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Transparency and Anti-corruption in International Organizations*

Abstract

When we talk about government, we usually think of national governmental, public administrative systems. But we have to see that these systems are in connection with international public administration, too. International organizations are part of governmental systems, because their operation has influence on national politics, legislation procedures and in general on operation of the State. At the same time those men and women who are employees of the international organizations – e.g. UN, its associate specialized agencies, EU etc. – drive the machinery that binds together the nations and regions of the modern world. So it has to be clear why one decides the way as he/she does and what ways are open to examine the process of operation. During the Cold War, the USA stated that the UN is untrustworthy because spies from the Soviet Union can take seats in the organization. Senator McCarthy wanted to purge the ranks of communists. This was one of a visible intention to influence a neutral organization – but there are a lot more possibility to help making decisions out of sight. It's a common problem that international organizations have huge bureaucratic systems that makes more difficult to follow the operation. It's interesting to examine how regulations of international organizations contain anti-corruption measures – including eServices – and how these rules help to make international organizations transparent.

I. Using influences of e-government on corruption at international organizations

There is a model that suggests that a 1% increase in the e-government index may have resulted in a 1.17% decrease in corruption.¹ World Bank has specified corruption as among the greatest obstacles to economic and social development, undermines development by distorting the rule of law and weakening the institutional foundation on which economic growth depends.² Corruption undermines justice in many parts of the world, denying the basic human right of the victims and accused to fair and impartial trial.³ This is also true for international organizations, although economic and political actors rarely meet justice, we do not have to go far to find cases like that:

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¹ Mistry, Jamshed J. – Jalal, Abu: *An Empirical Analysis of the Relationship between e-government and Corruption*. In *The International Journal of Digital Accounting Research*, Vol. 12, (2012), p. 169.

² <http://web.worldbank.org>. (2014. 05. 15.)

³ http://www.transparency.org/publications/gcr/download_gcr#summary. (2014. 05. 28.)

in the European Union, the Commission frequently sues the Member States and it is not indifferent whether it is an independent procedure or not. Where is the border-line between corruption (and opacity) and politics? That question can arise in many cases.

E-government is the first step of e-governance, and ensuring e-government is possible to ensure e-governance. E-government is understood as the use of emerging information and communication technologies like Internet and mobile phones to deliver information and services to citizens, business⁴ and national governments. As a first step, information about services is published on a web site and citizens can interact with the site to download application forms for a variety of services.

E-government initiatives can be categorized as internal, which are organization to organization and to employee, or external, which are organization to business, governments and citizens.⁵ Examples include using e-mail for internal government communication or customized software for tracking progress of government projects.

A widespread notion prevails that corruption is available in bureaucracy (and the latter is really in the nature of international organizations). Establishing e-governance will create a new culture where transparency is available, and it ensures equal treatment from bureaucrats.⁶

