



REDUCING THE HARMS OF CORRUPTION:

How a harm reduction strategy can focus the fight against corruption where it can do the most good

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It is time to apply the principles of harm reduction to the intractable problem of corruption.

We have a lot more tools today for attacking problems of public corruption than were available two or three decades ago. These include tools for vetting officials, monitoring communications, tracing money, seizing assets, coordinating internationally, punishing corporations, protecting whistleblowers, imposing sanctions, and more. Moreover, the old tools have new attachments—investigations, prosecutions, government audits, and commissions of inquiries with their public hearings—all of these familiar tools have been enhanced by sophisticated cooperation agreements, digital forensics, social media, and expanded powers and jurisdiction.

What we lack are not tools, but our determination and skill to use them *strategically*. This is where harm reduction can help. A harm reduction strategy helps us put our tools—all of them, new and old—to their most effective use. A harm reduction approach can provide a strategic overlay to any of the familiar categories of anti-corruption activities, whether these are divided between enforcement and prevention or among any other categories. Harm reduction can guide the work of investigators and prosecutors, of those training public servants, of those crafting internal controls and other oversight mechanisms, or of those reviewing declarations of interests and assets. Whatever roles we play in response to corruption, harm reduction principles can help us focus on what matters most.

Our argument proceeds in three steps. First, we show how a harm reduction strategy helps make the stated goals of anti-corruption efforts meaningful and concrete. Second, drawing on three recent initiatives in Nigeria, we illustrate what a realistic harm reduction strategy

looks like, and how it can produce significant results even in highly corrupt contexts. Finally, we describe how the principles of harm reduction might be applied in different country contexts and the skills that implanting a harm reduction strategy requires. A short annex provides a generic statement of a harm reduction strategy that readers can adapt as part of any institution's policies.

The challenge of strategy

Corruption is a crime of power, and entrenched systems of grand corruption are protected by networks of powerful people. Corrupt people in positions of great power are usually quick both to defend their positions and to adapt their methods in the face of inquiries. Even announcing an effort to reduce such corruption is itself a risky business, alerting powerful people to the threat of attack.

Perhaps for that reason as well as others, anti-corruption strategies tend to be announced with vague or even naïve goals, eradicating corruption in general, or—avoiding the word altogether—promoting integrity. Eradicating corruption and promoting integrity without any greater focus are both worthy goals to pursue but, phrased in this very broad manner, they do not tell us what to do. As an alternative, crafting strategies to reduce the greatest harms caused by corruption moves us from the abstract to the concrete.¹

Building anti-corruption strategies around the worst harms, rather than around the deployment of particular tools, opens up prospects for meaningful change that people can see and feel. It acknowledges the suffering of the victims of corruption and the persistence of the harms they endure over years or decades.

What might such a concrete ambition look like? Here are a couple of quick examples.

- Instead of trying to solve corruption in public employment generally, we might focus on the harm done by unqualified officials recruited into a disaster management agency or promoted to the top jobs in law enforcement.
- Instead of trying to solve corruption across all public procurement, one team might focus on shoddy work by corrupt contractors in a crucial public utility depriving millions of residents of water or electricity, while another team focuses on the embezzlement of large portions of an education ministry's capital budget, compromising the life-course of millions of students.

In both of these examples, the teams assembled to reduce these harms might make use of a combination of tools of enforcement and prevention, depending on their analysis of the particular problem they face. We are not proposing a third category of tools, but rather a sharper and arguably more effective strategic frame for deploying any tools available, including prosecution. We illustrate how this has worked in practice below.

¹ For a thorough treatment of this choice of frame and for the argument that harm reduction has advantages over such high-level strategies, see Malcolm Sparrow, *The Character of Harms: Operational Challenges in Control*, Cambridge University Press, 2008, especially Chapter 1. ““the control of bad things...is a different type of work form the construction of good things” (at 36)

Before that, however, let us consider a second tendency in announcing anti-corruption strategies: they are often announced as temporary measures, needed only until the corruption has been excised and the system returned to its normal, healthy state.

What does this mean in practice? Rather than build long-term institutional capacity to deal with the continuing harms of corruption, officials leading eradication campaigns typically assemble temporary teams, borrowed from a variety of departments, with time-limited resources—all of which reduce the real threat they pose to powerful, corrupt networks. In South Africa, for example, when President Ramaphosa took office promising an end to corruption, his chief initiative was the creation within the National Prosecuting Authority of a special Investigating Directorate that would have a five-year lifespan, relying on investigators temporarily detailed from other posts. Only after several years of difficulties assembling skilled personnel did he change course, advancing legislation to make the directorate permanent and allow it to recruit its own investigators with adequate powers. The new law was a tacit acknowledgment that South Africa will always need capacity to investigate and prosecute corruption.²

Harm reduction as a strategy acknowledges that corruption will adapt rather than disappear in the face of reform, and that the work of attacking the instances of corruption that cause the greatest harms is a permanent responsibility. This is not work for temporary institutions, but rather for specialised teams, each working to reduce one sort of harm or another, and then moving on to tackle other harms.

Corruption, like disease or crime, will always be with us. There is no compromise inherent in acknowledging this if officials publicly focus on its most harmful forms and demonstrate an ability to eliminate those harms. Campaigns to eliminate smallpox or polio can succeed without promising to eliminate disease, and COVID-19 and cancer can be made survivable even as those diseases themselves adapt and persist. By focusing on the most harmful forms of corruption, and reducing the harms they cause, we can build long-term public support for the institutional capacity needed to address the endless new forms of corruption that are certain to emerge.

A short history of harm reduction

Harm reduction is best known as a public health strategy. The term was originally conceptualised in the 1980s, along with “risk reduction” and “harm minimisation” as a set of practical strategies—such as the distribution of clean needles or the establishment of safe injection sites—to reduce the risk of HIV infection among intravenous drug users. While the term has been taken up controversially by reformers campaigning against drug prohibition, it has been widely embraced by police agencies seeking to prevent deaths caused by drug overdose.

