

Evidence-based learning series

# Corruption Control and Integrity-Building in Law Enforcement



## Evidence-based learning series

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ISBN 978-92-9222-772-2


Cite as DCAF (2025), *Corruption control and Integrity-building in law enforcement*, Evidence-based learning series, Geneva: Geneva Centre for Security Sector Governance.

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## About DCAF

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## About this report

This report examines corruption control and integrity-building in law enforcement, a key focus area for DCAF and its national, regional and multilateral partners. Corruption within law enforcement institutions erodes effectiveness, diminishes public trust and undermines the rule of law. The report explores systemic reforms and practical interventions designed to promote transparency, accountability and professionalism within law enforcement agencies. Methodologically, the report employs a structured three-stage approach: first, it identifies key concepts and assertions related to corruption and integrity in law enforcement; second, it tests a few of these assertions through an analysis of programmatic activities in diverse operational contexts, and third, it refines these concepts and identifies recurring patterns to generate evidence-based recommendations for policy and practice.

This publication marks the launch of DCAF's Evidence-Based Learning Series, an initiative designed to integrate research, policy, and practice in addressing key challenges in Security Sector Governance and Reform (SSG/R). Employing an adaptive learning approach, the series systematically applies research findings and operational insights to strengthen security governance policies and practices. Through outcome harvesting, it establishes a continuous feedback loop between evidence and action, ensuring that interventions are informed, effective, and context-sensitive. By identifying lessons learned and good practices, the series translates them into actionable commitments that promote sustainable and accountable security governance. Bridging the gap between theory and implementation, it enhances the resilience and responsiveness of SSG/R policymakers, practitioners, and academic scholars at national, regional, and international levels.

## Acknowledgments

This report has benefitted greatly from contributions by colleagues from DCAF and other organisations. Hans Born and Vincenza Scherrer provided valuable direction and insightful feedback throughout the writing process. Kudzai Moyo Tamuka made valuable contributions and provided essential support during the consultation phase, as well as in the review of literature, research, and methodology. Paulo Costa, Jolie-Ruth Morand, Valentin Wagee and Sarabeth Murray provided valuable insights and key project documents from the DCAF project, greatly enriching knowledge and learning. Hans Born, Michael Ofori-Mensah, Paulo Costa, Patrick Kwasi Brobby and Dan Hales provided constructive comments during the manuscript review.

Evidence based learning series conceptualization phase benefited from the valuable insights from Albrecht Schnabel, Alan Bryden, Alexander Burian, Anicia Lala, Anne Bennett, Anne Grobet, Antoine Hanin, Apolline Gagliardi, Ayoub Ayman, Cristina Finch, Daniël Prins, Dan Hales, Diego Represa García, Elsa Salame, Francesco Mapelli, Julia Klever, Olivier Prevosto, Samir Marmouri, Sophie Frediani.

We sincerely thank the Media and Communications Team, Quade Hermann, Maritie Gaidon, Nicola Dotti and Marta Quadrini Mosca Moschini for their steady support and guidance.

The views expressed do not necessarily reflect the views of the institutions referred to or represented within this publication.  
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# Abbreviations

<b>ANP</b>	Afghan National Police
<b>ASCE-LC</b>	Autorité Supérieure de Contrôle de l'État et de Lutte contre la Corruption (High Authority for State Control and the Fight Against Corruption)
<b>CSO</b>	Civil Society Organisation
<b>DCAF</b>	Geneva Centre for Security Sector Governance
<b>EU</b>	European Union
<b>EUPOL-COPPS</b>	European Union Coordinating Office for Palestinian Police Support
<b>FMO</b>	Financial Management and Oversight
<b>HRM</b>	Human Resource Management
<b>LOTFA</b>	Law and Order Trust Fund, Afghanistan
<b>MOIA</b>	Ministry of Interior Affairs (Afghanistan)
<b>MPD</b>	MOIA and Police Development
<b>PCIB</b>	Police Cooperation and Integrity-Building Programme
<b>PCP</b>	Palestinian Civil Police
<b>PFM</b>	Public Financial Management
<b>PSP-2</b>	Regional Programme for Peace and Stability in the Sahel
<b>PIMS</b>	Personnel Information Management System
<b>SPM</b>	Support for Payroll Management
<b>SSG/R</b>	Security Sector Governance and Reform
<b>UNDP</b>	United Nations Development Programme
<b>UNDP-PAPP</b>	UNDP Programme of Assistance to the Palestinian People



# Executive summary

This report brings together current conceptual knowledge on control of corruption in law enforcement with practical experience from operational activities. Its purpose is to distil evidence-based learning that can support improved policy and programming by DCAF and other actors addressing corruption in law enforcement in the context of security sector governance and reform (SSG/R). The report aims to develop synergies between theory, policy and practice through research and learning, with a focus on deriving lessons learned from five SSG/R projects that address corruption in law enforcement.

A review of academic and policy-related literature has highlighted central concepts with regard to definitions, types, causes and effects of corruption in law enforcement agencies, as well as common approaches to address corruption within the context of SSG/R programming. Defining corruption in law enforcement as any action or omission by law enforcement officials, in violation of law or trust, for personal profit or gain encompasses a range of practices, such as extortion, embezzlement, abuse of power, favouritism, fabrication of evidence and payroll and promotion fraud. Commonly observed contributing factors underpinning these forms of corruption include inadequate remuneration, undermined recruitment, lack of training and professionalism, weak internal accountability, tolerant or permissive organisational culture and lack of transparency and oversight.

From among a range of SSG/R approaches to control corruption and build integrity within law enforcement agencies, this report highlights five significant interventions for further investigation.

<b>01</b>	<b>02</b>	<b>03</b>	<b>04</b>	<b>05</b>
Assessing corruption vulnerabilities and risk	Strengthening codes of ethics and conduct	Strengthening internal investigations	Strengthening human resource management	Strengthening financial management and oversight

The report reviews the concepts underpinning each of these approaches and compares them with practical experience from five SSG/R projects focusing on law enforcement corruption. The selected projects and programmes span diverse geographic and institutional contexts, providing a broader perspective on the challenges and opportunities for anti-corruption efforts in different settings. The analysis draws primarily on project documentation, reports and available secondary data, offering insights into the strategies and interventions employed in each case. Several key learnings emerge that have broader relevance in relation to SSG/R policy and programming:

A comprehensive approach is essential, prioritizing and sequencing interventions to avoid fragmented efforts. A fragmented or ad hoc approach to corruption control and integrity-building is unlikely to yield sustainable results. Effective interventions require a well-coordinated, comprehensive strategy that prioritizes key reforms and sequences them in a manner that ensures coherence and long-term impact.

The commitment and sustained engagement of senior management are paramount for the success of policy and project interventions aimed at combating corruption and promoting integrity. In contexts where interventions have significant budgetary ramifications, the explicit backing of leadership becomes an additional critical determinant for the successful implementation and sustainability of such reforms.

Reforms to policies and systems for Human resource management (HRM) and Financial management and oversight (FMO) of law enforcement agencies may be contingent on reforms to broader public policies and systems, such as broader national systems of remuneration and employment conditions in public sector frameworks. The scope for reform within isolated anti-corruption initiatives can therefore be constrained by the need for alignment with overarching public policies and institutional frameworks – a systems approach.

Wider institution-building activities must be part of a broader democratic institution-building framework to be effective. Policymakers must ensure that anti-corruption efforts are intertwined with broader governance reforms, including improvements in public procurement, judicial independence, and the inclusion of civil society in oversight.

Corruption control and integrity-building interventions in law enforcement agencies must integrate local cultural, institutional norms and international standards to ensure their acceptance and long-term viability and to entrench good practices. The involvement of regional partners from similar backgrounds can effectively facilitate an understanding of international and national expectations.

Effective mechanisms for whistleblower protection are integral to the success of multiple interventions targeting corruption and integrity-building. These include reforms within internal investigations, HRM, FMO, and the development of ethical codes of conduct. Such protections must be enshrined within law enforcement policies and aligned with broader national and international legal frameworks.

Given the complexity of institutional change, the impact of interventions targeting corruption and integrity-building in law enforcement is unlikely to be immediately measurable. New capacities and changes in behavior entailed in interventions addressing corruption and integrity-building in law enforcement generally take time to develop, hence the actual impact of interventions typically cannot be measured in the short term.





# 1. Introduction

Corruption is generally defined as the use of public office for private gain. It takes many forms and affects different branches of government in a wide range of contexts. Beyond the day-to-day effects upon perceptions of and interactions with public officials, corruption ultimately weakens and destabilises state-society relations by eroding the effectiveness of state institutions and public trust in them.

Corruption in law enforcement has particularly significant implications for state-society relations in light of the front-line role that law enforcement agencies play in the interface between communities and the state. Within the context of Security Sector Governance and Reform, law enforcement is defined as a critical component of the broader security sector that includes police forces, customs agencies, border security, and other agencies responsible for maintaining public order and safety, enforcing laws, and preventing, detecting, and investigating crimes. Corruption among law enforcement officials undermines these important functions and erodes public trust in the agencies responsible for upholding the rule of law and the state that they represent.

Corruption can infiltrate law enforcement agencies when principles of good SSG/R such as accountability, transparency, responsiveness, inclusivity, and rule of law are not upheld. Corruption undermines the principle of accountability by enabling law enforcement officials to engage in corrupt practices that weakens internal disciplinary systems and creates a culture of impunity where officers prioritize personal gain over their duty to uphold the law. Corruption compromises the principle of transparency by clouding the actions and decisions of law enforcement officials and promoting cultures of secrecy and impunity within law enforcement institutions. Corruption erodes the principle of responsiveness in law enforcement, which calls for institutions to be sensitive to the diverse security needs of all parts of the population and to operate with a culture of service. Corruption within law enforcement agencies weakens inclusivity by reinforcing systemic biases and intersectional discrimination, disproportionately disadvantaging marginalized communities based on factors such as gender, ethnicity, and socioeconomic status. It fosters nepotism and bribery in recruitment and promotions, preventing diverse and merit-based representation within security institutions. Finally, corruption undermines the rule of law by impeding or distorting the fair and equitable application of the law to all individuals and communities.

Considering this contradictory relationship between corruption in law enforcement and the principles of good SSG/R and the detrimental implications for governance, human rights, and public safety, it is unsurprising that corruption in law enforcement garners significant attention to SSG/R policy and practice. Despite this attention, corruption remains a persistent problem in law enforcement in many contexts. Examination of corruption in law enforcement - including analyses

of drivers, effects, and ameliorative actions – is available in a large body of SSG/R research and policy literature from various academic, national, and international institutions, constituting a large and evolving body of knowledge.

This knowledge informs the planning and implementation of project and program activities of various SSG/R actors, engaging local, national and regional stakeholders including governments, law enforcement agencies, civil society organisations, and international organisations in practical actions intended to control corruption and build integrity within law enforcement agencies. The wide range of practical interventions includes support to law enforcement agencies for, *inter alia*, formulation of appropriate policies, rules and procedures and for increasing relevant knowledge, understanding and expertise among personnel. Experience from such corruption-related SSG/R interventions provides opportunities for learning that can shed light on the relevance and effectiveness of established knowledge and can feed into the learning loop to inform improvements in operational planning and implementation.

The experience of DCAF and other SSG/R actors addressing corruption in law enforcement spans numerous policy, research, and operational initiatives, providing an opportunity to bring together policy-related knowledge and operational experience on a topic that relates to fundamental SSG/R principles of accountability, transparency, integrity and rule of law.

The report comprises four sections. [Section 2](#) summarises concepts underpinning current understandings of corruption in law enforcement, leading to the identification of prevalent approaches to addressing corruption and integrity-building in law enforcement. [Section 3](#), reviews experience from five implemented projects to distil lessons that are relevant for policy formulation and for project planning and implementation:

- Police Cooperation and Integrity-Building Programme, Western Balkans; DCAF, 2016-22
- Coordinating Office for Palestinian Police Support Programme, Palestinian Territories; UNDP-PAPP/EUPOL, 2011-13
- Police Reform Programme, Bangladesh; UNDP and UK-DfID, 2009-15
- Law and Order Trust Fund, Afghanistan; UNDP, 2002-21
- Security Governance in the Sahel, Burkina Faso; DCAF, 2019-23

These projects have been selected for analysis within constraints imposed by the accessibility of project documentation and consent of actors involved and with regard to the five prevalent approaches to SSG/R programming addressing corruption in law enforcement. [Section 4](#) draws together intervention-specific lessons and consolidates them into broader lessons for policymakers, practitioners, and other stakeholders. The final section synthesizes the findings from the SSG/R projects and the broader analysis. It distils intervention-specific lessons into overarching recommendations for improving governance, fostering transparency and reinforcing accountability in law enforcement agencies. By integrating evidence-based learning into design and programme implementation, this section underscores the need for continuous knowledge exchange and learning in addressing corruption and building integrity in security sector governance.



