

# An Assessment of The Inter-Agency Framework in Kenya's Anti-Corruption Efforts, 2018-2022

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### **Abstract**

n 2015 blatant corruption in Kenya, estimated at a third of the country's annual budget, occasioned the declaration of the vice as a national threat. Consequently, a Multi-Agency Team (MAT) comprising the Financial Reporting Centre (FRC), National Intelligence Service (NIS), Directorate of Criminal Investigations (DCI), Ethics and Anti-Corruption Commission (EACC), Office of Director of Public Prosecutions (ODPP), Asset Recovery Agency (ARA) and Kenya Revenue Authority (KRA) was constituted in 2015. The operationalisation of the MAT was heralded by the appointment of career intelligence and security officers to head some of these key agencies, creating a strategic and operational MAT framework. Despite the adoption of the MAT, more grand corruption cases such as the Ksh 2.3 Billion KEMSA scandal of 2020 came to the limelight. Using a case study approach, this study assessed the effectiveness of MAT, its challenges and areas of potential improvement. Eight in-depth interviews were conducted. Using stratified sampling method, a sample size of 163 respondets was selected across the five agencies. For purposes of this study, the agencies have been pseudo-named A1, A2, A3, A4 and A5. The study established that 74.7% respondents had been involved in the MAT with 88.52% of the respondents indicating that the MAT was effective due to synergy, clarity and effective resource pooling. However, a lack of MAT framework, and corruption were established as some of the challenges. The study concluded that the MAT framework needs to be recalibrated to ensure the realisation of its intended outcome. The study recommends that there is need to anchor the MAT framework in law; resource all agencies adequately; and build capacities of the agencies before establishing any MAT.

*Keywords:* Corruption, multi-agency teams, synergy, framework, case study, mixed methods

## Introduction

It is estimated that Kenya loses approximately \$6 billion, to graft every year which is equivalent to a third of its annual budget (Houreld, 2019). Corruption has distorted priorities such that projects that confer bribes and other private benefits crowd out more socially valuable spending (Ndii, 2020). The net effect has been high-cost projects that have benefitted a few without trickling down to the majority (Mutua, 2022).

On 23rd November 2015, corruption was declared a national threat by President Uhuru Muigai Kenyatta (Mwakideu, 2019; State House Kenya, 2015). A Multi-Agency Team (MAT) was thus formed to deal with the vice. It comprised the Financial Reporting Centre (FRC), National Intelligence Service (NIS), Directorate of Criminal Investigations (DCI), Ethics and Anti-Corruption Commission (EACC), Office of the Director of Public Prosecutions (ODPP), Asset Recovery Agency (ARA) and Kenya Revenue Authority (KRA) (Nyaga, 2016). The purpose was to enhance synergy, co-ordination and collaboration among Law Enforcement Agencies (LEAs) and bring efficiency in the fight against corruption and organised crime (Office of the Attorney General and Department of Justice, 2015).

## Statement of the problem

Despite the adoption of MAT, corruption levels did not reduce in the country. If anything, several high-profile grand corruption cases including the Ksh 9 billion NYS II scandal of 2018 and the Ksh 2.3 billion Covid-19 KEMSA scandal of 2020 came to the public limelight. Indeed, the MAT framework was not a panacea to Kenya's corruption problem as graft cases generated public furore with little to no results by way of prosecution and conviction. In an interview with local radio stations in January 2021, retired president, Uhuru Muigai Kenyatta, said, "... yet what they steal every day is more than Ksh 2 billion" (Muriuki, 2021). This was immediately interpreted as Kenya losing Ksh 2 billion daily. This revelation underlined the magnitude of the problem despite concerted inter-agency efforts. This study assessed the Multi-Agency Framework in the country with three objectives: to establish the MAT's effectiveness, its challenges, and how it could be improved.

