

การศึกษารูปแบบการทุจริต กรณี การจัดซื้อจัดจ้างขององค์กรปกครองส่วนท้องถิ่น

Study of Corruption in Thailand: A Case of Public Procurement Conducted by Sub-district Administrative Organizations

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บทคัดย่อ

การวิจัยนี้มีวัตถุประสงค์เพื่อวัตถุประสงค์เพื่อศึกษารูปแบบการทุจริต กรณีการจัดซื้อจัดจ้างขององค์กรปกครองส่วนท้องถิ่นของประเทศไทย การวิจัยพบว่า การทุจริตหรือการกระทำความผิดมีอยู่ในทุกขั้นตอน ตั้งแต่การตั้งงบประมาณ ทั้งงบบกบิตที่ได้รับการจัดสรรทุกปี และงบประมาณ เงินสะสม โดยการตั้งงบประมาณหรือวงเงินนั้น จะเกี่ยวข้องกับอำนาจในการอนุมัติและวิธีการจัดหา การกำหนดความต้องการ หรือกำหนดสเปกสินค้าเพื่อเอื้อประโยชน์ให้แก่คนรายใดหรือบริษัทใดรายหนึ่งให้ได้รับการคัดเลือก การจัดหาพัสดุ ก็จะมีการเสนอราคา โดยมีการสมยอม การทุจริตส่วนใหญ่จะอยู่ในวิธีการจัดซื้อแบบเฉพาะเจาะจง และการขออนุมัติจ่ายเงิน โดยมีการกำหนดงบประมาณมีการแบ่งขอยวงเงินเพื่อให้มีอำนาจหน้าที่ในการอนุมัติโดยผู้มีอำนาจ

คำสำคัญ: องค์กรปกครองส่วนท้องถิ่น คอร์รัปชัน การทุจริตต่อหน้าที่

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Abstract

The research aims to study forms of corrupt practices as conducted by subdistrict administrative organizations (SAO), in region 3 in Thailand. Data was collected from documentary research, in-depth interviews and focus groups. Findings show that there were irregularities in all steps of the public procurement. Corruption involved how the budgets were initiated - which included annual budgets and incremental budgets - until procurement was finalized. These budgets were set up with the following aspects in mind: how the budget was authorized; procurement procedure; the need for related items; and specifications for products or services to be obtained. These practices facilitated certain private firms to gain interest from biddings. As part of the procurement process, biddings were often found to be in the form of mutual consent. A method called “special procurement” was most frequently used. In addition, the budget was often divided into smaller sums so that the administrators in charge were able to authorize such biddings and make payments as part of the procurement procedure.

Keywords: local administrative organizations, corruption, malpractice

1. Introduction

There had been a variety of definitions of corruption coined by academics and international organizations. These included infringements of common interest for personal gains (Rogow and Lasswell 1978), misuse of authority by government officials for personal gains in addition to their regular wages (Klaveren 1990), abuse of entrusted power for personal benefit (Transparency International 2000) and use of a personal position to derive personal benefit (World Bank 2018). Essentially, corruption could be defined as any practice conducted by state employees, government officials, politicians, businessmen and general public with personal gain in mind (Office of the National Anti-Corruption Commission 2010).

Interviews conducted with various concerned individuals citing related documents during the study revealed a number of startling information and evidences connected with wrong or inappropriate practices. Names of these people who were involved in the interview procedure are withheld as requested.

An interview with an official working with the Office of National Anti-Corruption Commission indicated that the number of corrupt practices in government agencies resulting in disciplinary action were on the rise and clearly alarming. 12,561 cases of corrupt practices were found and legally investigated during the period of 1912-1915.

Another government official working with the Office of Public Sector Anti-Corruption Commission gave information through an interview pointing out that during 2550-2557 the number of cases involving corrupt practices was rapidly increasing. Based on this data and other related sources obtained during the study, it is apparent that corruption in the country at various governmental levels is widespread as reflected by overall results of this study. Therefore, the situation is not to be simply seen just as a normal problem as claimed by certain circles. It is the severity of the situation that society should look at and seek appropriate remedy for the crisis in an urgent manner.

The Office of Public Sector Anti-Corruption Commission published its 1995 Annual Report indicating that the Ministry of Interior had the highest number of complaints in the country involving corrupt practices. Local administrative organizations were overseen by the Ministry of Interior. Among the most serious corruption charges, irregularities in public procurement were category ranked second highest which totaled 31 cases.