## 2. Conceptual overview of corruption in law enforcement

Corruption in law enforcement is the subject of extensive discourse within academic and policy-related literature. This section identifies the main concepts and assumptions regarding definitions and forms of corruption and integrity-building, factors affecting the spread of corruption in law enforcement, and factors affecting the control of corruption and integrity-building. It draws on a wide range of literature to give an overview of current theories and concepts regarding this corruption, providing a foundation for subsequent investigation of practical experience in SSG/R programming.

### 2.1. Definitions of corruption in law enforcement

Corruption in a very broad sense is commonly defined as *the abuse of public office for private gain* (e.g. Nye, 1967; Rose-Ackerman, 1999). This generic definition captures a wide scope of behaviour and resonates in public discourse, yet this wide range obscures the complexity and contextual variations of corruption, thus limiting the utility of the definition in research and public policy.

Various definitions of corruption in law enforcement appear in academic and policy-related literature, as presented in Table 1.

**Table 1. Corruption definitions**

Definition	Reference
Any type of proscribed behaviour engaged in by a law enforcement officer who receives or expects to receive, under his/her official position, an actual or potential unauthorized material reward or gain	Roebuck and Barker, 1974
Any illegal conduct or misconduct involving the use of occupational power for personal, group or organisational gain	Sayed and Bruce, 1998
Any course of action or failure to act ("omission") by individuals or organisations, public or private, in violation of law or trust for profit or gain	Interpol, 2001
An action or omission, a promise of action or omission, or an attempted action or omission committed by a police officer or a group of police officers, characterized by the police officer's misuse of the official position, motivated in significant part by the achievement of personal gain	Ivković, 2005

Definition	Reference
The direct or indirect offer, or the solicitation or acceptance by a police officer of any money, article of value, gift, favour, promise, reward or advantage, whether for himself/herself or for any person, group or entity, in return for any act or omission in connection with the police officer's position or performance of any function connected with policing	DCAF, 2009a
Abuse of power and authority for personal or institutional gain, and the product of the institutional and socio-political and economic environment of a country	Kumssa, 2015
Perversion or destruction of integrity in the discharge of public duties by bribery or favour or the use or existence of corrupt practices	EPAC, 2021

Notwithstanding the lack of consensus around a precise definition (Hauser, 2019), several consistent concepts are evident in the literature – and in the range of definitions presented above – that provide a solid foundation for and consistent understanding of corruption in law enforcement.

First, this corruption includes both individual behaviour and group/organisational behaviour. Common perceptions often view corruption in law enforcement as aberrant behaviour of unprofessional individuals. However, analyses consistently highlight social and organisational dimensions of such corruption (e.g. Sayed and Bruce, 1998; Punch, 2000; Kumssa, 2015). This expansion to include group and organisational behaviour highlights relationships between corruption in law enforcement and broader societal and institutional conditions (Kumssa, 2015). In this regard, the behaviour and attitudes of police officers are a product of the environment within which they work (Punch, 2000).

Second, corruption in law enforcement is *motivated by a range of different objectives*. Private gain is identified in some analyses as the principal motivation for corrupt behaviour (e.g. Nye, 1967; Punch, 2000). In contexts where officers are underpaid or work in poor conditions, corruption may be driven by economic necessity and to supplement inadequate incomes (Singh and Danny, 2019). Beyond financial gain, other forms of benefit may motivate corrupt behaviour, such as status, influence, prestige, sexual favours or future support (Goldstein, 1975). Moreover, beyond an individual, corruption in law enforcement includes behaviour motivated by intended group or organisational benefits, which could include prestige and/or performance-related organisational standing (Sayed and Bruce, 1998; Kumssa, 2015).

Third, corruption in law enforcement *encompasses a wide range of behaviours and actions*. This includes both acts and failures to act (Interpol, 2001). Moreover, corrupt behaviour in law enforcement extends beyond acts or omissions that are formally proscribed and/or illegal and includes behaviour such as unethical practices, favouritism and clientelism, and systemic deficiencies that perpetuate inequality, injustice and unfair distribution of resources (Newburn, 2015). Underpinning the wide range of acts of omission falling within the ambit of corruption in law

enforcement is the consistent characteristic that these acts or behaviours affect society’s trust in law enforcement institutions and impede equitable development (DCAF, 2019a).

Considering these three *dimensions* – the ranges of protagonists, motivations and actions/ omissions – the definition of corruption from Interpol (2001) provides a useful balance between comprehensiveness and precision: corruption in law enforcement is *any course of action or failure to act (omission) by individuals or organisations, public or private, in violation of law or trust for profit or gain*. In the consideration of corruption in law enforcement in this report, the specific protagonists of corruption are law enforcement officials, including police officers and officials in other roles within the range of agencies involved in law enforcement.

## 2.2. Types of corruption in law enforcement

Notwithstanding the utility of a concise definition of corruption in law enforcement, such broad definitions inevitably subsume a range of complex practices better understood separately for research and policymaking (Ledeneva *et al.*, 2017). A widely understood and utilized differentiation of corruption distinguishes between grand corruption, which involves larger amounts of money and often relates to the award of public contracts, and petty corruption, which involves smaller amounts and occurs in day-to-day transactions at lower levels of government (e.g. Rose-Ackerman, 1999). Further elaboration in the literature on different types of corruption in law enforcement supports a deeper understanding of the complex, context-bound and fluid nature of corrupt practices. Table 2 presents a composite typology of corrupt behaviour in law enforcement drawn from various academic and policy-related sources.

**Table 2. Corruption types**

Behaviour	Description	Reference
Extortion	Threats of harm or legal consequences	Andvig and Fjeldstad, 2008; UNODC, 2002; Chêne, 2010
Embezzlement	Misappropriation of resources, including funds or assets, for personal gain	Andvig and Fjeldstad, 2008
Abuse of power	Use of authority for personal gain or to intimidate, harass or oppress individuals, including acts of brutality, coercion, intimidation or discrimination against individuals or groups	Punch, 2000, 2009; Fijnaut and Huberts, 2002; Goldstein, 1975
Nepotism and favouritism	Preferential treatment based on personal relationships, or accepting bribes or other benefits to provide special treatment or advantages in investigations, promotions, assignments or other professional matters	DCAF, 2019a, 2019b

Behaviour	Description	Reference
Collusion	Illicit collaboration with external parties and criminals, including sharing confidential information, providing protection or participating in criminal activities	Bruggeman, 2000 Punch 2000; UNODC, 2003
Fabrication of evidence	Fabrication or manipulation of evidence to support or secure convictions or to protect guilty parties	Roebuck and Barker, 1974; Newburn, 1999; Prenzler, 2009
Protection rackets	Extortion of regular payments or provision of protection to businesses or individuals in exchange for shielding them from legal consequences or allowing illegal activities to continue	Punch, 2009; Roebuck and Barker, 1974
Payroll fraud	Creation of fictional officers on the payroll to embezzle salaries, involving manipulation of attendance records or receiving kickbacks from officers for falsifying duty hours or allowing them to engage in secondary employment while on duty	Huther and Shah, 2000; UNODC, 2003
Moonlighting	Secondary employment while employed in law enforcement, including providing private security services	DCAF, 2019a; Goldstein, 1975

In practice, the forms of corruption described above are not mutually exclusive and may occur in combinations, and they vary in specific form and extent in different contexts. Many of the types of corruption described in the academic literature are defined in relation to more economically and institutionally developed contexts, such as the United States, the United Kingdom and Australia. However, corruption assessment surveys like the Global Corruption Barometer (Transparency International) regularly suggest a greater prevalence of corruption in less economically and institutionally developed countries. This discrepancy between the contexts of research into corruption in law enforcement and the places where corruption is more prevalent raises questions about the comprehensiveness and broader validity of this typology of corruption in law enforcement.

## 2.3. Conditions and drivers of corruption in law enforcement

Effective policies and initiatives to address corruption in law enforcement agencies must be underpinned by a thorough understanding of the causes and drivers that lead to corrupt individual and organisational behaviour. The complexity and context specificity that follow from the definitions and typologies of corruption described above suggest a wide range of enabling conditions and drivers, differing across contexts and organisations. As with the overlapping and intersection of different forms of corruption, the drivers underpinning them are not mutually exclusive – in practice, incidents of corruption may be underpinned by multiple interlinked driving factors. Indeed, current knowledge highlights the multifaceted nature of corruption that is driven by different historical, political, institutional, social and economic conditions (Heidenheimer, 2002; Heywood, 1997). Despite this multiplicity and context specificity, consistent factors causing and driving corruption in law enforcement agencies may be discerned from the literature. Table 3 presents common causes and drivers drawn from academic and policy literature, which focus upon external drivers and organisational behaviour, as opposed to individual characteristics such as the personal integrity (or lack thereof) of individual officers.

**Table 3. Corruption conditions and drivers**

Conditions and drivers	Description	Reference
Low salaries/ inadequate remuneration	Insufficient salaries can undermine organisational morale and render personnel susceptible to corruption; low salaries may also discourage skilled and competent individuals from joining law enforcement agencies	DCAF, 2019a; Kumssa, 2015
Undermined recruitment	Undermined recruitment procedures lead to the employment of inappropriate personnel and can establish patterns of corrupt behaviour; recruitment procedures may be undermined through bribery of recruiting officers or by failures to conduct adequate checks to ensure that candidates have appropriate capabilities	Kumssa, 2015; Newburn, 2015
Lack of training and professionalism	Inadequate training and professional development opportunities can undermine the ethical standards and integrity of law enforcement agencies; insufficient training in ethics, human rights and proper conduct can leave officers ill-equipped to handle their responsibilities and make ethical decisions, increasing the risk of corruption	Fijnaut and Huberts, 2002; UNODC, 2003
Weak internal accountability mechanisms	If law enforcement agencies lack robust internal accountability mechanisms, such as effective disciplinary systems, independent internal affairs units and transparent complaint mechanisms, it can create an environment where corrupt practices go unchecked; the absence of appropriate checks and balances within the agency can enable corruption to thrive	Punch, 2000; Prenzler, 2009

Conditions and drivers	Description	Reference
Lack of transparency and oversight	When there is a lack of transparency in law enforcement operations, including investigations, arrests and interactions with the public, it increases the potential for corruption; insufficient external oversight, inadequate systems for monitoring and evaluating police conduct, and limited public access to information can contribute to corrupt behaviour	UNODC, 2003; Huther and Shah, 2000
Political interference and undue influence	Political interference in law enforcement agencies can compromise their independence and integrity; when politicians or influential individuals exert undue influence over law enforcement operations, it can lead to selective enforcement, favouritism and corruption; political pressure to protect certain individuals or groups can undermine the agency's ability to act impartially and enforce the law effectively	Søreide, 2014; Worrall, 2014
Organisational culture and peer pressure	The prevailing organisational culture within law enforcement agencies can significantly affect the prevalence of corruption; if there is a culture that tolerates or even encourages corrupt practices, it can create peer pressure on individual officers to engage in similar behaviour; the fear of retaliation or isolation for resisting corrupt acts can contribute to the perpetuation of corruption within the agency	Prenzler, 2009; Williams, 2002; Newburn, 2015
Intersection of social norms and corruption	It is important to understand how norms perpetuate corrupt practices and create a vicious cycle, interventions can be designed to address these underlying drivers more effectively. Emphasizing the need for contextually driven approaches, emerging research highlights the importance of diagnosing and changing social norms that fuel corruption while also addressing the consequences of ignoring these critical dynamics."	Kubbe, I, C. Baez-Camargo, and C. Scharbatke-Church, 2024
External pressures and organized crime influence	Law enforcement agencies can face external pressures from organized crime groups seeking to infiltrate or undermine their operations; intimidation, threats, bribery and coercion by criminal elements can compromise the integrity of law enforcement personnel and institutions, leading to corruption	Prenzler, 2009; UNODC, 2003

## 2.4. Effects and impacts of corruption in law enforcement

Corruption generally undermines the integrity of law enforcement agencies, eroding public confidence and trust in them and thereby reducing their effectiveness, thus compromising essential functions of the justice system, obstructing efforts to combat crime and ultimately undermining the rule of law. Yet these general effects entail numerous interrelated specific effects and impacts that vary in character and significance with prevailing social, political, institutional and economic conditions (Rose-Ackerman, 2016; Heywood, 2018). Significant common effects and impacts of corruption are outlined below.

