

# Building Integrity Self-Assessment Questionnaire and Peer Review Process

A Diagnostic Tool for National Defence Establishments

February 2015

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## MESSAGE FROM THE ASSISTANT SECRETARY GENERAL FOR POLITICAL AFFAIRS AND SECURITY POLICY

The Building Integrity Self-Assessment Questionnaire (SAQ) is a key component of the practical tools developed in the framework of the Building Integrity (BI) Programme. Introduced in 2008, the BI SAQ



was designed as an analytical tool for use by nations. When completed it provides nations with a snapshot of current structures, good practice and capacities. Following discussions at the 2013 BI Conference, it was agreed that as part of the updating of BI tools, the SAQ would be reviewed and updated to reflect lessons learned and to take account of gender issues including United Nations Security Council Resolution 1325.

The revised text set out in this publication reflects the feedback provided by 16 nations currently engaged in the BI SAQ process. Discussions with these nations were conducted at a workshop hosted by NATO HQ 20-21 February 2014. Further consultations conducted in Poland 15-17 April 2014 included nations as well representatives of BI Implementing Partners, including the United Nations Organisation on Drugs and Crime and Transparency International (UK Defence Team). The NATO International Staff also used the opportunity of a BI event conducted 8-9 November 2014 in Austria to consult with the NATO Parliamentary Assembly and the Global Organisation of Parliamentarians Against Corruption.

Participation in the BI Programme is on a voluntary basis and is open to NATO Allies, EAPC, MD, ICI and partners across the Globe. Thank you to all those who have contributed to the updating of this text. My staff stand ready to assist nations who have questions about the BI Programme. I encourage all nations to make use of the revised BI SAQ.

Ambassador Thrasyvoulos Terry Stamatopoulos

## BRIEFING

To: The Minister of National Defence, Chief of Staff (or equivalent) Building integrity and reducing corruption risk are important parts of building strong, capable, and affordable defence and security structures and forces.

Corruption undermines the defence and security capabilities of every country. Corruption causes waste of money, bad allocation of resources, and the purchasing of inadequate or low-quality equipment. This may endanger the life of personnel and decrease operational effectiveness. Corrupted personnel cannot be trusted. They can be paid the next time by vendors, organised crime, terrorist organisations, or by potential enemies.

Corruption in the defence sector reduces public trust and acceptance of the military in general and may erode public support for peace-keeping missions. It also reduces resources for civilian sectors of the economy, and can infect other parts of government. Corruption slows down the development and growth of a nation.

As part of NATO's Partnership Action Plan on Defence Institution Building, work is underway to develop practical tools to aid nations in building integrity and reducing corruption risk. Initial efforts are focused on the development of the following:

- Compendium of Best Practices in Building Integrity and Reducing Corruption Risk in Defence
- Training Module in Building Integrity and Reducing Corruption Risk
- Integrity Self-Assessment Process

Self-assessment of strengths and weaknesses of the defence integrity system is one of the bases of defence institution-building. This questionnaire is a diagnostic tool to help you in such an assessment.

Good anti-corruption processes are also a legal requirement for all NATO Ally and Partner nations who have signed the United Nations Convention Against Corruption (UNCAC). UNCAC is very clear on the obligations of nations. Defence establishments can use this document to help to ensure that their Ministry and the Armed Services are aligned with the Convention.

Completion of the questionnaire is voluntary. In accordance with procedures for the exchange of classified information, nations are requested to mark the top and bottom of each page of their response with the appropriate security classification.

This Self-Assessment Process is a tool that we believe will be useful for every defence establishment to undergo.

## CARRYING OUT THE INTEGRITY SELF-ASSESSMENT THE PROCESS

The BI Programme is a NATO-led **capacity building** programme providing **practical tools** to help nations strengthen integrity, transparency and accountability and reduce the risk of corruption in the defence and security sector. BI promotes good practice, processes and methodologies, and provides nations with tailored support to make defence and security institutions more effective. By embedding good governance, nations ensure value to taxpayers.

