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Anti-Corruption Regulation: A Comparative Analysis of the Practices in Ethiopia, Singapore, Norway, and Rwanda

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ABSTRACT: This article aimed to analyze the existing anti-corruption regulations of Ethiopia, Singapore, Norway, and Rwanda, comparatively, to search for better anti-corruption practices' standard operating procedures (SOPs). This research is motivated to improve the existing practices of the Federal Ethics and Anti-Corruption Commission (FEACC) of Ethiopia. The above countries' anti-corruption agencies (ACAs) are different in terms of the mandate assigned to them (institutional models). The comparison was based on the factors that contribute to or hinder the effective administration and operation of anti-corruption mandates. The research was guided by the Theory of Change (ToC). A qualitative approach and comparative case study (multiple case study) designs were employed. The sources of data for this research were operational documents, legal documents, and international and continental organizations' reports, such as UNCAC's Country Review reports and Organisation for Economic Cooperation and Development (OECD) reports, among others; experts e-mail interviews at anti-corruption agencies in Ethiopia and Rwanda; and social media platforms (Facebook, Twitter, YouTube, and LinkedIn), as well as anti-corruption agency websites, were accessed as sources of data. The triangulation approach was implemented in a complementary way to achieve the research results. Data collected from various sources was processed qualitatively with the support of specialized software (Atlasti.9) and then analyzed by the researcher. Data analysis in this research involved detailed case-by-case analysis followed by comparative thematic analysis. The findings show that, even though there are some legal frameworks and SOPs in Ethiopia's FEACC, there are a series of challenges in effectively managing anti-corruption activities. Therefore, the research draws lessons from their better practices in Ethiopia. Finally, the research recommends issues for the betterment of anti-corruption efforts in Ethiopia and proposes areas for further research.

Keywords: Anti-corruption, Regulation, Practices, Standard Operating Procedure

Introduction

Corruption is acknowledged as a multi-dimensional problem affecting all human activities around the world, particularly in developing nations (Fritzen & Dobel, 2018; Sevüktekin, Nargeleçekenler, & Giray, 2010). To be exact, corruption in Ethiopia is an ancient phenomenon with a social and cultural background (Abeje & Narayana, 2015). Corruption emerges from poor anti-corruption policies, low civil service salaries, the absence of accountability mechanisms, and above all, a weak anti-corruption agency and legal system, particularly in developing states (Armstrong, 2000; Gebre, 2016). Eradicating corruption starts with formulating and implementing sound policy and anti-corruption systems, applying ethical principles in public organizations, and practicing good governance (Washington & Armstrong, 1996; Stevulak & Brown, 2011; Gebre, 2016). In this regard, many countries ratified and adopted international anti-corruption conventions and regional protocols, formulated domestic laws, policies, and regulations, and established anti-corruption institutions to resolve the problem of corruption. The regulatory measures and institutional strategies to fight corruption have become more important over the last two decades, as has the rise of bodies specialized in anti-corruption activities (Odhiambo, 2016). In this process, essential elements of the strategy are chosen based on appropriate policies and strategies that enhance the capacity and model of the institutional structure to play an expected role against corruption (UNDP, 2005).

Around the world, there are many anti-corruption agencies; their mandates, functions, and establishment vary; some ACAs were established from scratch as independent ACAs, while others were within ombudsman offices, special units within police departments, or justice departments (Schedler, Diamond, & Plattner, 1999). In this case, despite their various forms and models, we can mainly categorize them into preventive and multiple-purpose agency models in terms of mandates and functions (Arsema, 2010). In this case, the OECD recommended that the establishment of ACAs be better adapted to the specific national context by considering varying cultural, legal, and administrative circumstances (OECD, 2008). Among ACA's institutional models, so far, there is no conclusive evidence on which model is the best and most effective in preventing or combating corruption (Mitchell, Merrington, & Bell, 2014).

The existing anti-corruption regulation can be understood based on two interrelated strategies. The one is the compliance-based approach. It involves rules, administrative procedures, and regulations that involve discretion and sanctions in order to check corrupt acts (repressive measures). The other is the integrity-based approach, which provides an ethical and moral framework through socialization and training to arrive at acceptable moral standards (preventive measures) (Downe, Cowell, Chen, and Morgan, 2013; Rohr, 1978; Christensen & Lægveid, 2011; Veresha, 2018). The above approach is used in a complementary fashion to address improper or unethical behavior in an organization or to arrive at an appropriate ethical/moral standard (Bowman & Knox, 2008; Cooper, 2012). ACAs have the upper responsibility to manage and regulate corruption ethics, either through an integrity-based and/ or compliance-based approach (Hijal-Moghrabi & Sabharwal, 2018; Gilman & Lewis, 1996). Despite these efforts, corruption remains a socio-economic and development problem for most countries around the world, especially in Africa (Mauritius, 2018). In this research, anti-corruption regulation is understood as any rules, procedures, processes, methods, management tools, or institutional structure designed to promote effective administration and management of ACA.

Similarly, the government of Ethiopia started designing the civil service reform program in 1994, and the FEACC was born out of this program by Proclamation Number 235/2001 as an independent multi-purpose agency model (Arsema, 2010). However, the mandate, functions, and power of the commission have been changed at different times. For instance, in 2015, the mandate of investigation and prosecution of the commission was given to other bodies, and in 2021, the commission's establishment proclamation was revised. Thus, the existing mandate and function of the commission are limited to corruption prevention.

This comparative research analyzed the anti-corruption regulation practices of the four countries' ACAs to draw lessons from their anti-corruption practices and identify the better regulations, mechanisms, and SOPs that produce the intended result at the input and activity stages by focusing on specialization, independence, resources, power, coordination, cooperation, and information exchange. As Lincoln and Guba (1985) and Marfan & Pascual (2018) stated, the goal of cross-country comparative research is to report the "lessons learned."