The literature addressing corruption in law enforcement describes different effects of varying scopes. In combining knowledge from various sources, the descriptions below distinguish between first-order effects that typically occur in the organisational scope of law enforcement agencies and second-order impacts that occur at a wider societal level.



**Table 4. Corruption effects and impacts**

Effects and impacts	Description	Reference
<b>Organisational effects</b>		
Erosion of public trust	Corruption undermines public trust, with implications for law enforcement effectiveness, as citizens become less likely to seek help, report crimes or cooperate with investigations; corruption thus impairs credibility and effectiveness and leads to a loss of public trust in the institution	Williams, 2002; Goldstein, 1975; Punch, 2000; Kumssa, 2015; Prenzler, 2009
Erosion of organisational morale	Corruption undermines organisational morale and motivation, thus hindering the recruitment and retention of qualified personnel and ultimately undermining organisational effectiveness; corrupt recruitment practices can lead to inappropriate personnel lacking professional commitment and diligence in the delivery of effective services	Goldstein, 1975; Kumssa, 2015
Increased cost of law enforcement	Corruption can entail misallocation and mismanagement of resources meant for crime prevention, including equipment, training and infrastructure; these resources may be embezzled or diverted for personal gain, thus reducing the effectiveness and efficiency of law enforcement agencies	Prenzler, 2009; Newburn, 1999
Decreased effectiveness of law enforcement	Increasing crime rates have been directly correlated with levels of corruption and are a measurable impact of reduced law enforcement effectiveness, attributed to the increased reluctance of citizens to report crime in the context of corruption; corruption thus enables criminal activities to flourish, contributing to an environment of increased crime	Andvig and Fjeldstad, 2008; Azfar and Gurgur, 2005; Prenzler, 2009; Kumssa, 2015
<b>Societal impacts</b>		
Weakened rule of law	Corruption subverts the fairness and integrity of investigations, prosecutions and court proceedings, thus undermining fundamental principles of delivery of justice; corruption usually entails the selective enforcement of laws and selective protection of criminals, which directly undermines the principle of equality before the law, contributes to cultures of impunity and thus weakens the rule of law	Newham and Faull, 2011; Gutierrez-Garcia and Rodriguez, 2016; Prenzler, 2009
Decreased economic development	Corruption hampers economic development by discouraging domestic and foreign investments, undermining business confidence and impeding markets; corruption can reduce investment by increasing uncertainty and costs for foreign and local companies, thus adversely affecting employment opportunities and increasing poverty	Newham and Faull, 2011
Decreased social cohesion	Corruption in law enforcement can exacerbate social inequalities by disproportionately affecting marginalized and vulnerable populations, including refugees, minorities and migrant workers; in corrupt societies with low government effectiveness, females and poor households are more likely to suffer from crime and police corruption	Azfar and Gurgur, 2005
Decreased respect for human rights	Corruption and the reduced rule of law that it entails can lead to human rights abuses, including the use of excessive force, torture or other forms of mistreatment; in the context of impunity fostered by corruption, law enforcement personnel are more likely to abuse power by violating the rights and dignity of individuals	Kumssa, 2015; DCAF, 2019a

## 2.5. Approaches and interventions addressing corruption and integrity-building in law enforcement

Considering the complexity and contextual character of the causes and drivers behind corruption in law enforcement and its effects and impacts at organisational and societal levels, no standard approach nor a standard set of approaches is appropriate to address corruption in all situations (e.g. Carvajal, 1999). There is no one-size-fits-all approach to addressing corruption in law enforcement – the most appropriate approaches in any specific situation or country depend on prevailing and historical social, cultural, institutional and economic conditions (McCusker, 2006). Nevertheless, a range of common approaches and interventions emerge from the literature that can serve as guides for policy development and programmatic interventions.

While approaches to addressing corruption in this area typically focus on specific law enforcement institutions, the recognition of linkages between these institutions and the societies they serve is fundamental to designing appropriate and effective policy and programme approaches (e.g. Punch, 2000). Prevailing cultural behaviour within law enforcement institutions is related to broader societal behaviour and conditions (Botero *et al.*, 2015; De Graaf, 2007; Dimant *et al.*, 2013; Dutta *et al.*, 2011). Thus anti-corruption approaches and strategies that are effective in the long term require parallel long-term changes in broader normative cultural behaviour (McCusker, 2006). Notwithstanding the scope of SSG/R policies and interventions that focus upon security and law enforcement institutions and the range of stakeholders therein, the definition and design of approaches to address corruption in this field should consider broader socio-cultural norms and expectations of the communities that law enforcement organisations serve (Gutierrez-Garcia and Rodríguez, 2016). In addition, approaches addressing corruption in law enforcement should consider broader policies and strategies involving public service reform to optimize long-term impacts.

The connection between *corruption control* and *building integrity* is another fundamental link underpinning policy and programme approaches to tackling corruption in law enforcement. The concept of integrity encompasses characteristics of incorruptibility, honesty, impartiality and accountability (Cardona, 2015). An organisation has integrity if it operates with appropriate accountability, competence, efficiency and honesty, while an individual has integrity if he/she works competently, honestly and effectively (Priajina *et al.*, 2016). Thus integrity is generally positioned as the positive counterpart to corruption – while counter-corruption, anti-corruption or corruption control convey a negative approach, building integrity suggests a more positive approach. Yet both are essentially similar in form and intent. Indeed, notwithstanding that the concept of integrity extends beyond corruption (Huberts, 2018), integrity-building and corruption control are typically viewed as two sides of the same coin within SSG/R policy and programming (e.g. Klockars *et al.*, 2004). In this context, *building integrity* emphasizes strengthening positive elements, while controlling corruption emphasizes corrective dimensions (Priajina *et al.*, 2016).

The broader scope combining corruption control and integrity-building includes SSG/R approaches to addressing corruption in law enforcement that may be grouped into two general categories: proactive and preventive. Preventive approaches seek preemptively to minimize incentives and opportunities for misconduct and corruption. They include initiatives to enhance professional standards and build cultures of ethical behaviour within law enforcement organisations (Chêne, 2010), for example through ethics training and the definition and dissemination of codes of conduct. Preventive approaches also include initiatives to reform or improve administrative systems regulating areas such as recruitment, financial management and HRM. Proactive approaches to addressing corruption control and integrity-building seek to increase the risks and costs of engaging in corrupt and unethical practices (Chêne, 2010). They include initiatives to enhance the detection of corruption, such as strengthening systems for oversight, reporting and investigating corruption. Proactive approaches also include initiatives to enhance the enforcement of rules and sanctions for corrupt behaviour, and disciplinary procedures when misconduct is substantiated.

This general framework of proactive and preventive approaches to corruption control and integrity-building includes a wide range of potential interventions addressing the various causes, drivers, effects and impacts of corruption in law enforcement. Notwithstanding that specific SSG/R policies and initiatives should address context-specific objectives, priorities and conditions, common and important interventions drawn from the policy and academic literature are outlined in Table 5. This schema of interventions is also presented in Figure 1. Five of these interventions are then described in greater detail. In Section 3, five projects are reviewed as examples of the application of these interventions.

**Table 5. Corruption interventions**

Interventions	Description	Reference
Assessing corruption vulnerabilities and risks	The complex and context-specific character of corruption in law enforcement requires that policy formulation and programme design be preceded by risk analyses identifying specific organisational vulnerabilities and suggesting appropriate intervention measures	DCAF, 2009a, 2019a
Strengthening codes of ethics and conduct	Codes of conduct define appropriate behaviour and provide a framework for organisational culture; organisation-specific codes of conduct should reflect specific priorities in accordance with the international standards of SSG	DCAF, 2009b, 2019a; Cardona, 2019
Strengthening legal and regulatory frameworks	Legal and regulatory frameworks for corruption and integrity-building in law enforcement include laws circumscribing the mandate and jurisdiction of law enforcement organisations and the obligations and limitations of actions and behaviour of the officials employed therein; this includes laws and regulations regarding employment, ethics and conduct, reporting and whistleblower protection	DCAF, 2019a
Strengthening internal investigation	Internal investigation of the behaviour of law enforcement officials is typically the mandate of internal affairs units, which play a critical role in maintaining integrity and controlling corruption within the organisation; strengthening internal investigation includes clarifying mandates and powers of investigating units and providing sufficient resources	Bayley and Perito, 2011; Bajramspahic, 2015; UNODC, 2011

Interventions	Description	Reference
Strengthening reporting and complaint mechanisms	Reporting and complaint mechanisms are processes and systems that enable civilians and law enforcement personnel to report misconduct, corruption or unethical behaviour of law enforcement officials; strengthening these mechanisms includes ensuring they are well defined and understood internally and externally, and that they can assure confidentiality and support subsequent investigations	Bayley and Perito, 2011; DCAF, 2019a; UNODC, 2011
Strengthening financial management and oversight	Financial oversight and management mechanisms refer to the processes, policies, and systems that ensure responsible and transparent financial organisational practices. This includes financial planning, internal controls, procurement and contract management, asset management, reporting, auditing, and external oversight.	Pope, 2000; DCAF, 2009b, 2012; Masson <i>et al.</i> , 2011; UNODC, 2011
Strengthening human resource management	HRM refers to the practices, policies and procedures used to employ and manage personnel, including systems and procedures of recruitment, training, promotion and career development, performance management, disciplinary procedures, supervision and oversight	DCAF, 2009a, 2019a; Chêne, 2011; UNODC, 2011
Enhancing community engagement	Enhancing community engagement in corruption control involves actively involving community members in efforts to prevent, detect and address corruption within these institutions; it goes beyond traditional top-down approaches to policing and involves collaboration, communication and partnership between law enforcement agencies and the communities they serve	UNODC, 2011; DCAF, 2019a
Enhancing regional dialogue and engagement	Regional dialogue and engagement are collaborative efforts and strategies across multiple police organisations within a specific region or geographic area; enhancement of dialogue and engagement includes improved information-sharing, undertaking joint initiatives, transnational training and capacity-building, and standardization and harmonization of systems	OSCE, 2016

**Figure 1. Corruption and integrity-building interventions**



### 2.5.1. Assessing corruption vulnerabilities and risk

Addressing corruption and promoting integrity within law enforcement agencies requires an evidence-based approach that considers the complexity and context-specific nature of corruption. Corruption arises from diverse causes and drivers, shaped by organisational characteristics, institutional structures and broader social, cultural and economic factors. Importantly, addressing corruption effectively also requires an intersectional lens that considers how overlapping factors, such as gender, ethnicity, socioeconomic status and power dynamics, can influence both vulnerabilities to corruption and the impacts of anti-corruption efforts. Hence strategies to combat corruption must be tailored to address specific types of corruption and their underlying drivers within the unique context of each organisation.

Additionally, political economy plays a critical role in understanding the broader dynamics that influence corruption. Political and economic factors such as the concentration of power, resource distribution, and entrenched patronage networks can create fertile ground for corrupt practices. Political economy analysis helps identify how state-society relations, the nature of political institutions, and economic inequalities intersect to shape the incentives for corruption within law enforcement agencies. Therefore, addressing corruption must take into account not only organisational factors but also the external political and economic environment in which these institutions operate (Dewey *et al.*, 2021).

Corruption risk assessment is a systematic approach used to understand and address specific vulnerabilities to corruption within organisations, particularly in law enforcement. It evaluates risks and develops strategies to promote integrity and prevent corrupt practices (DCAF, 2009b). Unlike reactive responses to corruption, risk assessments take a proactive stance by identifying vulnerabilities and implementing targeted measures to mitigate them (UNODC, 2020).

A key distinction in corruption risk assessment is between actual corruption, which refers to offences that have already occurred, and corruption risk, which encompasses internal or external vulnerabilities that could lead to corruption (EU, 2019). Responses to corruption are reactive while addressing corruption risks is a preventive approach. Objective risks, such as weak institutions and ineffective regulations, differ from subjective risks, like societal tolerance of corruption, highlighting the need for tailored, context-specific strategies (McDevitt *et al.*, 2011) which integrate an awareness of systemic inequalities, power imbalances and socio-cultural norms that shape corruption dynamics and their impact on different groups.

By focusing on these distinctions, corruption risk assessments offer a structured framework to reduce vulnerabilities and build institutional integrity. A corruption risk assessment provides insights into specific corruption risks faced by an organisation, serving as a foundation for evidence-based anti-corruption strategies. This process identifies realistic scenarios prone to corruption, prioritizes them and devises tailored interventions. It also symbolizes organisational commitment to ethical behaviour and professional standards, fostering a culture of transparency.