## Literature review

Corruption is a threat recognised globally due to its detrimental effects on the lives of the citizenry. It also has a negative impact on economic growth, and it is a symptom that suggests something has gone wrong in the management of the state (Rose-Ackerman, 1999). Corruption often takes many forms (Fombad, 2020). Actions such as bribery, fraud, embezzlement or misappropriation of public funds, conflict of interest, abuse of office, breach of trust, offences involving

dishonesty, improper benefits to trustees, bid rigging, dealing with suspect property and attempted corrupt behavior and conspiracies, constitute corruption as per the Kenyan law (Anti-Corruption and Economic Crimes Act, 2016).

Corruption weakens the public sector as well as the state's ability to carry out its basic functions such as raising revenue, supplying public goods and services, collection of taxes or making expenditure choices in a fair and efficient way (International Monetary Fund, 2016, 2019). It also affects the drivers of potential and inclusive growth, including macro-financial stability, public and private investment, human capital accumulation, and total factor productivity (International Monetary Fund, 2016). Corruption has the potential to threaten the political stability and sustainable development of a state and can result in the privatisation of public policy (International Monetary Fund, 2016; The United Nations Convention against Corruption, 2004). Further, there are often links between corruption and other forms of crime such as terrorism, organised crime and economic crime, money laundering (ML) and illicit accumulation of wealth and assets, often at the expense of a state's resources (FATF, 2022). Equally, corruption has been known to fuel Transnational Organised Crime (TOC).

The 2022 Corruption Perception Index (CPI) by Transparency International (TI) scored Kenya at 32/100, where 0 is highly corrupt and 100 is least corrupt (Transparency International, 2023). This score was reflective of Sub-Saharan Africa (SSA), which remains the world's worst performer on the CPI with an average score of 32 and where 44 out of the 49 countries scored below 50 (Transparency International, 2023). A 2021 survey by the EACC showed that more than 43.7% of Kenyans view corruption as the third biggest problem in the country, with the level of corruption thought to be high by 73.5 % of the respondents and corruption and unethical practices thought to be completely widespread in Kenya by 74.1% of respondents (Ethics and Anti-corruption Commission, 2022). The CPI by TI and the survey by EACC affirm the corruption pandemic that has taken root in Kenya without corresponding attempts to counter the vice.

Corruption is often categorised as either petty or grand. Petty corruption involves low or mid cadre officials, who are often underpaid and who interact with the public on a daily basis and often only involves administrators and not politicians (Dahlstrom, 2015; Kahura, 2021). Grand corruption occurs when a public official violates the rules and/or norms of office to the detriment of the interests of the public (Phillip, 2015). The latter is sometimes referred to as political corruption, with the interaction and power balance between politicians and administrators being very important to the outcome (Dahlstrom, 2015). The perpetuation of grand corruption has often been tied to the highly placed in society who enjoy some political immunity and, can thus flout laws and go unpunished (Kibwana, 1996).

It requires coordination. Over time, collusion between state officials and politicians form powerful corruption cartels that become inextinguishable (Dahlstrom, 2015; Kahura, 2021).

In order to address corruption, Gillespie and Okruhlik (1991) proffer four main ways, namely societal, legal, market, and political strategies. Societal strategies include mechanisms such as civic education and emphasis on the need for ethics and honesty by public service officers. Market strategies involve a decreased reliance on legal sanction and bureaucratic regulation while political strategies focus on authority, access to the political process, and administrative reform (Gillespie & Okruhlik, 1991). Legal mechanisms include the constitution, legislative and judicial rulings (precedence). In Kenya, these include the 2010 Constitution with key chapters, including Chapter Six, Eleven, Twelve, and Thirteen, and various legal instruments such as the Ethics and Anti-Corruption Commission Act (No. 22 of 2011) and the establishment of the Ethics and Anti-Corruption Commission (EACC); the Anti-Corruption and Economic Crimes Act (ACECA), No. 3 of 2003; the Leadership and Integrity Act (LIA), No. 19 of 2012; and Public Officer Ethics Act, No. 4 of 2003, and Bribery Act, No. 47 of 2016. These laws are complemented by others, including Proceeds of Crime and Anti-Money Laundering Act (POCAMLA), No. 9 of 2009; Public Procurement and Asset Disposal Act, No. 33 of 2015; National Police Service Act, No. 11A of 2011; Public Finance Management Act, No. 18 of 2012; Prevention of Organised Crimes Act, No. 6 of 2010; and The Penal Code (Cap 63) among others. Despite the application of various measures in Kenya's anticorruption efforts, little has been done by way of addressing the vice. Kenya's corruption levels have remained high with a net effect on the country's overall development.

