



**TACKLING CORRUPTION FROM THE BOTTOM UP:
DECENTRALIZED GRAFT PREVENTION IN MAURITIUS, 2009–2016**

Tristan Dreisbach drafted this case study based on interviews conducted in Mauritius in December 2016. The British Academy-Department for International Development Anti-Corruption Evidence (ACE) Program funded the development of this case study. Case published February 2017.

SYNOPSIS

Citizens of the Indian Ocean nation of Mauritius worried openly about corruption and petty bribery in government, just after the millennium. Surveys revealed that civil servants often took advantage of archaic and overly bureaucratic procedures, offering to reduce delay in return for cash. In 2009, Anil Kumar Ujoodha, director general of the national government's Independent Commission Against Corruption, introduced a new prevention program. He proposed a bottom-up strategy to reduce opportunities for bribe taking, nepotism, and conflicts of interest in the public service. Rather than handing down orders, policies, and procedures for fighting corruption, Ujoodha and his top staff shifted responsibility for the revision of practices to government agencies and their employees. Commission staff guided each agency through the process of setting up an anticorruption committee, assessing institution-specific corruption risks, developing solutions, and monitoring implementation. After piloting the new approach with the police and the Civil Status Division, the commission scaled up the initiative; and by 2016, more than 70 of the island nation's more than 200 agencies had agreed to implement more than 380 different measures to address corruption risks. Although the coordinated strategy purposely sidestepped certain major concerns such as the influence of money on elections, it succeeded in reducing the incidence of highly visible forms of graft that undermined government credibility at the grassroots level. The measures also helped the government meet its obligations under the United Nations Convention against Corruption and other international agreements.



INTRODUCTION

Shortly after taking over as Mauritius's top anticorruption official in 2006, Anil Kumar Ujoodha dispatched one of his officers on a mission: to request a copy of the officer's own birth certificate from a government agency.

Although the assignment appeared to be straightforward, its purpose was not. Ujoodha's office had received many complaints about his country's civil status offices, which issued birth certificates and other official documents. Complaints from applicants reported that staff members often asked for bribes in exchange for expedited service, and Ujoodha wondered how many attempts it would take before he gained a firsthand account of petty bribery, but the answer came quickly. The officer returned to the office and reported that a civil status officer had indeed asked for a bribe to reduce what could be a weeklong wait into same-day service.

"We could have arrested that [civil status] officer, but we didn't want to," Ujoodha recalled. "If there is systematic corruption, there is no point in getting one person out of the system. You have to get the system right." Moreover, a court would have tagged the mission as entrapment, he said.

Solicitation of bribes was not a new problem for the government of the small, verdant, island 2,000 kilometers east of Madagascar. Mauritius had long stood out as one of the few upper-middle-income countries in sub-Saharan Africa. It had well-developed institutions, educated civil servants, and high levels of economic development. But many of its agencies used archaic and overly technical bureaucratic procedures, and citizens sometimes had to wait days or weeks for delivery of a service unless they offered to pay extra for preferential treatment. One survey reported that more than half of respondents rated government agencies as highly corrupt.¹

Further, the country's small population of about 1.3 million meant that personal relationships could affect transactions between citizens and government officials. Close social and family ties created pressure for preferential provision of government resources and services as well as nepotism. In addition, a friendly investment climate attracted an influx of international money into the island, raising the likelihood of wrongdoing at many levels.

The government took steps in 2002 to strengthen its reputation for good government when it passed a new anticorruption law and set up the Independent Commission Against Corruption (ICAC). The number of complaints ICAC received annually multiplied to well over 1,000 in 2006, from about 200 during the commission's first year. Under Ujoodha's leadership, the investigation division brought cases against civil servants from various public agencies on charges of money laundering, influence peddling, and other corruption offenses; and it achieved more convictions.

The investigations and prosecutions represented a vital step toward cleaner government, but they could not correct the full scale of the problem.

The commission continued to receive complaints about traffic police and customs officers' taking bribes, officials giving preferential treatment when allocating market stalls to vendors, and other illicit practices.

When he became ICAC's director general, Ujoodha sought a new approach. Improving the situation in the long term required changing the way public agencies operated so that employees had fewer opportunities to engage in self-dealing. "The procedures, the rules of administration, and the organization of institutions tended toward corrupt practices," he said.

Responsibility for fixing the situation lay with ICAC's prevention and education division, which had earlier developed codes and best practices. But ICAC lacked the legal authority to require compliance. "We found that in certain sectors, people were not really willing to implement," Ujoodha said. "They were just dillydallying."

In 2008, the commission promoted Rashida Domah to be director of prevention and education. Domah had been at ICAC since 2006, having served during much of her career as an auditor—experience that made her well suited to diagnose organizational problems and risks. Ujoodha and Domah set out to drive change and restore citizens' confidence in their government.