Because the empirical evidence and regional and international standards, protocols, and conventions stated that ACAs to function effectively, they must have relevant resources and effective policies; be independent and specialized; and coordinate and cooperate well with various bodies (Langbein & Sanabria, 2017; Gebre, 2016; Meagher & Volland, 2006; Quah, 2015; Doig, 2004; Dereje, 2018; Osifo, 2012; Sebek, 2019; Demmke & Moilanen, 2011; De Sousa, 2010; Mauritius, 2018; Quah, 2008; Johnson et al., 2011; Badet et al., 2016; Cardona, 2015; UNDP, 2011; UNDP, 2005; OECD, 2008; AUCPCC, 2003). In particular, the UNCAC in Article 5 recommends that the countries review their efforts to search for the most effective ways that produce success in eradicating corruption (UNCAC, 2003, p. 55).

The previous studies witness that, despite the various efforts of the FEACC of Ethiopia, corruption of all forms remains a major socio-economic problem in the country (AAU, 2010; Kilimanjaro, 2011; Selam Development Consultant, 2014; Transparency Ethiopia, 2008; Ibrahim, 2013; the World Bank, 2005; JGAMP, 2001; Plummer, 2012; Transparency International, 2014 & 2013). Thus, the commission's efforts were challenged due to a lack of independence and autonomy; a lack of specialized staff; low public confidence; a lack of cooperation with relevant bodies; inadequate resources; and an unclear mandate and functions to bring about the expected change in curbing corruption (Arsema, 2010; Biruk, 2016; Zemelak, 2017; Tewodros and Raymond, 2011; Rahman, 2018; Hasen, 2020). However, the above-mentioned studies pose some gaps in terms of the themes of the study, the scope of the study, the population of the study, and the methods. In addition, most of the studies were conducted ten years ago and focused on the previous mandate and functions of the commission.

The countries were chosen for this research based on their success stories in reducing corruption compared to Ethiopia. They established different ACA institutional models: Ethiopia's anti-corruption commission has been implementing a preventive model since 2015; Singapore's Bureau has a multi-purpose agency model; the Norwegian authority has a law enforcement model; and Rwanda's office is unique because it was established in the office of the Ombudsman.

Research questions

1. What are the features of the existing anti-corruption practices' standard operating procedures (SOP) in Ethiopia, Singapore, Norway, and Rwanda?
2. What better practices' standard operating procedures(SOP) can be adapted, implemented, and incorporated into the anti-corruption drive in Ethiopia?

Specific Objectives of the Research

To compare the existing anti-corruption standard operating procedures (SOPs) of Ethiopia with Singapore, Norway, and Rwanda.

To find out better standard operating procedures (SOPs) for an anti-corruption drive in Ethiopia.

Significance

The findings are significant in expanding the current understanding of the ACA's practices. It also presents lessons and options for Ethiopia to closely observe the existing conditions. Finally, it is also a baseline for further research.

Scope and Limitation of the Research

Thematically, it focused on the anti-corruption regulations of ACAs under their mandate jurisdiction and operationalized four themes. Geographically, it compared the central anti-corruption agencies of four countries. Methodologically, it employed a qualitative multiple/comparative case study design and was temporarily cross-sectional.

Regarding the limitation, the sources of data for this research were documents, e-mail interviews, and social media. The interview was not conducted at two ACAs (Singapore and Norway), and a few operational documents were accessed due to the sensitivity of the topic. In addition, limited information was included from social media that was permitted by the ACAs. However, the available data were triangulated to improve the validity and reliability of the results.

2. Review of the Literature

Anti-corruption Regulation

Regulation as a process of administrative rule beyond written laws encompasses a range of institutions, policies, and actors (Scott, 2010). Furthermore, according to Hood, Rothstein, and Baldwin (2001), regulation is defined as managing, ordering, and influencing behaviors through standard setting, compliance monitoring, and enforcement. Regulation involves both hard and soft laws in governing particular issues (Levi-Faur, 2011; Black, 2002, p. 1). The broad definition of regulation includes non-state processes and intentional mechanisms of social control, such as social norms that reshape and affect behaviour (Baldwin, Scott, & Hood, 1998).

Anti-corruption regulations range from formal legislation to ethical principles, codes of conduct, and training to cultivate ethical behavior (Downe, Cowell, Chen, and Morgan, 2013). Therefore, anti-corruption regulation can be understood as two interrelated approaches to managing ethics and fighting corruption. The one is the compliance-based approach. It involves rules, administrative procedures, and regulations that involve discretion and sanctions to check corrupt acts. The other is the integrity-based approach, which provides an ethical/moral framework through socialization and training to arrive at an acceptable moral standard (Bowman & Knox, 2008; Hijal-Moghrabi & Sabharwal, 2018; Rohr, 1978; Cooper, 2012; Gilman & Lewis, 1996; Veresha, 2018; Drahos, 2017, p. xxvii). In this research, anti-corruption regulation is understood as any rules, procedures, processes, methods, management tools, or institutional structure designed to promote effective administration and management of ACA.

Anti-corruption Institutional Models

The above-mentioned anti-corruption approaches have been classified by various scholars and international organizations into the following popular ACAs institutional models based on their functions, mandates assigned to them, and reporting procedures: multipurpose agency model; law enforcement-type institutions; preventive policy development and coordination institutions; and a parliamentary model (OECD, 2008; Quah, 2009; Toolkit, 2004; UNDP, 2005, p. 4).

The factors that contributed to or hampered the effective management of anti-corruption agencies:

Specialization

Specialized skills and a clear mandate to combat corruption are required for specialization. It refers to an agency's specific mandate, focus, and professional staff with specific skills (Cardona, 2015; Šebek, 2019; OECD, 2008; UNCAC, 2003; AUCAC, 2004; Babu, 2006). In this regard, identifying their mandate's jurisdiction, defining the scope, and eliminating mandate overlap and duplication are crucial for anti-corruption agencies' success (UNCAC 2nd & Harutyunyan, 2003; Mauritius, 2018).

