if action is taken at three levels: project, corporate and individual. Detailed recommendations are made in this paper as to what should be done at these three levels.

Co-operative action is essential if corruption is to be prevented. Several co-operative initiatives have been established.

## **1. THE COST OF CORRUPTION**

Corruption in the financing, procurement, construction and maintenance of roads is probably the greatest obstacle to the development of an adequate and safe road network in developing countries. While there is corruption in the road sector in developed countries, the impact of corruption in developing countries is considerably more damaging given the greater scale of the corruption, the poverty of the citizens and the lack of adequate infrastructure.

Funds intended for road development are frequently diverted, by a combination of bribery, extortion and fraud, into the pockets of corrupt government officials, funders, international and

domestic contractors, consultants, sub-contractors, suppliers and their respective agents. The methods of such diversion range from the relatively simple to the highly sophisticated:

- Money provided for roads may be stolen by deceptive accounting.
- New roads may be planned or re-routed for corrupt purposes.
- Bribes may be demanded or offered for contract award, resulting in an equivalent inflation of the project price.
- Fraudulent claims may be submitted by project owners, contractors or consultants on the basis of fabricated records and evidence.
- Illegal withholding of payment by project owners or provision of sub-standard workmanship and materials by contractors may be used deliberately to increase profits.
- Corrupt certifiers may be bribed by contractors to approve sub-quality work, or by project owners wrongly to deduct liquidated damages or certify defects; or they may extort money from contractors before certifying payments due to them.

Corruption has a human cost. Money which should be spent on schools and hospitals is siphoned into off-shore bank accounts. Bribes allow safety and environmental procedures to be circumvented. The corrupt become very rich, and leave the poor far behind. People die due to lack of food and health-care, and dangerous projects. Corruption kills.

Corruption has an economic cost. The World Bank and EU Commission estimate the cost of corruption at 5% of the World's gross product. This equates to US\$1.5 trillion per annum of losses. Losses in the international construction sector are conservatively estimated at US\$500 billion per annum. In the World Bank's recent publication, "The Many Faces of Corruption", leakage from corruption on road projects is estimated at between 5% and 20% of transaction costs in corrupt countries [1]. In some cases, it can be higher. Corruption is believed to reduce a country's growth due to misappropriation or misallocation of funds. In particular, corruption can increase the financing, capital, operating and maintenance costs of projects.

Corruption damages the project. It can result in unviable, defective, dangerous, or environmentally or socially destructive projects. Defective roads are built which break up and become a danger to their users. In such an environment, there is little money or desire to repair such roads or to provide badly-needed roads to certain parts of the community. Repairs and maintenance will either never be carried out or, with the award of the maintenance or repair contract, a new cycle of corruption will begin so perpetuating the misappropriation of funds and the carrying out of defective work.

Corruption damages the companies involved in the project. Companies which refuse to participate in corruption lose work to corrupt companies, or are denied payments and permits. Companies which do participate in corruption face prosecution, fines and debarment.

Corruption damages the individuals involved in the project. Individuals who participate in corruption face prosecution, imprisonment, fines, and loss of employment and professional status. Individuals who do not participate face extortion and personal danger.

## **2. WHY ARE ROAD PROJECTS PRONE TO CORRUPTION?**

The following features of road projects make them particularly prone to corruption:

### **2.1 Contractual Structure**

Construction projects normally have a large number of participants linked together in a complex contractual structure. Each link has its own contractual documentation, and unique risks and difficulties. In relation to every contractual link, work and services are exchanged for payment. Every item of work and every payment provides an opportunity for a bribe to be demanded or paid in return for certifying too much work, certifying defective work, certifying extensions of time, or paying more expeditiously. Every contractual link also provides an opportunity for fraud (for example collusion, price fixing, or inflated claims).

### **2.2 Diversity of Skills**

The construction industry is a very diverse industry, both in the number of different professions and trades which work in the industry, and in the number of different specialist contractors. This leads to varied standards of qualification, integrity and oversight. No single organisation has the power to bring about change.

### **2.3 Size of Projects**

Some road projects can be very large in scale. It is easier to hide large bribes and inflated claims in large projects than in small projects.