THE CHALLENGE

Ujoodha and Domah had to work within the constraints of the country's anticorruption legal framework. The country's laws and institutions had gradually changed. In the 1990s, the government had set up the Economic Crime Office, which focused mainly on money laundering and financial crime. The office had investigated several ministers for fraud, and two ministers had resigned their posts as a result. But the office's scope of responsibility was too limited to be able to make meaningful inroads into some of the practices that concerned citizens the most. In 2002, Mauritius signed the Southern African Development Community Protocol against Corruption, and the parliament passed a law creating ICAC as the country's lead anticorruption body, with powers to investigate, prosecute, and prevent fraud and bribery and related practices. In consultation with the opposition in parliament, the prime minister appointed an ICAC director general, who had to be a supreme court judge, a long-serving magistrate or lawyer, or the former head of another country's anticorruption agency.

ICAC concentrated many anticorruption activities in one place. When public agencies uncovered evidence of serious acts of corruption among their employees, they reported the cases to the commission, which then took action by bringing the cases to court. With the consent of the Directorate of Public Prosecution, ICAC also had the authority to investigate and prosecute money laundering—a role it shared with the Financial Intelligence Unit, created by a separate law in 2002, which investigated money laundering and financial crimes but sent cases to ICAC for prosecution. Using information

uncovered in those investigations as well as its own research, ICAC's prevention division aimed to strengthen understanding of clean-government norms and reduce opportunities for civil servants to stray from them. (For more on ICAC, see ISS case study *From a Rocky Start to Regional Leadership: Mauritius's Anti-Corruption Agency, 2006–2012*.)

International agreements put added pressure on ICAC to act. In 2004, Mauritius joined the United Nations Convention against Corruption (UNCAC), which obligated member states to establish and implement anticorruption measures in the areas of prevention, law enforcement, international cooperation, and asset recovery. The convention required regular assessments of Mauritius's progress toward UNCAC goals.

To deliver on national commitments under the convention, Ujoodha and Domah wanted to strengthen ICAC's prevention activities. But first they had to correct a problem that had existed since the commission's creation and that had limited the prevention division's effectiveness. Although ICAC personnel could report on corruption risk within government agencies and suggest ways of changing policies and procedures, the 2002 anticorruption law gave the commission no legal authority to enforce its recommendations. ICAC could not require public officials to change the ways their agencies operated, because such decisions were the purviews of ministers, permanent secretaries, or top officials in the civil service.

In the past, ICAC had coped with those limitations by recommending specific legislation to change policies or procedures, and it had enjoyed some success in pushing for new laws; but Ujoodha recognized that parliament was unlikely to give ICAC broad authority to impose changes on civil servants in other parts of government.

Winning compliance from the agencies themselves and with the country's top political leaders was the only feasible approach, but Ujoodha and his colleagues faced a lack of will throughout most of the government. In the past, agencies set aside potentially simple fixes proposed by ICAC because no one had the initiative or responsibility to implement them. Ujoodha did not believe that official reluctance to act was necessarily a sign of complicity in corruption. "Very often, they just didn't understand," he said. "Or they did not want to be ordered how to do things" by ICAC. Agency managers also faced the threat of backlash from employees who benefited from the status quo.

But there were other types of challenges too. A successful strategy had to adapt to the diversity of practices across the government. Ujoodha and Domah found that some agencies treated corruption in the context of broader risk management exercises, and others had no anticorruption policies at all. Moreover, the dangers varied across tasks: some parts of government handled large procurements or issued licenses, whereas others had little day-to-day interaction with residents and businesses and made few large purchases.

A related issue involved how to monitor implementation and improvement. These functions presented two distinct challenges: tracking the progress of agencies' anticorruption efforts on one hand and monitoring actual rises or declines in corruption on the other. The first part, which required that directors and managers set clear goals and abide by a reporting process, was relatively easy. The second—measuring corruption—represented a difficult undertaking that challenged anticorruption reformers around the world. The most-common sources of data—perception surveys and officially filed complaints—were far from reliable. Survey data could report only citizens' perceptions and likely missed much of what was happening within the agencies in question. Complaints were useful for getting a general sense of citizens' experiences regarding corruption, but a rise in the number of complaints might not mean that corruption had worsened; it could reflect citizens' greater trust that institutions and officials would take their complaints seriously.

To address those challenges, ICAC had to overcome a capacity problem. Its prevention and education division had only about two dozen people. It had too few officers to identify and analyze corruption risks in the country's 24 ministries and 180 or so other departments, agencies, and local government institutions. Ujoodha said he had to fight hard to fund existing prevention programs, so asking for additional money to hire more ICAC staff was not a viable solution. He had to make the most of the resources on hand.

Finally, Ujoodha's team had to buttress public perceptions of ICAC's work and improve the relationship between Mauritians and their government. Investigations and prosecutions of corruption made headlines, but prevention activities were far less sensational and often took considerable time to produce results. The strategy had to communicate well with the public.

FRAMING A RESPONSE

Ujoodha and Domah considered the status quo unsustainable. The prevention and education division could not amplify its impact by simply producing more corruption prevention reviews and making recommendations, as it had in the past. Moreover, to overcome his commission's lack of legal authority to enforce compliance, Ujoodha had to create a plan that would appeal to the prime minister and the head of civil service, the people who had the authority, at least in theory, to mandate all agency personnel to cooperate with ICAC proposals.