Independence

In practice, independence includes freedom from any interference (Cardona, 2015; Mauritius, 2018). There are at least three categories of independence in the ACA context. They are organizational, financial, and professional. In general terms, the independence of the ACA is about adjudicating corruption offenses freely without any favor or terror, implementing recruitment and selection processes of staff without interference, and enjoying full freedom in discharging their mandate with confidence, which can contribute to the effectiveness of anti-corruption agencies (Transparency International, 2017).

Adequate Resources and Power

In this context, adequate resources include human training and development investment. In addition, the agencies must have sufficient jurisdiction with their investigative capacities, resources, and modern methods to develop evidence (Šebek, 2019; OECD, 2008; UNCAC, 2003).

Cooperation and Coordination with Various Bodies

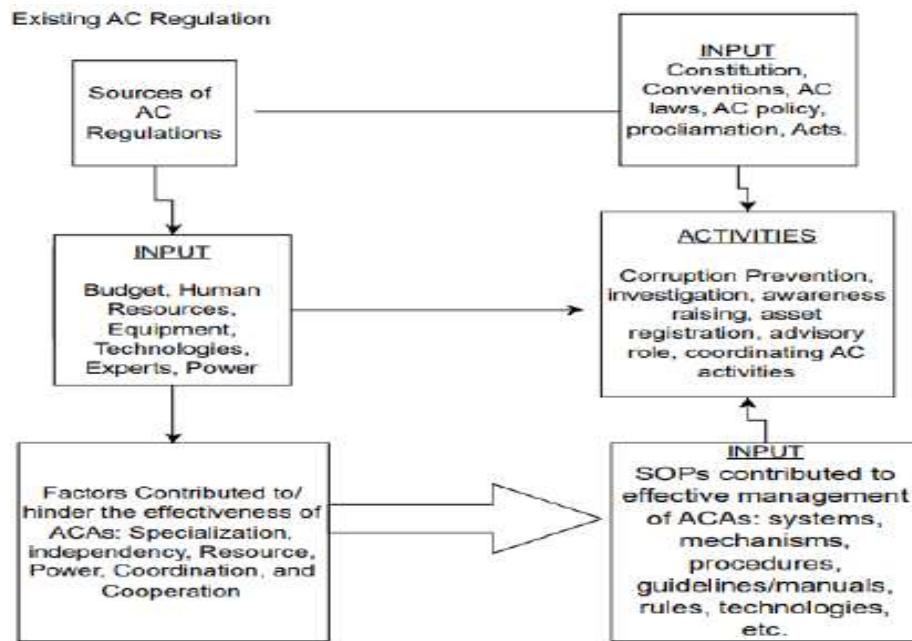
Cooperation in anti-corruption activities includes inter-agency coordination and international cooperation. Inter-agency cooperation and coordination have paramount significance for the effectiveness and success of anti-corruption agencies. Anti-corruption agencies typically collaborate with the police, the attorney general, public prosecution bodies, the judiciary, and audit offices (Mauritius, 2018). International and regional cooperation is undoubtedly important for anti-corruption agencies. In this framework, UNCAC Article 43 advocates cooperation at the international level for experience sharing. Research on anti-corruption agencies also reveals how cooperation, experience sharing, and knowledge transmission significantly contribute to institutional capacity enhancement by referring to the countries that successfully fight corruption, such as Singapore and Hong Kong (Mauritius, 2018).

Theoretical Framework: Theory of Change

Theory of Change (ToC) is a multi-purpose tool that can be applied for planning, managing, monitoring, and evaluating research, especially change-oriented research (Akca, 2021). White (2009) defines the "theory of change" as a method for improving the processes of project design, implementation, and evaluation. It is a tool used to model how short-term changes lead to long-term impacts. The ToC methodology was developed to explore behaviors and outcomes that are not easily measurable, so it is well-suited for anti-corruption organizations. Funnell & Rogers (2011) and Johnsen (2012) comment that the ToC can be helpful for policy architects and evaluators in the anti-corruption field.

The five components of a theory of change are inputs, activities, outputs, outcomes, and impact (Rogers, 2014). An anti-corruption agency's "effectiveness" would be assessed by comparing its internal processes, outputs, and resources against those of other ACAs. Such measures aren't based on corruption levels being measured (Johnsen, Hechler, De Sousa, & Mathisen, 2011). The indicators are divided into categories based on the basic functions that ACAs usually perform, including general management (organizational strategy, standard operating procedures, internal monitoring mechanisms, reporting procedures, and the standardization of work processes through documentation and guidance (manuals, handbooks); knowledge production, management, and dissemination; law enforcement; corruption prevention; and inter-agency cooperation (Johnsen et al., 2011; Vogel, 2012). The assessment of an organization's capacity includes an analysis of its systems and management processes, as well as its financial, human, and other resources (Lusthaus, Anderson, & Murphy, 1995). The adequacy of inputs and the effective activities of ACAs determine an expected change, which is comprised of outcomes and impacts according to the principles of the theory of change.

Conceptual Model



Source: Literature based Conceptualization.

This conceptual model was developed for this research based on the literature. Ethiopia is implementing corruption prevention functions (preventive ACA model), Singapore is implementing preventive and investigative anti-corruption functions (multi-purpose ACA model), Norway is implementing corruption investigation and prosecution ACA functions (law enforcement model), and Rwanda is implementing a preventative, policy development, and coordination model (unique). Their AC functions are rooted in the United Nations Convention against Corruption. The proclamation and constitution, AC policies, Penal Code, Prevention of Corruption Acts, National Security Provisions, and Environmental Crime Provisions; and UN, AU, and OECD Conventions are the major sources of anti-corruption regulation, which immediately give the mandates of the ACA input for its activities with a budget, human resources, expertise, equipment needs, and available technology. Thus, the ACAs play different roles in the war against corruption. These activities include expanding ethics education, asset registration, preventing corruption, and advising on corruption issues. In this case, ACAs developed standard operating procedures (SOPs) for their activities.