The programme is open to NATO Allies and partners. Request from other nations are reviewed on a case by case basis.

The BI programme includes a set of tools available to help nations assess their risk of corruption and strengthen good governance. Participation is on a voluntary basis and BI support is tailored made to meet national needs and requirements.



#### Self-Assessment Questionnaire (SAQ)

Completing the SAQ is the first step in the process. Participation is on a voluntary basis. It is a diagnostic tool that, when completed, provides nations with a snap shot of existing procedures and practices. It addresses current business practice in the defence and security sector. This includes:

- Democratic control and engagement
- National anti-corruption laws and policy
- Anti-corruption policy in defence and security
- Personnel: behaviour, policy, training and discipline
- Planning and budgeting
- Operations
- Procurement
- Engagement with defence companies and other suppliers
- Nation-Specific Questions



The completed SAQ is forwarded to the NATO International Staff who is responsible for the conduct of the Peer Review and in country consultations. The NATO-led expert review team does not share information with third parties. All activities and recommendations are coordinated with the country, as well as the composition of the peer review team.

#### Peer Review and in Country consultations

The completed SAQ is reviewed in country with representatives of the government. The aim of the Peer Review is to better understand the current situation, exchange views on best practices and on practical steps to strengthen the transparency, accountability and integrity of the defence and security sector.

Each peer review is tailored to the individual nation. It is strongly recommended that the SAQ and peer reviews be developed with contributions from Parliamentarians and the civil society including NGOs, media and academics.

#### Peer Review Report

The Peer Review Report, prepared on the basis of the completed SAQ and consultations in capitals, identifies good practice as well as recommendations for action. This is intended to help nations develop a Bl Action Plan and make use of existing Bl and other NATO mechanisms. The Peer Review Report in principle covers three areas:



#### **Action Plan**

Having completed the SAQ and Peer Review Process, many nations proceed with the development of a national action plan. In doing this, nations are recommended to make full use of NATO resources and partnership tools. Nations are also encouraged to take advantage of expertise of civil society organisations from within their own country and region. Such an approach helps promote transparency and build local capacity.

Where possible, the BI programme is integrated and aligned with national processes as well as NATO partnership mechanisms, including the Individual Partnership Cooperation Programme, Membership Action Plan, Partnership Planning and Review Process, and for Afghanistan the Enduring Partnership. This also includes identifying opportunities to link with other ongoing programmes such as the Professional Development Programme for Georgia and Ukraine.

#### ...and then?

Nations who have completed the SAQ and Peer Review process are encouraged to make the results public. BI resources including E&T are available to help nations implement their action plan and to build national capacity.

#### **CHECKLIST OF THE BI SAQ AND PEER REVIEW**

- Obtain a high-level mandate for the assessment. It is important that the leadership of the Ministry and the armed forces support this self-assessment. The official leading the Integrity Self-Assessment Process should set out the mandate for the Review, and agree this with the Minister, head of the Ministry, and head of the armed forces as appropriate. A high-level official should be nominated as the formal sponsor of the assessment.
- 2. **Designate a single responsible person for the self-assessment**. One person should be in charge of the questionnaire, the expert team visit, and the subsequent follow up plan.
- Establish a Working Group drawn from across the Ministry. They do not need to be full-time but resources including manpower, finance, equipment, and timeframes need to be identified and agreed. The Working Group completes the questionnaire, and meets afterwards to consider the report of the NATO-led expert review team visit.
- 4. Complete the questionnaire. It is the choice of the nation how widely to circulate the questionnaire for completion. For example, they can separate the chapters and send them to the relevant Departments or Ministries; or they can send the whole questionnaire in order to get different comments on the same questions. They can choose to send the questionnaire to groups outside government, such as non-governmental organisations (NGOs) or Academies, in order to get a different perspective. It should be returned to NATO at least two weeks before the visit. Nations are responsible for the security classification of the completed questionnaire. The NATO-led expert review team will not share the information with third parties.
- 5. Organising the interviews for the NATO-led expert review team. The visit will take place over 2-3 days and will be an intense round of meetings. Interviewees need to be relatively high-level in order to be able to discuss the responses of the questionnaire. Whilst this will depend on the nation, interviewees would typically be at the level of OF-4 or OF-5, from Colonel to Brigadier in a large country. Interviewees should be both civil servants and senior military officers. It is strongly recommended that the nation extend interviews to other groups such as Parliamentarians, NGOs, media, or academics. If they do, a single large meeting may be an effective way of bringing in many opinions efficiently (see the example from Ukraine in the box below).
- 6. NATO-led expert review team: visit report. The NATO-led expert review team will write a report of their visit for the use of the host nation. The report covers: i) observations on good practice the nation is undertaking; ii) observations on the areas to be improved; and iii) recommendations for action. The NATO IS can provide Subject Matter Experts to help the Defence Ministry in its efforts.

