

NATIONAL ANTI-CORRUPTION STRATEGY

Summary

OVERVIEW OF THE STRATEGY

1. Strategy to deal with petty corruption

- a. Government should computerise all activities involving delivery of public services on a mission mode. Adoption of technology would reduce direct interface between the citizens and the public officials. Information about the status of processing of the application of beneficiaries on a “First Come First Served” basis and the progress of delivery should be displayed in public. The potential of the Unique ID project in preventing corruption in delivery of public services should be fully exploited. This would minimise discretion, subjective intervention of public authorities and enhance objectivity.

Action: Government

- b. Simplification of rules and procedures should be undertaken so as to make them citizen friendly and avoid the need for the citizens to approach public officials for intervention. Review of systems and procedures should also aim at identifying and mitigating the risk of corruption. Department of Administrative Reforms and Public Grievance should take up this exercise at the earliest.

Action: Government

- c. Citizens should be empowered to resist the demand for bribes by instituting mechanisms like “Anti Bribery Hot Lines” or Whistle Blower provisions so that citizens can report solicitation of bribes which should then be followed by prompt action. Citizens should also be persuaded and convinced to desist from paying bribes through awareness and education campaign.

Action: Government, CVC, Citizens

- d. Promoting the involvement of citizens and Civil Society Organisations in keeping vigil through means like social audit.

Action: Government, Citizens, Civil Society Organisations

2. Strategy to tackle grand corruption

2.1 Actions to address the Demand Side:

- a. Political parties should demonstrate political will to fight corruption by adopting and enforcing a code of ethics among members, avoiding conflict of interest in appointment to public offices and adopt integrity in governance and prevention of corruption as a key election manifesto. Political will would also be demonstrated if the National Anticorruption Strategy is adopted and implemented; and the institution of Lokpal is created at the earliest.

Action: Political Parties, Parliament

- b. Until the modalities for state electoral funding are decided, disclosure of source of funding and the annual financial statements of the political parties should be made mandatory. Regulation of election funding and expenditure should be further strengthened.

Action: Political Parties, Election Commission

- c. Concealment of ill gotten wealth should be made difficult by ensuring traceability and transparency of all transactions and investments through the use of instruments like UID, Benami Act and Anti-Money Laundering provisions.

Action: Government, Anti-Corruption Agencies

- d. Promotion of transparency, objectivity and merit in selection and appointment to important public offices including the regulatory bodies.

Action: Government

- e. Transparent and participative policy making with regard to policies governing the issue of licences, auction of public assets and norms for regulation of business in various sectors.

Action: Government, Regulatory Bodies

- f. Strengthening the independence and integrity of regulatory bodies. The performance and effectiveness of regulatory bodies in achieving fairplay in regulation of business in their sectors should be evaluated periodically and reported to the Parliament.

Action: Government, Regulatory Bodies, Oversight Bodies, Parliament

2.2 Actions to address the Supply side

- a. Private sector should realise that corruption is against the long term interest of business as it distorts the market and increases the cost of doing business. The private sector should therefore work for a corruption free market based transaction system.

Action: Private Sector, Representative Bodies like FICCI, ASSOCHAM, Government

- b. Introduction of legislation to recognise the offering of bribes as an offence which should act as an deterrence and increase the risk of indulging in corrupt practices for the private sector.

Action: Government, Parliament

- c. Strengthening the enforcement of corporate governance measures. Financial disclosure and accounting norms should be streamlined so that the payment of bribes and kickbacks gets disclosed in accounts and become difficult to conceal.

Action: Regulatory Bodies

- d. A system of blacklisting and debarring of companies found guilty of indulging in unethical practices should be instituted.