Frameworks for corruption risk assessment vary to suit organisational contexts but typically include six steps (UNODC, 2020).

01

**Risk identification.** This initial step involves systematically identifying and documenting corruption risks through the collection and analysis of data from organisational reports, interviews, surveys and focus groups. These efforts address all aspects of an organisation's structure and operations.

02

**Risk evaluation.** Identified risks are assessed for their likelihood and potential impact. This step incorporates both quantitative and qualitative methods, evaluating factors such as legal and regulatory frameworks, internal reporting systems, HRM and financial management practices, organisational culture and leadership dynamics.

03

**Assessment of causes and drivers.** Internal and external factors contributing to corruption risks are analysed. These factors include weak governance, inadequate institutional development, resource limitations and cultural or societal influences. This step benefits from an intersectional analysis that identifies how systemic inequalities may exacerbate vulnerabilities.

04

**Risk prioritisation.** Risks are ranked based on their significance, taking into account organisational priorities, reform potential and broader institutional considerations.

05

**Development of mitigation initiatives.** Tailored anti-corruption measures, policies and procedures are designed to address identified risks. These initiatives include mechanisms for monitoring and evaluation to ensure progress is measured and sustained.

06

**Documentation and reporting.** Findings and recommendations are clearly recorded and published to support transparency, accountability and stakeholder confidence. Reporting processes should highlight diverse perspectives to ensure that anti-corruption efforts are equitable and address intersectional dynamics.

The effectiveness of corruption risk assessments depends on strong leadership commitment, organisational support and access to data and personnel. Additionally, sufficient resources, expertise and time are crucial for implementing mitigation measures. Through these steps, corruption risk assessment becomes a critical tool for reducing vulnerabilities and fostering accountability in law enforcement institutions.

By focusing on organisational vulnerabilities and implementing targeted interventions, corruption risk assessments strengthen institutional integrity and provide a robust framework for ongoing anti-corruption efforts.

## 2.5.2. Strengthening codes of ethics and conduct

Codes of ethics and conduct and mission or values statements form the foundation of organisational culture within law enforcement agencies. These declarations may be combined or separately ratified documents depending on the organisation. Mission and value statements provide organisational orientation, defining the agency's purpose and guiding principles, and often emphasizing public service, integrity, honesty and professionalism (IACP, 2019). Codes of ethics and conduct focus on individual behaviour, promoting professionalism and ethical standards (DCAF, 2019a).

Codes of ethics and conduct provide a framework for promoting integrity, professionalism and ethical behaviour within law enforcement organisations (UNOCHR, 1979). When addressed separately, codes of ethics are more conceptual, defining guiding principles of ethical behaviour (DCAF, 2019a). In comparison, codes of conduct outline more concretely proscribed and prescribed behaviour; they do not provide an exhaustive set of requirements, limitations and prohibitions, but rather provide general guidance about what is acceptable and unacceptable behaviour in particularly sensitive or problematic matters (IACP, 2019). This includes – but is not limited to – requirements and prohibitions about human rights, use of force, confidentiality, duty of care and corruption (UNOCHR, 1979). Together, codes of ethics and conduct are intended to ensure organisational culture and conduct that reflect high ethical standards and enable effective law enforcement under the organisation's mission and values.

Institutionalization involves widespread dissemination, acceptance and integration of these codes within a law enforcement organisation (DCAF, 2019a). Transparent drafting processes with internal and external consultations enhance buy-in from personnel and communities. Dissemination strategies should ensure consistent messaging and training for both recruits and experienced personnel, embedding the codes within the organisational culture. Appointing an ethics officer or equivalent role supports ongoing monitoring, training and ethical conduct (DCAF, 2019a).

SSG/R initiatives to enhance codes of ethics and conduct often involve two components: defining appropriate codes and establishing systems of internal control, and ensuring the codes are widely understood and accepted. Transparent drafting, consultation processes and strategic dissemination contribute to internalizing the codes. Prolonged messaging and training initiatives ensure these codes become central to organisational practices, promoting integrity and accountability within law enforcement agencies.

## 2.5.3. Strengthening internal investigation

SSG/R interventions to strengthen internal investigations in law enforcement generally aim to improve capacities for internal investigation as a deterrent to corruption. Internal investigations in law enforcement agencies are an element of internal control. The broader ambit of internal control includes a range of measures that aim to ensure the organisation operates as intended, i.e. in accordance with organisational objectives and values efficiently and effectively (DCAF, 2019a).

Internal control encompasses a range of mechanisms that operate at the level of the individual (e.g. rules, training), the process (e.g. systems and procedures for corruption detection and prevention) and the organisation (e.g. codes of ethics and conduct).

Internal investigation is an element of internal control operating with both processes and personnel. It is an oversight mechanism intended to detect and prosecute incidents of corruption, thereby supporting its prevention (through disincentives) and improving organisational integrity and transparency. Internal investigation generally comprises three components: reporting and complaint handling; investigation processes; and disciplinary and legal action.

01

**Reporting and complaint handling.** Complaints can arise internally or externally, necessitating mechanisms to protect complainants, such as whistleblower protections that ensure confidentiality and prevent retaliation. All complaints should be recorded and investigated following standard procedures to avoid discretionary disregard (UNODC, 2003, 2011). Clear protocols should keep complainants and defendants informed and allow for appeals.

02

**Investigation processes.** Investigations must be impartial and thorough, adhering to established protocols. Procedures should distinguish between criminal and administrative cases, guided by organisational codes and legal frameworks. Preventive measures, such as barring retirement or leave to evade investigation, are essential (UNODC, 2011).

03

**Disciplinary and legal action.** Decisions based on investigative findings are typically made by senior management and may include warnings, suspensions, terminations or prosecutions. Transparency in these actions fosters public trust and strengthens organisational integrity.

Internal investigations are often conducted by specialized units (e.g. internal affairs units). Such units require clear mandates outlining their authority, autonomy and resources, including skilled personnel. Beyond incident investigations, these units monitor compliance, audit anti-corruption measures and provide training on ethical conduct and reporting mechanisms (DCAF, 2019b).

Strengthening internal investigations involves developing robust frameworks for complaints and investigations, ensuring adequate resources for impartial and effective action and creating strong whistleblower protection protocols. Organisational protocols should be supported by a reliable legal framework, and internal investigation units must have clear mandates and sufficient resources to function independently. Training and capacity-building for investigators are also essential to ensure effective handling of corruption-related matters within law enforcement agencies.



## 2.5.4. Strengthening human resource management

Strengthening HRM in law enforcement agencies is a cornerstone of corruption control and integrity-building. HRM encompasses a wide range of policies and systems, including recruitment, training, professional development, performance appraisal, promotion, remuneration, conduct and discipline, and complaints and dispute resolution mechanisms. These components collectively ensure the recruitment and retention of skilled personnel while fostering an ethical organisational culture. In the public sector, HRM is guided by principles such as merit-based recruitment and promotion, tenure security and standardized pay frameworks, which are essential for attracting and retaining competent staff (Chêne, 2015; Punch, 2009).

Corruption in HRM often arises from unchecked discretionary power, leading to practices like nepotism, favouritism and abuse of authority in areas like recruitment and promotion. Strengthening HRM addresses these risks by ensuring transparent recruitment procedures, equitable criteria and merit-based promotion systems. Recruitment policies should include background checks and ethics assessments to select individuals with high ethical standards and integrity (UNODC, 2011). These measures not only preclude unethical practices but also contribute to building a professional and accountable organisational culture. Promoting diversity and inclusion in recruitment further ensures law enforcement agencies reflect the societies they serve, fostering trust and inclusivity (DCAF, 2015a, 2015b).

Training and professional development are integral to building capacity within law enforcement agencies. Policies in this area should provide opportunities for skill enhancement, career growth and specialization to retain talented personnel and discourage corrupt practices. Ethics training, mentoring and coaching programmes can reinforce professional standards and foster long-term integrity. Personnel with clear pathways for career progression and professional development are more likely to adhere to ethical norms and operate within the boundaries of the law (DCAF, 2019a, 2019b).

Performance appraisal and promotion systems also play a critical role in reinforcing ethical behaviour. These systems should evaluate personnel based on both job performance and adherence to ethical standards, ensuring that promotions are fair, transparent and merit-based (OSCE, 2008). Regular appraisals, clear eligibility criteria and predefined benchmarks help foster accountability and provide opportunities for feedback and improvement (UNODC, 2011).

Remuneration policies are another key aspect of HRM. Transparent salary structures and competitive compensation aligned with qualifications and responsibilities help prevent undue financial pressure, reducing incentives for corruption. While salary increases alone do not guarantee a reduction in corruption, appropriate remuneration supports the retention of qualified personnel and fosters organisational integrity (DCAF, 2015a, 2015b).

Codes of conduct and disciplinary procedures further strengthen HRM. Clear ethical standards and well-communicated rules of conduct ensure personnel understand the behavioural

expectations within the organisation. Additionally, mechanisms for complaints, whistleblowing and dispute resolution provide safeguards for addressing misconduct confidentially while protecting whistleblowers from retaliation. These mechanisms are critical for promoting a culture of accountability and transparency (UNODC, 2011). A robust HRM framework within law enforcement agencies supports the recruitment and retention of competent personnel while fostering an ethical culture that minimizes corruption risks. Strengthened policies on recruitment, training, appraisals, remuneration and discipline ensure that law enforcement agencies are better equipped to serve their communities with integrity, accountability and professionalism. These measures contribute significantly to the broader objectives of SSG/R, helping build trust and ensuring effective service delivery.

### **2.5.5. Strengthening financial oversight and management**

Strengthening financial oversight and management to address corruption in law enforcement agencies is rooted in public financial management (PFM) principles, ensuring public expenditure is planned, executed and scrutinized effectively. In the security sector, PFM encompasses oversight and management measures, including auditing, accounting and asset management, all aimed at promoting transparency and accountability. These processes help ensure financial resources allocated to public security are used effectively, aligning with the concept of value for money, which emphasizes efficiency and resource management in delivering public services (Kristensen *et al.*, 2019; DCAF, 2019a; Harborne *et al.*, 2017).

Financial oversight involves both internal and external mechanisms. Internal oversight includes professionally independent units within law enforcement agencies conducting internal audits, while external oversight engages actors like ministries, parliamentary committees and supreme audit institutions. Civil society organisations and media can also play informal oversight roles, fostering accountability within broader governance and security frameworks (Masson *et al.*, 2011; Pope, 2000). Financial management, comprising budgeting, accounting and asset management, aims to safeguard resources, ensure reliable financial information and enhance operational efficiency (DCAF, 2019a). Strengthened financial oversight and management mitigate corruption by reducing discretionary power over resources, deterring fraud through increased accountability and providing mechanisms for detecting and addressing misuse of public funds (Pope, 2000).

Three main approaches are central to strengthening financial oversight and management in law enforcement agencies. First, establishing enabling legislative and institutional frameworks integrates law enforcement into broader PFM systems through legal reviews and legislative support. Second, developing internal processes ensures the adoption of PFM standards in specific areas like accounting and asset management. Third, capacity-building initiatives target both internal law enforcement personnel and external stakeholders, such as CSOs and the public, to promote adherence to good practices and enhance oversight effectiveness. These combined measures seek to reduce corruption opportunities while fostering transparency, accountability and trust within law enforcement institutions.

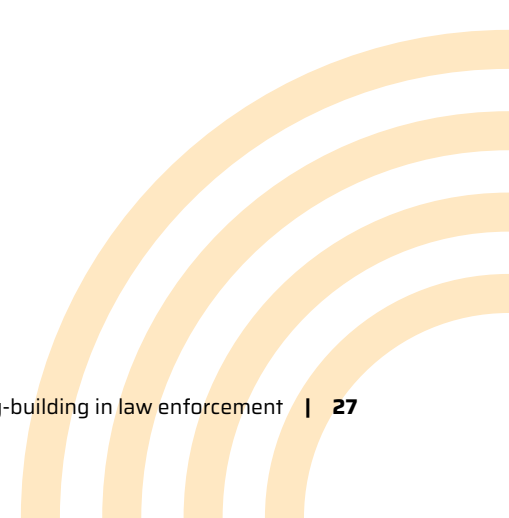


### **3. Practical experience of interventions addressing corruption and integrity-building in law enforcement**

Building on insights from academic and policy literature, the previous section outlined key strategies and interventions essential for combating corruption and fostering integrity in law enforcement agencies. This section applies that framework to analyse five SSG/R projects, using the lens of five interventions to identify lessons learned. By grounding the analysis in these structured interventions, this approach allows for a systematic comparison across diverse contexts and facilitates a deeper understanding of how theory aligns with practice.