### **2.4 Uniqueness of Projects**

Road projects vary in type, design and size, and rates for labour, equipment and materials vary according to market demand, type of project and location. As a result costs are often difficult to compare. This makes it easier to inflate costs and hide bribes.

### **2.5 Complexity of Projects**

Road projects can be complex, particularly where they go through difficult terrain, or involve tunnels and bridges. The inter-relationship between contractors and events is often uncertain. Bribes and inflated claims can as a result be more easily hidden, and be blamed on factors such as poor design or mismanagement.

### **2.6 The Length of the Site**

Roads can be extremely long. This makes control of the project quantities and quality much more difficult.

### **2.7 Concealed Work**

Many components of a road project are concealed by other components. For example, the road surfacing conceals the underlying material. The steel reinforcement in a bridge is concealed by concrete. As a result, dependence is placed by the industry on individuals

certifying the correctness of the work before it is concealed, or on the results of random testing. This provides opportunities to pay bribes to these individuals to certify too much work, or to approve defective or non-existent work.

## 2.8 Lack of Transparency

There is no culture of transparency in the industry. Project information is normally not disclosed, even when public money is spent. Commercial confidentiality frequently takes precedence over public interest.

## 2.9 The Extent of Government Involvement

The extent of government involvement in road projects is significant. Most major international road projects are government owned. Even privatised projects normally require government approvals, such as planning permission, or agreements to pay for the use of the road. The power wielded by government officials in this regard, when combined with the structural and financial complexity of the industry referred to above, makes it relatively easy for government officials to extract large bribes from road projects, or make them a vulnerable target for an unscrupulous contractor who may proffer a bribe.

## 2.10 Acceptance of the Status Quo

Many people working in the construction industry accept the status quo, and make little attempt to change it. Bribery and deceptive practices seem to have become so engrained in the industry that in many cases they have become accepted as “part of the game”, or a necessary commercial evil. However, this is beginning to change, and many professionals in the road sector are now speaking out against corruption.

# 3. THE CONCEALMENT OF CORRUPTION

Corruption on road projects is often concealed using one or more of the following methods.

## 3.1 Concealment through intermediaries

The payment of a bribe may be made direct by the payer to the ultimate recipient who is to carry out the dishonest act. However, it is common for a bribe to be paid through intermediaries. This is done so as to make it more difficult to detect that a bribe has been paid. Intermediaries may be agents, joint venture partners, sub-contractors, or other group companies. In these cases, the bribe may have been deliberately paid with full knowledge of all relevant parties. Alternatively, a bribe may be paid in situations where a related party is unaware of the bribe. In many cases, a party may have been wilfully blind to the circumstances. In other words, the party may have suspected that there was a likelihood of corruption but refrained from making enquiries or taking preventive action. Such wilful blindness would be treated as culpable in most jurisdictions.

## 3.2 Concealment through false documentation

Both bribery and fraud are normally concealed through false documentation. Bribes may be concealed through false agency agreements, or false contracts for work done. Fraud (for

example inflated claims) is normally concealed through documents such as false time sheets and programmes.

### 3.3 Concealment through covered work

Fraud involving sub-standard materials or incorrect quantities is normally concealed by covering the work over with other items.

## 4. PREVENTING CORRUPTION

Corruption on road projects can be prevented if action is taken at three levels: project, corporate and individual.

### 4.1 Project anti-corruption systems

Corruption on projects can be materially reduced by the implementation of an effective project anti-corruption system. Transparency International has developed its “Project Anti-Corruption System (PACS)” [2] for construction projects. PACS is a modular system which applies a variety of anti-corruption measures to all major project participants throughout their involvement in the project. These measures include the following:

#### 4.1.1 *Independent assessment*

Independent scrutiny of the project owner, the funders, the main contractor, consultants, major sub-contractors, and all other major project players is essential if corruption is to be limited on a construction project. Consequently, PACS provides for the appointment of an Independent Assessor whose primary duty is to monitor the project for corruption and to report corruption. This duty applies for the full life of the project. The Independent Assessor’s duties are set out in the Independent Assessor Agreement. The Independent Assessor has full access to the books, records and staff of all participants in the project, and has full access to the project site. In the case of a large and complex project, an Independent Assessor may be appointed specifically for that project. For smaller projects, an Independent Assessor may be appointed to monitor a number of projects. It is critical that the Independent Assessor is a person of integrity and is genuinely independent of all other project participants. PACS provides that he/she must be nominated by an independent and reputable institution. On public sector projects, a separate body (for example, a regulatory authority) could appoint and pay the Independent Assessor. On private sector projects, the project owner could appoint and pay the Independent Assessor. The Independent Assessor must also be suitably qualified. PACS recommends that he/she should be someone who has detailed experience and knowledge of the construction industry, and a working knowledge of the law of bribery and fraud and of how corruption can occur on construction projects. In order to ensure that there is a sufficient pool of suitable and properly qualified individuals to take on the role of Independent Assessor, it may in the long term be advisable to develop a system for training and accrediting Independent Assessors, whether through a national or international system.

#### 4.1.2 *Transparency*

Greater transparency of project details may significantly reduce the risk of corruption. Consequently, PACS requires the project owner to set up a publicly accessible project website. On this website, the project owner must disclose material project information on a

regular basis. PACS recommends that information should be disclosed in differing degrees of detail so that it can be of use to both laymen and to construction industry members. It is possible that false information may be disclosed. However, the Independent Assessor is under a duty to check the accuracy of the information disclosed. In addition, as the information is accessible by the public and other project participants, any inaccuracies are more likely to be discovered. The Project Transparency Policy sets out the information that should be disclosed on the website.

#### 4.1.3 *Due diligence*

The provision of information at an early stage in the project process in relation to the main project players will help to reveal and so minimise risk of corruption. Consequently, PACS provides that, at tender stage, bidders should provide, to the project owner, information in relation to their shareholders and officers, their financial status, their agents, joint venture partners and sub-contractors. Similarly, the project owner must provide information to each bidder as to its shareholders, officers and procedures. In this way, parties may detect, for example, a potentially corrupt connection between the officer of a project owner and a particular tenderer. Alternatively, a suspicious agency agreement may be revealed whereby the fees being paid to an agent are disproportionate to the legitimate services being provided by that agent. This could be indicative that the agency agreement is being used as a conduit for a bribe. The information to be provided is specified in the Disclosure Form and assistance in assessing that information is provided in the Disclosure Assessment Guide. It is possible that parties may provide false information in the Disclosure Forms. However, each Form contains a Declaration which must be signed by the Chief Executive and Chief Financial Officer of the relevant organisation. These officers must declare that they have made enquiries as to the accuracy of the information in the Disclosure Form, that they honestly believe the information to be true, and that they are aware that it may be a criminal offence to provide false information. The officers are, therefore, made aware that they are personally at risk of criminal liability should false information be disclosed. In addition, the Independent Assessor is under a duty to check the accuracy of information disclosed by the winning contractor.

#### 4.1.4 *Contractual commitments*

Contractual commitments can help to ensure that parties focus on corruption issues. Consequently, PACS provides that, at tender stage, the project owner must sign an Anti-Corruption Agreement with each bidder. This agreement requires each party to provide anti-corruption warranties. Each party also agrees to co-operate with the Independent Assessor, to permit information to be disclosed on the project website, and to implement an Anti-Corruption Programme for the duration of the project. In this way, the parties are contractually bound to participate in the operation of PACS. The Agreement also highlights the criminal and civil penalties that will apply in the event of corruption. The Agreement is signed as a condition of tender. This is required so as to ensure that all tenderers are bound into the anti-corruption requirements. Contractors are also required to obtain anti-corruption undertakings from their major sub-contractors which are similar to those contained in the Anti-Corruption Agreement. This ensures that sub-contractors are also made to focus on the issue of corruption.

#### 4.1.5 *Management controls*

Corruption occurs through the actions of individuals. A company can incur liability and suffer financial loss as a result of the actions of its employees. Consequently, it is critical that organisations implement adequate management controls over their officers and employees. For this purpose, PACS requires that major project participants should implement an Anti-Corruption Programme for the duration of the project. Under this programme, each organisation must appoint an internal Integrity Manager who is responsible for ensuring that the organisation complies with its anti-corruption commitments. The Integrity Manager can combine this role with other functions. The Integrity Manager is also required to ensure that project staff receive anti-corruption training. The organisation must also operate a gifts policy and maintain a Benefits Register which must be completed by individual officers and employees.