Action: Government

SUMMARY OF RECOMMENDATIONS

1. STRATEGY TO ADDRESS POLITICAL CORRUPTION

- 1.1 Establishment of institutions like the Lokpal and the adoption of a National Anti-Corruption Strategy would clearly demonstrate political will and send a positive signal to one and all.
- 1.2 Political parties should adopt a code of ethics and vigorously enforce it. Personal integrity should be given due weightage while enlisting members or giving tickets for election. These are mandatory minimum measures for establishing credibility of the political institutions.
- 1.3 Political parties should avoid conflict of interest while nominating members to public offices like ministers, chairmen or member of parliamentary committees.
- 1.4 Commitment to maintaining integrity in governance and combating corruption should be made a key election manifesto by all parties. Simultaneously the electorate should also be educated and made aware to give due weightage to this manifesto and the integrity of candidates while casting their vote in elections.
- 1.5 Modalities for state funding for elections need to be worked out at the earliest. Contributions to the state fund could be given tax exemptions. Meanwhile indirect public subsidies like tax credits and free media time on state media could be offered to parties combined with fairly strong regulations on intra-party governance, transparency, accountability of public and party funds.
- 1.6 Norms for disclosure of source and amount of funding received by parties should be strengthened. Annual financial statements and income and expenditure of the political parties should be made public. This would also foster a culture of transparency and democracy within political parties.
- 1.7 Political executive should move towards transparent and participative policy making.
- 1.8 Global Organization of Parliamentarians against Corruption (GOPAC) established in 2002, is an international network of parliamentarians dedicated to good governance and combating corruption throughout the world. It attempts to build alliances amongst parliamentarians in developing codes of conduct and indicators of performance of parliamentary oversight and to create forums for training parliamentarians on their budgetary and financial oversight role. GOPAC provides an opportunity for Indian parliamentarians to align their strategy for good governance to those of parliamentarians elsewhere in the world. India should actively participate in the South Asia chapter of GOPAC.

2. STRATEGY TO ADDRESS ADMINISTRATIVE CORRUPTION

- 2.1 Rules, regulations and procedures governing delivery of service and benefits to citizens should be simplified and made citizen friendly. A mission mode exercise should be achieved to achieve this. Exercise should be undertaken to identify the number of submission and approval points involved in activities relating to delivery of public services. Progress in simplification of procedures should be monitored annually in terms of the reduction in processing time and reduction in submission/approval points.
- 2.2 Improve service delivery by adopting an action plan for improving standards of public service through benchmarking and assessment on the lines of Sevottam pilot project. Innovative and localised solutions should be promoted with the involvement of civil society organisations. Instruments like citizen charters, centralised public grievance and monitoring system (CPGRAMS) and citizen report card system developed by the Public Affairs Centre, Bangalore should be replicated.
- 2.3 Reduce human interface and exercise of discretionary powers in delivery of public service through e-governance. Using information technology and automation of corruption prone processes should be undertaken on a mission mode. CVC since 2006 (vide its circulars dated 22-11-06 and 18-4-07) has been persuading with the organisations under its jurisdiction to identify and computerise all the activities which are vulnerable to corruption. However the progress in this regard has not been satisfactory.
- 2.4 Transparency to be maintained in policy making and drafting of regulatory norms. Proactive disclosure system by government agencies should be implemented. The successful model of Mexico's freedom of information programme which has developed tools such as online request processing system could be emulated. The RTI Act should be further strengthened to enhance accessibility to institutions and responsiveness of functionaries.
- 2.5 Government decision making and implementation to be made more participative.
- 2.6 To fight large scale corruption in Panchayati Raj Institutions, a separate vigilance apparatus with citizen's participation should be formed.