Nations are encouraged to align their follow-up action with other NATO partnership tools such as the Membership Action Plan, the Partnership for Peace Planning and Review Process and the Individual partnership Action Plan.

#### Good Practice I: Ukraine - Holding an open NGO and media meeting

During the 2008 trial of the Integrity Self-Assessment Process in Ukraine, the National Security and Defence Council of Ukraine organised a meeting to seek the opinions of a wide range of NGOs and others to inform the visiting NATO team.

Some 30 different organisations were represented around the table ranging from journalists through to anti corruption pressure groups, which gave the team an excellent opportunity to be briefed, from a local and non Government perspective, on the situation in the country, the problems, and options for the way ahead.

The meeting demonstrated openness and transparency and was a most worthwhile adjunct to the more formal sessions with politicians, military personnel, and government employees. The forthright NGO viewpoint was extremely helpful in complementing and balancing earlier presentations and interviews.

#### Good Practice II: Norway – Handbook

The Norwegian trial of the Integrity Self-Assessment Process in 2008 uncovered several areas of best practice, including the use of complaints boards, the development of an E-procurement process, and a handbook on Ethical guidelines regarding business contacts for the defence sector produced by the Ministry of Defence, shown below.



## **DEFINITIONS** INTEGRITY

Integrity has both a technical and a moral meaning.

- In a technical sense, we say that 'the hull of this ship has integrity'. This means that the whole system works properly – the outer skin of the ship does not leak, and that all the various systems that make up and support the hull are sound and function correctly.
- In a personal and moral sense, it means that the work has been done honestly and sincerely, and is uncorrupted.

In this handbook, when we say "integrity", we mean the following:

- An individual has integrity if he/she is doing their work competently and honestly, and completely.
- A process has integrity if it works as it is intended to, and fits seamlessly into the larger system of which it is a part.
- An organisation has integrity if its work is done within proper accountability, competently, to completion, and without diversion of output or resources to corrupt or dishonest ends.

#### CORRUPTION

Corruption is "the abuse of entrusted office for private gain".

Countries themselves will often have formal definitions written into their laws. For example, the definition used in Ukraine is the following: "The illegal action or inaction by an individual (either human or legal body) authorized to perform State functions directed at illegally obtaining any advantages, benefits, influences, privileges of material or non-material for themselves, or for third parties or groups". In Pakistan, the definition is as follows: "Corruption involves behaviour on the part of office holders in the public and private sectors, in which they improperly and unlawfully enrich themselves or those close to them, or induce others to do so, by misusing the position in which they are placed" (Government of Pakistan, 2002).

Whilst there are many other definitions, our experience is that most people know what it is, even if there is no formal description. For example in the United Nations Convention Against Corruption, which is the principal international convention on the subject, there is no formal definition of corruption; instead they give full definitions of what constitutes a public official.

What is more important is to be clear that there are different types of corruption in defence. Measures to address the risks will be effective only where there is an understanding of which particular aspect of the problem is being addressed. This questionnaire assists that understanding.

## QUESTIONNAIRE

## 1. DEMOCRATIC CONTROL AND ENGAGEMENT

 Describe Parliament's role in oversight of the defence establishment, including the function of the Defence Committee, oversight and scrutiny of the intelligence services, and key Defence Ministry appointments.