The framework of five interventions was chosen because it provides a comprehensive structure for assessing various dimensions of corruption control in law enforcement: strengthening internal investigations; improving human resource management; enhancing financial oversight and management; strengthening external oversight; and promoting community engagement. These categories address interconnected mechanisms critical for fostering transparency, accountability and integrity in law enforcement agencies.

The five selected SSG/R projects represent diverse geographic regions, governance environments and conditions, enabling a holistic analysis of practices and outcomes. Some projects address multiple interventions and are analysed under more than one intervention, illustrating their cross-cutting impact. To facilitate clarity, Table 6 provides an overview of the five projects and programmes, their geographic focus and the dimensions of interventions analysed.



**Table 6. Overview of selected projects and programmes**

Project/Programme	Region	Intervention	Funding/International implementing partners
Police Cooperation and Integrity-Building	Western Balkans (2016–2022)	Assessing corruption vulnerabilities Internal investigations	DCAF and the Norwegian Ministry of Foreign Affairs
UNDP-PAPP/EUPOL-COPPS Programme	Palestinian Territories (2012–2014)	Strengthening codes of ethics and conduct	The joint programme of the UNDP Programme of Assistance to the Palestinian People (UNDP-PAPP) and the European Union Coordinating Office for Palestinian Police Support (EUPOL-COPPS) with the support of governments of Denmark, Sweden and the Netherlands
Police Reform Programme	Bangladesh (2009–2015)	Strengthening HRM	UNDP and the UK Department for International Development
Law and Order Trust Fund for Afghanistan	Afghanistan (2015–2021)	Strengthening financial oversight and management	UNDP
Security Governance in the Sahel project under the Regional Programme for Peace and Stability in the Sahel (PSP-2)	Sahel (2019–2023)	Financial oversight and management	DCAF, Denmark and Norway

### 3.1. Police Cooperation and Integrity-Building Programme, Western Balkans

(Intervention: Assessing corruption vulnerabilities and risk)

#### 3.1.1. Project overview

The regional Police Cooperation and Integrity-Building in the Western Balkans (PCIB) project was undertaken by DCAF with support from the Norwegian Ministry of Foreign Affairs from 2016 to 2022 in Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia. The PCIB was framed by the main objective of enhancing regional cooperation and strengthening good governance, rule of law and key capacities to tackle national and transnational organized crime, including integrity-building and fighting against corruption (DCAF and Norway MFA, 2016). From this main objective, two project outcomes were intended: to support national law enforcement agencies in building strategic and operational capacities to prevent, detect and fight cross-border organized crime at the regional level; and to assist in the implementation of measures to build or sustain police integrity, including strengthening the fight against corruption in the beneficiary countries.

Activities and outputs related to the second intended outcome included supporting systematic corruption risk assessment and “developing, revising, implementing, and monitoring action plans to enhance organisational capacity to prevent, investigate, and address corruption” (DCAF and Norway MFA, 2016). This covered support for the development and use of strategic documents for building integrity, including integrity plans – “strategies that include an action plan and are widely accepted, particularly in the European context, as an effective strategic and operational measure for curbing corruption” (DCAF and Norway MFA, 2016).

Two activities addressed corruption risk assessment in the development or update of integrity plans in Albania, Serbia, Bosnia and Herzegovina, North Macedonia, Kosovo and Montenegro. Activities with the Albanian State Police – training, advice and mentoring sessions, including mentoring by experts from DCAF and the Kosovo Police – supported the development of a risk assessment strategy, collection of data to conduct a risk assessment and definition of measures to address corruption risks. These activities in turn supported drafting an integrity plan and an action plan, which were endorsed for implementation in 2020. Following dissemination of the integrity plan among regional directorates, the Albanian State Police revised the plan in 2022 to address shortcomings in the implementation and monitoring process it set out, highlighting the enhanced internal capacities for conducting corruption risk assessment and ascribing mitigating measures to those risks by identifying gaps in the specific provisions of the action plan (DCAF and Norway MFA, 2016).

Also in Albania, in response to work with the State Police, the Albanian Ministry of Interior requested similar support in the development of its organisational integrity plan. Training was provided on conducting risk assessments, defining risk probability and impact, identifying measures to address corruption risks, establishing indicators and targets related to risk mitigation strategies and drafting the integrity plan. Project experts then provided feedback to the Ministry of Interior on drafts of the risk matrix, action plan and integrity plan, leading to the successful finalization of an integrity plan and an action plan.

In Serbia, training, advice and mentoring sessions were provided to the Ministry of Interior to develop knowledge and skills related to integrity planning and management, specifically in conducting corruption risk assessments. Sessions addressed existing models of risk assessment, identifying and assessing corruption risks, preparing preventive measures and implementing and monitoring integrity plans.

To support the development of integrity plans in various countries, activities included training sessions on integrity planning and management (Bosnia and Herzegovina and North Macedonia), mentoring sessions on implementing and monitoring an integrity plan (Kosovo and North Macedonia) and providing expert advice on integrity planning strategies (Montenegro). Notably, assistance to North Macedonia’s Ministry of Interior and Police contributed to drafting an integrity plan. This plan included classified information about the Ministry’s structure, which required declassification and ministerial approval before publication

Several observations emerge when considering these experiences in the PCIB project in relation to the generic theory of change for corruption risk assessment.

Firstly, while the availability of sufficient local expertise to undertake corruption risk assessments is generally assumed, experience in Albania, Serbia, Bosnia and Herzegovina, North Macedonia, Kosovo and Montenegro highlights that such expertise cannot be presumed in the context of SSG/R initiatives. This suggests that training, mentoring and advice to build capacity in corruption risk assessment should typically be incorporated in the early stages of SSG/R initiatives addressing this assessment and subsequent strategies and plans to address corruption and integrity-building in law enforcement agencies.

Secondly, dialogue between beneficiary countries – particularly mentoring support and dialogue between the Kosovo Police and Albanian State Police – highlighted the potential for regional dialogue and cooperation regarding corruption risk assessment, strategy and planning, which can support improved and more relevant outcomes considering social and cultural commonalities that relate to corruption, alongside differing experiences and capacities in addressing it.

Thirdly, while international and regional support can be important in effectively assessing corruption risks and developing appropriate mitigation approaches, the resulting strategies and plans must reflect specific local structures and conditions, which may include addressing sensitive or classified information. Experience in North Macedonia highlighted both how corruption risk assessment might address classified information and how leadership can nevertheless support the successful undertaking of corruption risk assessment and the development of integrity and action plans.

### **3.1.2. Lessons for assessing corruption vulnerabilities and risk**

Table 7 distils lessons for policymaking at the national level and for project planning and implementation at the level of the supporting organisation in relation to assessing risks and vulnerabilities. These lessons consider the general conceptual framework of corruption in law enforcement, the specific concepts regarding the assessment of risks and vulnerabilities, and the practical experience exemplified in the PCIB project.

**Table 7. Lessons for assessment of vulnerabilities and risk**

For policy	For projects
Policies should mandate undertaking periodic updates of corruption risk assessments for all law enforcement agencies, including assessment methodologies and monitoring and reporting requirements	Sufficient support and commitment from senior management of law enforcement agencies is a necessary precursor for organisational corruption risk assessment and should be ensured at the beginning of project planning efforts
Corruption risk assessment findings should be integrated into national or organisational anti-corruption strategies, such that findings inform the development and adjustment of anti-corruption programming	Sufficient expertise for corruption risk assessment should be planned, considering the specific assessment methodologies to be employed; sufficient internal capacities should be developed to address sensitive or confidential information
Policies should include independent oversight for review and validation of corruption risk assessments to enhance transparency and credibility	Data collection for corruption risk assessments should rely on a variety of sources and integrate input from a variety of stakeholders, including law enforcement personnel, oversight bodies and representatives of communities and civil society
	Feedback mechanisms, such as internal consultations and reviews during the development of risk assessments, should be integrated with policies and practices addressing corruption risk assessment to enable input from stakeholders, ensuring that diverse perspectives are considered and assessments are perceived as transparent and inclusive

## 3.2. UNDP-PAPP/EUPOL-COPPS Programme, Palestinian Territories

(Intervention: Strengthening codes of ethics and conduct)

### 3.2.1. Project overview

The joint programme of the UNDP Programme of Assistance to the Palestinian People (UNDP-PAPP) and the European Union Coordinating Office for Palestinian Police Support (EUPOL-COPPS) was undertaken in the Palestinian Territories from 2011 to 2013 with support from the governments of Denmark, Sweden and the Netherlands. The principal aim of the programme was to promote democratic governance based on the rule of law and respect for human rights. To this end, the programme sought three outcomes: to increase knowledge within the Palestinian Civil Police (PCP) about international best practices and standards for police accountability and develop mechanisms of internal accountability; to enhance anti-corruption efforts of the Palestinian Anti-Corruption Commission and Corruption Crimes Court; and to strengthen civil society to promote civilian oversight.

Development of a new PCP code of conduct was undertaken by UNDP-PAPP/EUPOL-COPPS as a contribution to outcome 1 – to increase knowledge within the PCP about international best practices and standards for police accountability and develop mechanisms of internal accountability. The development of the code was influenced by several characteristics and internal conditions of the PCP. Firstly, internal PCP conditions had a “paramilitary” culture of discipline that focused on breaches of conduct (e.g. falling asleep at one’s post, losing a weapon) that did not address civilian interactions. Secondly, despite receiving significant numbers of complaints about police behaviour (e.g. 364 complaints in 2013, mostly related to arbitrary arrest, protracted detention and ill-treatment –Independent Commission in Human Rights, cited in Langan, 2014), reporting of complaints remained *ad hoc*, with three internal accountability bodies – the Inspector General’s Office, the Bureau for Grievances and Human Rights and the Police Security and Disciplinary Department – having overlapping responsibilities that included maintenance of separate complaints systems by each unit (Langan, 2014). Thirdly, a narrow hierarchy meant that many procedural steps in the development of the code of conduct, such as engagement with CSOs, required direct approval of the chief of police.

The development of the new code of conduct was facilitated by UNDP-PAPP/EUPOL-COPPS experts and involved a consultative process that included PCP units and personnel as well as CSOs. Initial workshops with PCP personnel introduced comparative experiences in code of conduct development and relevant international standards, including the European Code of Conduct. A study visit by PCP leaders to Slovenia was organized by the Slovenian Police and Ministry of Foreign Affairs to observe the development of the code of conduct there. Extensive consultation (around 50–60 meetings) engaged PCP personnel and CSOs; this was notable, following the initial reluctance of the PCP to engage CSOs in the development of the code (Langan, 2014). These workshops and consultations also addressed the parallel development of a consolidated complaints system to support oversight and control in relation to the new code. However, coordination between the three internal accountability units within the PCP (the Internal Oversight and Inspection Unit, Professional Standards Unit and Complaints and Discipline Unit), delayed the development of the new complaints system, such that the new code of conduct was completed and published before the finalization of the new complaints system (Langan, 2014). Development of the new code of conduct also required negotiation between international standards and local norms of conduct, e.g. concerning the inclusion of a provision that would require approval of the chief of police for a policeman to marry a non-Arab woman (Langan, 2014).

The resulting Code of Conduct and Ethics of the Palestinian Police (State of Palestine, 2014) defines eight core values – honesty, integrity, professionalism, sympathy, transparency and accountability, justice and equality, respect, and quality and excellence – and elaborates eight principles.

1. Doctrine of police officers.
2. Maintenance of rights and freedoms.
3. The rule of law.
4. Standards for enforcing the law.
5. Gradual use of force.
6. Professional conduct.
7. Excellence in providing service.
8. Respect for the terms of the code.



Publication of the code was followed by widespread dissemination of printed copies throughout the PCP and the inclusion of related training within the police academy (Langan, 2014). However, these steps towards internalization of the code were not accompanied by amendments to legislation to create a legal basis for the new code of conduct (Langan, 2014).

Several observations emerge when considering these experiences in the UNDP-PAPP/EUPOL-COPPS joint programme in relation to the generic theory of change underpinning SSG/R initiatives to develop codes of conduct in law enforcement agencies.

First, in addition to training personnel following the development of a new code of conduct, training senior personnel on international standards and comparative experiences can facilitate the development process and support adherence to international standards. This is particularly important given that the development of a code of conduct inevitably entails negotiations between local socio-cultural norms and international standards. Peer-to-peer learning, as seen in the interaction between PCP leadership and the Slovenian Police, could greatly facilitate the use of international standards as a foundation for code of conduct development.