- 2.7 Use of citizens charter should be made mandatory. The charter with clearly laid down information about services, government officials responsible for the delivery, timelines, penalty clauses and grievance redressal in case of non-compliance should be prominently displayed in the public domain.
- 2.8 Objectivity and transparency should be ensured in senior level appointments by the government. The following recommendations of 10th Report of the ARC should be implemented to achieve this:
- Bring transparency to the empanelment process of senior officers.
 - Open competition for selection to the posts and Selection to be based on performance and domain competence..
 - Selection through a independent authority like the Central Civil Service Authority.
 - Setting time limits for the selection process.
 - If the administrative ministry disapproves a panel, it should put forward its speaking reasons.
 - Setting of objective and transparent criteria for promotion or appointments to senior positions.
- 2.9 The following steps should be taken to reduce corruption in public procurement:
- Make the system objective by introduction of e-procurement and e-payment.
 - There is a strong case for legislating in this area by incorporating globally recognized practices. Introduction of a “stand still” period between the finalisation of a tender and the signing of the contract to allow the bidders to review, verify and contest the integrity of the process of award.
 - The concept of Integrity Pact should be made more effective by allaying the fear and enhancing the confidence of the private sector. It is actually a public private partnership against corruption in public procurement. Private sector participation in Integrity Pact is still not wholehearted and treated as more of a ritual. Further citizens and civil society organizations should be involved to act as monitors of Integrity Pact.
- 2.10 Vigilance in public sector undertakings, banks and autonomous bodies should be made more proactive and preventive by adopting a risk management approach. Independent Commission on Anti-Corruption of New South Wales, Australia is well known for its risk management approach to corruption which can be adopted by the CVC. This would include (a) development of a corruption risk assessment toolkit to be used by the CVOs for assessing their organisations for the risk of corruption (b) identification of three or four highly sensitive departments per year for suo moto conduct of risk assessment studies and (c) table the risk assessment report in the Parliament and give it wide publicity. The Central Vigilance

Commission is supporting the development of a Corruption Risk Assessment Model by SCOPE.

- 2.11 To recognize and reward the efforts of companies that voluntarily embody good anti-corruption policies, a system of “credits” should be introduced. Companies would be eligible to earn credits on various objective parameters. A framework should be evolved under which specific concessions or incentives should be made available to companies holding credits. Incentives could be in the form of additional points when evaluated for government contracts, priority clearances for major projects, governmental assistance or endorsement in tapping foreign markets, etc.

3. STRATEGY TO DISCOURAGE PRIVATE SECTOR PARTICIPATION IN CORRUPTION

- 3.1 Graduate towards transparent and participative policy making in place of closed door policy especially with regard to grant of licences, auction of public assets, award of large public contracts and in formulating regulatory norms. After the finalisation of a policy and before its implementation, opportunity should be given to all stakeholders to review, debate and contest the policy to ensure fair play.
- 3.2 Strengthen the independence and integrity of regulatory bodies. Conflict of interest in appointment to regulatory bodies should be avoided. Appointment to regulatory bodies should be free from the patronage system and should be based on merit, past performance, domain knowledge and integrity. Performance and effectiveness of regulatory bodies in ensuring level playing field in their sector of operation should be reviewed periodically by oversight bodies and the report presented to Parliament.
- 3.3 Strengthening professional ethics and integrity in legal, auditing, accounting and valuation firms.
- 3.4 With regard to public procurement contracts, the private sector is driven to corruption largely due to the phenomenon of “winner’s curse”. The bidder for a government contract believes that if he does not bribe other competitors would bribe and win the contract because they are convinced that it is the only way of doing business with the government. Efforts need to be made to allay the fears and convince the private sector to contribute towards a corruption free public procurement regime. Private sector should be urged to renounce its misperception of being a hapless victim of the corrupt system and rather come forward and cleanse the system by desisting from corruption. They need to take some initial risk for their long term interest. Though Integrity Pact has been adopted by many government departments and PSUs, they have not engaged the private sector positively.
- 3.5 Corruption needs to be mainstreamed on the agenda of bodies like FICCI, ASSOCHAM, CII etc. who have either ignored this aspect or done very little in this direction. This is the biggest service which they can do to the sector they represent and the people at large.