The factors that promote or hinder the effectiveness of the commission to implement its mandates include specialization, independence, resources and power, cooperation, inter-agency collaboration, and the existing anti-corruption regulations of the ACAs and their mandate boundaries, which imply the existing functions and organizational structure (models) of the ACAs.

3. Research Methodology

This article adopted a qualitative comparative multiple case study that focused on the anti-corruption agencies of Ethiopia, Singapore, Norway, and Rwanda. The decision to select them was premised on the fact that they are presently operating in their respective countries with a common objective, i.e., fighting corruption, which is a global problem. The comparison was intended to search for alternative lessons, better standards, and operating procedures that boost the effective management of anti-corruption agencies, particularly the Federal Ethics and Anti-corruption Agency of Ethiopia. Comparative analysis improves our critical understanding of our own society's ways of thinking, patterns, and systems by examining similarities and differences in issues established and implemented in other societies (countries). Hence, the comparison provides an opportunity for alternative options and the search for solutions for specific constraints by

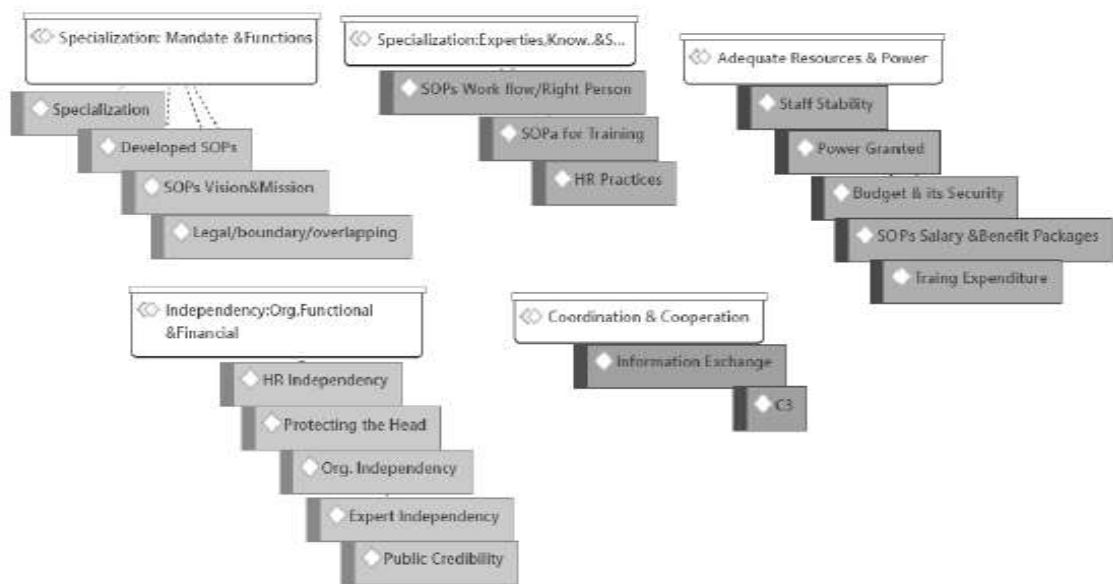
indicating the ways and means of resolving them (Esser & Vliegthart, 2017; Kim, Brenner, Liang, & Asay, 2003).

The sources of data for this research were key informants' e-mail interviews, ACA's social media platforms, and documents such as the national, regional, and international legal documents; the national, regional, and international ACA reports; and books. The key informants were experts from ACAs in Ethiopia and Rwanda on the positions of anti-corruption strategy, institutional design, performance evaluation, advisors on anti-corruption, directors of human resources, and change management who were relevant to the study.

A purposeful sampling strategy was used in qualitative research as a means or strategy to achieve the saturation criterion (Creswell, 1998a). In qualitative research, sampling must be flexible enough and should mirror the problem statement. With in-depth investigations of specific phenomena, the sampling population should be heterogeneous (Miles & Huberman, 1994). On the other hand, the criteria sampling technique, as its name implies, entails establishing criteria before selecting the study population, respondents, and/or sites. As a result, selected respondents or sites were thought to have a wealth of information or knowledge about the specific issue (or issues) under investigation (Nastasi, 1998). The volume of interviews was determined by data saturation logic.

Comparative case study research, which is conducted on the public policies of different countries, should collect data by interviewing public officials as well as public policymakers in their respective countries instead of relying on official websites and institutions' official documents is more crucial to getting information (data) in a particular context (Seixas et al. 2018). Therefore, in this research, documents and expert interviews were employed during data collection. Furthermore, social media platforms (Facebook, Twitter, LinkedIn, and YouTube) and AC agencies' websites are also used as sources of data. Therefore, in this case, expert interviews, social media platforms, and official websites were also used as data sources to support the evidence in the document (for triangulating) with the responses of the interviewees. In line with these sources of data, relevant international, national, as well as AC agencies' operational documents were collected and analyzed before interview data to justify and fill the evidence gap created by documents; in this way, the evidence collected from various sources together attains data saturation and data triangulation. Methodological triangulation provides sufficient enriched and in-depth evidence (data) from multiple sources (Denzin, 2012). Data saturation is crucial to all types of research. Data saturation can also be achieved through methodological triangulation (Bekhet & Zauszniewski, 2012). Qualitative researchers decide on a sampling plan and determine the sample size based on their estimation and judgment (Moser & Korstjens, 2018). The data analysis in this research was a comparative thematic analysis of four cases.