Information yielded through an interview with an official from the Office of Public Sector Anti-Corruption Commission, revealed that, based on collected data by the commission, there were rampant corrupt practices in local administrative agencies. These activities included projects of various

kinds such as construction of buildings and roads. Employees working for local administrative organizations were bribed so that individuals involved would omit from conducting proper inspection. Overall, fifty-two percent of complaints sent to the Office of Public Sector Anti-Corruption Commission, Region 3 involved corrupt practices. The nature and severity of the problem gave rise to this study.

2. Research Methodology

Documentary Research

Documentary research will be conducted on law relating to procurement and supplies administration, *Organic law on the prevention and suppression of corruption*, Law on executive measures for the *prevention and suppression of corruption*, law determining plan and process of *decentralization to local government organization*, including law relating to the establishment of the *local government organizations*.

In-depth Interview

It involves interviewing representatives of the relevant groups of people or touching on issues related to the patterns of corruption and formulating policy for identifying the patterns of corruption. The interview will be conducted among 15 people, consisting of a local government officer who is a Member of the Procurement Committee, an official of the Anti-Corruption Office in the public sector who is responsible for the case, 2 local government officials (who is not a supply administrator and not a member of procurement committee), 1 persons who is responsible for the inspection in the inspection committee, 2 local government officers who perform the duty as a supply administrator, 1 Officer from Department of Special Investigation who is in charge of the case, 2 officers from State Audit Office of Thailand, 1 local government supervisor at department level, 1 local government supervisor at

provincial level, 1 local government supervisor person at district level, 2 persons who complained of problems related to procurement, 1 senior expert. In the interview, the identity of the informant will be concealed by using a pseudonym.

Focus Group

Focus group emphasizes on recording opinions from sample group of 10 people, consisting of 2 persons who are responsible for the case, 1 scholar, 5 local government officials (separately, 3 practitioners and 2 executives), 1 entrepreneur and 1 person from public sector. The process encourages *brainstorming* ideas and formulating policies jointly in order to solve the problem or prevent the problem relating procurement of the *local government organizations*.

3. Literature Review

3.1 Definition of corruption

Analysis of documents collected in the study revealed that other than corrupt practices aimed for monetary gains, there were other forms of practices conducted with intention to receive personal benefits. In particular, malfeasances were often found during public hearing process. The Organic Act on anti-Corruption B.E. 2561 indicates that “*an act of malpractice by a government official is when one performs breach of duty or nonfeasance in any mode of action for the public to believe that he or she holds a position with authorization to perform a certain duty or use such a position to gain a benefit for themselves or other individuals.*” In the case of having a civil society hearing, the practice involved enticing people who held similar political ideology to attend the hearing. The data was then used to support the request for a budget claiming that such budget was initiated based on people’s needs.

Udom Rathamarit (1987) opined that corruption and misbehavior as seen in the government circle involved use of authority and influences in their capacity as government officials for personal gain. This was because state employees were empowered to act on behalf of the state. The intention, however, was to protect the public's interest. Such authority was not intended to be tied to individuals. The concept for appointing these government officials was for them to serve as mechanisms that would act for benefits of the public at large. Therefore, when state employees misbehaved providing uncalled for benefits to themselves or friends, or expected rewards in various forms, or with intention to cause damages or losses to individuals or the government, such action was deemed to be corrupt and misbehavior in nature.

3.2 Civil society hearings

Through a synthesis of number of in-depth interviews, the study found that malpractices were often found to distort information or convince people to believe as ill-fatedly intended by government officials during the civil society hearing process. Normally, civil society hearings are held so that both the local administrative body with its entrusted power and the general public could jointly use financial resources to eradicate local problems/develop their own community. Although the requirement to hold public hearing was met, but such manipulation of real public opinion could be clearly seen because only a group of people who held similar view with administrators of a local administrative organization were involved in the public hearing activity. The intention of the law in this regard is for the government officials to hear and be aware of problems, needs and points of issues so that these aspects or issues can be accordingly addressed to. With such information, the government can then provide appropriate help suitable for a given locality. A 4-year plan to further move the community is normally

developed based on such data. In principle, such a plan, based on people's involvement, intends to make the community a self-reliance one and decentralize administrative power. The above malpractice reflects conflicts of interest and local politicians' intention to get a budget for their precinct. Essentially, selected natives are allured or persuaded to attend a civil society hearing to voice their opinions that mirror the wish of corrupt government employees, interest groups, and/or certain local politicians. Information and resolutions collected from such gatherings are then made into policy, rules and regulations. The end result therefore does not reflect real problems and meet people's needs.