- 3.6 Concerns of integrity and ethics should be integrated into the corporate governance instruments. Corporate governance should be strengthened through regulation and creation of education and awareness among investors.
- 3.7 The most important measure is to recognise the offering of bribe as an offence. Both solicitation as well as offering of bribe should be made punishable by bringing out suitable legislation. India is few of the countries which has not done so. Until this is achieved there would be no deterrence, disincentive for the private sector to desist from corruption.
- 3.8 System of blacklisting, debarring or shaming of companies found involved in corruption should be seriously enforced.

4. STRATEGY FOR ENCOURAGING CITIZENS TO RESIST CORRUPTION

- 4.1 Capacity building of citizens and citizens group to enable them stand up against corruption through conduct of training by Government. State Institute of Rural Development (**SIRD**) and Administrative Training Institute (**ATI**) could take up the challenge. Trained activists could in turn train school/ college teachers, health workers, village secretaries posted in rural areas.
- 4.2 Citizens should be empowered to resist corruption by enabling them to report solicitation of bribes in vulnerable service delivery activities like PDS, registration of property, municipal services, health schemes etc. The system of hotlines should be introduced for this purpose so that prompt action is taken on the complaints. The system should be regularly monitored as a high priority activity by the Vigilance Commissions both at the centre and the state.
- 4.3 Citizen committees at the service delivery points like hospitals, schools, hostels etc. should be introduced. Citizen committees should also take up inspection of quality of works.
- 4.4 Citizens, citizen's group or civil society organisations should keep vigil over government service delivery by making use of the provision of transparency and social audit to expose corruption. Some successful examples of citizen participation in anti-corruption efforts are mentioned in Annexure-I.
- 4.5 Making of bribe giving as criminal offence would act as deterrent to citizens resorting to bribes.

5. Supporting Framework

5.1 Legal and regulatory Framework

5.1.1 Strengthening of the Prevention of Corruption Act, 1988

- a. The PC Act does not expressly seek to punish corrupt acts of private parties, except to a limited extent through Section 8, 9 (dealing with persons accepting gratification to use their influence on a public

servant in the conduct of an official act) and Section 12 (dealing with abetment, pursuant to which a person offering a bribe could be punished). However, there is no direct provision prohibiting a private person from offering a bribe or engaging in other corrupt practices. Such a provision is required to ensure that all parties to corruption are dealt with adequately.

- b. The provisions of the PC Act are inadequate since confiscation of property acquired through corrupt means is only permitted after prosecution for the relevant offence. To effectively deter public servants from engaging in corrupt activities, it is important that possession of properties disproportionate to known legal sources of income of a public servant be declared as an offence and such properties be confiscated by the state even pending prosecution. Adequate provisions in this regard need to be introduced through amendments to the PC Act.
- c. In cases of corruption, it is extremely important that prosecution take place within a short timeframe. This requires simplification of legal and administrative procedures. Further, exemplary punishments should be meted out to public officials convicted of corruption and the fact of such punishment should be widely disseminated. This will not only act as a deterrent to the officials, but will also bring to the public's attention that steps are being taken to curb corruption.

5.1.2 Prevention of Benami Transactions

- a. An effective anti-corruption strategy should aim at measures which make it difficult for the corrupt to spend or invest the ill gotten wealth. Most of the wealth in India which is accumulated through corrupt means gets invested in benami immovable property, gold and jewellery, high value consumer goods and other conspicuous consumption. The Benami Transactions (Prohibition) Act, 1988 (**Benami Act**) prohibits benami transactions and even provides for government acquisition of the property held benami. However, the rules to make the confiscation of property and other provisions effective have not been issued. Implementation of the Act needs to be made more effective.
- b. The unique identification project presents an opportunity to curb this menace effectively. Quoting the unique identity number or presenting other appropriate identity documents should be made compulsory for acquisition or transactions of all immovable property, purchase of gems and jewellery and for any other major expenditure above a certain threshold, and clear records regarding the same should be maintained. This would ensure that property is not sold to non-existent persons or in fictitious names and would provide information about any expenditure disproportionate to known sources of income.

