

Building Integrity and Reducing
Corruption Risk in Defence
Establishments

Integrity Self-Assessment Process

A Diagnostic Tool for
National Defence Establishments



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2009 Version

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Introduction

Background

The *Integrity Self-Assessment Process* is a mechanism that has been developed within the NATO Partnership Action Plan on Defence Institution Building (PAP-DIB). It is focused on practical support for nations, helping their defence reform efforts, as well as helping nations meet their international obligations within the UN framework.

The process consists of two elements: a questionnaire to be completed by the nation, and a follow-up on-site visit by a NATO-led expert review team, who will meet with representatives of the nation to discuss the replies to the questionnaire. The questionnaire focuses on practical performance rather than legislation. The NATO-led expert view team will exchange views on best practice, and consider with the nation how it might strengthen the integrity of its defence establishment and reduce corruption risk. The expert team is led by NATO International staff, and comprises three or four people, including representatives of nations and of subject matter experts from Transparency International and other experienced organisations.

The questionnaire has been developed through several rounds of discussion with nations and their experts, followed by a trial in three nations. These trials, in Bosnia-Herzegovina, Ukraine, and Norway, were carried out during 2008. The results were very positive, with strong support being expressed from all three nations for the Integrity Self-Assessment Process, despite the very different nature and size of the three countries. The trials also led to helpful revisions of the process, notably in shortening the questionnaire and in refining the format and reporting of the expert visit. A report that describes the results of the trials is separately available.

This handbook contains the questionnaire, guidance on organising the process in-country, a sample briefing note that can be used to brief the Defence Minister or Head of the Armed Forces to introduce the process, and an outline of the format of the visit by the NATO review team. A separate WORD document is available for recording the results of the questionnaire.

While aimed primarily at Defence, the nation may apply the Integrity Self-Assessment Process to other Ministries and institutes in the security sector.

The development of the Integrity Self-Assessment Process has been taken forward by a small ad hoc team led by Poland with the participation of Norway, Ukraine, Georgia, Bosnia-Herzegovina, Croatia, the Former Yugoslav Republic of Macedonia,¹ and the UK, as well as Transparency International (UK), NATO International Staff, and NATO School Oberammergau. The draft text has also been consulted with NC3, UNODC, OECD and DRMI (Monterey).

¹ Turkey recognises the Republic of Macedonia under its constitutional name.

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.

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.

Carrying out the Integrity Self-Assessment

The Process

1. *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.
3. *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 nations 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. *Conduct a top-level review.* The completed report of the Working Group should then be presented and discussed with top officials. Their conclusions should then go to the leadership board of the Ministry, the senior committee of the armed forces, and the Minister. If requested, a NATO-led expert review team may take part in this review and follow up.
7. *Follow through.* Establish an improvement plan to follow up the report and effect changes. Aspects of this may be reflected in IPAP and PARP.
8. *Repeat the process* as part of a regular cycle, taking into account other mechanisms developed between Partners and NATO. Such cycles may occur on an annual or a biennial basis.

Following-up – Initiating an Improvement Process

It is recommended that nations make full use of NATO resources and partnership tools in developing the follow-up to this effort. Nations are also encouraged to take advantage of expertise of civil society organisations from within their own country. Such an approach will help strengthen the outputs of this process and build trust with the public.

NATO-led Expert Review Team: Visit Report

The NATO-led expert review team will write a short report of their visit for the use of the host nation. It will typically be three to five pages long, and cover three areas: 1) observations on good practices the nation is undertaking; 2) observations on the weak areas of the defence integrity system; and 3) suggestions for actions that the host nation may wish to consider to strengthen the weak areas. The NATO-led expert review team will act as consultants to help the Defence Ministry in its efforts.

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.

Questionnaire

I. Democratic Control and Engagement

1. 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.
 - 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.
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?

Areas to explore:

- 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).

II. 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:

- International anti-corruption treaties and conventions (for example, UN Convention Against Corruption, OECD Convention on Combating Bribery of

Foreign Public Officials).

- Monitoring mechanisms such as Council of Europe GRECO evaluations.
 - 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?

Areas to explore:

- National policy, anti-corruption strategy, laws, institutions, and procedures.
 - Anti-corruption and ethics bureaus, audit units, compliance groups, etc.
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.