4. Results and Discussion This section analyzed anti-corruption regulations/ SOPs (any rules, procedures, processes, methods, management tools, or institutional structure designed to promote effective administration and management of ACA). The features of existing standard operating procedures (SOPs) to search for better practices that contribute to specialization, independence, adequate resources, coordination, cooperation, and information exchange within and between various bodies.



Coded and Developed by Atlas.ti.9 window

Figure.4.1 Themes: Analytical Framework

Comparative Analysis:the Federal Ethics and Anti-Corruption Commission (FEACC) of Ethiopia, the Corruption Prevention and Investigation Bureau (CPIB) in Singapore, the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime (NAIPEEC), the Office of the Ombudsman of Rwanda (OOR).

The features of Existing Standard Operating Procedures

Specialization: mandates and functions:

The finding shows that the existing mandate of the FEACC overlaps or already exists in other institutions without clear and strong SOPs that define exactly their roles. Moreover, the finding reveals that compared to the three ACA, the commission's existing mandate and functions are not enough to effectively fight corruption and manage AC activities according to the ToC. In this regard, international best practice standards state that specialization needs to be supported by strong inter-agency coordination and cooperation mechanisms to eliminate mandate overlap and duplication (Mauritius, 2018). In addition, the previous study result also reveals that the mandate overlap and unclear mandates of the ACA create a series of gaps and limitations for implementing their AC policies and programs (UNCAC 2nd & Harutyunyan, 2003). On the other hand, to communicate its vision and mission, the commission typically develops a manual (regulations, directives, guidelines, etc.). Compared to the FEACC, the three ACA have better SOPs, mechanisms, techniques, and systems other than the regulations. In this regard, the empirical literature reveals that AC legal frameworks are not enough to fight and control corruption effectively; mechanisms are needed to implement anti-corruption legislation and manage ACA (Odhiambo, 2016).2016).

Interms of specialized expertise, knowledge, and skill: The research found that the FEACC's human resource (HR) practices (recruitment, training) are based on internal administrative regulation and general civil service proclamation. The SOP was not developed in some aspects of human resource practices (short-term training procedures, etc.). Compared to FEACC, the three ACAs have better SOPs in HR practices (e-recruitment, training curriculum, strong regulations, technologies, etc.). Therefore, unlike the FEACC, the three ACAs have developed and implemented the SOPs that realize specialization: expertise, knowledge, and skill. In this regard, international standards demonstrated that specialization is vital for the effective functioning of ACAs. Because fighting corruption requires specific knowledge, expertise, and

skills (OECD, 2008). In addition, the previous empirical finding reveals that to promote professionalism in the organization, there must be a career system in place based on the principle of meritocracy that allows the promotion and recruitment of civil servants fairly and neutrally with clear regulations that delineate the rights and responsibilities of public servants (Saint-Martin & Thompson, 2006).

Regarding the issue of independence, the research found the following issues: in the commission's HR practices, there is only administrative regulation (manual) that is subject to manipulation; the commissioners' dismissal procedure is not transparent, or there is no concrete evidence for their dismissal decision by the government (the practice is against the commission's establishment proclamation); the commission is currently accountable to the executive; and the commission lacks SOPs that enhance experts' professional freedom.

Compared to the FEACC, the CPIB is significantly independent of any influence. However, the research found that, similar to the FEACC, the Bureau is accountable to the prime minister. Therefore, this condition departs from the principles of independent ACAs, stating that organizational independence is the least possible degree of government participation in the appointment of the agency's authorities and implementation of its functions, and its decision-making and functional independence refer to the agency's ability to carry out its functions without the undue interference of any third party or the executive (Mauritius, 2018). In addition, according to the OECD (2008), the independence of a specialized ACA is considered a fundamental requirement for the proper and effective exercise of its functions. The reasons why the independence criteria rank so high on the anti-corruption agenda are closely linked with the nature of the phenomenon of corruption. On the other hand, compared to the FEACC, the Bureau has outstanding HR practices that enhance its independence (e-recruitment procedures, training SOPs, the "Government Instruction Manual," directors nominated from civil servants, etc.). In NAIPEEC, with the principles of a transparent government system in place, the independence of the authorities is ensured. For instance, the recruitment processes are implemented through e-recruitment, and the potential applicants apply online. There is also a procedure that ensures experts' freedom. The OOR has a strong legal basis that ensures its independence, including the constitution. In this case, the finding shows that the appointment procedure of the Ombudsmen is transparent and that they are free from any influence. In addition, Rwanda has an outstanding civil service management system, regulations, and a standard e-recruitment procedure. The other interesting SOP is the public credibility evaluation system: Rwanda Governance Scorecard, Rwanda Bribery Index, auditing system, public suggestion boxes all over the country, the evaluation survey is conducted by an external consultant, and the office organizes a panel discussion at the grass-roots level. Therefore, the findings of this research on the HR practices of ACAs in Singapore, Norway, and Rwanda support the previous research by Langbein & Sanabria (2017); it reveals that independent and professional public organizations are those that implement merit-based criteria in human resource management rather than politically affiliated criteria and are free of subjectivity and interference, which can be more likely to ensure the independence of ACAs.

Interms of adequate resources and power: This research found that the FEACC prepares the annual budget as per the commission's establishment proclamation and the guidelines of the Ministry of Finance, which is approved by the Parliament and funded by the Ministry of Finance. Regarding the issue of staff salary and employees' stability, the research found that the commission salary scale is low and there is a high turnover rate; in this case, the commission lacks the SOP for employee retention. In addition, short-term training investment has no established standard that pre-determines the required budget and lacks training need assessment procedures. Compared to the FEACC, the CPIB's budget is revised from time to time based on market conditions and has clear legal provisions. Furthermore, the findings show that, unlike FEACC, the CPIB staff salary and benefits are constantly reviewed based on government policy that declares and determines the salary scale by considering the current

market condition. The Bureau invests more in staff training and capacity development based on the assessment of experts' performance and skill gaps. In this regard, this finding supports the previous study by (Demmke & Moilanen (2011), which states that for ACAs to be effective, the political elite must support the design and implementation of anti-corruption policies and regulations. On the other hand, based on transparent budgeting procedures, the government of Norway spent more on NAIPEEC, and significant resources were allocated to help both foreign and domestic police agencies that investigate corruption. The issue of salary and benefits is determined based on Norway's wealth redistribution policy, and the NAIPEEC implements various projects on the capacity development of its staff in collaboration with the Ministry of Finance, the Ministry of Justice, and the universities.