5.1.3 Unaccounted money parked in foreign banks.

A substantial portion of wealth created through corrupt means finds its way to bank accounts outside the sovereign jurisdiction of India. Government of India has signalled its resolve to unearth unaccounted money parked outside India. The steps being taken in this regard include amending the Income Tax Act, 1961 to enable the Central Government to enter into agreements even with non-sovereign jurisdictions for exchange of information and other purposes. Steps have already been initiated for negotiations for entering into agreements for the exchange of information with other nations and renegotiation of the double tax avoidance treaty with Switzerland is in process. India is an active participant in the global efforts to facilitate exchange of tax information and to take action against tax evasion. These efforts need to be strengthened to eliminate opportunities for investment of wealth earned through corrupt activities.

5.1.4 Empowering people and civil society by strengthening provisions like “Whistle Blowing” and “False Claim” through enactment.

5.2 Institutional Framework

5.2.1 Judiciary

- a. Despite provision of special judges in the Prevention of Corruption Act, there is considerable backlog of cases in various states as well as the centre. The delays are mostly on account of non-establishment of special courts in some states, delay in appointment of special judges, resource constraints of the courts etc. To enhance efficient case disposal, adequate strength of judges along with requisite support staff should be sanctioned. A mandatory outer time limit of one year should be set for disposal of corruption cases. In this regard, some of the best practices contained in the special statutes of Orissa and Bihar, as mentioned below, are worth emulating:
 - A Special Court/Judge shall not normally adjourn any trial;
 - The Special Court/Judge shall endeavour to dispose of the trial of the case; within a period of one year from the date of its institutions or transfer;
 - A judge may act on the evidence recorded or partly recorded by his predecessor.

In addition, the following recommendations of the ARC also may be considered for implementation, in consultation with the superior judiciary:

- Normally special judges shall be entrusted only with the anti corruption related cases;

- The Supreme Court and the High Courts may lay down guidelines to preclude unwarranted adjournments and avoidable delays.
- b. A National Judicial Council tasked with investigating cases of corruption within the judiciary needs to be instituted. While such a suggestion has been considered in the past, it is important that the role and constitution of the Council be carefully structured so as to balance the twin goals of increasing judicial responsibility and protecting the independence of the judiciary.

5.2.2 Regulatory Bodies

- a. Objectivity and transparency should be maintained in recruitment and appointment of officials to regulatory bodies.
- b. appropriate whistle blowing and complaint handling mechanisms should be put in place in all regulatory bodies.
- c. In many instances, regulators prescribe self regulatory measures for their stakeholders (for example brokers in capital markets and practicing public accountants). Such measures govern the conduct of participants in the regulator's area of operation and serve as an important line of defence against unethical activity contributing to corruption. As these measures promote equity and inclusive growth amongst participants, they serve to promote lesser interventions by the regulator and hence reduce the potential for corruption through abuse of power. Self regulations may include:
- Restrictions on acceptance of any office post retirement especially from the conflict of interest viewpoint, like accepting independent directorship or other position in a company,
 - Ceiling on/ regulation of fees and other remuneration to be received,
 - Rotation of auditors once in three years in case of statutory auditors for top listed entities on BSE / NSE).

5.2.3 The Central Vigilance Commission (CVC)

- a. Limiting the restrictions imposed under Section 6A of the Delhi Special Police Establishment Act only to the criminal misconduct on account of abuse of office by the senior Public Servants and vest the powers of pre-enquiry / investigation scrutiny with the CVC and not with the administrative department. Such an arrangement will also be consistent with Article 30 of the UNCAC which advocates a balance of immunities and privileges with the exigencies of investigation.