4. Results

4.1 Forms of corrupt practices to develop operational plan and local legislation

Analysis of collected documents showed that after the 4-year plan was developed and approved, municipal law and regulations were to follow. Before such law and regulations could take effect, the local council, district-chief officer and Governor must also give their approval.

The Government Procurement and Supplies Management Act B.E. 2560, Section 55 stipulates that what is termed as "special procurement" can be administered in three different ways: 1) state agency may invite any firm that has specified qualifications to offer its bid, 2) any firm with specified qualifications may be invited to meet with the agency for negotiation concerning the bidding, and 3) in case the amount of money involved in the procurement is deemed to be substantially small, the state agency may make the procurement directly with a private firm. A substantially small amount, in this case, is indicated as not more than 50,000 baht or approximately US\$ 1,560.

Analysis of various in-depth interviews, focus groups and collected documents regarding manners which led to corrupt practices can be summed up as follows:

1) Splitting of a given budget into smaller amounts. A given budget for various projects was split into amounts of not more than 50,000 baht so that these figures were within the state administrator's authority to give his or her approval to proceed with the procurement. Since the amount of money involved for each procurement was considered to be small, a special procurement method could then be utilized for this purpose and as such considered to be legal. In practice, a local legislation involving budgets for various projects in any given community must be passed before the money could be used. However, description of any given major project was often split into smaller ones and written in different pages so that it was difficult for the authority above to see that these activities came under the same project.

2) Use of extraordinary meetings to change certain legislation or municipal law. Extraordinary meetings were called so that the current legislation could be altered. The change here therefore did not reflect what was said while these politicians were soliciting votes during the past election.

3) Sequencing of projects to be administered. Through interviews, the study found that corrupt practices were administered through use of sequencing of projects. Here, certain projects deemed to be of less important to local people were put into effect before more significant ones so that this would favor particular politicians or interest group.

4.2 Forms of corrupt practice to alter operational plan

This study found that there were irregularities in administering the budget for the fiscal year. Communication was passed along to administrators of local administrative organizations wishing to receive funding for their precincts. The hidden message conveyed to these localities was that in order for budget

to be made available to any of these towns, administrators involved must choose pre-selected contractors that would agree to provide certain benefits to the broker. If such an agreement could not be made, there was a likelihood that the money would go elsewhere. Added budgets were at times made available to any of the precinct that agreed to share the money illegally gained through this process. Such activities showed that they were in conflict with the principle of decentralization and that there was lack of transparency. Furthermore, a conduct of this nature contradicted with the Regulations of the Ministry of Interior, 2005 and the 2nd revised version 2016, Section 4 of the same Regulations which provides detail on how local development may be processed. The matter here is an example of corruption reflecting theories as given by Robert Klitgaard (1991) as follows: $C = M + D - A$ (Corruption + Monopoly + Discretion - Accountability). Collusive biddings were often found as part of these corrupt practices. Administrators of local administrative organizations made use of such collusions and/or passing of law or regulations so that a particular private firm was favored in the bidding process. Although it is unavoidable for the chief officer running any government organization to use his or her D (discretion) so that things can move forward in an efficient manner, but such practices must be done under clear rules and regulations, in transparent manner, and reasonably known to the public.

4.3 Forms of corruption in public procurement

A common malpractice to use a given budget earmarked for public procurement was to call for a specific bidding with the purpose to repair road. The road, in this instance, was still in a relatively good shape. But the decision was made to have the road “*repaired*” anyway. Once the money left over from other projects was transferred, it would then be put together and specified for a new project. A special procurement was then administered to

conduct the repair using the new-found budget. A pre-selected construction firm was singled out and specifically chosen as part of the bidding to complete the task.

As part of the above process, the budget was initially split into smaller sums for various biddings so that none of these amounts was beyond 50,000 baht which gave the authority power to give their necessary approval. Under this arrangement, because the budget was under 50,000 baht, the procurement could be conducted giving a specific private firm to get the contract.

Analysis of collected data revealed that the mayor was often the person who, where possible, combined various projects and split the overall budget into smaller sums making certain that none of these was over 50,000 baht. As pointed out earlier, these split projects would be written in the legislation placing them in parts of the legislation where they could not be easily spotted and recognized as coming from the same undertaking.