2 See, Suné Payne, “Investigating Directorate will become permanent NPA entity ‘to strengthen anti-corruption activities’” in *Daily Maverick*, 23 October 2022, available at <https://www.dailymaverick.co.za/article/2022-10-23-investigating-directorate-will-become-permanent-npa-entity-to-strengthen-anti-corruption-activities/>.

Beyond the field of drug policy, public health officials have used harm reduction strategies to address a wide array of risky behaviours including eating disorders, tobacco use, and dangerous driving.³

The principles underlying harm reduction can be formulated in many different ways. Most simply, the US Institute of Medicine has identified two:

A harm reduction policy or intervention (a) explicitly assumes continuation of the undesired behavior as a possibility and (b) aims to lower the total adverse consequences, including those arising from continuation.⁴

We dare not attempt to summarise here the voluminous scientific literature evaluating harm reduction efforts. Suffice it to say that there is widely accepted evidence that harm reduction strategies can reduce various, specific harms, including HIV transmission, drug overdose fatalities, and many more.⁵

Applying harm reduction principles to corruption will not cure all the ills of government. Just as HIV transmission does not occur exclusively through intravenous drug use, so shoddy school construction does not occur exclusively because of public corruption; but where corruption is a major cause of some set of harms, taking a harm reduction approach to corruption would seem to be common sense.

For the avoidance of doubt, let us be clear what harm reduction is not. It is not an effort to excuse or condone corruption. It is neither a substitute for law enforcement nor a suggestion that illicit corruption should be legalised. Law enforcement, in our view, is an essential part of reducing the harms of corruption and should remain at the top of the menu of responses, especially to grand and high-level corruption. But criminal investigation and prosecution is just one tool, best deployed when supporting a wider strategy.

Crucially, harm reduction strategies, when applied to corruption, refocus our attention from the prevalence of corruption to the real harms that it inflicts on real people, as well as on society as a whole. Instead of defining success as the elimination of all corruption, the aim here is to improve the lives of people and the effectiveness of institutions that corruption damages and destroys.

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- 3 For contemporary use of harm reduction as part of US government policy, see: Substance Abuse and Mental Health Services Administration, "Harm Reduction" available at <https://www.samhsa.gov/find-help/harm-reduction> (accessed 14 June 2023). For the use of naloxone by police departments as a way to reduce fatalities from drug overdose, see: Pourtaher E, et al., Naloxone administration by law enforcement officers in New York State (2015-2020). *Harm Reduction Journal*, 2022 Sep 19, available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9483860/>. For the extension of harm reduction to a wide range of risky behaviour in adolescents, see: "Harm reduction: An approach to reducing risky health behaviours in adolescents." *Paediatrics & child health* vol. 13,1 (2008): 53-60. For a critical appraisal of the mainstream acceptance of harm reduction, see: Gordon Roe, "Harm Reduction as Paradigm: Is better than bad good enough? The origins of harm reduction" in *Critical Public Health*, vol 15,3 (2005): 243-250.
 - 4 Institute of Medicine (US) Committee to Assess the Science Base for Tobacco Harm Reduction; Stratton K, Shetty P, Wallace R, et al., editors. *Clearing the Smoke: Assessing the Science Base for Tobacco Harm Reduction*. Washington (DC): National Academies Press (US); 2001. 2, Principles of Harm Reduction. Available at: <https://www.ncbi.nlm.nih.gov/books/NBK222374/>.
 - 5 As the 2023 report of the European Monitoring Centre for Drugs and Drug Addiction concluded: "While some harm reduction responses remain controversial...the overall concept that evidence-based measures to reduce harm are an important component of balanced drug policies is largely accepted. "European Monitoring Centre for Drugs and Drug Addiction (2023), *European Drug Report 2023: Trends and Developments*, Harm Reduction, available at: https://www.emcdda.europa.eu/publications/european-drug-report/2023/harm-reduction_en.

Reducing the harms of corruption in Nigeria

The harms caused by corruption are widely known. They can be described, like corruption itself, at high or low levels of abstraction, with greater or lesser degrees of moral condemnation. As Kofi Anan, the former UN Secretary General, wrote in the Foreword to the United Nations Convention Against Corruption:

Corruption is an insidious plague that has a wide range of corrosive effects on societies. It undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organized crime, terrorism and other threats to human security to flourish. This evil phenomenon is found in all countries—big and small, rich and poor—but it is in the developing world that its effects are most destructive. Corruption hurts the poor disproportionately by diverting funds intended for development, undermining a government’s ability to provide basic services, feeding inequality and injustice and discouraging foreign aid and investment. Corruption is a key element in economic underperformance and a major obstacle to poverty alleviation and development.

As a practical matter, however, to reduce any of these well-known harms, we need to see them in greater specificity and in particular contexts. Some examples might help. We draw these three, each focused on a specific set of harms, from the wider work done by Nigeria’s Independent Corrupt Practices Commission (ICPC) between 2017 and 2023.

Consider the problem of corruption at national seaports, where cargo is imported and exported. In 2014, the ICPC conducted with several partners a Corruption Risk Assessment in Nigeria’s seaports, concluding that corruption there was so widespread that it was impeding trade and deterring investment. Investigating and prosecuting individual offenders would likely yield a series of minor criminal convictions but was unlikely to disrupt the systematic extraction of bribes at every stage of the transportation of goods. So many different authorities were able to create their own rules, and those rules were so ambiguous, that the opportunities for corruption were limitless. Not only did this hurt the individual businesses trying to use the ports, with crews facing extortion and threats of violence, but the harms extended to the national economy as a whole, hurting everyone.