#### Areas to explore:

- Parliamentary authority over defence policy and high level decisions.
- Defence Committee membership, competencies, and expert support.
- The level of women's participation in the controlling and oversight functions of the Defence Committee.
- Issues of corruption and integrity in the defence establishment (for example, at the political level, military level, and by civil servants).
- 2. Describe the other providers of defence services in your country, such as the National Guard, Presidential forces, intelligence services, and Border Guards. Are they subject to Parliamentary control and scrutiny? How does this work? To whom are they accountable in the government? What is their relationship with the Defence Ministry?

#### Areas to explore:

- Issues of organised crime with these forces.
- Independence (or not) of these forces.
- Private military contractors their relationship with Defence Ministry, control and scrutiny of activities, and audit.

**Recommendation:** it is advisable to include direct answers obtained from the other defence providers in the questionnaire

3. Describe the national defence policy of your country including the role of Parliament and the Defence and Security Committee in its compilation. If there is a stated defence policy, national security strategy, or government paper covering defence policy, please refer to these. How is the defence policy published and how are the public made aware of it?

#### Areas to explore:

- Laws regarding access to defence information.
- Availability of and public access to the key documents on defence policy.
- 4. Describe the Defence Ministry's relationship with civil society including the media and non-governmental organisations (NGOs). How are they consulted or kept informed on specific defence issues, and how frequently?

- Civil society's opinion about the integrity of the defence establishment.
- Media's opinion about the integrity of the defence establishment.
- Other general opinions of the defence establishment (positive or negative).

## 2. NATIONAL ANTI-CORRUPTION LAWS AND POLICY

1. How are international anti-corruption instruments used to fight bribery and corruption in your country?

#### Areas to explore:

- Ratifications and practical enforcement of international anti-corruption treaties and conventions (for example, UN Convention Against Corruption, OECD Convention on Combating Bribery of Foreign Public Officials, Council of Europe conventions).
- Monitoring mechanisms such as Council of Europe GRECO evaluations, OECD Working Group on Bribery, UNCAC monitoring mechanism.
- Indices such as the World Bank Institute's Control of Corruption Index or Transparency International's Corruption Perceptions Index.
- 2. What are the main methods and institutions to build integrity and counter corruption in your country?

- National policy, anti-corruption strategy, laws, and procedures.
- Prosecuting and preventing institutions as anti-corruption agencies, law enforcement bodies, ethics bureaus, audit units, compliance groups, etc.
- Coordination of prosecuting and preventing activities.
- 3. Describe briefly any major cases brought for prosecution of bribery or corruption in your country in the last three years, and the sanctions applied.

## 3. ANTI-CORRUPTION POLICY IN DEFENCE AND SECURITY

 What are the areas of greatest risk in bribery and corruption for Defence Ministry and armed forces personnel in your country (for example, small bribes, expenses, travel, postings, etc)? Please list the top 6 areas.

#### Areas to explore:

- How do you determine the areas of greatest risk? Is there understanding as to how the areas of greatest corruption risk might affect women differently than men?
- How are these areas of potential bribery and corruption risk mitigated? Describe the measures currently in place.
- What are the sanctions which can be applied to personnel if they are found to have taken part in these top 6 areas of bribery and corruption?
- 2. Describe the level of commitment to anti-corruption and integrity measures within the Defence Ministry as declared by the Defence Minister and the Chief of Defence. How do they communicate their policy and guidance internally?

#### Areas to explore:

- Does the official statement on integrity or anti-corruption policy exist?
- Do the Defence Minister and Chief of Defence talk publicly on integrity issues? If so, describe.
- What is the level of awareness within the Defence Ministry and across the armed forces of integrity and corruption risk matters? Has it been explored by any surveys?
- Give examples of practical steps taken in order to communicate commitment to anti-corruption and integrity across the Defence Ministry and in the armed forces.
- Is there any formal policy, strategy or action plan within the Defence Ministry and armed forces to address integrity and corruption issues? If yes describes its goals, priorities and major reforms underway.
- 4. If there is an anti-corruption policy, strategy or action plan, describe who is responsible for its enforcement.