#### 4.1.6 *Raising awareness*

In order to minimise corruption, it is essential to make individuals aware of the risks of involvement in corruption and that corruption is not to be tolerated on the project. This will act as a significant deterrent. Consequently, PACS provides a number of measures which raise awareness of corruption as follows:

- Government officials: Extortion by government officials can cause loss and delay to the project and to contractors and consultants. To limit this problem, PACS requires the project owner to send an Anti-Corruption Notice to Government to all government departments which may be involved in the project (for example, in providing licences or permits for the project). This notice informs the department that PACS is to be implemented on the project, and that corruption will be reported. It asks the department to provide an Anti-Corruption Government Commitment whereby the department agrees to take steps to minimise corruption by its officers, to appoint a senior officer to whom complaints of extortion can be made, and to publicise a list of fees and time-scales which should properly apply to government procedures. Each Anti-Corruption Commitment and each list of fees and time-scales is published on the project website.
- Funders: Corruption in financing terms can significantly increase the cost of projects. In addition, complaints are often made that funders do not properly monitor the way in which their funds are used, and also that they fail to provide any assistance to contractors and consultants who may be suffering losses due to extortion. Under PACS, funders are engaged in the anti-corruption process. The project owner is required to send Instructions to Funders informing the funders that PACS is being implemented on the project, that the funding methods and agreement are to be published on the website, that the Independent Assessor will make regular reports to the funders and will also report corruption to them, that actions taken by the funders in response to such reports will be publicised, and that any refusal by a funder to allow publication of the funding agreement will also be publicised.
- Project staff: Significant corruption on the project may be carried out by the staff of the project owner, the tenderers, the contractors, consultants and the major sub-contractors. It is, therefore, essential that these individuals are made aware of the

risks of personal involvement in corruption. PACS achieves this by requiring each organisation to implement an Anti-Corruption Programme for the duration of the project. Under this programme, an Integrity Manager must be appointed who is responsible for ensuring within his/her organisation that:

- All staff involved in the project are made aware of the implementation of PACS and in particular of the appointment of the Independent Assessor
  - Anti-Corruption Rules for Individuals are posted up so that they may be seen by all relevant staff. These stress the risk of criminal liability, civil liability and dismissal from employment in the event of involvement in corruption.
  - Anti-corruption training of senior officers is carried out using the Anti-Corruption Training Manual.
- Civil society: In public sector projects, it is critical that civil society is given an opportunity to observe and assess the expenditure of public funds. In order to achieve this, PACS requires the project owner to set up a project website (as explained under “Transparency” above). Due to the nature of information to be disclosed under the PACS Transparency Policy, the public will be aware of the type of project, the expenditure, the programme, the specification, the funding arrangements, government involvement, and the major players.

#### 4.1.7 *Reporting*

In order for corruption to be deterred, individuals must be aware that there is a real risk that corruption on the project will be reported and punished. Consequently, it is essential that safe and effective systems for reporting corruption are set up on the project. PACS provides for such reporting in a number of ways:

- By the public: On the project website, the public is provided with the contact details of the Independent Assessor to whom it may make reports of suspected corruption in connection with the project.
- By the project staff: The project staff are provided with the contact details of the Independent Assessor to whom they may report corruption. Each organisation is also required to set up an internal system for reporting corruption.
- By the Independent Assessor: The Independent Assessor is under a duty both to receive reports from the public and project staff, and to investigate those reports. He is also under a duty to report suspicion of corruption to the project owner, the funders, other project participants, relevant professional associations and the criminal authorities.

#### 4.1.8 *Enforcement*

There must be a real threat of enforcement if corruption is to be deterred. In addition, all relevant individuals must be made aware of this threat. PACS provides for this as follows:

- The Independent Assessor reports corruption to the criminal authorities. This will enable enforcement of criminal penalties.
- The Independent Assessor reports corruption to project players. This will enable enforcement of the civil remedies provided for under the Anti-Corruption Agreements.
- Organisations are required to take disciplinary action against their staff for involvement in corruption.