The establishment of Multi-Agency Teams (MAT) came in the backdrop of the need to synergise strengths of all agencies and institute targeted anti-corruption efforts. The multi-agency approach was a partnership between Law Enforcement Agencies (LEAs) and other relevant stakeholders (Kibusia, 2020). The MAT brings together the different agencies under one roof for efficient coordination, management, utilisation of resources (human, financial/material, time), and delivery of specific results (Clift, 2010). This enhances cooperation among agencies with shared responsibilities and overlapping jurisdictions (Kaiser, 2011).

MAT can be a long-term or short-term engagement, a formal or semi/informal process. However, whichever form it takes, it must be supported by various decision-makers at strategic levels. To render support to the strategic levels, the MAT framework in Kenya was complemented with the appointment of intelligence and security officers as heads of different government agencies. This included

the appointment of the Director General (DG) of Financial Reporting Centre (FRC), the Director of Public Prosecutions (DPP), the Chief Executive Officer (CEO) of EACC, the Inspector General (IG) of police, the DG at the Directorate of Immigration and Citizen Service, and the Director of Asset Recovery Agency (ARA) from career intelligence and/or military officers. As a form of intelligence sharing, the decision-making group network connects the law enforcement and intelligence communities for prevention and protection purposes (Pfeifer, 2012). They form strategic points of instant intelligence sharing, solution finding, and policy direction.

Whereas the MAT framework, working both at strategic and operational level, creates an ideal situation of synergy, it is one that is often riddled with challenges. First, there is usually a reluctance towards intelligence and information sharing as people are naturally prone to gravitate towards and give more information to members of their own organisation and less information to outsiders (Pfeifer, 2012). Further, secrecy, mistrust among agencies, incidences and accusations of bribery receiving and information sharing with outsiders also permeate inter-agency collaborations. Such challenges impact the success of the MAT leading to low effectiveness.

## Methodology

A mixed methods approach was applied. This involved gathering both qualitative and quantitative data under a case study research design. To gather qualitative data, purposive sampling was used while for quantitative data, stratified random sampling was used. In this research, stratification was based on the units/ departments within the identified agencies that dealt with corruption investigations. The sampling frame would ideally have been drawn from a list of officers working in each agency who dealt with corruption matters. Based on interactions with the agencies, the researcher estimated the target population at 280. Consequently, a sample size of 163 respondents was obtained with a confidence level of 95%, a margin error of 5% and a population proportion of 50%. The sample size for each agency was: A1 = 29; A2 = 12; A4 = 35; A3 = 46; and A5 = 41. A total of 83 questionnaires were administered as follows: 29 = A1; 7 = A2; 36 = A4 and 11=A5 while eight interviews were conducted at A2 = 1; A1 = 2; A3 = 2; A4 = 1 and Civil Society Organisations (2). The research was conducted after approval by the National Commission for Science, Technology and Innovation (NACOSTI). Approval was sought from the agencies before data was collected, with confidentiality of respondents was maintained while data was processed in an aggregated form to avoid non-attribution.

## Findings

#### ■ Effectiveness of MAT

The data revealed that MAT was operationalised with NIS as the lead agency but where there was a MAT on corruption, EACC took the lead. At the operational level, MAT took two main forms, i.e., ad-hoc teams and an established team. The former was formed for specific goals and often brought teams together that worked for a while or until the achievement of the goal. The established team, in the form of a unit under one roof, had brought various agencies to work together on specific cases. Interestingly, the established unit never prosecuted a single case in its entire 5-year period despite having all actors including analysts, investigators, and prosecutors.