#### Areas to explore:

- Is a specific department or individual is responsible for ensuring that this occurs?
- What is the effectiveness of this?
- 5. What institutions exist with the aim of building integrity, and combating and preventing corruption in defence? Describe recent successes.

- What are the roles of anti-corruption and ethics advisers, external and internal auditors, inspectorates-general, prosecutors, etc?
- What is the extent of cooperation and flow of knowledge between institutions?

- What evidence is there of the level of trust in the military compared with other government institutions? For example, what is the level of awareness of the "military" in national and international measures, such as Transparency International's Global Corruption Barometer?
- 6. Describe the methods and procedures in place to enable defence officials (military and civilian) and armed forces personnel to report evidence of corruption.

- Are Defence Ministry officials and armed forces personnel encouraged to report perceived corrupt practices? If so, describe how this happens.
- Do "hotlines" exist for whistleblowers for reporting bribery and anti-corruption concerns?
- What protection mechanisms for whistle-blowing are there, how well do they work, the extent of their application. How well known are the procedures?
- Do women who work within the sector report corrupt practices affecting them or others and are there any specific protection mechanisms in place?
- What is the role of the media in bringing cases of suspected corruption to light?

## 4. PERSONNEL – BEHAVIOUR, POLICY, TRAINING, DISCIPLINE

#### **Required Standards of Personal Conduct and Behaviour**

 Describe the Code of Conduct which applies to Defence Ministry personnel (military, civil servants, and civilian employees) including which areas of corruption risks are covered. Please attach the relevant documents.

#### Areas to explore:

- What are the regulations pertaining to bribery, gifts and hospitality, conflicts of interest, post-separation activities, etc?
- How is the Code of Conduct disseminated?
- Are regulations underpinned by a code of ethics or values, and if so how is this communicated and embedded?
- What guidance exists to support and contextualise the Code of Conduct?
- Are there differences for military and civilian personnel, or whether the same rules apply to each type of employee?
- What special attention, if any, is paid to those in sensitive positions, for example in defence
  procurement or in financial/commercial management?
- 2. Give details of how breaches of this Code of Conduct are dealt with, and by whom. Describe briefly three cases which have come to notice within the last two years in your country. Are there any cases where reported breaches of the Code of Conduct have involved abuse or exploitation of women?
- Briefly describe the process of personnel evaluation including frequency of reports, debriefing/ feedback process, and how issues of personal integrity and political activity are addressed.

- Meritocracy of appointments/postings how job vacancies are advertised, whether there is
  room for "favouritism" and if so how does it affect the hiring and promotion of women etc.
- Is the data on promotions gender-aggregated?
- Does regular staff "anti-corruption" training take place?
- Has integrity training been included into the process of military training in military schools and universities and during exercises?
- What are the frequency and the men-women ratio of rotation of staff in sensitive posts.
- How do staffs declare offers of corporate hospitality (including travel, entertainment, expenses, etc)?

#### Payroll

 Describe the mechanisms for the payment of salaries and other income to individuals, outlining what transparency and auditing methods are used on a regular basis together with procedures for publishing the audited data.

#### Areas to explore:

- Is the number of civilian and military personnel to be paid accurately known, and do they receive the correct pay and on time?
- Are pay rates for civilian and military ranks published in your country?
- Do civilian and military pensions get paid correctly and on time?
- Is the data on salaries gender-aggregated?
- Are chains of command separate from chains of payment?

#### Violations of Anti-Corruption Policy and Regulations

Describe the process for prosecuting corruption incidents, and for disciplining uniformed personnel, civilians, and bidding companies.