Understanding those harms was just the start. Only in 2017, with new leadership at the Commission, was a team assembled from the public and private sector, authorised to look for effective ways to reduce those harms. The ICPC entered a partnership with the National Shippers Council, the Maritime Anti-Corruption Network, and the Convention on Business Integrity to build structural solutions, based on detailed explanations of how the systems of corruption actually operated. The team put at the centre of their efforts a new, harmonised set of Standard Operating Procedures (SOPs) across all the authorities at the port and a companion Nigeria Ports Process Manual, making the required procedures simpler, consistent, and transparent. A training programme on the rules was implemented across the port and a new Ports Service Support Portal was provided for port users with an on-line help

desk to quickly resolve any complaints about deviation from the SOPs. The whole operation was driven and monitored by a new, multi-agency Ports Standing Task Team.

The results were impressive—surprisingly so—with a substantial decline in reports from port users of attempts to extort bribes. The success was visible in what one report described as “a huge drop in the delay of vessels calling at Nigerian ports, thus cutting down payment of demurrage from weeks to as low as four days.” The initiative won praise internationally, including the Collective Action Award for Outstanding Achievement from the Basel Institute of Governance in 2022.⁶

A second example involves the prerogative of legislators to designate funds in annual budget legislation for projects that benefit their constituencies. The practice is commonplace worldwide in legislatures at national, provincial, and local levels, especially where legislators are elected from individual constituencies, and the risks of corruption in such appropriations are obvious.

In Nigeria, the annual federal budget includes 100 billion naira (almost 100-million pound sterling) for constituency projects. Beginning with the 2019 budget, the ICPC has assembled a multi-disciplinary team from its own staff and several government and civil-society partners to track hundreds of constituency projects listed in the budget - from the construction of primary schools and health care facilities, to rural electrification, and to the provision of market stalls and drinking water - tracing how the funds are spent and if the projects are completed. In many cases, the tracking confirms that the projects are well executed, providing real benefit to the constituencies. In hundreds of others, the trackers have found that projects are abandoned before completion or never begun. In these cases, the ICPC requires that the contractors either complete the projects or return the funds. The ICPC prefers recovery or completion to prosecution in these cases, but refusal to comply can result in prosecution. The tracking also reveals all manner of mismanagement of funds and sub-standard quality of work.

None of the commissioners, including the Chairman, play any role in the selection of projects to track. The team, including at least two prominent members of the Nigerian media and a representative from the Nigerian Institute of Quantity Surveyors, selects the projects and conducts the tracking.⁷ When problems are identified, it is the ICPC staff that confronts the contractors. These are not projects delayed or abandoned because of shifting government priorities, but rather projects that are intended from the start to kickback substantial portions of the cost, or the entire cost, to the sponsor, or to generate excess profits for the contractors favoured by the sponsor. In some cases, the projects are poorly executed, in others they are abandoned long before completion, and in still others they are entirely phantoms.

6 Basel Institute of Governance, “Cutting corruption in Nigerian ports: data, impact and Collective Action” (7 March 2023) available at <https://baselgovernance.org/blog/cutting-corruption-nigerian-ports-data-impact-and-collective-action> (accessed 15 July 2023). See also: ICPC, “Port Interventions Successful Due to Collaborative Support of all Stakeholders – Owasanoye” (20 December 2022) available at <https://icpc.gov.ng/2022/12/20/port-interventions-successful-due-to-collaborative-support-of-all-stakeholders-owasanoye/> (accessed 15 July 2023); and Ignatius Chukwu, “Port transformation: The ‘Nigerian miracle’ that is making waves around the world” in *Business Day*, 5 May 2023, available at <https://businessday.ng/news/article/port-transformation-the-nigerian-miracle-that-is-making-waves-around-the-world/> (accessed 15 July 2023).

7 Quantity surveyors are known in some countries as “cost engineers.”

When funds are returned or contractors return to complete or repair the projects, the ICPC publicises the result, describing the harms mitigated in concrete terms. The media coverage and public reactions have been so positive that the ICPC has expanded the project to include specific projects inserted into the budget by the executive as well as by the legislature.⁸

The ICPC insists publicly that any misconduct revealed by the tracking will be punished through “all lawful measures,” but the focus is on delivery of the full value of the projects to the constituencies rather than the prosecution of individuals, and this does not appear to have diminished the public support for the initiative. The initiative has not resulted in any criminal charges against legislators, but it has nonetheless unsettled the relationship between some of those legislators and the ICPC, perhaps reflected in an unsuccessful effort in 2023 to reduce the power of the chair of the ICPC.⁹

A third and final example comes from the ICPC’s partnership with the Head of the Civil Service to reduce the harms that can follow from ill-considered political patronage. Since 2020, the ICPC has used its investigatory powers to assist the Office of the Head of the Civil Service of the Federation to screen candidates for the post of “permanent secretary” (the top civil servant in each government ministry), chief executive, and accounting officer in key ministries, departments, and agencies. The ICPC investigates the background of each candidate against five parameters—corrupt practice, substance abuse, undeclared assets, sensitive-information leakage, and financial malpractice. This goes beyond a simple a paper-vetting, including an extended interview and polygraph examination. The results do not trigger criminal prosecution but instead can form a basis for preventing appointment.

The harms reduced go beyond those which a corrupt permanent secretary might do. By institutionalising the process, the Office of the Head of the Civil Service and the ICPC influence the behaviour of senior civil servants across government who hope to be nominated over time. In practice, some potential candidates have withdrawn from consideration for appointment to avoid being exposed, though others have challenged the ICPC screening outcome, in which case a full-scale investigation of the disputed finding follows.¹⁰ At least one successful candidate for permanent secretary has thanked the chair of the ICPC, explaining that she would not have obtained the position had it not been for the withdrawal of better positioned candidates who could not get through the vetting.