The study found that, 74.7% of the respondents had been involved in MAT with participation varying across agencies, where, for instance, at A5 all respondents were involved in MAT while at A2 only 2 of the 7 respondents had been involved. There was minimal involvement of A4 with other agencies, despite being the lead agency in anti-corruption. This was due to its status as an independent constitutional commission that should not work under the direction or influence of any person. A1 preferred to work with the A3, a relationship that the A3 also reciprocated while A5 worked more often with A4. It is likely that the results of A1-A3 investigations were not well utilised for conviction as the mandate of investigating corruption lies with A4 while prosecution rests with A5.

Table 7.1 presents results on MAT experience and effectiveness.

There was minimal involvement of A4 with other agencies, despite being the lead agency in anti-corruption as RVI explained:

The A4 is an independent constitutional commission, and cannot work under the direction or influence of any person. But where there is a MAT on corruption, A4 takes the lead-RVI.

The low involvement of A4, yet it has the constitutional and legal mandate of investigating corruption, creates a conundrum. It is thus probable the results of A1-A3 investigations were not well utilised for conviction as the mandate of investigating corruption lies with A4 while prosecution rests with A5.

From the table, 88.52% of the respondents indicated that the MAT was effective, with all A2 and A3 respondents agreeing that the MAT was effective (*though there were responses from A3 on why MAT was not effective*). However at A1, about 19.20% respondents and 18.20% at A5 held that the MAT was not effective.

TABLE 7.1 ▲ MAT experience and MAT effectiveness across the agencies

Agency		MAT Experience			MAT Effectiveness			
		Yes	No	Total	Yes	No	Total	
Al	Count	26	3	29	21	5	26	
	%	89.70%	10.30%	100.00%	80.80%	19.20%	100.00%	
A2	Count	2	5	7	2	0	2	
	%	28.60%	71.40%	100.00%	100.00%	0.00%	100.00%	
	Count	23	13	36	23	0	23	
A3	%	63.90%	36.10%	100.00%	100.00%	0.00%	100.00%	
A5	Count	11	0	11	9	2	11	
	%	100.00%	0.00%	100.00%	81.80%	18.20%	100.00%	

## Challenges to MAT

To understand what determined the level of effectiveness of the MAT performance, respondents gave reasons as shown in Table 7.2.

TABLE 7.2 ▲ Reasons for MAT performance

	Al	A2	A3	A5	Total			
Reasons for high MAT effectiveness								
Synergy	26	1	30	14	71			
Clarity	26	0	12	6	44			
Resource pooling	13	0	13	3	29			
Reasons for low MAT effectiveness								
Mistrust	7	0	3	2	12			
Lack of framework	6	0	2	1	9			
Corruption	2	0	0	0	2			

*Synergy*, the ability of the agencies to work together as one cohesive team was the most important factor for an effective MAT. *Clarity* presents a clear understanding of goals, roles, and deliverables of the MAT, and was the second most important factor for a successful MAT. Resource pooling is the integration of all resources, human, financial and technical. These three factors, working together, created the highest probability of a MAT being effective by harnessing strengths across agencies.

Low effectiveness of MAT was on account of mistrust that led to suspicion amongst members, fear of sharing information, and overall failure of MAT. Whereas the MAT framework should have made information sharing easy, this was not the case as RIV explained:

Information sharing is often laced with many red-tapes, mistrust and sometimes shared with the wrong audience such as exposes to the media. Similarly, why the bureaucracy? When information is requested, it goes through so many officers, wasting time yet this can be remedied by having liaison officers in all the agencies - RIV.

Lack of framework (i.e. no proper existing legal or policy framework to effectively operationalise the MAT) was a challenge identified by all agencies.

The study established that a key challenge was that MAT lacked a legal framework and its operationalisation was unclear. As one respondent explained, the MAT framework happened at the whims and wishes of those in power, thereby collapsing when there was an administrative change while another respondent stated that the MAT was operationalised at principal level and was not properly cascaded to the operational level. Further, there were no established processes of the MAT, including on issues such as the calibre of officers, training needs, team building or team dynamics, resources, and intelligence sharing. Some of the interviewees decried the low calibre of officers posted to the MAT while others lamented that information/intelligence sharing within the MAT was characterised by bureaucracy.