- The Anti-Corruption Agreement provides for termination, damages and/or fines for breach of the agreement (depending on the severity of the breach).
- All project staff are informed that the Independent Assessor is under a duty to report corruption to the criminal authorities. They are, therefore, aware that there is a real risk that they will be penalised for any corruption.

## 4.2 Corporate anti-corruption systems

While PACS is designed to be a complete project anti-corruption system which applies to all participants, there will be many projects where PACS is not implemented. Therefore, companies, as a matter of good corporate practice, should implement effective corporate anti-corruption systems which apply to their entire business wherever they are operating. These practices are inevitably similar to, or the same as, those required on a project system.

### 4.2.1 *Corporate anti-corruption code of conduct and management programme*

The company should implement an internal anti-corruption code of conduct and management programme which commits the company to a strict anti-corruption policy. To assist in this process, Transparency International has published its “Business Principles for Countering Bribery” and accompanying “Guidance Document”, “Six Step Implementation Process” and Verification Module [3].

The code of conduct should:

- Prohibit all officers and employees of the company from engaging in any form of corrupt conduct.
- Specify the company’s policy on political and charitable contributions, gifts, hospitality and expenses to ensure that they could not be used as a subterfuge for bribery.
- Specify the company’s policy on facilitation payments.
- Commit the company to take all reasonable steps to prevent corruption by the company’s subsidiary and associated companies, agents, joint venture and consortium partners, sub-contractors and suppliers.

The purpose of the company’s anti-corruption management programme is to ensure that the code is complied with. As such, the programme should:

- Require a senior officer of the company to have responsibility for management of the programme.
- Ensure that all employees receive adequate training in implementation of the programme. TI’s Anti-Corruption Training Manual can be used for this purpose [4].
- Ensure that the code is applied in relation to all dealings by the company with parties with which it has business relationships.
- Put into effect proper whistle-blowing procedures.
- Be subject to adequate internal controls and audit.
- Be periodically monitored and reviewed.

An effective anti-corruption code and management programme will not guarantee that no corrupt behaviour will take place. However, they could materially assist in the prevention of corrupt behaviour. In the event that corrupt behaviour is identified, the existence of the code and programme may be a factor in the defence of the company in a criminal prosecution, or in

mitigating any criminal penalty, and may also be a mitigating factor if the company is threatened with debarment. If the code and programme are to provide this protection, they must have been genuinely and properly introduced and managed. They cannot be an artificial defence. The tribunal will normally want to see evidence of proper implementation and enforcement.

#### 4.2.2 *Contractual safeguards*

The company should ensure that contractual documentation in relation to a construction project includes the following safeguards. TI's "Anti-Corruption Agreement" (which is a Module of PACS [2]) can be adapted for this purpose.

- The contract should contain adequate anti-corruption warranties given by the other contracting party to the company. Under these warranties, the other party should undertake to the company:
  - that it will not participate in any corrupt practices in relation to the project;
  - that it will ensure that its officers and employees, and subsidiary and associated companies, do not participate in any corrupt practices;
  - that it will take reasonable steps to ensure that its agents, joint venture and consortium partners, sub-contractors, suppliers and consultants do not participate in any corrupt practices.
- The contract should pass on to the other contracting party any anti-corruption obligations assumed by the company in its contracts with other companies.
- The contract should entitle the company to terminate and/or obtain compensation in the event of a corrupt act by the other contracting party.
- The contract should contain a claims management code which requires integrity in the event of contract claims. The code would oblige a claimant to take reasonable steps to ensure that all claims submitted by it are genuine and accurate. The recipient would be obliged to take reasonable steps to review the claim diligently, objectively and in good faith, and to pay the sums due on time. TI's "Claims Management Code" can be used for this purpose [5].
- The company should be willing to give equivalent commitments to those contained in paragraphs a) to d) above to the other contracting party.

#### 4.2.3 *Due diligence*

The company should undertake adequate due diligence with a view to minimising corruption risk. TI's "Disclosure Form" and "Disclosure Assessment Guide" (which are Modules of PACS [2]) can assist in this purpose. Examples of areas of risk which due diligence would try to prevent are the following:

- Major road projects can cost a significant amount of money and bribes can be hidden in the project costs. Staff and representatives that have responsibility for contract, sub-contract, consultancy and supply tenders, project management, and the certification and payment of contractors, sub-contractors, consultants and suppliers, are all

vulnerable to bribery. The company needs to take adequate steps to ensure the integrity of these personnel.