After looking at prevention-related models from other countries, Ujoodha worked with colleagues to determine how they could meet the specific challenges and limitations they confronted in Mauritius. Soon they converged on a strategy: decentralizing prevention efforts so that the agencies themselves had more responsibility to assess their own corruption

risks and devise their own solutions. ICAC's prevention staff would focus their energy on guiding public sector employees through that process.

Decentralization aimed to achieve several goals. First, by focusing at the agency level, it could tailor reforms to the specific vulnerabilities that different functions and tasks caused, thereby improving effectiveness. It put more responsibility for anticorruption activities on the staff of public agencies, which, Ujoodha said, "knew their own problems better than we did."

Second, the new approach could build a sense of ownership and responsibility, thereby increasing the likelihood of sustainability. Managers often had at least a rough idea of how to reduce corruption opportunities by making processes more efficient or instituting simple rule changes, but they were sometimes reluctant to do so because of a likely backlash from their employees. The ICAC strategy enabled them to plan changes and implementation in ways that would help build staff support while also improving performance.

Third, decentralization increased incentives for senior officials to invest in the reforms. With flexibility came responsibility for demonstrating results. "You can't have a permanent secretary saying, 'I don't know what goes on in my ministry,'" Ujoodha said. "You need to be responsible, and you need to take action."

Finally, the plan made good use of available resources and stood a good chance of winning top-level political support as a result. Enlisting the agencies in research and decision making boosted ICAC's limited capacity to assess corruption risks and create effective solutions. It freed officers to dedicate more time to guiding employees of other agencies and less to compiling research and making recommendations that agencies might simply ignore. A plan that improved public agencies' performance and public perceptions of government without the need for additional resources would prove especially attractive to those senior leaders.

Ujoodha, Domah, and their colleagues thought anticorruption should be a core focus of every agency's risk assessment responsibilities, and they wanted each agency to set up its own anticorruption committee run by its own officials. A plan for eliminating vulnerabilities would be each committee's first task.

After drawing up a draft policy, each agency's anticorruption committee would submit its plan, first for ICAC review and then to top agency officials for approval. ICAC staff would help the committees identify specific corruption risks and help develop solutions, but ultimately, the committees would be responsible for diagnosing potential problems and implementing the initiatives. The idea was to focus on solutions that agencies could implement with existing resources.

Ujoodha expected little resistance from senior officials as long as he could get the prime minister's office and the head of civil service to endorse

the strategy. Moreover, he said, most agency heads and ministers were honest and he could sell the strategy to them by explaining that they would benefit politically by touting success in preventing corruption within their institutions. Further, permanent secretaries and other senior officers were likely to go along because many of the anticorruption measures helped public agencies run more effectively by simplifying complicated processes and identifying inefficiencies.

As ICAC's team moved to transform its strategy into an action plan, Ujoodha insisted on broad consultation in order to build acceptance. He opened up discussions to all ICAC personnel, holding meetings to explain the project and solicit feedback. He then hosted similar conversations with staff from public agencies. He did not want the strategy to come as a surprise, so he invited officials to ICAC headquarters for overviews of the strategy and explanations of the process of creating anticorruption committees, policies, and strategies.

"We had meetings with all of the public sector departments and ministries and the permanent secretaries to make them understand," Ujoodha said. One of the concerns agencies raised during the meetings involved the additional burden the strategy could place on their staffs. Ujoodha said that even though the time commitment might be considerable in the initial phase of the establishment of committees and policies, it would be much lighter as the process became routine. He also told agency staffs they would have flexibility in setting time frames for putting reforms into place.

Ujoodha and Domah wanted to collect up-to-date information before moving forward. ICAC staff developed a questionnaire to learn more about citizens' experiences with corruption. Ujoodha enlisted 40 ICAC officers to help survey 2000 citizens, sampled from a master list he had drawn from the electoral register. The results helped ICAC identify the most-common acts of corruption that citizens experienced in their daily lives.

Because agency officials had to learn how to look within their institutions and come up with their own solutions, teaching and guidance were important parts of the strategy. "We would walk them through it," Ujoodha said: "planning the assessment, identifying areas vulnerable to corruption, addressing likelihood of risks, identifying responses, and setting time frames for implementation, reviewing, and evaluating."

Professional and personal relationships also were vital to the strategy's success. During ICAC's early years, its corruption prevention officers had portfolios of public institutions for which they were responsible. Those officers, most of whom had several years of experience, closely analyzed the agencies in their portfolios, regularly visited agency offices, and sought to develop working relationships with agency staff. Ujoodha and Domah saw those existing relationships as a vital resource for building momentum. Under the new strategy, ICAC officers served as members of anticorruption committees, which also included high-level civil servants from each agency.

Each ICAC prevention officer took responsibility for assisting about five agencies.

Ujoodha and Domah decided that the first step for every committee would be to create an anticorruption policy by adapting a template that ICAC had developed. The policy would then guide the committee's work. The policy was simple and reflected existing provisions in the civil service guide. It stated the agency's commitment to fight corruption as defined by Mauritius law, detailed the composition and responsibilities of the anticorruption committee, and set expectations for employee conduct. ICAC officers stressed that agencies should integrate the policies into the training curriculum for new staff.