It is useful to contrast this third example with other initiatives to improve the integrity of the appointment process for top government posts. This is not an exercise in compliance with procedures for nominations, selection panels, or merit-based selection. The focus here is not on the process of appointment. Instead, those appointed—regularly or irregularly—must

8 ICPC, “Constituency/Executive Projects” available at <https://icpc.gov.ng/constituency-executive-projects/> (accessed 16 July 2023). For the most recent phase of the initiative, see: “Aina Ojunugwa, “ICPC to Investigate 712 Projects in 20 States, Begins Disposal of Forfeited Assets” in *The Will*, 6 November 2022, available at <https://icpc.gov.ng/constituency-executive-projects/> (accessed 16 July 2023).

9 Bakkare Majeed, “Nigerian Senate whittles down powers of ICPC chair, may cripple agency’s capacity to fight corruption” in *Premium Times*, 4 June 2023, available at <https://www.premiumtimesng.com/news/top-news/602472-nigerian-senate-whittles-down-powers-of-icpc-chair-may-cripple-agencys-capacity-to-fight-corruption.html> (accessed 16 July 2023).

10 The ICPC has been administering integrity tests to candidates for permanent secretary posts since 2013, but the ICPC screening was enhanced in 2020. See: “Permanent Secretaries to Face SSS, ICPS Screening,” *International Centre for Investigative Reporting*, 15 November 2013, available at: <https://www.icirnigeria.org/permanent-secretaries-to-face-sss-icpc-screening/>; and “ICPC Chairman: Many prospective perm secs indicted for corruption, substance abuse” in *The Cable*, 4 October 2022, available at <https://www.thecable.ng/icpc-chairman-many-prospective-perm-secs-indicted-for-corruption-substance-abuse> (both accessed 19 July 2023)

at least not have a disqualifying past or present. The focus on avoiding the harms that flow from compromised leadership rather than compliance with all procedural requirements in the overall appointment process. Insisting that public officials hired irregularly nonetheless meet the qualifications for their roles is a widely practiced (if unacknowledged) harm reduction strategy.

Looking across all three of these Nigerian examples, the skills of working on harm reduction become apparent. Rather than apply a single tool—whether prosecution, forensic auditing, asset declarations, or anything else—to many different kinds of corruption, these initiatives all involve assembling teams across two or more organisations to tackle a specific kind of corruption causing specific harms. The team tries to understand how the corruption in question works and then looks for efficient ways to stop or reduce it using a combination of tools, including—but never limited to—criminal investigation or prosecution.¹¹ This is the art of harm reduction.

Could harm reduction be practiced at scale?

Harm reduction is a shift in thinking, goal setting, and sense of achievement, and it does not require an entirely different set of policies and practices. Like advances in strategy in other fields—evidence-based public health, community policing, sustainable development—harm reduction makes use of many of the same, familiar tactics that practitioners have used for decades, but directs them with greater focus toward realistic goals derived from contextual understanding of the specific harms that corruption causes. Practitioners of harm reduction will continue to rely on forensic audits, electronic surveillance, financial disclosure, anonymous reporting, whistle-blower protection, criminal prosecution, asset forfeiture, and more. But instead of organising their work around one or another of these tools, practitioners of harm reduction organise their work around the harms of corruption, and then use the tools appropriate to the problems at hand, aiming to make meaningful improvements in the actual experience of citizens and the quality of government.

Consider the conflation of these two approaches to corruption—eradication and harm reduction—in the infamous Lava Jato investigations in Brazil. Seen as an effort to reduce the harms of grand corruption at the highest levels of the Brazilian state energy company, Petrobras, and the giant construction company, Odebrecht (now rebranded as Novonor), the Lava Jato prosecutions were a great success. Those companies today are widely regarded as having reformed, with leaders and governance committed to integrity. The massive

¹¹ As part of its harm reduction strategy, the ICPC has prosecuted in appropriate situations, as the following three examples illustrate. As part of the efforts at the seaports, the Commission seized assets from corrupt immigration, health, and customs officials at the port who boarded ships contrary to the new SOPs and were gratified with physical assets by corrupt shippers. The assets were seized and forfeited as proceeds of crime (*FGN vs Assets Listed*, suit FHC/ABJ/CS/294/2023), while the officers are liable to further sanctions by their individual paramilitary agencies. Similarly, as part of its review of constituency projects, the Commission has initiated prosecution of a Senator who facilitated a project for the construction of Solar Powered Borehole for his community to be sited on public land, but who allegedly diverted the project to his private property (*FGN vs. Senator Haman Misau*, charge BA/72C/2023). Similarly, the Commission has initiated prosecution of a project supervisor at the Lower Benue River Basin Authority who oversaw a Dam Project in the Kanke Local Government area of Plateau State (*FGN vs. Felix Dasoh & Anor*, charge HCM/83/2023). In this case, the Commission alleges that the respondent created a fake job-completion certificate that enabled the payment of N51 million to the contractor who did not execute the project. The money has been recovered. All three of these cases are proceeding at this writing.

bribes that Odebrecht funnelled to political parties and candidates across Latin America have been stopped.¹² But the Lava Jato crusaders were eradicators. They were not content with reforming these two giant companies, but were determined to purify Brazilian politics, promising “the end of systemic corruption.”¹³ At this, unsurprisingly, they failed.¹⁴

Harm reduction is anti-corruption at human scale. Practiced well, harm reduction can actually keep its promises, remain within the law, and minimise the risks to personal safety that its practitioners face.

To practice harm reduction well, officials and practitioners must work institution-by-institution to identify the specific harms that corruption does, and then devise practical strategies to reduce those harms. It is a form of problem-solving, making use of the same practices that problem-solving requires in law enforcement and regulatory administration.¹⁵

A focus on harm reduction should have several additional advantages. As it begins to make progress, reducing at least some of the harms of corruption:

- *it raises morale* through its focus on achievable targets that matter to public servants because they matter to citizens
- *it permits measurement* of progress with indicators of the harms being reduced, rather than trying to quantify the total amount of corruption
- *it benefits people and communities most injured by corruption* as their experiences become the primary focus of official attention.