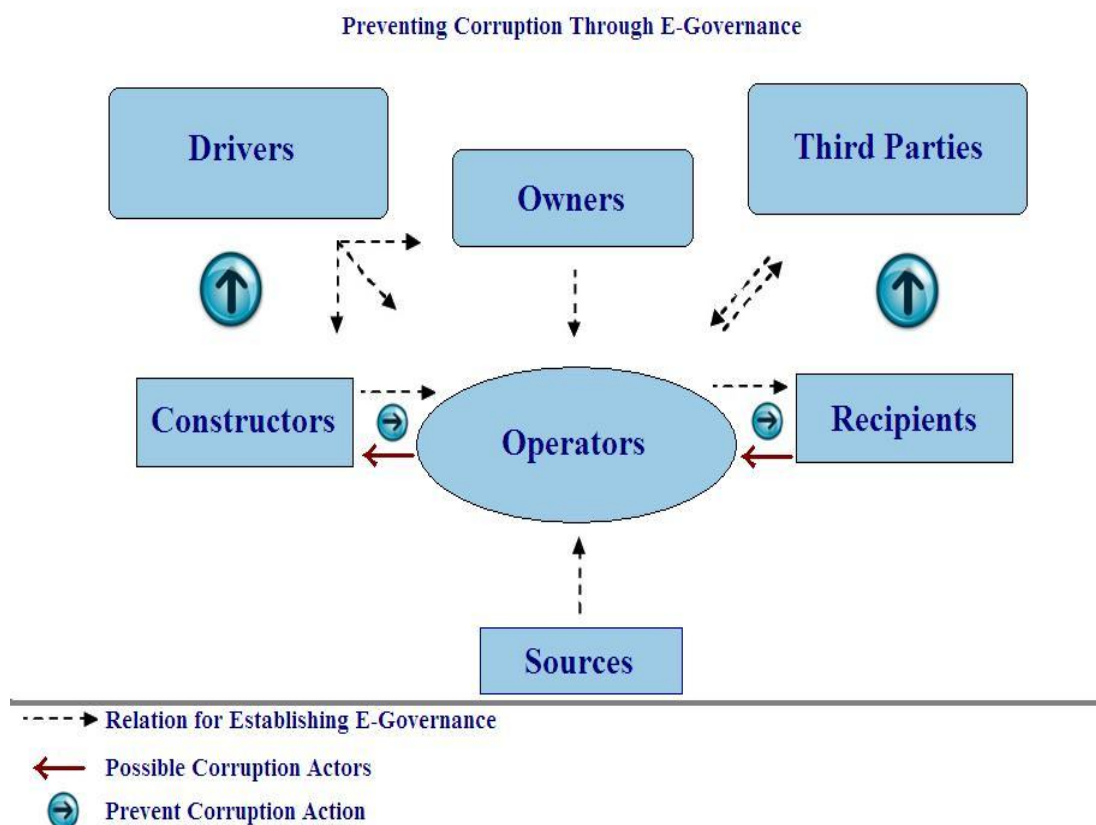


Figure 1⁷

The Korean study contains the figure above, and this can be applied in cases of international organizations, too. It is very important that documents (e. g. treaties, founding papers, annual and

⁴ Iqbal, M. Sohel – Seo, Jin-Wan: *E-Governance as an Anti Corruption Tool. Korean Cases.* 2008. (http://www.karis21.or.kr/karis21admin/adaction/down/03Iqbal_Seo.pdf. - 2014. 05. 16.) p. 55.

⁵ Ibid. p. 55.

⁶ Ibid. p. 60.

⁷ Source: Ibid. p. 71.

other reports, statistics) of these organizations can be downloaded from their websites, as a tool of e-government.

In the following study we will summarize how the European Union, the Council of Europe, the United Nations and the World Bank use anti-corruption ways and e-government tools.

II. Transparency at the European Union

We can talk about the European Union from at least two aspects. It is a common view that the EU is a political cooperation between the Member States. That is true, but we have to see that it is an international organization at the same time. It has officials, who can take part in corruption business and with this conduct they can form the institution into a system which moves contrary to its original purpose.⁸

The predecessor of the European Anti-Fraud Office – also known as OLAF⁹ – was created as a part of the Secretariat-General of the European Commission in 1988. In this time its name was Anti-Fraud Coordination Unit (UCLAF) and worked alongside national anti-fraud departments and provided the coordination and assistance needed to tackle transnational organised fraud.¹⁰ By 1995, the system was strengthened and UCLAF was authorised to launch investigations on its own initiative, on the basis of information from various sources. Each departments of the Commission was required to inform UCLAF of any suspected instances of fraud within their areas of responsibility.

It was a very important step forward, as it made possible to have an independent institution – and independence is the cornerstone for effective anti-corruption agencies.¹¹ In order to confirm this, we shall examine the so-called Jakarta Principles, which was declared by the United Nations (UN) in the Jakarta Statement on Principles for Anti-Corruption Agencies in 2012. The declaration states that the heads of anti-corruption agencies should be appointed through a process that ensures his or her apolitical stance, impartiality, neutrality, integrity and competence.¹² Also recommended principles are the requirement of accountability and the adoption of codes of ethical conduct, and a continuous effort to keep public trust and confidence through regular public reporting. Anti-corruption agencies are encouraged to promote these principles, as they have fundamental importance in order to guarantee the independence of anti-corruption agencies during their functioning.¹³

OLAF was established by Commission Decision 1999/352/EC in 1999 (ECSC, Euratom). The Commission stated that the Office shall make effort to fight against all the illegal activities that can affect the financial interests of the EU or – and it is important – any other act or activity

⁸ The same thoughts can be found in the interinstitutional agreement of the European Parliament, the Commission and the Council, 1999 (hereinafter: Agreement...): „All the institutions, bodies and offices and agencies should entrust to the Office the task of conducting internal administrative investigations with a view to bringing to light serious situations relating to the discharge of professional duties which may constitute a failure to comply with the obligations of officials or other servants of the Communities liable to result in disciplinary or, in appropriate cases, criminal proceedings or a failure to comply with the analogous obligations of the members, managers or members of staff not subject to the Staff Regulations. Source: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:1999:136:0015:0019:EN:PDF> (2014. 05. 30.)