Upon passing of the annual ordinance, the mayor was the one and only person who coordinated with a preferred private firm to take part in the procurement. An employee working for a local administrative organization indicated in an in-depth interview that the mayor himself would deliver the procurement request documents to the supplies section and instructed the person in charge to go ahead making the procurement having a pre-selected firm to engage and chosen for the procurement. Such a practice was not considered to be illegal and perfectly in line with current procurement rules and regulations. Corruption of this nature did not have to be in monetary form. No one knew specific detail of the deal. The alarming point here is that there was lack of transparency and could result in substandard or inferior products being delivered to the state agency. Also, as part of the procurement process, Head of the Supplies Section or his subordinate would negotiate with the supplier and settled for a deal. Once a supplier or contractor was found,

Head of or an assigned person with authority from the local administrative organization would then take the next step in dealing with the supplier or contractor with support from a junior employee from the supplies section making necessary contacts and follow up activities. 10-18 % of the allowed budget was often paid to the authority to help pay for “*gasoline expense*” or to speed up the payment or making necessary arrangements so that that particular firm was chosen for the procurement. Other kinds of help to the potential winning firm also included provision of quotation papers and workload sheet. These papers were prepared in advance for the pre-selected firm entering the contract.

4.4 Form of corruption used in e-bidding

Malpractice in public procurement via e-bidding was found to be possible. In case of e-bidding a particular firm could go to the Comptroller General's Department and obtained a list of those planning to offer their bids. An arrangement was then made among these private firms to “*hua*” (term generally used in Thailand), or collude which made concerned parties to come to terms for a particular bidding.

Data concluded in a focus group conducted as part of the study showed that there were ways a pre-selected private firm could negotiate with a given local administrative organization. Anywhere between 10-18 % of the total winning bid would be asked for by the government agency. Mechanisms that allowed corrupt practices to take place were placed in various steps of the procurement. Essentially, using available mechanisms, it was possible for the Supplies Section to make necessary arrangements so that only one pre-selected private firm was involved in the e-bidding.

4.5 Form of corruption used during administration of the contract

Analysis of procedure concerning administration of signed construction contracts together with view given in an interview with a government official working at a local administration organization indicated that there were certain parts of the procedure that corrupt practices could occur. Normally, during any given construction a construction supervisor would be appointed to oversee the task to make certain that the work was conducted as specified in the contract. However, the study found that it was difficult to determine whether there were any irregularities committed or not. There were situations that the work could have been done below the standard as specified in the contract. For example, mixing of cement and sand for construction could be performed at a wrong ratio. In this case, only building material using proper mixing ratio would be shown to the construction control and acceptance committee when inspected. At times, sample of construction materials from elsewhere were given to the inspector. Fill and compaction work could also be improperly carried out during the initial phase of the construction. In brief, due to certain constraints and limitations, it was not possible for the construction control and acceptance committee to inspect all the details and oversee the work on a daily basis.

Upon completion of the work, corrupt practices occurred in various forms such as 1) the contractor offered a deal to submit the work as was, the remaining work or uncomplete work was verbally promised by the contractor be taken care of later, 2) the construction control and acceptance committee asked for benefits from the contractor, and 3) the SAO supervisor at times inspected the work in progress and found certain irregularities in the construction such as the width of steel plates used in the construction was not as specified in the contract; in such a case money would be given under the table. Also, the concerned SAO personnel often came for routine

inspection only on days when the weather was agreeable but would write in the work report that the site was visited every day. Another example of corrupt practice was when the SAO supervisor or Chief Executive of the SAO happened to use his or her relative or friend to commercially register business and involved in bidding for an announced project. If successful, the nominee in this case could get speedy service in approving each phase of the construction work. Shoddy works with many questionable aspects of the construction would then be presented to the construction control and acceptance committee for acceptance.

4.6 Form of corruption during inspection of work progress

The Ministry of Interior's Regulations on Procurement of Local Administration Units 1992, as amended to (No. 9) 2010 stipulates that, for any given procurement, a control and inspection committee must be appointed by the administrator of that concerned government agency. This committee has the duty to inspect work as completed during specified time frames based on procurement rules and regulations until the whole project is complete. A construction control and acceptance committee is also to be appointed by SAO or any other similar local government organization. The structure of these two committees is basically similar having one person serving as head of committee and at least two persons serving as committee members. In case public procurement was to be done by comparing available quotations, bidding, or method known as special procurement, each of the above committee must have at least two representatives with appropriate expertise from their community. This procedure, however, was often overlooked citing constraints of various forms during the decision making process.