- How active is the process?
- What is the role of military courts in this process and are they open to the public?
- Are there any corruption incidents involving illegal or unethical activities that are harmful to women that have been brought to prosecution?
- 6. Give details on the extent of prosecutions or internal actions taken against defence and armed forces personnel for bribery or corruption offences in your country in the past three years. Discuss whether the judgements have been made public, and if so how.
- Give details on the extent of prosecutions of any defence companies in your country in the past three years.
- 8. Describe how National Audit or Anti-Corruption Offices exercise oversight of procedures within the defence establishment in your country.
- 9. If national security provisions allow active corruption investigations to be halted, describe the procedures which would need to be followed to justify the process.

## **5. PLANNING AND BUDGETING**

#### **Acquisition Planning**

- Describe briefly your country's acquisition planning process including cycle time and key personnel and departments involved.
- Describe the key criteria for your country's defence acquisitions (for example, national operational requirements, NATO requirements, technology upgrades, etc).

#### Budgeting

- 3. Describe the process for presenting the defence budget to Parliament including the key items of expenditure and criteria on which they are based. Is this debated in Parliament? Is the defence budget published each year?
- 4. Aside from central government allocation, what are the major sources of defence income including sales of surplus equipment, property, and other assets?
- 5. What is the process for public hearings on Defence Ministry budgets in your country, and do the media regularly report on this area?
- 6. Is the actual Ministry budget and spending for the last year published in detail? If yes, how detailed they are? Is it common for actual spending to be above the budget? Is a report on spending done during the year, and if so, how frequently?
- Describe the audit process for Defence Ministry expenditure, including the audit cycle, publication of results, oversight by Parliament or other bodies. Are major projects audited separately? If not, please explain why not.

#### Asset disposal, destruction and leasing

8. Describe the processes for asset disposal, asset destruction, and leasing of assets, together with strengths and weaknesses of the systems.

- Procedures for assets including equipment, property, scrap, etc.
- The process for valuing and managing the sale of surplus property, and steps taken to ensure its integrity.
- Is the income from property sales disclosed each year in the Ministry's accounts? Which organisation receives the income and what can it be used for?

## 6. OPERATIONS

- Is there a military doctrine addressing corruption issue for peace and conflict? Is there military
  doctrine on how to address corruption issues, both at the strategic level for the mission commanders and in the field?
- Are commanders at all levels clear on what corruption issues they may face during any deployment?

#### Areas to explore:

- Have commanders at all levels been trained?
- Is there guidance on the subject at the strategic level?
- Are there oversight mechanisms?
- Are there training modules available?
- 3. How is corruption risk mitigated in processes for accelerated and routine procurement (including local contracts and purchases) in a conflict environment? Are there specific processes for accelerated procurement? If so, have these been reviewed for corruption risk
- 4. Is the organisation clear on what corruption issues it may face in any deployment?

- Is there guidance on the subject?
- At field level, is there clear guidance for troops (national, coalition, and local) and local authorities (including police, judiciary and local government) on acceptable behaviour?
- Are there oversight mechanisms?
- Are there training modules available?
- Are there professionals, such as military auditors, capable of monitoring corruption risk in the field? Have they been trained? Do operations plans envisage their presence?

## 7. PROCUREMENT

#### Procurement – Legislation

- Describe and list the laws in your country specifically relating to defence and security procurements.
- Outline any exceptions (together with supporting rationale) for any items or services exempt from the general procurement law.

#### Procurement – Organisation and Reform

- 3. Briefly outline who is responsible for procurement in the Defence Ministry and armed forces. Is procurement handled through a central procurement office, or is it handled separately in each of the armed forces or Ministry?
- Describe the complete defence procurement cycle from assessment of needs to implementation of the contract (including any differences applicable to specific Ministries or departments), together with strengths and weaknesses of the system.
- 5. Describe the procurement oversight mechanisms together with their strengths and weaknesses.

#### Areas to explore:

- What are the rules for the rotation of personnel in sensitive posts?
- What is the requirement for the declaration of assets or gifts acquired in addition to normal and published pay?
- What are the requirements for declaration of conflict of interests is this applicable to all rank levels?
- Is the procurement function subject to periodic or random reviews for integrity and ethics?