⁹ From its French name: Office de Lutte Anti-Fraude.

¹⁰ Source: http://ec.europa.eu/anti_fraud/about-us/history/index_en.htm. (2014. 05. 16.)

¹¹ Later, when OLAF was established, the Commission Decision states the same in Art. 3. (Discussed later).

¹² UN: *Jakarta Statement on Principles for Anti-Corruption Agencies*, p. 2. <http://www.undp-pogar.org/publications/ac/aciac/JAKARTA%20STATEMENT%20-%20Principles%20for%20Anti-Corruption%20Agencies%20-%202026-27%20November%202012.pdf> (2014. 05. 31.)

¹³ <https://www.unodc.org/southeastasiaandpacific/en/2012/12/corruption-kpkl/story.html>. (2014. 05. 04.)

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by operators in breach of Community provisions.¹⁴ This is a step forward because this is an explicit expression of the fact that corruption and fraud are not all about financial questions.

Again, independence is a criterion to manage the tasks of the new Office. When exercising the powers, the Director of the Office shall neither seek nor take instructions from the Commission, any government or any other institution or body.¹⁵

It is an interesting issue that neither the Commission Decision, nor the agreement on establishing the Office does not dispose what happens if the Office finds an illegal act. Only a few sentences were mentioned in connection with waiver of immunity. So any request from a national police or judicial authority regarding the waiver of the immunity from judicial proceedings of a manager, official or servant (of the institution, body, office or agency) concerning possible cases of fraud, corruption or any other illegal activity shall be transmitted to the Director of the Office for his opinion. If a request for waiver of immunity concerns a member of the institution (or body), the Office shall be informed.¹⁶

In 2013, a new regulation was adopted¹⁷ which contains the definitions of e.g. “financial interests of the Union”, or “person concerned”, and we can find rules on both external and internal investigations. To avoid fraud investigation, the regulation prescribes, that the Director-General shall direct the conduct of investigations on the basis, where appropriate, of written instructions.¹⁸ Generally, the institutions, bodies, offices and agencies shall be informed whenever the staff of the Office conduct an internal investigation on their premises or consult a document or request information held by them.¹⁹

According to the regulation, the institutions, bodies, offices and agencies – and generally also the Member States or national authorities – shall transmit any information relating to possible cases of fraud, corruption or any other illegal activity affecting the financial interests of the Union to the Office without delay. But there is also lack of consequences if the mentioned bodies do not do it.

The regulation has positive attributes in international cooperation as it states, that administrative arrangements may be agreed, as appropriate, by the Office with competent authorities in third countries and with international organisations.²⁰ It is also obligatory that within its mandate to protect the financial interests of the Union, the Office shall cooperate, as appropriate, with Eurojust and with the European Police Office (Europol).²¹

Case study

In September 2010, a company director in the UK was sentenced to 18 months in prison for the theft of €174,500 in the course of an EU-funded research project. He got a further 2½ years after admitting another eight fraud offences. The successful prosecution was the result of close cooperation between the OLAF and the UK authorities.

The case concerned a €174,500 grant paid by the European Commission in 2005 to a UK company for an EU-funded project "Safeguarding EU food exports by the development of natural gel products with health-enhancing properties". The payment was intended for some other companies participating in the project, but was stolen and

¹⁴ EC: Commission Decision of 28 April 1999 establishing the European Anti-fraud Office (OLAF). In OJ L 136, 31.5.1999 p. 21. (art. 2 sec. 1). (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L:1999:136:TOC> – 2014. 05. 06.)

¹⁵ Ibid. Art. 3.

¹⁶ Agreement Art. 6.

¹⁷ 883/2013/EU concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999.