One further advantage of harm reduction is especially useful in relation to corruption: it provides a criteria for selecting priorities that is not party-political. When anti-corruption commission chairs, investigators, or prosecutors focus attention on one or another example of corruption, they are often attacked for making party-political choices. It is as if the critics expect each case to be randomly selected or chosen merely in the order in which it is received. Harm reduction strategies provide a rationale for strategic selection that is not tied to political parties or politics. The greatest sources of harm are prioritised over others. This, in turn, requires that these officials have a clear policy defining harms and establishing priorities, and we provide a generic example of such a policy as an annex.

12 On the reform of the companies, see Michael Pooler, “Petrobras CEO to leave as Lula prepared to take office in Brazil” in *Financial Times*, 6 December 2022, available at <https://www.ft.com/content/485793f2-19d7-49d8-a00d-24f18df157cc> (accessed 17 July 2023); and

13 Sergio Moro, “Preventing Systemic Corruption in Brazil” in *Dædalus, the Journal of the American Academy of Arts & Sciences* v.147,3 (Summer 2018). For another example, the UK representative to the OSCE told the group in 2021, “The UK is taking every opportunity to eradicate corruption and corrupt behaviour including through our G7 Presidency.” See: “Strengthening good governance and combatting corruption: UK statement,” 22 July 2021, <https://www.gov.uk/government/news/strengthening-good-governance-and-combatting-corruption-uk-statement>, accessed 14 January 2023. See also: OECD, *Putting an End to Corruption* (2016) available at <https://www.oecd.org/corruption/putting-an-end-to-corruption.pdf>, accessed 14 January 2023.

14 There are many assessments of Lava Jato, and most assess it against this grander ambition. See, for example, “What did Lava Jato, Brazil’s anti-corruption investigation, achieve?” in *The Economist*, 9 May 2021, available at <https://www.economist.com/the-economist-explains/2021/03/09/what-did-lava-jato-brazils-anti-corruption-investigation-achieve> (accessed 16 July 2023): “Any success that the investigations, arrests and convictions had in cleaning up Brazilian politics will probably be ephemeral. Lava Jato removed some bad actors from the stage, but failed to fix the culture of corruption.” See also: Ezequiel A Gonzalez-Ocantos, et al., “Introduction: Anti-Corruption Crusades” in *Prosecutors, Voters and the Criminalization of Corruption in Latin America: The Case of Lava Jato*, at 7 (Cambridge University Press, 2023).

15 For a discussion of how public institutions can fulfil a “harm reduction mission,” see Malcolm Sparrow, *The Character of Harms: Operational Challenges in Control*, Cambridge University Press, 2008.

The tools at our disposal to confront corruption grow more numerous and sophisticated each year; but the tools available are not our principal constraint. We need more sophisticated strategies through which to deploy those tools. Principles of harm reduction will not make that work easy, but it provides a framework through which we can use our tools most effectively. We make a difference that matters to real people, suffering the harms of corruption in the real world. Harm reduction is what our people urgently need.

Sample policy including consideration of harm reduction strategies in anti-corruption programmes, inquiries, and responses

Introduction

This policy sets forth the principles and guidelines to be considered by the [Generic Government Department] (the Department) in addressing allegations of public corruption. It outlines the Department's approach to initiating inquiries into alleged corruption, along with the allocation of its resources to various inquiries. The paramount objective is to effectively reduce the harms caused by corruption whether to individuals, institutions, or society as a whole, prioritising the amelioration of the gravest harms through both law enforcement and preventive efforts.

1. Principles for Initiating Inquiries and Allocating Resources

The Department is committed to a fair, transparent, and effective process in dealing with allegations of public corruption. The decision to open an inquiry and the allocation of resources across potential inquiries are guided by all relevant statutes, law, and regulations, as well as by the principles of harm reduction set out in this policy. Priority is given to matters where:

- There are reasonable prospects of successfully reducing the harms caused by corruption.
- The potential for harm reduction is greatest, aiming to address the most severe impacts of corruption on society.

This approach ensures that the Department's limited resources are deployed in a manner that maximizes public benefit and public integrity.

2. Guidelines for Prioritisation

A. Assessing Harms

The Department shall assess the actual and potential harms caused by instances of alleged corruption through both quantitative and qualitative measures. This dual approach ensures a comprehensive understanding of the range of harms, avoiding reliance on an appraisal based solely on financial loss, the number of victims, or any single quantitative factor. Where the subject of a potential inquiry is an instance of a wider pattern of systemic corruption, consideration must be given to the harms caused by the systemic corruption as well as by the particular instance under review.

Examples:

- 1) *Financial Mismanagement in Public Contracts:* An investigation into a case where public funds were misappropriated through fraudulent contracts should consider the financial loss, assess the impact of the loss of goods or services (short- and long-term) on their intended beneficiaries, and gauge any damage to public trust.
- 2) *Bribery in Regulatory Approvals:* A case involving bribery for expedited or unlawful regulatory approvals should evaluate both the direct financial implications and the actual or potential harms to public health and safety.

B. Assembling Teams

When initiating an inquiry into each matter, the Department will assemble a multidisciplinary, problem-solving team whose size and scope reflect the gravity and complexity of the harms to be addressed. These teams may (but need not) comprise personnel from within the Department, other government departments, and third-party organizations. The composition of these teams will be determined by the nature of the harms to be addressed and the tools likely to be most effective in reducing these harms, without being confined to the specific tools traditionally entrusted to the Department.

Examples:

- 1) *Cross-Departmental Task Force:* For a corruption case involving the evasion of environmental regulations, a team might include environmental scientists and experts in organisational management in addition to lawyers and law enforcement officers, ensure a comprehensive approach to both understanding the harms caused and discerning potential methods of reducing those harms.
- 2) *International Collaboration:* In cases of corruption with cross-border implications, experts from international anti-corruption bodies may be included to provide specialized knowledge and facilitate cooperation between jurisdictions.