Drawing on information it had accumulated from corruption prevention reviews, survey data, complaints, and discussions with ministries, the commission's prevention and education division identified 21 priority areas in which agencies should develop their own anticorruption strategies. For each, the division listed common problems and included suggestions on how to fix them. One priority area was procurement. ICAC staff prepared guidance on assessment of risks in procurement, selection of method of procurement, creation of tender documents, processing of bids, awarding of contracts, inspection of deliveries, and payment methods. The commission developed similar advice for other areas, including conflict of interest, internal audit, contract administration, asset management, overtime, and codes of conduct.

Clarifying the subtler aspects of conflict of interest was crucial, Ujoodha said. Civil servants had a general sense of right and wrong, but there were gray areas of interactions with friends, family, or other personal relationships. "That was one of the major priorities," he said. "Conflict of interest in a small country is very important. We have to make sure it is clear." Each agency was to clarify its conflict-of-interest policy and provide explicit guidance for staff members in handling conflicts such as a professional interaction with a close family member.

The commission boiled down the overall strategy, called the Public Sector Anti-Corruption Framework, into a 53-page guide designed to guide all workers at public agencies. A small group of officials in the prevention and education division spent much of 2009 producing the guide, which ICAC released at the end of the year. The booklet walked officials through the process of establishing an anticorruption committee, creating a policy, and assessing and managing corruption risks. ICAC staff wrote the text, and the European Union provided funding for printing copies.

As he worked on the strategy, Ujoodha also drew on the opinions of staff at the United Nations Office on Drugs and Crime, which monitored country compliance with the United Nations Convention against Corruption and provided guidance. Ujoodha said the UN staff showed enthusiasm for his ideas, and he decided to enter the framework in the United Nations Public Service Awards competition, which recognized achievements in public

administration around the world. “When we embarked on that competition, the pressure mounted,” Ujoodha said.

In 2010, the parliamentary committee that oversaw ICAC approved the Public Sector Anti-Corruption Framework as part of ICAC’s 2010–14 action plan. Ujoodha had gained the support of the prime ministry through discussions during development of the strategy. The government officially endorsed the framework in June 2010.²

GETTING DOWN TO WORK

By 2010, Ujoodha and Domah and their colleagues had in place a strategy, a working manual, and a support structure. Now they faced the task of putting their ideas into practice.

Piloting the strategy

Ujoodha wanted to test the Public Sector Anti-Corruption Framework with a small number of agencies that had experienced serious corruption problems but still had good working relationships with ICAC. Both the police service and the Civil Status Division fit the bill because “they were the departments where we had the most complaints,” Ujoodha said.

Citizens complained regularly about bribery in the traffic division of the police service. Among other things, they said police accepted bribes to give passing grades in driver’s tests and to set aside traffic citations. Ujoodha had a good relationship with Police Commissioner Dhun Iswur Rampersad, who had cooperated with ICAC on several previous reforms.

Because top police officials had attended strategy discussions with ICAC, they were familiar with the plan. Ujoodha said he told Rampersad that participation in the framework would bolster the image of the police service by showing “a willingness to comply, a willingness to diminish corruption.” The police commissioner agreed to implement it.

The Civil Status Division was under the aegis of the prime ministry, and its main responsibilities were to provide birth certificates, marriage licenses, and death certificates. The division’s decentralized structure of the office created many opportunities for civil status officers to seek illicit income. Employees worked in 47 offices spread around the island and monitoring them all was difficult with the limited resources at the disposal of the division’s management. Plus, the nature of the division’s work was conducive to corruption because citizens usually had to wait several days for documents needed for urgent business. Applicants who needed those documents urgently sometimes resorted to bribing officers.

Impatient applicants often unwittingly fueled corruption. For example, when international travelers came to Mauritius for, say, a tropical beach wedding and a civil status officer might direct the couple to a specific lawyer to prepare the necessary affidavit. The lawyer then paid the civil status officer a kickback from the fee collected.

Civil status officers sometimes made arrangements with hotels to officiate at weddings during off-hours. They sometimes asked resorts or hotels for transportation reimbursements—which were legally allowed—but at levels well above the actual costs.

The civil status registrar, the head of the division, had worked with ICAC on addressing some of the division's corruption problems, including through increased digitization of records to expedite service. ICAC had a good relationship with the registrar and persuaded him to start implementing the strategy.

The police service, host to the second pilot project, was a very different institution from the Civil Status Division. It was the largest employer in the public sector, with about 12,000 personnel, and it carried out many different kinds of responsibilities. The Civil Status Division was much smaller, with fewer than 200 employees, who handled a small set of specific tasks. What the two had in common was that much of their work was done by people who were spread throughout the country and who had significant latitude in dealing with citizens and making decisions.