III. Anti-Corruption Policy in Defence and Security

1. 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?
 - 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 publish their policy and guidance internally?

Areas to explore:

- 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?
 - Give examples of steps taken to address integrity and corruption risk within the Defence Ministry and in the armed forces.
3. Describe the measures in place within the Defence Ministry and armed forces to address integrity and corruption issues, and any major reforms underway to ensure that these issues are tackled. Please list all measures being taken.
4. If there is an anti-corruption policy, describe who is responsible for its enforcement.

Areas to explore:

- Is a specific department or individual 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.

Areas to explore:

- 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.

Areas to explore:

- 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 anticorruption 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?
- What is the role of the media in bringing cases of suspected corruption to light?

IV. Personnel – Behaviour, Policy, Training, Discipline

Required Standards of Personal Conduct and Behaviour

1. 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.
3. 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.

Areas to explore:

- Meritocracy of appointments/postings – how job vacancies are advertised, whether there is room for “favouritism,” etc.
- Does regular staff “anti-corruption” training take place?
- What is the frequency of rotation of staff in sensitive posts?
- How do staff declare offers of corporate hospitality (including travel, entertainment, expenses, etc.)?

Payroll

4. 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?
- Are chains of command separate from chains of payment?

Violations of Anti-Corruption Policy and Regulations

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

Areas to explore:

- How active is the process?
 - What is the role of military courts in this process and are they open to the public?
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.
 7. 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.

V. Planning and Budgeting

Acquisition Planning

1. Describe briefly your country’s acquisition planning process including cycle time and key personnel and departments involved.
2. 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, 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 spending for the last year published in detail? If yes, how detailed is it? 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?
7. 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.

Areas to explore:

- 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?

VI. Operations

1. Is there a military doctrine addressing corruption issues for peace and conflict?

Areas to explore:

- Have commanders at all levels been trained?
- Are there professionals (such as military auditors) capable of monitoring corruption risk in the field? Have they been trained and will they be deployed?

2. Are commanders at all levels clear on what corruption issues they may face during any deployment?

Areas to explore:

- Is there guidance on the subject at the strategic level?
- 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?

3. How is corruption risk mitigated in processes for accelerated and routine procurement (including local contracts and purchases) in a conflict environment?

4. Is the organisation clear on what corruption issues it may face in any deployment?

Areas to consider:

- Is there doctrine and guidance on the subject?
 - At field level, is there clear guidance for troops on acceptable behaviour?
 - Are there oversight mechanisms?
 - Are there training modules available?
5. Is there military doctrine on how to address corruption issues, both at the strategic level for the mission commanders and in the field?

Areas to explore:

- Have the senior commanders been trained? 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?
6. Are there processes for accelerated procurement in a conflict environment? If so, have these been reviewed for corruption risk?

VII. Procurement

Procurement – Legislation

1. Describe and list the laws in your country specifically relating to defence and security procurements.
2. 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?
4. 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

6. 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.
7. Describe the processes for the publication of all procurement/acquisition plans (both classified and unclassified) and outline the mechanisms for determining the equipment specifications, including the decision-making processes.

Areas to explore:

- What proportion of potential defence purchases is made public by number and by value?
 - Are thorough and complete written records kept (in paper or electronic form) of each tender submission and of subsequent changes?
8. 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 contracts use e-procurement, and what is the procedure for the use of e-procurement?
9. 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

10. 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.
11. Describe the use of offsets, if used, during the procurement process.

Areas to explore:

- 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.

12. 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.

Areas to explore:

- 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.

VIII. Engaging with Defence Companies and Other Suppliers

1. 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.
2. 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.
3. 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?

Areas to explore:

- Planning and purchasing cycles, and documents used.
 - Any differences in procedures used to advise foreign as opposed to domestic companies.
5. 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.

IX. 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 Partnership for Peace and the Euro-Atlantic Partnership Council, please see the following websites:

<http://www.nato.int/issues/pfp/index.html>
<http://www.nato.int/issues/eapc/>

For further information on Transparency International's defence sector programme and the wider Transparency International coalition, please see the following websites:

<http://www.defenceagainstcorruption.org>
<http://www.transparency.org>