C. Pursuit of Concurrent Objectives

While the paramount priority of the Department's efforts is the reduction of the gravest harms caused by corruption, every matter also presents opportunities to pursue additional lawful objectives. These may include the denunciation of corrupt practices and the punishment of individuals culpable in corruption. Such objectives should be pursued when they support or complement and do not detract from the overarching goal of reducing the gravest harms.

Examples:

- 1) *Public Awareness Campaigns:* Alongside legal proceedings against corrupt officials responsible for a pattern of corruption that resulted in the loss of life, liberty, or injury to the livelihoods of large numbers of citizens, the Department might launch a public awareness campaign highlighting the extent of the harms and the vulnerabilities exploited by the corrupt officials, thereby denouncing the corrupt practices, and educating the public.
- 2) *International Sanctions:* In cases involving international corruption, the pursuit of sanctions against individuals or entities might serve both to punish the perpetrators and to signal to the international community the seriousness with which the Department views such offenses.

Conclusion

The principles and guidelines outlined in this policy reflect the [Generic Government Department]'s commitment to addressing public corruption in a manner that is effective, fair, and geared towards the reduction of harm. By prioritizing the most harmful instances of corruption, assembling multidisciplinary teams, and pursuing concurrent objectives where appropriate, the Department aims both to remove the scourge of corruption and pursue justice for its victims.

MEMBER BIOGRAPHIES

KAMEL AYADI

Founding Chairman of the Global Infrastructure Anti-Corruption Center MENA (GIACC – MENA) and member of the Board of Directors of the World Justice Project, Tunisia

Kamel Ayadi is an international consultant and civil society activist in the fields of anti-corruption, ethics, governance, corporate social responsibility, and social accountability. He has served in a number of high-level positions, including Minister of Public Service, Governance, and Anti-corruption; Chair of the Authority on Financial and Administrative Control; Secretary of State; Senator; and Chair of the Regulatory Authority of Telecommunication. After having served in leadership positions in numerous NGOs, including President of the Tunisian Order of Engineers, he was elected in October 2003 as the president of the World Federation of Engineering Organisations (WFEO, 100 member countries). He also served for six years as the Founding Chair of its standing Committee on Anti-corruption. He is the Founding Chair of the World Leadership and Ethics Institute, Founding Chair of the Tunisian Centre for Strategic Thinking on Economic Development. He is also the Founding Chair of the Global Infrastructure Anti-corruption Centre's for the MENA region.

SHAMILA BATOHI

National Director of Public Prosecutions, South Africa

Career Advocate Shamila Batohi has served as South Africa's National Director of Public Prosecutions (NDPP) since February 2019. Advocate Batohi began her career as a junior prosecutor in the Chatsworth Magistrate's Court in 1986 and steadily advanced to become the Director of Public Prosecutions in KwaZulu-Natal. She was seconded to the Investigation Task Unit established by President Nelson Mandela in 1995, investigating and prosecuting apartheid-era atrocities, and later served as the first regional head of the Directorate of Special Operations in KwaZulu-Natal, investigating and prosecuting serious organised crime and political violence. Immediately before her appointment as NDPP, she served as a Senior Legal Advisor to the Prosecutor of the International Criminal Court in the Hague.

MONIKA BAHR

Professor at the University of Gothenburg, Sweden

Monika Bauhr is a Professor at the department of Political science, University of Gothenburg and a research fellow at the Quality of Government Institute. Bauhr investigates the causes and consequences of corruption and quality of government. She studies the link between democracy and corruption, the role of transparency and access to information, women representation and the nature of different forms of corruption and clientelism. She also investigates how corruption influences public support for foreign aid, international redistribution and the provision of public goods more broadly. She has previously been a visiting scholar at Harvard University, Stanford University and the University of Florida in the US and the University of Dar es Salaam in Tanzania. She has also served as a consultant and participated in public events relating to climate change, corruption and development policies. Between 2014 and 2017 she has been the Scientific Coordinator and Principal Investigator of the ANTICORRP (Anticorruption Policies Revisited: Global Trends and European Responses to the Challenge of Corruption), a large-scale multidisciplinary research program, involving 20 institutions in 15 European countries, funded by the European Commission. She is also a co-editor of the recently published Oxford Handbook of the Quality of Government.

MARTHA CHIZUMA

Director-General of the Anti-Corruption Bureau (ACB), Malawi

Martha Chizuma is the Director General of the Anti-Corruption Bureau effective from 1 June 2021, the first-ever female to hold the position in the country. The Bureau is mandated to fight corruption through prevention, public education and law enforcement. She holds a master's in law from the UK and bachelor's in law (Hon) degree from Malawi. Before joining the Bureau, she was Ombudsman of Malawi from December 2015 to May 2021. However, she has also held various positions in the judiciary and private sector. With fighting corruption being on top of the Government agenda, Martha is responsible for providing strategic leadership to operational and administrative processes at the Bureau in a manner that ensures that positive and substantive inroads are being made against corruption in Malawi and also that a correct moral tone is set for the country in as far as issues of integrity are concerned.

IZABELA CORRÊA

Secretary for Public Integrity at the Brazilian Office of the Comptroller General and editor of the Chandler Papers (2021-2024)

Izabela has been dedicated to the themes of integrity and anti-corruption academically and as a practitioner for over fifteen years. She is currently serving as the Secretary for Public Integrity at the Brazilian Office of the Comptroller General. Prior to that, she was the Postdoctoral Research Associate for the Chandler Sessions on Integrity and Corruption (2021-2023). She has also served in the Brazilian Central Bank (2017–2021), and in the Brazilian Office of the Comptroller General (2007–2012), where she led a team of public officials that oversaw the development and implementation of high-impact transparency and integrity policies. Izabela holds a PhD in Government from the London School of Economics and Political Science (2017) and a master's degree in political science from the Federal University of Minas Gerais (UFMG) in Brazil. She is a member of the Chandler Sessions and the managing editor of its paper series (2021-2024).