- b. Creating provisions for punitive action for wilful disregard of the directives (by clearly distinguishing the same from the guidelines) of the commission in a similar manner as prescribed in the RTI Act.
- c. In the same lines as selection of senior officer of the CBI, a committee comprising of the CVC and the two Commissioners, Secretary DOPT and the Home Secretary should be established for selection of the full time Chief Vigilance Officers. CVOs should be paid salaries and perks from CVC accounts.
- d. Creation of more posts and incentives for officers and staff in the Central Vigilance Commission.
- e. Steps to be taken for the capacity building of vigilance officials in line with modern trends and global best practices.

5.2.4 The Central Bureau of Investigation

- a. Enactment of a CBI Act along the lines suggested by the Parliamentary Standing Committee on Personnel, Public Grievances, Law and Justice.
- b. Formal coordination mechanism between the CBI and the state Anti Corruption Bureau.
- c. Collection of statistics on corruption cases and trend analysis should be undertaken under the aegis of the National Crime Record Bureau.
- d. A client satisfaction survey of the complainants of anti-corruption cases with the concerned department in the aftermath of a CBI case should be conducted and government should issue guidelines on special grievance redressal mechanism for the victims of corruption, under the supervision of the Chief Vigilance Officers of the respective organisations.

5.2.5 State Anti Corruption Agencies

- a. During the XVII biennial conference of heads of anti corruption bureau and CBI, a resolution was passed that a national anti corruption mission should be started by the central government for modernization of the state agencies. This recommendation should be implemented under the guidance of the DOPT;
- b. Another resolution of the conference that a committee should be formed for the standardization of practices and organization structure of the state agencies should also be implemented.
- c. State agencies should be made multi disciplinary bodies and draw subject specialists from various government departments.
- d. As per the recommendations of the ARC, the State Vigilance Commissions/Lok Ayuktas may be empowered to supervise the prosecution of corruption related cases.

5.2.6 Media

- a. Develop an ethical code of conduct for media organisations.
- b. In order to introduce transparency in the working of the media organisations, the owners, proprietors and editors should be asked to disclose their financial, political and other interests which can have a bearing on the objectivity of the organisation. Secondly, the news organisations should also give a disclosure about their major advertisers. They may do so by posting such information on their websites every quarter.
- c. Set up an office of Media Ombudsman or regulator on the lines of Banking Ombudsman. Retired journalists or people associated with media could be made Ombudsmen.
- d. Media should not focus only on the negative aspect that is corruption cases of sensational nature but also organise debates, discussions on corruption and create awareness among citizens.

6. Social Action against Corruption

- 6.1 Campaign to educate and create awareness in society against the evil of corruption. This should include media campaign as well as outreach activities. Central Vigilance Commission is already in the process of launching an Awareness Campaign.
- 6.2 Education is the foundation of a morally sound society. Lesson on ethics should be included in the curriculum of schools. Children should be taught to achieve their goals for earn money through rightful means to be taught in middle school. With the encouragement from Central Vigilance Commission, the Vigilance Wing of Air Port Authority of India and Bharat Petroleum Corporation Ltd. has started the concept of integrity club in Kendriya Vidyalas. The Commission has advised the government to adopt this concept across all schools.

7. International Cooperation

- a. UNCAC is the first legally binding global instrument that has benchmarked the desirable standards for effectively combating corruption. India is a signatory to the UNCAC and it should ratify it at the earliest.
- b. Recommendation of the Financial Action Taskforce (FATF) on money laundering mandate compliance with certain standards in respect of international cooperation. India should work towards full membership of the FATF in a time bound manner.
- c. **Ratification of and adherence to treaties:** While there is no denying the fact that the bilateral treaty route is a comprehensive method of cooperation, it involves a lengthy procedure which is reinforced by the fact that India has so far been able to enter into very few bilateral treaties. It is therefore advisable that India should increasingly ratify and get the

- benefit of provisions of international and regional conventions and participate as an active member in the international bodies.
- d. **Strengthening of legislative provisions:** The Extradition Act has comprehensive provisions that cover a wide range of issues. Nevertheless there is scope for a few amendments to convey a strong message of zero tolerance of corruption and facilitation of extradition of fugitives of corruption and economic offences. These are:
- Expansion of the Schedule under section 31(2) to cover all the offences under the PC Act, as well as section 3 of the Prevention of Money Laundering Act, 2002 (**PMLA**), so that the offenders cannot misuse the political offences clause.
 - Clear provisions in the Act for prosecution of Indian Nationals in lieu of extradition.
 - Clear provisions regarding evidentiary requirements that are applicable to requests received from the civil law countries.