In 2010, the management teams of the police service and the Civil Status Division formally agreed to implement the ICAC framework. Ujoodha wanted each of the anticorruption committees set up to include at least one of the highest-level civil servants in their respective agencies, along with employees knowledgeable about processes and procedures. Both the police and the Civil Status Division assigned their highest officials to the committees. The commissioner of police served as chair of that service's anticorruption committee, which also included the head of the traffic branch, a division commander, and the managers in charge of human resources, financial operations, and procurement. The registrar chaired the Civil Status Division committee.

ICAC officers worked with the committees of each agency to produce anticorruption policies based on the ICAC template, and the resulting documents, approved in 2011, were similar in structure and content, with only small procedural differences regarding the composition of the committees and the processes for reporting suspected acts of corruption to ICAC.

The police service placed its anticorruption committee under its professional standards department. The committee began exploring areas of corruption risk and identified several that called for immediate action. One was the slow process for providing passports. Processing could take a week, and citizens in a hurry were tempted to offer bribes for expedited service. Another involved the procedure for providing security services for private events. The problems in the licensing section in the traffic branch were another area of concern. The committee formed subcommittees led by middle managers to address each challenge. The committee was responsible

for preparing a yearly anticorruption progress report to update the police service on progress made.

The committee in the Civil Status Division also identified three priority problems it wanted to address. In the first, the process for providing copies of birth certificates was taking up to a week, and bribes were common. In the second, officers were taking advantage of opportunities to profit from officiating at wedding ceremonies and collected kickbacks from lawyers. In the third, politicians tried to influence the assignment of staff to different offices around the island, usually aiming to reward supporters with positions closer to their homes, and because the island is 45 kilometers (28 miles) wide and about 65 kilometers (40 miles) long, the maximum commute was about one hour. Because the division was smaller than the police service, the anticorruption committee did most of the work itself instead of delegating challenges to subcommittees.

As the pilot project moved ahead, ICAC staff recognized the value of choosing committee members who were likely to remain at their agency for several years. “In some situations, it was better to have the assistant permanent secretary on the committee because he would be there for a longer period,” Ujoodha said. ICAC also learned that membership size should vary from agency to agency depending on the specific characteristics of the institution.

The committees worked closely with ICAC officers and began to design possible solutions to the problems they had identified. For example, the police service believed that using cameras to monitor driving tests could help curb corruption and explored how to reform the traffic-ticketing process. The civil status division put greater emphasis on digitizing and automating files to streamline processes and reduce the opportunities its staff had to solicit bribes. The committees created an action plan and set deadlines for implementation.

Agency leaders had to make sure their employees were on board in order to make progress. Not everyone welcomed change. Choolun Bhojoo, the Deputy Commissioner of Police said: “Human beings are generally resistant to change, but through meetings we discussed what had to be done and why.” With circulars and face to face discussions, he kept employees apprised of the committee’s work and communicated clearly why the changes were necessary.

William Mario Ayelou, who became head of the Civil Status Division in 2013, said his desire to make changes elicited strong pushback from employees. This was particularly true when he forbade staff from officiating at renewal-of-vow ceremonies, which were illegal in Mauritius. Civil status officers wrote anonymous letter criticizing his actions. The prime minister’s office summoned Ayelou to explain his reason for the change. “I had the support of 90% of the staff, but a minority resisted,” he said. “I talked to them all and tried to sensitize them.”

Scaling up

In 2012, with the basic structures in place at the police service and the Civil Status Division, Ujoodha moved to implement the strategy at other agencies. Although he had already spoken to officials from many public agencies about the framework, he knew that ICAC alone could not ensure widespread adoption of the approach. An important step was to secure support from Suresh Chundre Seeballuck, head of the civil service.

Ujoodha said he met Seeballuck several times to talk about the framework and its importance. “He was also concerned about corruption in the ministries,” Ujoodha said. “He wanted to come up with a solution and found our strategy interesting.”

Lending his support, the civil service chief issued a circular directing officials throughout the government to participate in the Public Sector Anti-Corruption Framework. The support eased the way for Ujoodha and his colleagues to promote the new strategy to the government, agencies, and the public. Seeballuck had had long experience in the civil service and recommended that Ujoodha keep the approach focused on specific problems and proceed gradually to avoid sparking resistance.

To expand the program, Domah led the prevention and education division in what she termed *aggressive marketing*. She invited two or three high-ranking officials from every ministry to ICAC training workshops to learn about the framework and what was expected. The commission sent letters to every ministry, parastatal body, and local government informing them about the goals and the opportunities the initiative presented.

Domah’s division published a short guide so the agency committees could learn about corruption risk management. The document outlined a four-step process: identifying risks; analyzing, evaluating, and prioritizing risks; managing risks; and monitoring progress. ICAC officers offered assistance through every step and kept a record of each agency’s status.

In their communications with officials, Ujoodha and Domah emphasized that reforming procedures and reducing corruption would improve public agencies’ operations and save staff time in the long run by catching potential problems before they turned into serious issues.