The evidence shows that Rwanda has a similar budgeting procedure to Ethiopia. The office's budget is based on legal provisions such as Rwanda's constitution, the Presidential Order, and the law governing the office and is approved by the parliament. Capacity building at institutional, organizational, and individual levels takes priority. In addition, the training and development program is managed by the Rwanda Development Board. The issues related to employees' salaries are also determined by the presidential order, the Prime Minister's order, and the Rwanda public sector pay and retention policy and implementation strategy. The salary and benefits packages are composed of a basic salary, a housing allowance, a transportation allowance, a state contribution to social security, and a state contribution to medical care. In addition, a staff horizontal promotion system is in place based on the staff evaluation performance contract.

Therefore, in terms of adequate resources (budget) for their operation, employees' salaries, and capacity development, this finding shows that compared to Ethiopia, Singapore's, Norway's, and Rwanda's ACAs have better resources (budget) to fulfill their mandate. Therefore, this finding, related to the previous study result, reveals that an effective human resource policy articulates better civil service pay and enhances human resource capacity development (Armstrong, 2000).

In terms of the power granted to the ACAs, according to the FEACC Revised Establishment Proclamation No. 1236/2021, the commission has the power: to prevent corruption; raise awareness; play an advisory role; organize (media, ethics liaison offices, and various institutions); coordinate AC activities; register assets; and follow up anti-corruption laws; and represent the country by collaborating with others overseas. Compared to FEACC, the outstanding powers granted to CPIB are:

The Prevention of Corruption Act (PCA) has extra-territorial powers over a Singaporean citizen to deal with corrupt acts outside Singapore and investigate both corrupt citizens and non-citizens. The Bureau is also authorized to investigate any bank, share, expense, or purchase with full power. The CPIB has the power to investigate anyone, including the prime minister. The mandate boundary of the Bureau includes both the public and private sectors. On the other hand, the NAIPEEC, as per the Penal Code, which declares criminal acts, has the power to: cancel individuals' and enterprises' jobs; cancel the right to operate in the country; as well as the power related to investigating all forms of financial institutions and financial records. OOR has the power: to assess public projects and make recommendations for implementation by various institutions; to conduct operational audits of public and private institutions and make recommendations for the audited institutions to follow; to request explanations from the authorities of institutions that have not implemented the recommendations; to recover public assets; and to propose new laws to the Parliament. In addition, the outstanding power of the office is that, according to Organic Law No. 03/2012, it has the power to request the Supreme Court to review a judgment rendered at the last instance due to injustice. Therefore, the research found that, compared to the FEACC, the three ACA

have more power in corruption prevention and investigation. But the power of the commission lacks the element of law enforcement, which is crucial to the ACA.

Terms of coordination, cooperation, and information exchange: the FEACC establishing proclamation, 2021, states "the Commission shall establish relations and cooperation on behalf of the country with national, regional, and international bodies." However, it is not coordinated and does not collaborate well with other institutions or bodies, especially with the Federal Police and Attorney General (Ministry of Justice), and there are no clear and specific SOPs to govern the three institutions working on corruption (the FEACC, Federal Police, and Attorney General (Ministry of Justice)). However, at the national level, the commission works with various bodies based on the MoU, such as religious institutions, civil society, medical associations, trade forums, the business sector, and others. Unlike the FEACC, the CPIB established and developed the following SOPs: a permanent secretary in each ministry; a Practical Anti-Corruption Guide for Businesses (PACT); a Government Instruction Manual (GIM); workshops; Innovate, Digitize, Engage, and Adapt and Skill Up (IDEA); a Public-Private Partnership (PPP); an Anti-Corruption Partnership Network (ACPN); and Various Intelligent Systems in One Network (VISION). On the other hand, NAIPEEC has the following SOPs: works with multinational organizations and forensic professionals on the prevention and detection of fraud and corruption; has a joint governance model; has a joint alliance against the black economy; and has ethics guidelines for public services. In addition, the authority also cooperates with law enforcement authorities internationally through EUROPOL, INTERPOL, and the Egmont Group, police cooperation, EUROJUST, Nordic police cooperation arrangements, and police-to-police cooperation. Their relationship and cooperation mechanisms are regulated by the Police Act and the Criminal Procedure Act, and most of the time the authorities use video conferencing to conduct meetings with them.

On the other hand, the law that established the office under Article 25(3) states the role of the National Anti-Corruption Advisory Council. In this case, the office follows up on the anti-corruption activities through the Advisory Council at all levels. The office collaborates with international organizations through membership. It also collaborates and works on cross-cutting issues such as gender, family promotion, etc. In addition, the office developed the following SOPs for information exchange: an MoU, an Advisory Council, a secure intranet system for managing files and workflow across all its departments, email, a WhatsApp group, periodical staff meetings, and Cybercafé. Complaints received through Cybercafé.