When it comes to recovery of proceeds of crime, cooperation under the provisions of Chapter IX of the PMLA is available only when the requirements under the PMLA are satisfied. It would be helpful if similar provisions are incorporated in the PC Act for dealing with offences of disproportionate assets. The existing provisions are also deficient in respect of following aspects of direct recovery which need to be strengthened through appropriate legal amendments.

- Provisions of civil forfeiture of proceeds of corruption
 - Management of frozen assets on the basis of a foreign arrest or framing of charges
 - Allow for civil litigation by the country for repatriation of illegally acquired assets
- e. **Strengthening of the institution of central authority for Mutual Legal Assistance (MLA):** International and regional conventions require designation of a central authority for facilitating the process of MLA. In India, the functions of central authority are divided among the Ministry of Home Affairs (incoming requests), INTERPOL division of CBI through the concerned embassies (outgoing requests). Due to competing demands of work, absence of permanent legal staff, and shortage of resources, efficiency suffers and the processes often get delayed. Therefore there is a strong case for designation of a single executive agency as central authority for MLA with sufficient budgetary and manpower (legal and investigative) support. The central authority should have the powers to: (a) make and receive requests for assistance and to execute and/or arrange for the execution of such requests; (b) where necessary, certify or authenticate, or arrange for the certification and authentication of, any documents or other material supplied in response to a request for assistance; (c) take practical measures to facilitate the orderly and rapid disposition of requests for

assistance; and (d) negotiate and agree on conditions related to requests for assistance, as well as to ensure compliance with those conditions.

- f. **Technical assistance and information exchange:** Another dimension of international cooperation is the mutual sharing of best practices, shared learning of lessons among the group of practitioners and technical assistance under the framework of regional bodies. Article 60 of the UNCAC also recommends such cooperation among the member states.
- g. **Institutional capacity building:** When it comes to competence in dealing with the international investigation matters, capacity of the anti-corruption agencies is inadequate which significantly affects the success rate. Besides training, manuals and compendium of best practices can also be developed and circulated among agencies for facilitating self learning.

Annexure-I

- 1) Awareness and building capacity for mobilization through community radio programme called Panchayat Waves in Karnataka.
- 2) Voicing concern through citizens initiative like Research for advocacy like the Report Cards Survey started by the Public Affairs Centre, Bangalore.
- 3) Citizen based monitoring and evaluation like budget analysis initiative of Bangalore, peoples charter of Lok Satta, Hyderabad etc
- 4) Joint civil society public sector initiatives in implementation of programmes like low cost housing in urban communities by SPARC, Mumbai,
- 5) Auditing like Jan Sunvai of Mazdoor Kisan Shakti Sangatan, Rajasthan
- 6) Joint management of sectoral programmes like education guaranty scheme of Madhya Pradesh, forest protection committees of West Bengal, Joint Forest Management of Andhra Pradesh etc.
- 7) Government frameworks for participatory planning like peoples Planning Campaign of Kerala
- 8) Citizen oversight committees like committees for works inspection, school committees, hospital advisory boards
- 9) Open public documents and right to information, publication of procurement prices, tax assessments, arrear lists, list of successful bidders, discretionary grants, successful bids in major contracts, public disclosure of assets and liabilities, criminal record of politicians, election expenditure, government stationery requirements, books short listed for purchase for libraries, tax exemptions, details of works, schemes sanctioned etc.