Agencies initially were slow to embrace Ujoodha and Domah’s way of thinking and slow to comply with the civil service head’s directive, however. Just 10 of the country’s roughly 200 agencies had signed on to the framework by mid 2012. ICAC officers began working with the leaders of those agencies to establish anticorruption committees. The police service and the Civil Status Division had included only top managers on their anticorruption committees, but as enrollment in the framework grew, ICAC prevention officers encouraged the appointment of internal auditors to the committees as useful sources of expertise. Agencies hired internal auditors to evaluate their risk management, control, and governance processes; those auditors performed their work independently of the National Audit Office; and they

developed a unique understanding of procedures, weaknesses, and opportunities for corruption in their respective agencies.

ICAC helped identify risks, but each agency was responsible for examining its own data. Complaints that citizens or staff had submitted to ICAC were primary sources of information, as were any corruption prevention reviews or related research the commission had conducted on an agency. Other sources included audit reports, internal management reports, and survey data. And for some agencies, international standards such as those of the International Organization for Standardization also informed the process.

As agencies set up committees and began the risk management process, they identified a wide variety of corruption risks—from minor issues to serious problems. The ministry of commerce looked at how it provided licenses and construction permits. The fire service found problems with its own procurement processes and the way it selected officers for sought-after training programs. It, too, identified the need for a code of conduct and better integrity training for staff. And the municipal council in the town of Vacoas-Phoenix uncovered troubles in its procedure for allotting market stalls to vendors and found risks in its procurement processes.

Generally, the commission recommended creating a subcommittee for each identified risk. The subcommittee could draw remedies from the Public Sector Anti-Corruption Framework manual and adapt them as necessary. The subcommittees sent their ideas to the full anticorruption committee, which reviewed the recommendations and assigned responsibility for follow-up within the organization.

The country's Board of Investment, was a prime example of the decentralized process Ujoodha had set in motion. The board was the first point of contact for international investors exploring opportunities in Mauritius. Khoudijah Maudarbocus-Boodoo, who served as the board's director, led her colleagues to sign on to the framework in 2012. The board, which had already hired a private consultant to begin a risk assessment process, formed an anticorruption committee with help from ICAC. The committee asked the consultant to incorporate questions about corruption risks into interviews with stakeholders from government, the private sector, the public, and her own staff. The board then held a one-day internal workshop to discuss corruption risks that threatened to harm the agency's operations or reputation, she said. The workshop resulted in a matrix of identified risks, with procurement and human resources issues chief among them. The anticorruption committee created two subcommittees to develop strategies in those areas. The board asked the firm that conducted its internal audits to assess progress every six months.

Ujoodha's close communication with the United Nations paid off when the UN's Department of Economic and Social Affairs presented to Mauritius a 2012 Public Service Award for the country's work in creating and

implementing the strategy. The award was validation for Ujoodha, who cited it frequently in his discussions with agency officials and the media. Journalists had long been critical of ICAC because they saw it as ineffective, Ujoodha said, and international approval for the prevention strategy helped demonstrate ICAC's value. Ujoodha sponsored meetings with journalists to discuss the work of the commission and Mauritius's anticorruption legal framework.

More than 40 agencies had created anticorruption committees by the end of 2013.³ By that time, leadership had shifted. Domah left her position as director of prevention and education to serve on ICAC's board of directors. Her successor was Isswar Jheengut, who had been assistant director at ICAC but had spent several years in another job.

Tracking progress

As new agencies signed on to the framework, ICAC's prevention and education division developed a plan for tracking implementation of the corruption prevention strategy and for improving coordination as needed. The diversity among the public agencies meant priorities and goals would differ. It was hard to know which indicators to track and how to do so with limited staff.

The presence of ICAC prevention officers at anticorruption committee meetings and the working relationship between those officers and agency staff made it possible for the commission to keep a close watch on the progress of anticorruption efforts in all agencies. The committees met about once every three months, and an ICAC officer was always present to hear status updates and contribute advice or answer questions from agency staff. But informal contact between ICAC officers and the agencies was perhaps more important than the officers' formal roles as members of the anticorruption committees.

Each ICAC officer had a portfolio of about five agencies and tracked the commitments that the agencies' committees had made. Ujoodha and Domah's 2010 discussions of the strategy had featured little specific talk about monitoring, Ujoodha said, but the officers developed their own strategies for tracking progress. They made phone calls, generally every week or two, to check in with their contacts at the agencies about progress made toward fulfilling their anticorruption commitments. For example, Maudarbocus-Boodoo of the Board of Investment reported frequent calls—"almost too often," she said—from the ICAC officer assigned to the board.

Such frequent and informal contact enabled ICAC officers to identify potential problems early. If an institution appeared slow in meeting its obligations, ICAC leaders asked the head of civil service to write a letter asking that the relevant officials prioritize compliance with their commitments under the Public Sector Anti-Corruption Framework, Domah said.

ICAC officers presented formal reports to the director of prevention and education every three months to track progress made under the framework. In addition, each agency's anticorruption committee had to report progress to ICAC twice a year. That reporting provided the prevention and education division with the number of agencies that had committed to join the framework, the number of anticorruption committees established, the number of anticorruption policies approved, the commitments made by the committees, and the commitments successfully implemented. Commission staff compiled the data into a spreadsheet to track the progress of each agency.