Therefore, the research shows that, compared to FEACC, the CPIB, NAIPEEC, and OOR have relatively better SOPs for coordinating, cooperating with, and exchanging information. However, the commission is not yet well coordinated and has not collaborated with other national, international, and regional institutions/bodies. Specifically, research indicates that the commission should coordinate and cooperate with the Federal Police and Attorney General (the minister of justice). In this regard, the previous study by Dereje (2018) stated that "policy implementation cannot achieve its intended goals with a single ministry, agency, or department; it must bring together all potential stakeholders with diverse interests" (p.1) Furthermore, the evidence indicates that "one of the important features of specialized bodies promoted by different international instruments is cooperation with civil society. This standard applies not only to the preventive and education bodies but also to the law enforcement bodies. An anti-corruption body cannot function in a vacuum, and none can perform all tasks relevant to the suppression and prevention of corruption alone. Efforts to achieve an adequate level of coordination, cooperation, and exchange of information should take into account the level of existing fragmentation of the anti-corruption functions and tasks divided among different institutions (OECD, 2008).

In addition, according to Mauritius (2018), cooperation in anti-corruption activities includes inter-agency coordination and international cooperation. Inter-agency cooperation and

coordination have paramount significance for the effectiveness and success of anti-corruption agencies. Anti-corruption agencies typically collaborate with the police, the attorney general, public prosecution bodies, the judiciary, and audit offices. But in practice, existing experience reveals that, in various countries, inter-agency cooperation and coordination are weak or don't exist due to political interference and mandate overlap among institutions. In practice, however, different countries address the challenges by establishing special multidisciplinary coordinating commissions, enacting special legal provisions on cooperation and information exchange, or signing special agreements and memorandums among relevant institutions on cooperation and information exchange (UNDP, 2011; OECD, 2008).

The Lessons Learnt: Standard Operating Procedures

The lessons drawn from the comparative analysis of the four ACAs presented are based on: Specialized: mandates and functions; Specialized: expertise, knowledge, and skills; independence—organizational, functional, and financial; adequate resources and power; and coordination, cooperation, and information exchange. In this regard, the researcher's early statement was that "despite the contexts and environments in which anti-corruption agencies operate, the researcher believes that best practices can be learned from everywhere." Furthermore, scholars reveal that, so far, there is no conclusive evidence on which AC model and practices are the best and most effective in preventing or combating corruption (Mitchell, Merrington, & Bell, 2014). However, empirical evidence and regional and international standards, protocols, and conventions stated that, for anti-corruption agencies to function effectively, they must have relevant resources and effective policies that are independent and specialized, as well as coordinate and cooperate well with various bodies (Langbein & Sanabria, 2017; Gebre, 2016; Meagher & Volland, 2006; Quah, 2015; Doig, 2004; Osifo, 2012; Sebek, 2019; De Sousa, 2010; Mauritius, 2018; Quah, 2008; Johnson et al., 2011; Badet et al., 2016; Cardona, 2015; UNCAC, 2003; UNDP, 2011; UNDP, 2005; OECD, 2008; AUCPCC, 2003).

The comparative research concludes that compared to the CPIB, NAIPEEC, and OOR, the FEACC's existing SOPs are not effective according to the principles of the ToC; the inadequacy of inputs and the lack of effective SOPs for its activities hinder the realization of the expected result. Therefore, the research supplies the issues that need to be considered in Ethiopia with lessons from Singapore, Norway, and Rwanda. A cross-country comparative study aims to report the "lessons learned" (Marfan & Pascual, 2018; Lincoln & Guba, 1985).

What better practices' standard operating procedures (SOP) can be adapted, implemented, and incorporated into the anti-corruption drive in Ethiopia?

In terms of the clarity of the legal framework and specialization, the research found that the FEACC has some legal documents and SOPs for preventing corruption. However, there is a challenge in the clarity and competence of the mandate, functions, and working procedures: overlapping areas have no strong, clear, and specific SOPs that delineate the roles and coordinate them; the quality of internal working procedures; the consistency of the internal structure; tension in the ever-changing mandate and functions; and the identity of the ACA as a specialized agency. The commission's HRM practices, on the other hand, are based on directives and guidelines, which are manual documents that can be manipulated or corrupted and cannot address the human capital market; the commission lacks a standardized job description, workflow procedures, and short-term training assessment SOPs; the commissioners' dismissal procedure is not transparent (the practice is contrary to the commission's establishment proclamation); and the commission is currently accountable to the executive. The procedures for coordinating and exchanging information within and between various bodies are ineffective and lack clear SOPs. Especially with the Federal Police and the Attorney General (Ministry of Justice), the research identified this as a fundamental challenge.

Therefore, the CPIB has a broad and powerful mandate and responsibilities in preventing and investigating corruption in public, private, and overseas; developed SOPs (Pro-Enterprise Panel (PEP), Zero In Process (ZIP), POWER, More Vision, Less Bureaucracy (MVLB), mobile exhibitions, videos, and cartoon films); Kopi Lim, the corruption reporting channel; the annual customer survey procedure; and the procedure for managing false information. HRM is guided by the principles of meritocracy, equal opportunity, and transparency: e-recruitment and listing criteria (communication skills, physical fitness, psychometric principles, pen-and-pencil test, structured interview panel, and behaviour traits model). The training programs and modules are designed for employees at all levels in cooperation with educational institutions, and there are scholarship opportunities. The staff is stable due to: protection, transparency, attractive salary and benefits, training and scholarship opportunities, government commitment, transparent policy, and procedure.

The CPIB is an independent ACA with effective laws, an independent judiciary, political commitment, and responsive public service; the directors are nominated from the public service. However, it is accountable to the prime minister. Bureau's budget, staff salaries, and benefits are regularly reviewed (a conscious policy of the government to peg salaries to the level of the economy). Training expenditures are based on skill gaps. The Bureau also granted extraterritorial jurisdiction over citizens and non-citizens (to investigate any bank account, share account, purchase account, expense account, or any other account, etc.). The Bureau has SOPs for coordination, cooperation, and information exchange such as PACT, IDEA, ACPN, GIM, and expert workshops in the areas of excellence in the investigation, excellence in computer forensics, and excellence in ACA management.