¹⁸ 883/2013/EU art. 7. sec. 1

¹⁹ Ibid. art. 4. sec. 4.

²⁰ Ibid. art. 14. sec. 1.

²¹ Ibid. art 13. sec. 1.

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paid into the account of a company which was not involved in the project, but was owned by the recipient company's director.

OLAF was contacted in January 2007 by the UK Department of Business Innovation and Skills, (BIS), which was conducting a criminal investigation into the matter. OLAF informed the UK authorities about the research project, and helped them to find EU officials who could give evidence in court.

The European Union has a Civil Service Tribunal, where these corruption cases can be discussed. On 13 November 2002, the *Stern* magazine website published an article in German by Mr Tillack. That article states, inter alia: There is no let-up in the pressure on the Eurostat hierarchy under its Director-General, Yves Franchet. As Franz-Hermann Brüner, head of the European Anti-Fraud Office, OLAF, put it, OLAF is already investigating “a whole series of cases” at Eurostat. The European trade union “Action & Defence” is already asking, through a leaflet, an alarming question: is Eurostat governed by a “network of corruption”?²² From this article there was a case before the Court, but its main question was defamation. This is important only because other forums also count with the opportunity of corruption inside international organizations.

There are not so many cases about fraud or corruption, but e.g. the Tribunal stated²³ that it follows from Article 60(6) of the Financial Regulation in conjunction with Article 72 of Regulation No 2342/2002 that any servant involved, within an institution, ‘in the financial management and control of transactions’ is required to inform OLAF ‘[i]n the event of any illegal activity, fraud or corruption which may harm the interests of the Community’. The Tribunal’s decision includes that „It should be borne in mind that, in the actual words of Article 22a of the Staff Regulations, any official who wishes to report the existence of possible illegal activity or serious failure to comply with the obligations of officials may communicate directly to OLAF the evidence which he believes he has in relation to those irregularities. Thus, where the person informed by the official refuses to refer the matter to OLAF, that official still has the option of approaching OLAF directly.”²⁴

In a case of *Violetti and Schmit v. Commission*²⁵, it was an interesting situation, because in 2002, the unit responsible for internal audit within the Directorate-General (DG) for the Joint Research Centre (‘the JRC’) drew up a report on the application of Article 73 of the Staff Regulations to the staff of that directorate-general posted to Ispra (Italy) (‘the JRC internal audit report’). That report noted that working conditions within the Ispra site could not justify so many accidents and that there were suspicions regarding the genuineness of the accident reports, the JRC internal audit report concluded that it was necessary to inform OLAF of those facts and suggested that a comparison be made between the frequency of the accident reports originating from the JRC staff posted to Ispra and the frequency of the reports originating from the rest of the Commission staff.

The final investigation report indicated that the staff of the JRC in Ispra had reported three to four times more accidents than the rest of the Commission staff posted to other sites and that the probability of those reports leading to the declaration of a partial permanent invalidity was twice to three times as high at the JRC in Ispra as in the rest of the Commission. It also noted that some of the 42 officials referred to in the information note of 23 July 2003 had been able to

²² F-30/08 (*Nanopoulos v. Commission*).

²³ F-41/10 (*Garde v. EESC*) 58.

²⁴ F-41/10 (*Garde v. EESC*) 61. The same question – informing OLAF or not – arises in F-23/05, when the Tribunal states that taking account of all of the circumstances [the Secretary-General, the Directors-General and the Heads of Service of the Commission] might reasonably have considered that he was obliged to inform OLAF without delay of the evidence of which he had become aware.

²⁵ F-7/05, F-5/05 joined cases. (ECLI:EU:F:2007:101)

(<http://curia.europa.eu/juris/document/document.jsf?jsessionid=9ea7d2dc30dd6833507a89f04a73a061a1bfed98c3d0.e33KaxiLc3qMb40Rch0SaxuNbx50?text=&docid=78113&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=176138> – 2014. 05. 17.)

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obtain payments of considerable sums after reporting several accidents, even though these were of minor severity. However, the final investigation report did not propose the initiation of disciplinary proceedings against those officials.