Secondly, considering the importance of stakeholder consultations during code development, the distinction between internal and external consultations may be helpful to add emphasis to each as an integral step. The reluctance of law enforcement personnel to engage external stakeholders in discussions about acceptable and unacceptable behaviour may be understandable, but the engagement of CSOs is crucial for the transparent development of credible codes of conduct. Leadership support may be critical in assuring this engagement.

Thirdly, the development of a code of conduct requires internal negotiations between units of a law enforcement agency. The experience with the PCP of multiple overlapping control units is perhaps not unique and may be anticipated in other initiatives to develop codes of ethics and conduct.

### **3.2.2. Lessons for strengthening codes of ethics and conduct**

Table 8 distils lessons for policymaking at the national level and for project planning and implementation at the level of the supporting organisation in relation to strengthening codes of ethics and conduct. These lessons consider the general conceptual framework of corruption in law enforcement, the specific concepts regarding the assessment of risks and vulnerabilities, and the practical experience exemplified in the UNDP-PAPP/EUPOL-COPPS joint programme.

**Table 8. Lessons for strengthening codes of ethics and conduct**

For policy	For projects
Policy and legislation should mandate the adoption of a code of ethics and conduct for all law enforcement agencies, which should be developed following national and international standards such as UN General Assembly Resolution 34/169	Projects developing or disseminating codes of ethics and conduct require substantial support from senior management, which should be ensured during project planning
Policies should mandate that codes of ethics and conduct are integrated into the recruitment and training of law enforcement personnel	Projects developing or disseminating codes of ethics and conduct should engage all stakeholders, including community and civil society representations while anticipating and accommodating sensitivities of personnel about external assessments of policing behaviour
Codes of ethics and conduct should incorporate effective whistleblower protections in accordance with broader legal frameworks, to provide appropriate confidentiality and protection to those reporting violations of the code	Dissemination and enforcement of codes of ethics and conduct can involve various units of a law enforcement organisation; activities when developing or disseminating codes should include mapping and engagement of all relevant units
Robust accountability mechanisms for monitoring and enforcing compliance with the code of conduct should be established; procedures for investigating alleged violations, imposing sanctions and remedying breaches of ethics must be implemented	Codes of ethics and conduct should reflect both international standards and local socio-cultural norms; planning of projects addressing the development and dissemination of codes should include staff with local experience
Cross-cutting	
Policies establishing codes of conduct and ethics and projects to develop and disseminate them should include a process for systematic periodic review, feedback and revision to address emerging challenges, changes in legislation and evolving societal standards	
Policies establishing codes of conduct and ethics and projects to develop and disseminate them should engage with the community and civil society to enhance transparency, build trust and ensure that ethical standards align with community expectations	

## 3.3. Police Cooperation and Integrity-Building Programme, Western Balkans

(Intervention: Strengthening internal investigation)

### 3.3.1. Project overview

As described earlier, the regional Police Cooperation and Integrity-Building in the Western Balkans (PCIB) project was undertaken by DCAF with support from the Norwegian Ministry of Foreign Affairs from 2016 to 2022 in Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia. The PCIB was framed by the main objective of enhancing regional cooperation and strengthening good governance, rule of law and key capacities to tackle national and transnational organized crime, including integrity-building and fighting against corruption (DCAF and Norway MFA, 2016). From this main objective, two project outcomes were intended: to support national law enforcement agencies in building strategic and operational capacities to prevent, detect and fight cross-border organized crime at the regional level; and to assist in the implementation of measures to build or sustain police integrity, including strengthening the fight against corruption in the beneficiary countries.

The second project outcome included an emphasis on strengthening the capacities of internal control and professional standards units, as defined in Output 2.3, “Enhanced operational capacity of the internal control and professional standards units to prevent, investigate and support the prosecution of corruption and other integrity violations committed by law enforcement agents” (DCAF and Norway MFA, 2016). This output, which relates directly to the strengthening of internal investigation, was supported by four planned activities: regional workshops, specialized training, expert advice and mentoring, and dissemination of DCAF knowledge products. Importantly, the impact of these activities on the output was to be measured by three indicators:

- updated knowledge and skills of internal control personnel to perform their duties related to preventing corruption and integrity violations more efficiently;
- increased capacity of staff to investigate and present evidence to prosecutors of corruption and integrity violations;
- increase in the quality of cases brought to prosecutors related to corruption within law enforcement agencies.

The PCIB’s final report in relation to internal control and internal investigations focuses on a series of regional workshops and specialized training sessions, delivered in an online format following COVID-related restrictions (DCAF, 2022a). The workshops engaged representatives from law enforcement agencies of each of the beneficiary countries in exchanges on various topics.

- Regional challenges and good practices regarding internal control and investigation.
- Corruption investigation procedures and case studies.
- Integrity-testing programme implementation and case studies.
- Internal control models and mechanisms for personnel security vetting and integrity testing.

Specialized training sessions for specific country law enforcement agencies addressed other topics.

- Security vetting (Serbia).
- Security vetting and integrity testing (Kosovo and North Macedonia).
- Corruption investigations (Kosovo).

In addition to these training and workshop-related outputs, the PCIB contributed to improvements in the legal framework for internal investigation in Montenegro, where revisions to the Law on Internal Affairs, *inter alia*, assigned specific responsibilities to an internal affairs unit for the prevention of corruption and improving the integrity of employees of the Ministry of Internal Affairs, including law enforcement personnel (DCAF, 2022a).

PCIB lessons-learned reports highlight the achievement of project outcomes, including the standardization of procedures for corruption control across countries of the Western Balkans following EU best practices (DCAF, 2022b). The reports also highlight the impact of COVID-19 in promoting the switch to online training and workshops, and the limitations that political tensions between beneficiary countries and political instability within these countries imposed on project implementation and the adoption and standardization of improved national internal control mechanisms.

This experience of the PCIB project suggests several important issues about strengthening internal investigations when considered in relation to the conceptual overview of the topic presented in Section 2.5.3. Firstly, the regional scope of the project and the emphasis on EU good practices highlight the importance of international standards regarding internal control in law enforcement; conversely, the emphasis of the PCIB on capacity-building through training, workshops, etc. suggests that active implementation of international standards is context-specific and subject to national institutional and political conditions. Secondly, PCIB activities supported several changes in internal control systems at the ministerial level, rather than at the level of individual law enforcement agencies. This highlights that systems of internal control in police forces must be aligned with broader public sector systems, thus reform of police internal investigation systems may require broader national institutional reform. Thirdly, although the PCIB project defined clear outcome indicators for enhancements in internal control – including increased capacity for internal investigation and increased quality of cases for prosecution of corruption – reporting on project outcomes addressed only the numbers of trainees and workshop participants. This gap between the reporting of outputs and actual project outcomes highlights broader difficulties in measuring the real impacts of SSG/R projects on improving capacities for corruption control in law enforcement agencies.

### 3.3.2. Lessons for strengthening internal investigation

Table 9 distils lessons for policymaking at the national level and for project planning and implementation at the level of the supporting organisation in relation to strengthening internal investigation. These lessons consider the general conceptual framework of corruption in law enforcement, the specific concepts regarding the assessment of risks and vulnerabilities, and the practical experience exemplified in the PCIB project.

**Table 9. Recommendations for strengthening internal investigation**

For policy	For projects
Policies should mandate the establishment of internal investigation units within all law enforcement agencies, including a clear definition of roles, responsibilities, authority and autonomy to investigate misconduct and corruption at all levels within an organisational hierarchy	Projects to develop systems and capacities for internal investigation should include comprehensive training for investigations personnel to equip them with the skills and knowledge necessary to conduct thorough and impartial investigations
Policies should be aligned with a legal framework that grants internal investigation units the authority to conduct investigations with clearly defined jurisdiction and powers	Development of internal investigation capacities should include standardized procedures and protocols for matters such as initiating investigations, conducting interviews and documenting findings, to ensure consistency and fairness in handling cases
Policies should establish mechanisms for collaboration between an internal investigations unit and external oversight bodies, such as ombudsperson offices or anti-corruption commissions, with clear delineations of roles, functions and powers	Projects to develop systems and capacities for internal investigation should have a monitoring and evaluation framework that includes indicators and project evaluation after a sufficiently long period to measure the actual impacts on organisational capacities for corruption control
Cross-cutting	
Policies and systems of internal control in law enforcement agencies must be aligned with broader public sector systems, thus reform of police internal investigation systems may require reforms to systems of public sector employment and corruption control	
Policies and projects intended to establish and develop capacities for internal investigation should include provision for external oversight of internal investigations – e.g. by external auditors or oversight bodies – to assess the performance of internal investigations and provide recommendations for improvement	
Whistleblower protection is an essential foundation for effective internal investigations; policies framing internal investigations should include provisions for whistleblower protection that are aligned with broader frameworks for such protection, while projects to develop internal systems and capacities for internal investigation should include procedures and awareness for whistleblower confidentiality and protection	

## 3.4. Police Reform Programme, Bangladesh

(Intervention: Strengthening human resource management)

### 3.4.1. Project overview

The Police Reform Programme – Phase 2 (PRP-2) was undertaken in Bangladesh from 2009 to 2015 with funding from UNDP and the UK Department for International Development. The project was implemented through UNDP’s National Execution modality, which involved programme teams embedded within the Bangladesh Police.

Phase 1 of the programme (PRP-1) ran from 2005 to 2009 using the same implementation arrangements. PRP-1 was underpinned by the general aim of building the capacity of the Bangladesh Police and supporting a national roll-out of community policing approaches. Achievements of PRP-1 included (UNDP, 2009):

- improvements in service delivery, *inter alia* through the introduction of new service delivery procedures and community policing approaches
- strengthened strategic planning, including development of the Strategic Plan 2008–2010
- strengthened oversight and reduced corruption through the establishment of an internal oversight unit
- enhanced capacity for evidence-based prosecutions through training on operational, management and leadership topics.

While HRM was not a specific outcome defined for PRP-1, several of the lessons learned from this initial phase highlighted the central importance of HRM in broader institutional capacity development and reform. Lessons learned included recognizing that although ownership of reform was high among senior management, this ownership did not extend to middle and lower ranks, thus limiting the effectiveness of reform efforts. The limited ownership was attributed to poor staff morale linked to poor wages and working conditions – HRM issues that were outside the scope of PRP-1 (UNDP, 2009). Hence another lesson learned in PRP-1 was the necessity for political will and legislative reform (including reform of the Police Act and the Police Regulations of Bengal) to address poor wages and working conditions effectively. PRP-1 also identified corruption as a significant impediment to police reform, which was again attributed in part to poor wages and poor working conditions (UNDP, 2009).

Building on lessons learned from PRP-1, the second phase of the programme was designed to support the Bangladesh Police “to improve safety, access to justice, and human rights, particularly for disadvantaged and vulnerable groups to contribute to an environment where economic growth and poverty reduction can occur” (UNDP, 2009). To this end, PRP-2 was structured around six outcomes.

1. Strategic direction and organisational reform.
2. Human resource management and training.
3. Investigations, operations and training.
4. Crime prevention and community policing.
5. Promoting gender-sensitive policing.
6. Information and communications technology.

**Outcome 2 (Human resource management and training) included three planned outputs:**

- establish a professional and dedicated human resource department
- update HRM policies, structures and procedures to promote transparent and merit-based recruitment
- improve capacity to deliver competency-based training comprehensively.

While addressing corruption control and integrity-building were not explicit objectives of PRP-2, relationships between HRM, salary and work conditions, staff morale and corruption are noted in the programme design and documentation.

A need for legislative reform – specifically, reform of the Police Act and Police Regulations of Bengal – is identified as a fundamental impediment to the programme’s impact on salary and working conditions, and hence on corruption and integrity-building. Despite programmatic support provided to the Bangladesh Police and Ministry of Home Affairs under Outcome 1 (Strategic direction and organisational reform), progress towards legislative reforms required to improve police salaries and working conditions was not achieved during the programme. The lack of political will on the topic is identified in project evaluations as an impediment to reforms; without this, progress towards improving staff salaries and working conditions, and thereby addressing root causes of corruption, was limited (UNDP, 2012b, 2015b).