When an organization's work involved the private sector, ICAC could engage counterparts in private companies who would help identify solutions and implement policies. The 2002 Prevention of Corruption Act required ICAC to liaise with private sector organizations to develop anticorruption practices. In 2013, businesses suggested creating a forum for discussing matters that required cooperation between the public sector and the private sector.⁴ In response, ICAC created the Public Private Platform Against Corruption in collaboration with the Joint Economic Council, the Mauritius Institute of Directors (a training center focused on corporate governance), the Mauritius Chamber of Commerce and Industry, and Transparency Mauritius—the Mauritius affiliate of Berlin-based anticorruption nongovernmental organization Transparency International.

Creating clear standards for behavior

Domah and her colleagues at the prevention and education division had included a code of conduct as one of the recommendations in the Public Sector Anti-Corruption Framework. Codes of conduct were common to anticorruption efforts in many countries because they helped agencies develop clear expectations for employee behavior—an essential step that provided notice of standards. Without a code, it was hard to sustain disciplinary proceedings or convictions for infractions. Ujoodha made it clear that in addition to setting behavior standards, codes of conduct played an important role in protecting employees. “Once you follow the code of conduct, nobody can point a finger accusing you of doing something wrong,” he said.

The head of civil service had already prepared a code of ethics for public officers, and ICAC in 2009 had produced a code of conduct for employees of parastatal bodies. The strategy envisioned more agencies' creating their own codes to set out in clear terms the standards of behavior expected of employees. Many agencies did just that.

For example, the Board of Investment's anticorruption committee worked with ICAC officers to create an internal code of ethics and an accompanying policy on accepting gifts. “The code was important because staff have to be reminded about proper behaviors,” Maudarbocus-Boodoo

said. “It was also an important tool for training new employees.”

ICAC worked with the Ministry of Local Government and municipal and district councils to create for all councillors a code of conduct that took effect in 2016 and a best-practices guide to assigning market stalls to vendors.

Sometimes the preparation of a code required cooperation between many different organizations. For example, Maudarbocus-Boodoo led a group within the Public Private Anti-Corruption Committee that produced a set of best practices for licensing by local authorities.

Where it was important to have a common standard throughout the government, the prevention and education division took the initiative to come up with language that would work for everyone. High on this list were policies on overtime management, on gifts and gratuities to public officials, and on procurement. The prevention division worked with the Procurement Policy Office in 2015 to revise past standards. Sacheedanand Tahalooa, a member of the office, said workers had not taken the original code seriously. Tahalooa worked with ICAC staff to find ways to capture procurement officers’ attention and build awareness. He sponsored workshops that presented examples of corrupt acts that had resulted in sanctions against employees.

In 2014, the commission also produced a guide to managing conflicts of interest—a matter common to all parts of government. A prohibition against conflicts of interest was part of ICAC’s anticorruption policy template, and agencies made separate conflict-of-interest policies as well. Any employee involved in procurement processes or in issuing licenses had to declare any conflict of interest that arose.

Declaring assets

Putting the preventive strategy into practice was easier than it might have been, because one potentially sticky issue—asset declaration—had been resolved earlier, at least partly. The 1968 constitution required members of parliament to declare their assets and conflicts of interest, and a 1991 law extended the practice to ministers and commissioners of public agencies. Further, the 2002 law that created ICAC required all of the commission’s board members and officers—and their counterparts at the Financial Intelligence Unit responsible for investigating money laundering and financial crimes—to do the same.

To file asset declarations, officials had to fill out a document listing details of property holdings, vehicles, investments, and business interests, as well as those of their spouses and minor children. After swearing an affidavit before a court, they submitted their declarations to ICAC. The law required members of parliament to declare assets upon taking office, after every election, and when they left office. Ministers and commissioners declared their assets upon appointment and departure. Officials also had an obligation to file new declarations whenever the value of their assets changed by more

than 100,000 rupees (about US\$2,800 in 2017). Although ICAC had the authority to review asset declarations, the law said the declarations were not open to the public.⁵

Domah and her colleagues believed there could be room for asset disclosure to apply to other employees of public agencies as well. In some corruption-prone agencies, keeping track of assets could give managers evidence of potentially corrupt employees and could dissuade staff from accruing assets through illicit means. The ICAC team included disclosure of assets as one of the strategic priorities in the Public Sector Anti-Corruption Framework, which meant that each agency had to decide whether to set up an asset declaration system for civil servants—apart from the one for ministers, who were already participating. Although most of the government bodies did not apply the requirement to civil servants, a few did. One example was the Mauritius Revenue Authority, which required all employees to submit sworn declarations, beginning in 2012.⁶

In 2015, the government introduced a bill to expand asset declaration requirements to all civil servants earning a certain salary or more, but as of early 2017, it had not passed.

Compliance and impact monitoring

The anticorruption commission also faced the twin challenges of compliance and monitoring: assessing whether personnel adhered to the rules and determining whether the actual level of malfeasance was decreasing, remaining steady, or rising.

ICAC's two dozen prevention officers, each one assigned to a subset of government agencies, were responsible for tracking implementation of the framework. At the anticorruption committee meetings and through informal contacts with agency staff, they gathered information on progress and then submitted their reports to ICAC directors for approval. ICAC also encouraged agencies to list their anticorruption action items and show rates of progress in their annual reports.