II.1. In the context of e-government

From 1999, 335 individuals have received prison sentences totalling 900 years.²⁶ The above mentioned provisions can sketch us the main aspirations of establishing a transparent internal operation of the European Union. E-government has a special role in these developments. For instance, the first and most important opportunity to use the benefits of the modern system is in reporting fraud and corruption. Anyone who has an obligation to report possible cases of fraud, corruption, other illegal activity, or professional conduct which may constitute a serious failure to comply with the obligations of officials can contact anonymously. There are no formalities, and he can communicate with OLAF in any of the official languages. This is an easy way to fight against noxious processes. OLAF also states that whistleblowers respecting the staff regulation on this matter will be protected from adverse consequences. This covers the identity of the whistleblower, as well as the mobility and staff report of the person concerned. (In order for the Commission to be able to apply such protective measures, the person concerned will need to identify himself or herself to the Institution.) It is also facilitation that there is no need to wait until one have proof, the Office will conduct its own investigation.²⁷

OLAF also uses the power of e-system in digital forensics that provides both its investigators and its external partners with practical support for digital forensics (identification, acquisition, imaging, collection, analysis and preservation of digital evidence). There are two documents on the issue: Guidelines on Digital Forensic Procedures for OLAF Staff and OLAF Digital Forensic Operations - Information Leaflet.

Prior to the opening of an investigation, the Office shall have the right of access to any relevant information in databases held by the institutions, bodies, offices or agencies when this is indispensable in order to assess the basis in fact of allegations. That right of access shall be exercised within the time-limit, to be set by the Office, required for a prompt assessment of the allegations. In exercising that right of access, the Office shall respect the principles of necessity and proportionality.²⁸

During an external investigation, the Office may have access to any relevant information, including information in databases, held by the institutions, bodies, offices and agencies, connected with the matter under investigation, where necessary in order to establish whether there has been fraud, corruption or any other illegal activity affecting the financial interests of the Union. For that purpose Article 4(2) and (4) shall apply.²⁹

The Office shall have the right of immediate and unannounced access to any relevant information, including information in databases, held by the institutions, bodies, offices and agencies, and to their premises. The Office shall be empowered to inspect the accounts of the institutions, bodies, offices and agencies. The Office may take a copy of, and obtain extracts from any document or the contents of any data medium held by the institutions, bodies, offices and agencies and, if necessary, assume custody of such documents or data to ensure that there is no danger of their disappearance.³⁰

²⁶ http://ec.europa.eu/anti_fraud/investigations/fraud-in-figures/index_en.htm (2014. 05. 15.)

²⁷ Source: http://ec.europa.eu/anti_fraud/investigations/report-fraud/index_en.htm (2014. 05. 03.)

²⁸ 883/2013/EU art. 6. sec. 1.

²⁹ Ibid. art. 3. sec. 5.

³⁰ Ibid. art. 4. sec 2(a).

We can see that benefits of IT are visible in the European Union, and in OLAF. Everyone can access and send information – there is only one deficiency: we still do not know how much money was spent and what kind of private negotiations took place before any forums of EU.

III. How does it work outside the EU?

As international organizations have a leading role in forming economical, political and social life of its member states (and even non-members as well), we can suspect that these organizations should establish an independent office that can examine the whole working processes in the light of anti-fraud and anti-corruption intentions. E-governmental tools can help international organizations to make their operation transparent, as it could be possible to show a map on their website how they work, and how they use financial funds.

III.1. Council of Europe and United Nations

Both Council of Europe and United Nations have an external anti-corruption office. The first one is operating with Group of States against corruption (GRECO) that was established in 1999 by the Council of Europe to monitor States' compliance with the organisation's anti-corruption standards. The second one is operating with UNODC, which has a very impressive background in connection with corruption and transparency. Recently, it has launched even a web-based anti-corruption portal known as TRACK (Tools and Resources for Anti-Corruption Knowledge). The portal features the Legal Library on the United Nations Convention against Corruption (UNCAC), providing an electronic database of legislation and jurisprudence from over 175 States.