To further illustrate the challenges, using a 5-point Likert scale was used with the following parameters: 1 = never, 2 = rarely, 3 = neutral, 4 = occasionally and 5 = frequently.

Respondents were asked how often they experienced certain challenges when dealing with other agencies. Using a 'Compare Means Test' (median used, instead of mean as it is an ordinal scale), the results are as shown in Table 7.3.

From the Table A2 respondents had low inter-agency experience, thus they never experienced any of the challenges. For A1 respondents, use of intelligence reports to solicit for bribes was an occasional challenge while for A3 respondents it was leakage of intelligence. For A5, and equally for A1, missing evidence was an occasional challenge. For all agencies, however, inadequate information or support (uncooperativeness) was a cross-cutting issue that created bottlenecks, thereby impairing smooth operations.

TABLE 7.3 ▲ Inter-agency challenges

Challenges	Al	A2	А3	A5	Total
Leakage of intelligence information	3.00	1.00	4.00	3.00	3.00
Use of intelligence/investigation/ prosecution reports to solicit for bribes	4.00	1.00	3.00	3.00	3.00
Lack of professionalism	3.00	1.00	3.00	3.00	3.00
Inter-agency conflicts	4.00	1.00	3.00	3.00	3.50
Dropping/missing evidence	4.00	1.00	3.00	4.00	4.00
Inadequate information/support from other agencies	4.00	1.00	4.00	4.00	4.00

### Improving inter-agency cooperation

The third objective of the study was to establish how inter-agency cooperation could be improved. The research observed that A2 was not a key MAT member despite its strategic advantage in gathering and analysing financial information. The challenge witnessed in getting information could thus readily be remedied by more active involvement of A2 at operational levels. Respondents across all agencies noted that a framework, either set in law or policy, was needed, as the MAT functioned without any legal anchor. However, respondents involved in a MAT that was well structured noted that they were never successful in prosecuting and convicting a single case. Thus, in establishing a MAT framework, it is not simply about putting all agencies under one roof.

Capacity building was identified as key to improving the MAT. For instance, the MAT may be preceded by training and team building exercises as well as workshops/seminars that try to synthesise the different personalities and create strong cohesive teams that can work as a whole. This would also create synergy which is important due to the diversity of professions, cultures, organisational background, ways of working, and weltanschauung (worldview).

## Conclusion

The MAT approach is heralded as an important chapter in Kenya's fight against corruption. It was an approach where intelligence supposedly took the lead and coordinated with other agencies leading to a targeted fight. Some 74.7% of the respondents had been involved in the MAT, with A1 preferring to work with A3 while A4, on account of its independence, was not a key player. The effectiveness of the MAT was high among 88.52% of the respondents with the key reason being synergy. The key challenge is that MAT lacked a legal framework and its operationalisation is unclear.

## Recommendations

- The MAT framework needs to be grounded in legal and policy frameworks that guide its establishment, implementation, roles and interactions of agencies, staffing requirements, resource and information sharing, Key Performance Indicators (KPIs), Monitoring and Evaluation among others. Its anchoring can be driven by EACC and ODPP who are the lead agency and prosecutors respectively;
- To improve information and intelligence sharing among agencies, liaison officers or having an information management system in place may be considered so as to allow timely access to information by all actors;
- There is need to allocate adequate resources to MAT frameworks to ensure achievement of deliverables. The resources can be pooled from each individual agency or from partner agencies, and some of these can go towards the acquisition of technology, databases, and analytical tool as well as training to keep abreast with trends and typologies of corruption. Better remuneration plus other systems of reward to improve and increase the morale of officers may also be considered;
- The establishment of MAT should ideally be preceded by activities to create synergy and cohesive teams including training, team building activities, workshops, and seminars among others.

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