The development of a personnel information management system (PIMS) was a significant programme output relating to both Outcome 2 (Human resource management and training) and Outcome 6 (Information and communications technology). Development and roll-out of the PIMS are identified as a major programme achievement, supporting improved recording of personnel qualifications and training, merit-based recruitment and promotion and, in turn, improved competence and integrity of personnel. The significant effort required to develop the PIMS covering a large number of Bangladesh Police personnel highlights the perceived importance of the system. However, the actual impacts of the new system on organisational integrity require a longer timeframe of assessment than that provided by the available programme evaluations.

Another significant achievement of PRP-2 was training, which reached around 37,600 officers (UNDP, 2015b). The improved quality of the training and its impacts on investigative procedures, better communications between the Bangladesh Police and village police, and general improvements in performance due to new skills were noted. Yet despite recognition in project documents of the significant problem of corruption within the Bangladesh Police, it

appears that training on professional ethics, corruption and integrity-building was not part of the broader PRP-2 training efforts. Considering the scale of training activities and the number of personnel reached, the failure to integrate training on ethics and professional integrity may have been a missed opportunity for PRP-2 and the Bangladesh Police.

### 3.4.2. Lessons for strengthening human resource management

Table 10 distils lessons for policymaking at the national level and for project planning and implementation at the level of the supporting organisation in relation to strengthening HRM. These lessons consider the general conceptual framework of corruption in law enforcement, the specific concepts regarding the assessment of risks and vulnerabilities, and the practical experience exemplified in the PRP-2 programme.

**Table 10. Lessons for strengthening human resource management**

For policy	For projects
HRM should include recruitment policies that ensure transparency and merit-based selection, with selection criteria emphasizing integrity and competence, and comprehensive background checks	Projects intended to strengthen HRM should develop systems and capacities for transparent and equitable recruitment and promotion in line with established policies, including training addressing ethical standards and techniques for staff assessment
HRM policies should include requirements for merit-based promotions and remuneration aligned with performance, skills and adherence to ethical standards; policies should define merit-based promotion criteria and support the continuous professional development of personnel	Personnel information systems are an important feature of effective HRM; projects intended to strengthen HRM should consider whether adequate information systems, including digital systems, are in place to monitor recruitment and professional development in a consistent, transparent and equitable manner
HRM policies should include mechanisms for reporting and investigating allegations of corruption or misconduct aligned with organisational policies and procedures, and broader legal frameworks for whistleblower protection	Projects to develop HRM systems and capacities should include a monitoring and evaluation framework that includes project evaluation after a sufficiently long period to measure the actual impacts on organisational capacities
<b>Cross-cutting</b>	
HRM policies and systems of law enforcement agencies must be aligned with broader legal and policy frameworks for public sector employment, including broader provisions for remuneration and working conditions; policies and projects intended to strengthen HRM in these agencies must be formulated with a clear understanding of broader legal and policy frameworks and the likelihood of broader reforms	
Policies and projects intended to strengthen HRM in law enforcement agencies should promote diversity and inclusion to enhance organisational resilience and reduce corruption risk by supporting an organisational culture that allows the voice and professional development of personnel and is representative of the communities they serve	
Reform of HRM policies and development of organisational systems for effective HRM require strong leadership support, including political support where reforms affecting remuneration and working conditions of personnel involve broader budgetary considerations	



## 3.5. Law and Order Trust Fund, Afghanistan

(Intervention: Strengthening financial oversight and management)

### 3.5.1. Project overview

The Law and Order Trust Fund, Afghanistan (LOTFA) was established in 2002 as a mechanism to provide payment, equipment and training to the Afghan National Police (ANP) and the General Directorate for Prisons and Detention Centres. LOTFA ran until 2021, administered by UNDP in cooperation with the Ministry of Internal Affairs (MOIA) and the Ministry of Finance. LOTFA went through numerous changes during its lifespan, including in 2012 the addition of capacity development objectives in areas such as payroll management and institutional reform, and in 2015 the division of operations into two projects: Support for Payroll Management (SPM), intended to develop policies and capacities for the MOIA to manage payroll functions, and MOIA and Police Development (MPD), intended to develop policy frameworks, business processes, management systems and training within the MOIA. Both the SPM and MPD projects addressed corruption within the ANP by strengthening financial management and oversight (FMO) arrangements. Corruption seen in the large number of “ghost officers” – unverified personnel on the ANP payroll – was addressed through various activities to strengthen payroll-related aspects of FMO.

The LOTFA-SPM project had five intended outputs.

**Output 1:** Policy development and implementation, involving reviews of financial and legal frameworks affecting salary entitlements and payments.

**Output 2:** Capacity-building for payroll management, involving the development of financial and HRM processes.

**Output 3:** Systems integration, involving the development of digital systems and databases to support salary payments.

**Output 4:** Systems infrastructure development, involving the development of physical infrastructure such as buildings and fibre networks for ANP payroll stations throughout the country.

**Output 5:** Funds transfer, involving actual payment of salaries to personnel of the ANP and General Directorate for Prisons and Detention Centres by digital systems. Total salary amounts of around US\$400 million per year were paid during the operation of LOTFA.

The LOTFA-MPD project had two components: institutional development and police professionalisation. Component 2 had three elements.

**Output 1:** MOIA capacity to lead and manage reform, including developing a *civilianisation* programme that increased financial administration capabilities by engaging civilian personnel for administrative functions.

**Output 2:** MOIA administrative and police support services, including financial and budget management training for police at national, provincial and district levels.

**Output 3:** MOIA internal control and accountability, including the development of policies and procedures for internal payroll and purchasing audits.

The annual progress reports for both projects highlighted their alignment with the UNDP Strategic Plan (UNDP, 2021). Specifically, project documents emphasized adherence to the plan's Outcome 3: "States have strengthened institutions to progressively deliver universal access to basic services, including the rule of law (justice and security), health, education, water, sanitation, electricity, and transport." The reports also noted the Central Prisons Department aligned with the plan's Outcome 2: "Increased trust in and access to fair, effective, and accountable rule of law services in accordance with international human rights standards and the government's legal obligations."

While certain outcomes, such as the successful completion of the strategic planning and management, monitoring and policy development, were achieved, programme evaluations identified significant gaps in integrating and operationalising the newly developed Financial Management Office policies, procedures and capacities within the MOIA and ANP. Specifically, FMO-related activities yielded limited impact due to systemic constraints, including high turnover among senior MOIA staff and insufficient technical expertise among lower-level staff to manage and sustain digital systems (UNDP, 2018a, 2018b, 2022).

These capacity limitations significantly hampered the institutionalization of reforms and restricted the effective operationalization of the Financial Management Office. The ultimate collapse of the Afghan government in August 2021 and the takeover by the Taliban further compounded these challenges, leading to the cessation of LOTFA.

This analysis highlights the dual nature of the programme's outcomes: while certain deliverables were achieved in line with project objectives, systemic issues and contextual challenges hindered the broader institutional integration and sustainability of key reforms

Despite the premature closure of LOTFA, the design, implementation and outputs of the SPM and MPD projects highlight several important issues in relation to strengthening FMO as an approach to addressing corruption and integrity-building in law enforcement.

Firstly, the design and implementation of LOTFA projects highlighted linkages between corruption, payrolls and FMO. Large numbers of police personnel mean that payroll is typically the largest expenditure of law enforcement agencies and an important focus of strengthening FMO to address corruption. In particular, the potential for unverified “ghost officers” as a common form of corruption underscores the need for robust financial management and HRM as interconnected approaches to addressing corruption in law enforcement. An effective payment system to counter such corruption would include biometric verification of personnel to ensure that only verified officers receive salaries. Integrating this with automated payroll systems linked to a centralized and regularly updated personnel database can further reduce the risk of fraudulent payments. Additionally, periodic audits and cross-checks between payroll and active duty rosters can help detect and eliminate discrepancies. These measures, supported by transparent oversight mechanisms and accountability frameworks, can significantly mitigate the risk of ghost officers while fostering trust and efficiency in financial and HRM systems.

Secondly, experience in the LOTFA projects highlights digital systems, including reliable personnel databases underpinning electronic salary payments, as critically important for strengthening the FMO of police payrolls. Thus alongside the development of policies and procedures for FMO mentioned in the literature, the development of digital systems to enable the implementation of these financial procedures is an important aspect of strengthening FMO to address corruption. Beyond software, LOTFA projects in Afghanistan highlighted the need to provide infrastructure and develop internal technical capacities to operate and maintain these digital systems. Given that these technical capacities are outside core policing functions, LOTFA highlighted how the creation of civilian posts within law enforcement agencies can support the development of internal technical and administrative skills to strengthen FMO.

Thirdly, experience in LOTFA demonstrates the critical importance of national ownership and political buy-in to implement Financial Management Office reforms successfully in police organisations. Management of large government expenditures on policing involves political decisions about resource allocation and security. Moreover, while the nature of policing expands the scope and impacts of corruption, financial management in police organisations must adhere to the same regulations as in other public agencies. Hence strengthening FMO in law enforcement agencies may require the negotiation of broader public finance reforms. The LOTFA projects highlight that without adequate political support, FMO-related reforms are unlikely to have an enduring impact.

### 3.5.2. Lessons for strengthening financial oversight and management

Table 11 distils lessons for policymaking at the national level and for project planning and implementation at the level of the supporting organisation in relation to strengthening financial oversight and management. These recommendations consider the general conceptual framework of corruption in law enforcement, the specific concepts regarding the assessment of risks and vulnerabilities, and the practical experience exemplified in the LOTFA SPM and MPD projects.

**Table 11. Recommendations for strengthening financial oversight and management**

For policy	For projects
FMO policies in law enforcement agencies must be aligned with broader public service policies and grounded in principles of value for money and transparent use of public resources	Projects intended to develop FMO systems and capacities should include training to develop administrative capacities of units tasked with implementing FMO systems
FMO policies of law enforcement agencies should establish internal audit units with clear definitions of roles, responsibilities, authority and autonomy to inspect and audit financial transactions of other organisational units	Projects intended to develop FMO systems and capacities should include training and awareness-raising for non-administrative units and personnel to understand and comply with FMO policies and procedures; such awareness-raising may include informal oversight actors such as CSOs and the public
FMO policies in law enforcement agencies should provide for external oversight, including by formal actors such as public audit authorities as well as informal actors such as CSOs	Information systems – including digital systems for financial transactions, asset management and personnel management – are important components of effective FMO; projects intended to develop FMO systems and capacities should consider technical requirements and personnel capacities to manage financial management systems
<b>Cross-cutting</b>	
Reform of FMO policies and development of systems and capacities for effective FMO requires strong leadership support given the wide impacts of financial management and requirements for alignment with broader public financial management systems	

## 3.6. Security Governance in the Sahel, Burkina Faso (Intervention: Financial management and oversight)

### 3.6.1. Project overview

The Security Governance in the Sahel project was implemented by DCAF between 2019 and 2023 with support from Denmark and Norway, as part of the broader Regional Programme for Peace and Stability in the Sahel (PSP-2). The PSP-2 programme focused on financial oversight and management, specifically addressing challenges in the security sector's resource management. These challenges included corruption, patronage networks, misallocation of equipment and impediments to control mechanisms. These issues were further compounded by the ambiguous concept of "defence secrecy" and an overall lack of transparency within the security sector. In Burkina Faso, notwithstanding the publication of a relevant decree on public procurement, many public contracts linked to the security sector were carried out without appropriate control and transparency measures. Corruption was identified as the second most significant motivating factor (after "instability") behind the two coups d'état of 2022 (Yeboah and Aikins, 2024). Thus procurement and resource management were a major focus of DCAF's programme in Burkina Faso. The programme provided advice and expertise to support the implementation of measures that ensure security forces are subject to normal audit and supervision of procurement on the basis of clear regulations.

The aim of the Security Governance in the Sahel project was to strengthen democratic oversight and control of the defence and security sector in Burkina Faso, Mali and Niger by contributing to the establishment of democratically controlled security systems and institutions compliant with human rights and rule of law principles. In Burkina Faso, project Outcome 3 was to improve the efficiency and professionalism of security institutions in the Liptako-Gourma region (Liptako-Gourma is a generic name given to the tri-border area shared by Niger, Mali and Burkina Faso), focusing on strengthening the technical capacities of state institutions responsible for oversight of resource management in the security sector, including support for the Autorité Supérieure de Contrôle de l'État et de Lutte contre la Corruption (High Authority for State Control and the Fight against Corruption – ASCE-LC). Key activities implemented in relation to this outcome between 2019 and 2023 included:

- organising a regional conference on best practices in resource management in the defence and security sector, which brought together a vast range of actors involved in financial governance, including CSOs, specialized oversight institutions, representatives from ministries and parliamentarians (Outcome 3.1.1)
- on the basis of a joint assessment, delivering support to internal control institutions in the security sector to enable them to better fulfil their mandate through provision of expertise and capacity-building activities (Outcome 3.1.2)

- organisational and financial support provided to government oversight missions of the defence and security forces, enabling them to adopt new audit methodologies; this support also improved their ability to translate violations into criminal penalties by fostering stronger collaboration with the judiciary (Outcome 3.1.3).