Internal cases, however, are not discussed in these forums. The Council of Europe has only three cases in far connection with corruption and transparency, but the UN has a well developed system. The Office of Internal Oversight Services (OIOS)³¹ was established in July 1994 as an operationally independent office that assists the UN Secretary-General in fulfilling his internal oversight responsibilities in respect of the resources and staff of the Organization through monitoring, internal audit, inspection, evaluation and investigation. The Office has the authority to initiate, carry out and report on any action it considers necessary to fulfil its responsibilities with regard to its oversight functions. The strategy of the Office focuses on ensuring that the Organization has an effective and transparent system of accountability in place and the capacity to identify, assess and mitigate the risks that might prevent it from achieving its objectives. The Office among others, provide independent reviews of the effectiveness of the use of the Organization's resources. It uses e-governmental tools, as it has an easy, understandable website, but one cannot inform the office if he suspects fraud.

It seems that internal audit offices do their jobs as they were part of a simple corporate. OIOS links the reader to the Sarbanes-Oxley Guide which let a brief insight to the work of the office. It's not a surprise, because international organizations are not far from a joint-stock company, where the member states are the shareholders.

Case-law of UN Dispute and Appeal Tribunal is currently does not contain these kind of disputes, however the International Anti-Corruption Association has been invited by the United Nations General Assembly³² to serve as a non-state observer – so in a few months we can look at some statistics that can be interesting in this topic.

³¹ http://www.un.org/depts/oios/pages/about_us.html (2014. 05. 15.)

³² Through the adoption of Resolution 68/122 on 16 December 2013, the General Assembly wishes to promote cooperation between the UN and IACA and invites IACA to participate in the sessions and work of the General

III.2. World Bank

The World Bank has a really interesting project, as it launched the Inspection Panel in 1993 that is an independent complaints mechanism for people and communities who believe that they have been, or are likely to be, adversely affected by a World Bank-funded project.³³ On its website we can find e-government tools, as it has a section where anyone can read how to submit a request (and it can be done via e-mail), and Requests for Inspection can be viewed by country or region (alphabetically) and by request number. Also a summary can be found for every case that can help those who concerned to prejudge their position and possibilities.

The World Bank also emphasises on transparency when its Independent Evaluation Group (IEG) annually publishes an e-book report of results and performance.³⁴ IEG also publishes a biannual report on operations evaluation,³⁵ and there are many more electronic documents on several topics³⁶ that are also useful sources of transparency.

It's a joyful development, that World Bank performs the minimal criterion of transparency, when it publishes all the ongoing, planned and closed consultations that take place in front of the organization.³⁷

It is very important that in the annual report of the World Bank we can read about financial questions and complete organizational information as well – among others: fund donors, complete financial statements, lending data and complete income by regions, remuneration of executive management, executive directors, and staff members.

Executive Management: Annual Salaries (Net of Taxes, in US\$)

Name and position	Annual net salary ^a	Annual WBG contribution to pension plan ^b	Annual WBG contribution to other benefits ^c
Jim Yong Kim , President ^d	476,360	121,615	250,567
Sri Mulyani Indrawati , Managing Director	381,250	97,333	86,163
Bertrand Badré , Managing Director, Finance and CFO ^e	379,000	96,759	85,654
Anne-Marie Leroy , Senior VP and World Bank Group General Counsel	364,127	92,962	82,293
Izumi Kobayashi , Executive Vice President, MIGA	363,158	92,714	82,074
Mahmoud Mohieldin , Managing Director	362,041	92,429	81,821
Jin-Yong Cai , Executive Vice President ^f	350,000	153,440 ^g	79,100
Kaushik Basu , Sr. Vice President & Chief Economist ^h	345,000	88,079	77,970
Pamela Cox , Senior Vice President ⁱ	344,700	151,116 ^g	130,986
Caroline Anstey , Managing Director	330,293	144,800 ^g	85,546
Caroline Heider , Director General ^j	322,320	82,288	72,844
Executive Directors ^k	244,350	n.a.	n.a.
Alternate Executive Directors ^g	211,370	n.a.	n.a.

Figure 2³⁸

Assembly as an observer [A/RES/68/122 (<http://documents.un.org/mother.asp>)]. The motion to grant IACA this status was tabled by Austria, the Academy's host country, supported by 45 other UN Member States.

³³<http://web.worldbank.org/WBSITE/EXTERNAL/EXTINSPECTIONPANEL/0,,menuPK:64132057~pagePK:64130364~piPK:64132056~theSitePK:380794,00.html> (2014. 05. 17.)

³⁴ IEG: *Results and Performance of the World Bank Group 2012*. Washington, 2013 (<http://issuu.com/world.bank.publications/docs/9780821398531>) (2014. 05. 03.)