#### Procurement - Tender Boards, Equipment/Service Specifications, Bidding Processes

- Outline the mechanisms for determining the equipment specifications, including the decisionmaking processes.
- Describe the processes to determine what procurements should be "operationally essential" and "single source" and include the percentage of each (by number and value) when compared with the conventional procurement cycle.

- Decision-making mechanisms;
- What is the current percentage of defence procurement in your country that is single source (or not competed)?
- What safeguards are in place to prevent requirements from being shaped such that there can be only one supplier?
- Any limiting legislation.
- Any in-house bidding/comparator system if used.

8. Describe the composition, function, responsibilities, and working mechanisms of tender boards.

#### Areas to explore:

- Scope and requirement for record-keeping.
- Pre-employment qualifications and training requirements for members of tender boards.
- Regulations and Codes of Conduct for members of tender boards together with their strengths and weaknesses.
- Requirement for gender balance or the lack of it.
- 9. Describe the processes for the publication of all procurement/acquisition plans (both classified and unclassified).

#### Areas to explore:

- What proportion of potential defence purchases is made public by number and by value?
- 10. Describe the procurement process, outlining the overall strengths and weaknesses in the system.

#### Areas to explore:

- Bidding assessment and evaluation.
- Contract award.
- Post-contract mechanisms.
- Declaration of potential conflicts of interests of persons participating.
- Auditing procedures.
- When procurements are of a particularly high value, is there an enhanced integrity process/ checklist? Please describe.
- What percentage of contracting is done using e-procurement, and what is the procedure for the use of e-procurement?
- 11. Describe the mechanisms for determining quality control of procured goods or services, and outline the procedures used when specifications are not met.

#### **Procurement- Special Topics**

12. Describe the use of "agents" and "intermediaries" used during the procurement cycle, how confidence in their integrity is assured, and outline the strengths and weaknesses of this approach.

#### Areas to explore:

- Any procedures for vetting of agents.
- Any policies regarding appropriate conduct in the use of agents.
- 13. Describe the use of offsets, if used, during the procurement process.

- How offsets requirements are determined in your country.
- Assessment and evaluation of offsets proposals during the bidding process.
- Evaluation and monitoring of offsets post contract award.
- Describe any particular measures to limit the corruption risks of offsets.

### 8. ENGAGING WITH DEFENCE COMPANIES AND OTHER SUPPLIERS

- Describe the mechanisms Ministries or official organisations (especially procurement agencies) use to engage with and subsequently pay commercial companies, outlining the strengths and weaknesses of the processes.
- Describe any efforts the Defence Ministry has considered in using companies to help them raise the standards of integrity and anti-corruption across procurement, and any results of such processes.
- Are bidding companies required to have an ethics programme in order to be able to bid for work? Describe the process and mechanisms which apply when companies do not meet or maintain the standards.

#### Areas to explore:

- Whether there are any differences in treatment of domestic and foreign firms in the areas
  of ethics and compliance.
- How companies are assessed to be reputable.
- The use of procedures such as blacklisting, debarment, or suspension, and who is responsible for their implementation and updating.
- 4. What process is used to advise companies of impending procurements in your country?

- Planning and purchasing cycles, and documents used.
- Any differences in procedures used to advise foreign as opposed to domestic companies.
- Describe the mechanism or processes in your country which enable companies to complain about perceived malpractices in the procurement system, including examples of previous complaints and outcomes.

## 9. NATION-SPECIFIC QUESTIONS

This section is to remain blank until a nation is undertaking the Integrity Self-Assessment. The NATO led team administering the Integrity Self-Assessment will update this section at that time.

## FURTHER INFORMATION

For further information on the Integrity Self-Assessment Process, please contact the following:

#### Susan Pond

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For further information on the NATO Building Integrity Programme, please see the following websites:

http://www.nato.int/cps/en/natolive/topics\_68368.htm http://buildingintegrity.hq.nato.int/

The 2014 Questionnaire will be available soon on the websites in different languages.

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