JAVIER CRUZ TAMBURRINO

Compliance Officer of the Chilean Central Bank, Chile

Javier Cruz Tamburrino is the Compliance Officer of the Chilean Central Bank. His main responsibilities include, among others, designing and implementing an Annual Compliance Plan, coordinating and articulating the compliance activities with the Prosecutor's Office, the Comptroller's Office, the Division Management Corporate Risk and the other areas of the Bank. Prior to joining the Central Bank, Javier Tamburrino served for nine years as Director of the Financial Analysis Unit (UAF), a public service whose mission is to prevent Money Laundering (ML) and the Financing of Terrorism (FT) in the Chilean economy, also acting as National Coordinator of the ML/TF Preventive System of Chile.

TODD FOGLESONG

Lecturer and Fellow-in-Residence Munk School, University of Toronto, Canada

Todd Foglesong joined the Munk School of Global Affairs & Public Policy at the University of Toronto in 2014. He teaches courses on the governance of criminal justice and the response to crime and violence in global context. In cooperation with the Open Society Foundations, he is developing a peer-based system of support for government officials that seek to solve persistent problems in criminal justice. Between 2007 and 2014, Todd was a senior research fellow and adjunct lecturer in Public Policy at Harvard Kennedy School (HKS). Between 2000 and 2005 Todd worked at the Vera Institute of Justice, creating a center for the reform of criminal justice in Moscow and founding Risk Monitor, a non-governmental research center in Sofia, Bulgaria that supports better public policies on organized crime and institutional corruption. Before that, Todd taught political science at the Universities of Kansas and Utah.

GUSTAVO GORRITI

Founder and Editor of IDL-Reporteros, Peru

Gustavo Gorriti leads the investigative center at the *IDL-Reporteros*, in Lima, Peru. He was Peru's leading investigative journalist before having to leave the country, largely because of his reporting. During the April 5, 1992, coup, he was arrested by Peruvian intelligence squads and "disappeared" for two days until international protests forced President Alberto Fujimori first to acknowledge his detention and then to release him. Gorriti had earlier investigated, among other things, the drug ties of the man who became Fujimori's de facto intelligence chief. After several months of mounting threats and harassment, Gorriti left Peru for the United States, where he was a senior associate at the Carnegie Endowment for International Peace and the North-South Center. In 1996, he settled in Panama and went to work for *La Prensa*. Gorriti's investigative reporting there, however, had a similar effect, and the government attempted unsuccessfully to deport him. After Fujimori lost power, Gorriti returned to Peru in 2001. Gorriti was a Nieman fellow in 1986. He received the Committee to Protect Journalists' International Press Freedom Award in 1998.

JIN WOOK KIM

Chief Prosecutor of the Corruption Investigation Office for High-ranking Officials (CIO), South Korea

Jin-wook Kim is Head of the Corruption Investigation Office for High-Ranking Officials. Prior to his current position, he was head of the international affairs department at the Constitutional Court of Korea (2020–21), and head of the education department and research department, at the Constitutional Research Institute (2016–20). He holds a master of law from the National University of Seoul, where he also graduated in archaeology and art history. He holds an LLM in public law from Harvard University.

JOHN-ALLAN NAMU

CEO and Editorial Director of Africa Uncensored, Kenya

John-Allan Namu is an investigative journalist and the CEO of Africa Uncensored, an investigative and in-depth journalism production house in Nairobi, Kenya. Africa Uncensored's ambition is to be the premier source of unique, important and incisive journalism. Prior to co-founding Africa Uncensored, he was the special projects editor at the Kenya Television Network, heading a team of the country's best television investigative journalists. He has received numerous awards for his work including the CNN African Journalist of the Year and joint journalist of the year at the Annual Journalism Excellence Awards by the Media Council of Kenya.

BOLAJI OWASANOYE SAN

Research Professor, Nigerian Institute of Advanced Legal Studies and Immediate Past Chairman, Independent Corrupt Practices and Other Related Offences Commission (ICPC) Nigeria

Owasanoye started his career as an assistant lecturer at the Lagos State University. He moved to the Nigerian Institute of Advanced Legal Studies (NIALS) in 1991 and became a Professor of law 10 years later. In August 2015, he was appointed as the Executive Secretary of the Presidential Advisory Committee Against Corruption (PACAC) before being appointed to the ICPC in 2017. He was involved in advocacy for passage of major anti corruption bills in Nigeria including Nigeria Financial Intelligence Agency Act, Proceeds of Crime Act, and reenactment of the Money Laundering Prevention and Prohibition Act and the Terrorism Prevention Act, amongst others. At the continental level he participated in drafting and advocating adoption of the Common African Position on Asset Recovery by the African Union in 2020 and served as member of the UNGA/ECOSOC established FACTI Panel in 2020-2021. His portfolio of consultancies include Nigerian federal and state agencies, as well as international development agencies such as the World Bank and USAID, DFID and UNITAR. In 1997, he co-founded the Human Development Initiative (HDI), a non-profit organisation. In 2020, He was awarded the rank of Senior Advocate of Nigeria (SAN) and national honour of Officer of the Federal Republic (OFR) in 2022.

ANNA PETHERICK

Associate Professor in Public Policy at Blavatnik School of Government, United Kingdom

Anna Petherick is a Departmental Lecturer in Public Policy and Director of the Lemann Foundation Programme. She is co-Principal Investigator of the Oxford COVID-19 Government Response Tracker (OxCGRT) project, which, going back to January 2020, has been recording and analysing how national and subnational governments around the world have been enacting policies to fight the pandemic. Her research as part of OxCGRT focuses on combining policy data with behavioural data, from surveys and mobile phone records. In addition, she works on corruption, gender and trust, with much of it based in Brazil. Between her undergraduate and graduate studies, Anna worked as a full-time journalist. She wrote a column for The Guardian that fused longevity and wellbeing research (how to die as late as possible, and until then stay as happy and as physically young as possible), and another column about the social dimensions of climate change for the journal, Nature Climate Change. Anna holds a BA (MA) in Natural Sciences (Evolutionary Genetics, Population Modelling) from Cambridge University.