³⁵ IEG: *Assessing the Monitoring and Evaluation Systems of IFC and MIGA Biennial Report on Operations Evaluation*. Washington, 2013 (http://ieg.worldbankgroup.org/Data/reports/chapters/broe_overview.pdf – 2014. 05. 03.)

³⁶ <http://ieg.worldbankgroup.org/webpage/evaluations> (2014. 05. 08.)

³⁷ <http://consultations.worldbank.org/> (2014. 05. 08.)

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III.3. International Monetary Found

As envisaged in the Code of Conduct, the IMF has a system of financial certification and disclosure in place since April 2000. Staff members are expected to comply with the system of financial certification and disclosure, including the reporting of full and accurate information where required, which may entail eliciting the cooperation of immediate family members.³⁹ Above this however, we can find nothing about internal investigations, and these certifications are not available for public purpose.

At the same time, following an extensive review of earlier experience with evaluation at the IMF, the Executive Board decided to establish an Independent Evaluation Office (IEO) with Terms of Reference (TOR) which provide that the IEO will be „independent of Fund management and staff and will operate at arm's length from the Fund's Executive Board”.⁴⁰

Above that, there is the External Audit Committee (EAC), which has three members, all of whom are independent of the IMF and its Executive Board. The EAC reports to the Board of Governors and is responsible for the oversight of the IMF's external audit, internal audit, financial accounting and reporting, risk management and internal control functions.

Unfortunately the users cannot access any information, provided by these offices – and this way, their existence is a good thing beyond dispute, but not really usable if we want to know anything about internal processes. In the case of IMF it seems that e-government can be used for detecting sources, but we need more investigation to find information.

IV. Summary

International organizations have never been more central to world politics than they are today/nowdays. At least 238 international organizations (IOs) are currently at work on every imaginable global issue. They make authoritative decisions that reach every corner of the globe and affect areas as public as governmental spending and as private as reproductive rights.⁴¹

Author of this article made an interview in 2013 with one of the representatives of Transparency International (TI), who said that turnstile phenomenon is also a current form of corruption, but is not known so much, as e. g. payola or unregistered lobby. International organizations have to deal with the same corruption factors as a business or as a State, but we can see not much development from them in e-world that could be a tool to fight against it.

E-government can lead to transparency provided that the legal framework supports free access to information. International organizations should develop and implement an anti-corruption ethics and compliance programme.⁴² The representative of TI said that organizational structure, anti-corruption programme, interests of executive management, organizational and operational rules, acquisition regulation, lobby regulation, code of ethics, and financial data from all of the offices in different regions should be placed on the website, where any person with a general knowledge of using internet can find it. It follows that a transparency map needs to be on each websites, because international organizations are known for their bureaucratic system, which arouses this obligation.

³⁸<http://siteresources.worldbank.org/EXTANNREP2013/Resources/9304887-1377201212378/9305896-1377544753431/Remuneration.pdf> (2014. 05. 09.)

³⁹ <http://www.imf.org/external/hrd/fdiscl.htm> (2014. 05. 16.)

⁴⁰ <http://www.imf.org/external/np/eval/2001/103101.htm> (2014. 05. 14.)

⁴¹ Barnett, Michael – Finnemore, Martha: *Rules for the World. International Organizations in Global Politics*. Cornell University Press, 2004. p. 1.

⁴² OECD – UNODC – World Bank: *Anti-Corruption Ethics and Compliance Handbook for Business*. 2013. p. 15. <http://www.unodc.org/documents/corruption/Publications/2013/Anti-CorruptionEthicsComplianceHandbook.pdf> (2014. 05. 18.)

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Yet, while ICT eliminates many opportunities for corruption for those who do not understand the new technology fully, it opens up new corruption vistas for those who understand the new systems well enough to manipulate them. Therefore, proper safeguards are needed as well. Many ICT projects fail because of insufficient planning capacity and political instability.⁴³ International organizations should take into consideration these arguments and continue the way begun (like World Bank) or at least start something that can increase transparency through the window of ICT.

⁴³ Oye, N. D.: *Reducing Corruption in African Developing Countries: The Relevance of E-Governance*. Greener Journal of Social Sciences, Vol. 3 (1), January 2013. p. 11.