On the other hand, the NAIPEEC is the central and specialized (police and prosecutor) agency in the investigation and prosecution of economic, environmental, and computer crimes in public, private, and international organizations with adequate legal framework and SOPs, including the Pollution Control Act, the Wildlife Act, the Biodiversity Act, the Act relating to Motorized Traffic in Unfenced Areas and on Watercourses, the Salmon and Inland Fisheries Act, and the Act relating to Motorized Traffic, etc. The authority closely works with various bodies based on clear SOPs and no overlapping mandates. Its HRM is transparent (e-recruitment procedures, social media/technologies), has a training curriculum, and cooperates with national and international research and training institutions for the same. The Authority's staff is stable due to, among other things: their protection, transparency, attractive salary and benefits, training and scholarship opportunities, transparent governance and government commitment, policy stability, team spirit, and wealth redistribution policy.

The powers granted to the authority are to seize and access such records and to freeze transactions; in this case, a court order is not required. Enterprises involved in corruption may also lose their operating rights, be prohibited, etc. The authority has wide networks around the globe to develop SOPs for cooperation and information exchange, such as the Joint Government Model (JGM), Work Related Crime (WRC), Joint Alliance against the Black Economy (JABE), ethics guidelines, video conferencing, EUROPOL, INTERPOL, and the Egmont Group.

The OOR is a unique institution; it combines the functions of an ombudsman with those of an independent ACA with a robust legal framework and mandates and coordinates AC activities at the national level through the advisory council. The council is critical to preventing overlapping mandates. The office developed SOPs: rules and regulations; a procedure manual; e-services and e-recruitment; a service charter for citizens; an investigation manual; an AC policy; the prevention and repression of money laundering; the financing of terrorism and the proliferation of weapons of mass destruction; and the Online Declaration of Assets System

(ODAS). Its HRM has a strong legal foundation, such as the Constitution, with an e-recruitment procedure (website, publication, e-mail, SMS, audiovisual), and new staff are sworn in. The staff is stable due to attractive salaries and benefits, professionalism, meritocracy, transparent procedures, the government's commitment to fighting corruption, etc. The office has extraordinary powers, such as the power to propose new laws to Parliament and review court decisions. The office coordinates, cooperates, and exchanges information through an advisory council, working on cross-cutting issues; it also has SOPs for a secure intranet system, WhatsApp groups, and the Cybercafé for information exchange.

The diagram below summarizes the issues that need to be considered in Ethiopia, along with lessons learned, as shown below:

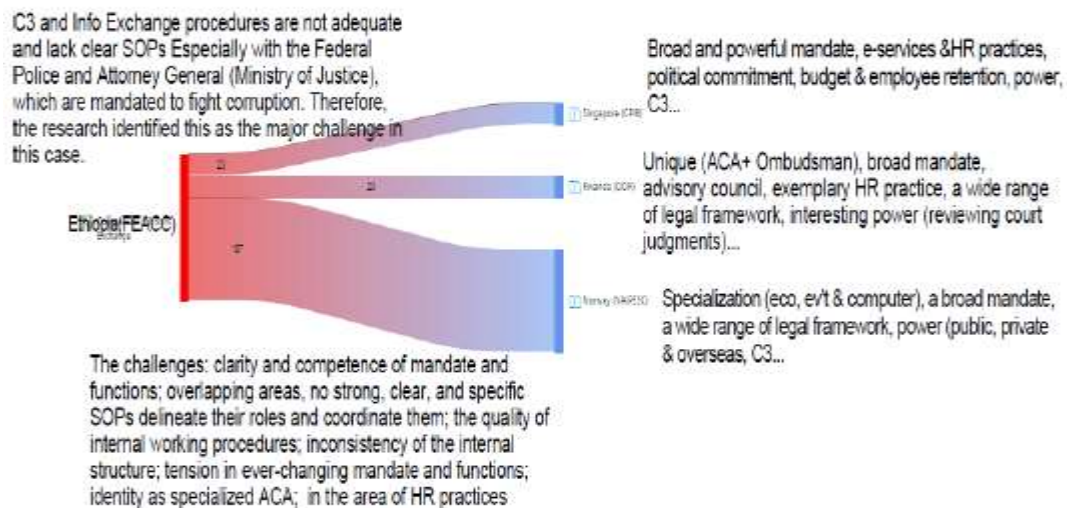


Diagram 5.1 Senkey Diagram

Atlas.ti.9 Window Analysis output

5. Conclusion

This chapter concluded the study by summarizing key comparative research findings based on the research questions and making recommendations; it also attempted to propose the gaps for further research.

The comparative analysis concludes that compared to the CPIB, NAIPEEC, and OOR, the existing AC practices of the FEACC are not effective at the input and activity levels, according to the ToC. To be exact, compared to the FEACC, the three ACAs have better-specialized mandates and functions; factors that contributed to their independence (financial, organizational, and functional); better resources and power that fit into their missions; and better SOPs and mechanisms for coordinating, collaborating, and exchanging information. As a result, this research aimed to search for and draw lessons from ACAs in Singapore, Norway, and Rwanda to provide better options for AC efforts in Ethiopia.

6. Recommendation

The research recommends the lessons learned from ACAs that emerged from the comparative findings of this research as an opportunity to improve the existing anti-corruption practices in Ethiopia for the parliament, stakeholders, and the commission itself.

7. Implication and Future Research

Given the significance of cross-country comparative research in drawing lessons from different contexts, this research contributes to generating new knowledge on the working methods of four countries' anti-corruption agencies. This research is also distinctive in that it brings together four ACAs, which operate in different contexts as well as in terms of institutional model, policy, and practice. Practically, the research assists practitioners and policymakers in closely observing the existing practices in Ethiopia in comparison to others. Finally, the research recommended the limitations and uncovered dimensions of this particular issue.

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