While any given project is being carried out, each phase of work completion is inspected by the construction inspection committee. Analysis of collected interview data showed that malpractices often occurred during

this part of the project. Often, the committee and other related personnel would accept the work without actually going out to inspect the work at the site but merely went along with what the contractor presented to them. A percentage of the agreed cost of that particular construction work would be given to these people. The amount mentioned here was agreed upon by both parties using various dubious means of communication before the work was inspected and accepted by the construction control and acceptance committee. To speed up the payment for each phase of the construction, the contractor would at times give money to the construction control and acceptance committee. In principle, such a practice violated the Ministry of Interior's Regulations on Procurement of Local Administration Units 1992, the Government Procurement and Supplies Management Act B.E. 2017, and the Liability for Wrongful Act of Officials Act 1996, but the activity took place anyway. Clearly, the process was not transparent and corruption, unfortunately, was found to be frequent.

4.7 Form of corruption during project control process

The Ministry of Interior's Regulations on Procurement of Local Administration Units 1992 (amended) stated that while the construction is being carried out, a construction supervisor is to be appointed to control the quality of the work in progress. Controlling and inspection of the progress of the work being made was often loosely done thus enabling malpractices to occur at this stage.

4.8 Form of corruption during payment for each phase of work completion

Based on analysis of in-depth interviews with personnel working with various SAO's, the study found that corrupt practices often occurred at this particular stage of any given project. Payments were sometimes made without

work being fully completed for each phase and before the Finance Unit making proper written request to authority above for these payments. Cheques were found to have been written for the contractor in this scenario, at times in advance ahead of schedule. Also, as part of the malpractice, personnel involved in the payment process would make quicker payments than usual to the contractor. In providing such a special service, monetary benefit was accordingly given by the contractor. In certain projects where highly specialized expertise was required for the person to act as a construction supervisor, such a person would have to be acquired from another SAO area. Special “*gifts*” would then be provided by the contractor so that the work could proceed quickly and smoothly.

5. Conclusion and Recommendation

5.1 Conclusion

Analysis of collected data throughout the period of study concerning investigation of procurement practices conducted by various SAO's in region 3 revealed that there were ample corrupt practices that were done in various forms at practically all stages. Such irregularities involved bidders, government employees, and local politicians. Corrupt practices began during civil society hearings for the purpose of creating the 4-year development plan for the community involving administrators of the SAO's and people who served as their political base networks. Because data collected during civil society hearings was not based on current local problems and people's actual needs, budgets were therefore not proposed for solving real problems and developing the area for benefits of local citizens. These budgets were often proposed and later written in dubious forms before passing them in local legislation. For public procurement, budgets for various projects were at times technically prepared for official approval by splitting a large project into subprojects with smaller figures so that these amounts of money were within

SAO administrators' authority to approve the subsequent bidding requests. Writing of specifications and choosing a less than ideal procurement method, frequently using the method called "*special procurement*," were done in manners so as to allow certain private firms to gain advantage over other competing companies. The firms involved in the bidding process at time colluded so that a particular firm could win the bidding.

5.2 Recommendations

1. At the policy making level, high level administrators need to make earnest efforts to govern procurement rules and regulations as stipulated in the Government Procurement and Supplies Management Act 2017. These chief officers must set themselves as good examples for their subordinates to follow. The popular use of "*special procurement method*" must be reviewed and considered if further use is avoidable. It is highly desirable for the Office of Public Sector Anti-Corruption Commission to get more deeply involved in tackling the corruption problems. Visits at SAO's every six months should be conducted to scrutinize procurement activities and give related suggestions as needed.

2. The Thai government needs to overhaul the law concerning civil society hearings as normally seen. Past practices clearly showed that having chosen people to voice their opinions during civil society hearings were contradictory to the spirit of the law.

3. Results of this study should be further synthesized and used for tackling corrupt procurement practices. Brief Policy papers based on such findings should be published and distributed to all centers under the supervision of Office of Public Sector Anti-Corruption Commission.

4. Together with principles given by Robert Klitgaard (1991), results of this study should be presented to concerned government agency so that certain rules and regulations inherent in current procurement law could be

revised. In particular, aspects concerning procurement monopoly and SAO administrators' power to use their discretion as part of the procurement process should be reconsidered and appropriately decreased as deemed befitting.

5. *Local government organizations* should have Integrity pact in the performance of duties by the officers at all levels.

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