KATHLEEN ROUSSEL

Director of the Public Prosecutions, Canada

Kathleen Roussel is the Director of Public Prosecutions. She was appointed June 21, 2017. Kathleen was Deputy Director of Public Prosecutions from 2013 to 2017. She was responsible for the Regulatory and Economic Prosecutions and Management Branch. Previously, Kathleen served as Senior General Counsel and Executive Director of the Environment Legal Services Unit at the Department of Justice (Canada), from 2008 to 2013. From 2001 to 2005, she was the Senior Counsel and Director of the Canadian Firearms Centre Legal Services, before joining the Department of Environment's legal services later that year. Before joining the public service, Ms. Roussel worked as a criminal defence lawyer. She has been a member of the Law Society of Upper Canada since 1994 and graduated from the University of Ottawa Law School in 1992, having previously obtained an Honours Religion degree from Queen's University.

AGUNG SAMPURNA

Former Chairman of the Audit Board of the Republic and Lecturer at the University of Indonesia, Indonesia

Dr Agung Firman Sampurna was the Chairman of the Supreme Audit Agency for the period 2019 – 2022. Previously, he served as Member I of BPK-RI for the period 2014 – 2019, Member III for the period 2012 - 2013, and Member V for the period 2013 - 2014. Agung Firman Sampurna once led the Main Auditorate of Finance State (AKN) III (2012 – 2013), AKN V (2013 – 2014), and AKN I (2014 – 2019). Recipient of the Mahaputra Naraya Star, Agung Firman Sampurna is heavily involved in training activities, research, seminars and various other forums, both domestically and abroad. Agung holds a Bachelor of Economics from Sriwijaya University, a Master of Public Policy and Administration from the University of Indonesia and a PhD in Public Administration also from the University of Indonesia.

TANKA MANI SHARMA

Former Auditor General, Nepal

Tanka Mani Sharma Dangal is a Nepalese Bureaucrat. He has long experience in Public Financial Management and fiscal administration. He has experience in Public Procurement Management and development administration, Civil Service Administration and Training, Cooperative Societies Regulation and Management, Health Sector Financing, Public Enterprises Management, and other different areas of public sector management. He served as an Auditor General of Nepal from 2017 to 2023 for 6 years. His prior positions include Secretary at the Office of the Prime Minister and Council of Ministers, Ministry of General Administration, and Public Procurement Monitoring Office. He had also served as a Director General of the Inland Revenue Department, Department of Customs, Department of Revenue Investigation, and the Registrar of the Department of Cooperative. Likewise, he had served as Finance Chief in different Ministries and Departments of the Government of Nepal.

Mr. Sharma holds a Master's degree in Business Administration (MBA). He has attended various national and international training and seminars and acquired knowledge and skills in different fields of the public sector management and governance system. He has been rewarded with the "Best Civil Service Award" in 2001 by the government of Nepal. He has also been awarded the medal "Prasiddha Prabal Janasewa Shree" by the president of Nepal in the year 2021. He was also awarded the "Prabal Gorkha Dakshin Bahu" medal in 2000. Mr. Sharma hopes to build a more efficient and effective public administration, promoting good governance through transparent and accountable public sector management. Moreover, he emphasizes maintaining professional integrity and controlling mismanagement and corruption in the governance system.

CHRIS STONE

Professor of Practice of Public Integrity, Blavatnik School of Government, University of Oxford

Chris Stone is Professor of Practice of Public Integrity. Chris has blended theory and practice throughout a career dedicated to justice sector reform, good governance and innovation in the public interest, working with governments and civil society organisations in dozens of countries worldwide. He has served as president of the Open Society Foundations (2012–2017), as Guggenheim Professor of the Practice of Criminal Justice at Harvard's Kennedy School of Government (2004–2012), as faculty director of the Hauser Center for Nonprofit Organizations at Harvard University (2007–2012), and as president and director of the Vera Institute of Justice (1994–2004). He is a graduate of Harvard College, the Institute of Criminology at the University of Cambridge, and the Yale Law School. At the Blavatnik School, Chris's work focuses on public corruption turnarounds: the leadership challenge of transforming cultures of corruption into cultures of integrity in government organisations, large and small. As an affiliate of the Bonavero Institute of Human Rights within the University's Faculty of Law, Chris serves as the principal moderator for the Symposium on Strength and Solidarity for Human Rights.

LARA TAYLOR-PEARCE

Auditor General, Sierra Leone

Lara Taylor-Pearce is auditor general of Sierra Leone and has more than 27 years of experience in public- and private-sector financial and administrative management and oversight. As the government's chief external auditor since 2011, she has won praise for helping change Sierra Leone's public-sector accountability landscape, including her work in developing its 2016 Public Financial Management Act and other public-sector oversight acts. Among other honors, she received the 2015 National Integrity Award from the Sierra Leone Anti-Corruption Commission. She has also served as principal finance manager and head of administration for the Institutional Reform and Capacity Building Project, finance and administrative manager for the Public Sector Management Support Project, technical assistant in the Accountant General's Department of the Ministry of Finance, and supervisory senior for KPMG Peat Marwick. An honours graduate in economics of the University of Sierra Leone, she is a fellow of the Association of Chartered Certified Accountants (FCCA), U.K, and of the Institute of Chartered Accountants of Sierra Leone (FCASL). She is vice chair of the INTOSAI Development Initiative (IDI) board, chair of the governing board of the African Region of Supreme Audit Institutions-English Speaking (AFROSAI-E), and a Grand Officer of the Order of the Rokel (GOOR) President's National Award.

REDUCING THE HARMS OF CORRUPTION:

How a harm reduction strategy can focus the fight against corruption where it can do the most good



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