- Bribes can be demanded or paid by any of the parties involved in a project, either directly or indirectly (e.g. through agents). Reasonable enquiries need to be made to ensure as far as possible that the proposed project participants are not corrupt.
- Some countries and project owners are more corrupt than others. Operating in high risk countries, or contracting with high risk owners, will inevitably require greater precautions. Transparency International publishes a “Corruption Perceptions Index” which assesses the perceived corruption risk in most countries [6].
- It will obviously not be possible to make certain that there will be no corruption in relation to a project. Only reasonable enquiries and preventive actions can be undertaken. However, as far as civil liability is concerned, the company should try to ensure that no bribes are paid, as it may be liable for the consequences whether or not it had knowledge of the bribe, and whether or not it took preventive actions. As far as criminal liability is concerned, the company should take sufficient steps to ensure that it cannot be accused of deliberately authorising the party to pay a bribe, or of being wilfully blind or reckless as to whether or not a bribe was paid.

#### **4.3 Individual codes of conduct/anti-corruption rules**

All corrupt acts are undertaken by individuals. Many individuals in the road sector are members of professional institutions. Professional institutions should maintain and enforce anti-corruption codes with which their individual members must comply. Institutions should maintain confidential reporting and advisory services, and ensure that their members receive anti-corruption training. TI’s Anti-Corruption Training Manual can be used for this purpose [4]. This Training Manual includes in Section 3 a set of “Anti-Corruption Rules” which institutions can impose on their members.

### **5. CO-OPERATIVE ACTION**

It is now accepted that co-operative action is essential if corruption is to be prevented. Tackling corruption is not a competitive issue. Everyone (apart from the corrupt) will benefit if corruption is eradicated. A level playing field will be achieved, and companies will be able to bid free from the risks, unfairness and uncertainties which corruption imposes. The construction industry is now playing a leading role in corruption prevention. Several co-operative initiatives have been established.

- Transparency International in 2003 launched an international initiative to prevent corruption in the construction and engineering sectors. In this project it is working with governments and funders, and with construction and engineering associations, companies and professionals. It has published a series of anti-corruption reports and tools [7].

- The World Economic Forum Partnering against Corruption Initiative (PACI) [8] was established by the WEF, and is facilitated by Transparency International and the Basle Institute of Governance. Over 100 major international companies from the construction and engineering, oil and gas, and mining and mineral sectors, with a combined turnover in excess of US\$500 billion, and from over 35 countries, have committed not to tolerate bribery, and to implement effective anti-corruption procedures.
- The World Federation of Engineering Organisations [9] brings together national engineering organisations from over 90 nations and represents some 8,000,000 engineers from around the world. It has established an international Anti-Corruption Task Group to agree on appropriate anti-corruption actions.
- Transparency International, the United Nations Global Compact 10<sup>th</sup> Principle, the International Chamber of Commerce's Commission on Anti-Corruption and the World Economic Forum's Partnering against Corruption Initiative have agreed to coordinate their efforts to disseminate good practice and guidance materials and to support each others' implementation and compliance tools.
- The UK Anti-Corruption Forum [10] is an alliance of UK business associations, professional institutions and organisations with interests in the domestic and international infrastructure, construction and engineering sectors. It was founded in October 2004. Its member associations represent over 1,000 companies and 200,000 professional engineers. The Forum also includes numerous major, medium and small companies as active members. The purpose of the Forum is to promote industry-led actions which can help eliminate corruption. In September 2005, the Forum published its "Anti-Corruption Action Statement" which calls on all those with interests in the infrastructure, construction and engineering sectors to take effective and co-ordinated action to reduce corruption, on both a domestic and international basis, and on both the supply and demand sides.
- The Global Transport Knowledge Partnership [11] is a web-based information portal focusing on the transport sector. The governance part of its web-site has a section on "Controlling Corruption".

## 6. CONCLUSION

If all participants in the road sector co-operate with a view to developing and implementing effective anti-corruption actions, and if anti-corruption systems of the type outlined above are implemented at project, corporate and individual level, then corruption can be materially reduced in the road sector, to the benefit of everyone except the corrupt.

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