With support from DCAF, the ASCE-LC produced a roadmap for improving the financial governance of the security sector. A methodology for financial audits of the defence and security sectors was developed as the result of a continued dialogue between inspectors and independent auditors. Training on the general principles of financial control was provided for members of the ASCE-LC, the Commission de la Défense et de la Sécurité, the Agence Nationale du renseignement (National Intelligence Agency), the Centre de Presse Norbert Zongo (a prominent media actor), the Cour des Comptes (Court of Audit) and the Intendance Générale (technical inspectorates of the ministries in charge of defence and security). Key activities of the Security Governance in the Sahel project addressing strengthening FMO included capacity-building for audit and control bodies. Training sessions were organized for control bodies addressing the classification of infractions and the drafting of usable reports and *procès-verbaux* (proceedings). Inspectors and controllers were trained in the identification of irregularities and mismanagement, the search for legislative and/or regulatory texts applicable to infringements and the drafting of reports and minutes to provide sufficient evidence for referral to judicial authorities. Based on the knowledge acquired during this training, the inspectors and controllers were able to revise and improve reports submitted to the ASCE-LC.

### 3.6.2. Lessons for strengthening financial oversight and management

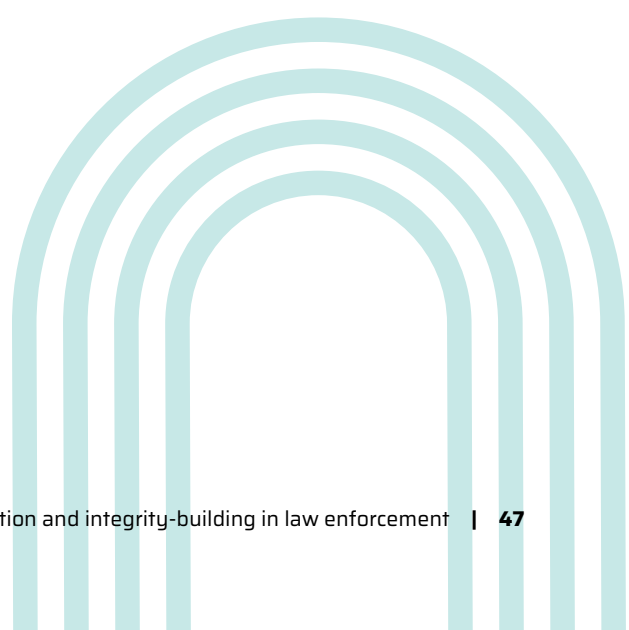
Table 12 distils recommendations for policymaking and project planning and implementation in relation to strengthening FMO. A key general lesson to emerge from the Security Governance in the Sahel project is the progressive development of activities in this field. Cooperation under the project commenced by addressing problems associated with a lack of clarity around the notion of “defence secrecy”. This initial engagement led to the definition of a strategic plan and then to specific activities intended to strengthen the analysis and investigation capabilities of state auditors and inspectors. These activities increasingly generated demand for change by focusing on FMO issues at a technical level, despite a context marked by *d'états* and the increasingly authoritarian stance of the Transition regime in Ouagadougou.

**Table 12. Recommendations for strengthening financial oversight and management**

For policy	For projects
<p>FMO policies for the security sector should address any ambiguity around “defence secrecy” and provide a framework for financial oversight and audits, ensuring that oversight institutions have adequate resources and capabilities to carry out effective financial audits</p>	<p>Focused technical training addressing specific FMO topics in oversight institutions – such as identification of irregularities, drafting reports and referring cases to judicial authorities – can significantly improve audit capabilities and support the broader strengthening of FMO</p>
<p>FMO policies for the security sector should include frameworks for cooperation among government oversight bodies, CSOs and independent actors such as the media, thus engaging diverse stakeholders to ensure transparency and promote reforms that are implemented across institutions</p>	<p>Training activities can foster cross-sectoral cooperation through engagement of multiple official oversight institutions; involving external stakeholders such as CSOs can promote transparency and public engagement in oversight processes</p>
<p>FMO policies for the security sector should be integrated within a broader framework of corruption control and governance to ensure that sectoral institutions are fully integrated into national financial governance systems</p>	<p>Technical training for auditors and inspectors should be designed with regard to broader frameworks and systems for governance and public procurement</p>

**Cross-cutting**

Effective policy frameworks and technical capabilities for financial audits of security sector institutions are essential components of strengthening FMO; cross-cutting efforts should focus on integrating clear regulatory frameworks and empowering oversight institutions to ensure effective financial governance, while simultaneously involving civil society to hold security forces accountable and fostering public trust; reforms should focus on embedding cultures of accountability and transparency across security sector institutions through systemic reforms in financial oversight





## 4. Lesson learned and conclusion

This report combines conceptual knowledge of corruption in law enforcement agencies with practical experience from operational activities to identify evidence-based learning for SSG/R policy and programming addressing corruption and integrity-building in law enforcement.

While corruption in law enforcement is defined in numerous ways, several consistent factors are apparent across these definitions. First, it encompasses individual and collective behaviours, shaped by broader social and institutional dynamics. Second, its motivations range from monetary gain and status ambitions to political objectives and performance-related pressures. Third, corruption includes a wide spectrum of actions, spanning illegal and unethical conduct. To encapsulate these dimensions, this report adopts an adapted version of Interpol's (2001) definition of corruption, specifically tailored to law enforcement: *Corruption in law enforcement refers to any act or omission by law enforcement officials that violate the law or public trust for profit or personal gain.*

This inclusive definition captures a variety of corrupt practices, including extortion, embezzlement, abuse of power, favouritism, evidence fabrication and payroll fraud. These practices are influenced by a combination of historical, political, institutional, social and economic factors, which vary significantly across contexts. Despite this variability, common drivers of corruption in law enforcement include inadequate remuneration, poor working conditions, compromised recruitment processes, insufficient training and professionalism, weak internal accountability mechanisms and a lack of transparency and oversight.

The report outlines five critical interventions for combating corruption and fostering integrity in law enforcement agencies. First, assessing corruption vulnerabilities and risks enables targeted and effective measures to address root causes. Second, strengthening codes of ethics and conduct establishes clear behavioural standards, fostering a culture of accountability and professionalism. Third, enhancing internal investigations ensures robust mechanisms to detect and address misconduct, reinforcing transparency and internal accountability. Fourth, improving HRM focuses on merit-based recruitment, comprehensive training and professional development to build an ethical and competent workforce. Lastly, strengthening financial oversight and management mitigates opportunities for fraud and mismanagement, bolstering public trust. Together, these interventions form a comprehensive framework to tackle corruption and build integrity.

Through a review of the concepts underpinning each of these interventions and a comparison of these concepts with practical experience from relevant SSG/R programmes and projects, a range of recommendations are presented for each approach, with relevant policies concerning project



planning and implementation. From among these, several consistent recommendations emerge that have broader relevance concerning SSG/R programming addressing corruption and integrity building in law enforcement agencies.

- 01 | A comprehensive approach is essential, prioritizing and sequencing interventions to avoid fragmented efforts. A fragmented or ad hoc approach to corruption control and integrity-building is unlikely to yield sustainable results. Effective interventions require a well-coordinated, comprehensive strategy that prioritizes key reforms and sequences them in a manner that ensures coherence and long-term impact.
- 02 | The commitment and sustained engagement of senior management are paramount for the success of policy and project interventions aimed at combating corruption and promoting integrity. In contexts where interventions have significant budgetary ramifications, the explicit backing of leadership becomes an additional critical determinant for the successful implementation and sustainability of such reforms.
- 03 | Reforms to policies and systems for HRM and FMO of law enforcement agencies may be contingent on reforms to broader public policies and systems, such as broader national systems of remuneration and employment conditions in public sector frameworks. The scope for reform within isolated anti-corruption initiatives can therefore be constrained by the need for alignment with overarching public policies and institutional frameworks, thereby limiting the depth of change achievable within individual law enforcement agencies.
- 04 | Wider institution-building activities must be part of a broader democratic institution-building framework to be effective. Policymakers must ensure that anti-corruption efforts are intertwined with broader governance reforms, including improvements in public procurement, judicial independence, and the inclusion of civil society in oversight.
- 05 | Corruption control and integrity-building interventions in law enforcement agencies must integrate international standards while aligning with local socio-cultural and institutional norms to ensure their acceptance and long-term viability and to entrench good practices. The involvement of regional partners from similar backgrounds can effectively facilitate understanding of international and national expectations.
- 06 | Effective mechanisms for whistleblower protection are integral to the success of multiple interventions targeting corruption and integrity-building. These include reforms within internal investigations, HRM, FMO, and the development of ethical codes of conduct. Such protections must be enshrined within law enforcement policies and aligned with broader national and international legal frameworks to ensure their robustness, legitimacy, and operational effectiveness.

## 07

Given the complexity of institutional change, the impact of interventions targeting corruption and integrity-building in law enforcement is unlikely to be immediately measurable. New capacities and changes in behaviour entailed in interventions addressing corruption and integrity-building in law enforcement generally take time to develop, hence the actual impact of interventions typically cannot be measured in the short term. Monitoring and evaluation frameworks should therefore be adapted to enable evaluation of impacts in the medium and long term.

This report encountered limitations in gathering information on SSG/R programming and policies addressing corruption and integrity building in law enforcement. Additionally, challenges in accurately measuring the impact of projects and programs restricted the availability of evidence for this report. Measuring actual impact was difficult given the intangible nature of some outcomes sought by activities addressing corruption and integrity-building. Many outcomes achieved through these interventions, such as increased public trust, enhanced ethical organisational culture and stronger accountability mechanisms, are inherently qualitative and difficult to measure directly. These outcomes often manifest as gradual shifts in perceptions, behaviours and institutional norms rather than as immediate, tangible results. Another significant challenge in measuring the actual impact of anti-corruption interventions lies in the typical timeframes used for project evaluations. The changes brought about by such interventions, particularly within law enforcement agencies, often take time to materialize. For example, improvements in organisational culture, accountability or public trust may only become evident after a considerable period, well beyond the lifespan of most project evaluation cycles. These evaluations tend to focus on short-term results, such as immediate project outputs and outcomes, rather than examining the broader, long-term effects. This disconnect makes it difficult to capture the full scope of an intervention's impact, as the most meaningful and sustainable changes often emerge over extended periods.

An additional challenge stems from the limited accessibility of data and information about SSG/R programming addressing corruption within law enforcement. Corruption is a sensitive issue, requiring careful handling by law enforcement agencies and supporting organisations involved in corruption control and integrity-building efforts. This sensitivity often leads to restrictions on the availability of documentation related to such programmes. Consequently, the evidence supporting this report was constrained by limited access to detailed project and programme evaluations and documentation. This limitation not only reduced the sample size available for analysis but also affected the depth of insights into these interventions. Additionally, some of the available programme documentation lacked critical information about implementation failures, flawed activity designs and external challenges. These absences restrict a fuller understanding of the complexities involved in governance reform, corruption control and integrity-building interventions, which could otherwise inform more effective strategies and practices.

In conclusion, addressing corruption and promoting integrity within law enforcement agencies requires a comprehensive, multi-dimensional approach that integrates systemic reforms and cultural considerations. By focusing on key interventions such as strengthening ethical codes, improving internal investigations, and enhancing human resource management, law enforcement agencies can better combat corruption and foster accountability. The successful implementation of these reforms hinges on the commitment of senior leadership, sequencing and prioritizing of various interventions, alignment with broader public policies, and the integration of local and international standards. Furthermore, addressing corruption must be seen as part of a larger democratic institution-building framework, emphasizing transparency, the rule of law, and civil society engagement. While the impact of such interventions may take time to manifest, adopting a long-term perspective and ensuring robust monitoring and evaluation mechanisms are essential for sustaining meaningful change and building a culture of integrity in law enforcement. Finally continued research and the sharing of data and information are essential to deepening our understanding of effective strategies in corruption control and integrity-building in law enforcement. Greater emphasis should be placed on collecting evidence and data analytics to assess what works, while sharing insights and leveraging adaptive learning approaches to incorporate lessons learned. This will ensure that future interventions in the security sector governance and reform field are more impactful and responsive.



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