To measure the actual impact of the preventive strategy in controlling and reducing corruption, ICAC struggled to develop better metrics for assessing levels of corruption—as distinct from compliance with the framework. Data on the number of complaints ICAC received was useful but not sufficient to determine whether corruption in its various forms had diminished.

The commission continued relying on survey data to gain some sense of the problem. In 2014, ICAC hired a consulting firm to conduct a national survey on perceptions of corruption in government departments, parastatal organizations, municipalities, and district councils. The same firm had conducted a similar survey 10 years earlier. The 2014 survey reported that 13% of respondents had been asked for a bribe, which represented an improvement from 16% in the 2004 ICAC survey, although the difference

was almost within the margin of error. Only 5.6% of respondents to the 2014 survey reported actually paying bribes. Perceptions of corruption throughout society remained high, however. Seventy percent of respondents in the 2014 survey said there was corruption in most spheres of Mauritian society; 60% said both high-level and small-scale corruption had been increasing in recent years; and 62% said ICAC was not doing as much as it could to fight corruption.⁷

Audits provided another tool useful for both tracking and monitoring. Investment board director Maudarbocus-Boodoo used her agency's regular internal audits to monitor the implementation of changes to procurement, recruitment, and promotion policies—a tracking function. But she also assessed compliance. “It's about good supervision to make sure employees are following the new policies—that laggards know the new rules and that supervisors make sure everyone on the team is carrying them out,” she said.

Getting legislative support

Many of the anticorruption strategies implemented in other countries required action by legislatures to pass enabling legislation. Such legislation could give new powers to anticorruption authorities, set forth new penalties for corrupt acts, or otherwise facilitate the implementation of a strategy. Ujoodha and his colleagues had not taken that route with the Public Sector Anti-Corruption Framework, which purposely focused on using existing resources and the existing legal structure.

But that did not mean that legislation played no role in the strategy. Some of the reforms endorsed by anticorruption committees required legislative action, and agencies could directly request that parliament pass a law to permit a change in an agency's organization or functions. ICAC was authorized to—and often did—step in to help refine those requests and seek legislative approval. For example, Ujoodha said the commission successfully pushed for a law that would speed up the granting of building permits by the ministry of commerce and for another law that would privatize the vehicle examination centers of the National Transport Authority, which had received complaints about staff's accepting bribes from citizens requesting roadworthiness certificates. ICAC also supported efforts to create new campaign-finance legislation.

OVERCOMING OBSTACLES

The ICAC prevention strategy addressed mainly lower-level corruption within public agencies. But high-level corruption scandals continued to rock Mauritius and erode faith in the government, possibly accounting for some of the persistently negative public opinion survey results. Respondents frequently cited ministers, members of parliament, municipal and district councillors, and barristers as “very much” active in the practice of corruption.⁸ The scandals also disrupted leadership within ICAC, whose

director was appointed by the prime minister in consultation with the opposition.

In 2011, just as Ujoodha and his ICAC colleagues began to roll out their prevention strategy, a major scandal hit the government. That year, ICAC's investigation division opened an investigation into a 2010 deal by the government to buy a hospital and turn it into a geriatric center. The hospital was owned by members of the family of the president and his son; the latter served as finance minister. But ICAC's investigation determined that finance minister Pravind Jugnauth had violated the conflict-of-interest provisions of the Prevention of Corruption Act through his handling of the sale. As head of the ICAC, Ujoodha was responsible for recommending that the Director of Public Prosecutions prosecute the case.

Then came an abrupt change in the commission's leadership. In December 2014, shortly after general elections brought a new coalition to power, the incoming government, in which former president Arenood Jugnauth (the father of Pravind Jugnauth) became prime minister, removed Ujoodha from his post as ICAC director general. Ujoodha still had more than a year left on his contract. The new government also removed Domah from her post on ICAC's board.

The changes affected ICAC's investigation and prosecution divisions but left the prevention and education program intact, along with the prevention strategy that Ujoodha and Domah had helped create. ICAC's new director general, Raj Aujayeb, had come from the public prosecutor's office. He continued Ujoodha's work, prosecuted the Jugnauth case, and secured a conviction in 2015.⁹ It was a historic moment for ICAC: the first legal victory against a high political official and the first time an incumbent or former minister received a conviction. Jugnauth later won an appeal in the Mauritius courts, however, and in 2016, returned to his position as finance minister while the public prosecutor was preparing to appeal the decision to the United Kingdom-based Privy Council, the highest court of appeal in the Mauritius court system.¹⁰

A second scandal hit in 2015. When police searched the home of Navin Rangoolam, prime minister from 2005 to 2014, they found US\$6.2 million, much of it in foreign currency. The police arrested Rangoolam on charges of conspiracy and money laundering, although he claimed that the money had come from legitimate campaign contributions.¹¹

Although those incidents highlighted the vulnerability of ICAC leadership to the vagaries of partisan politics, there were some positive consequences. The Rangoolam scandal generated political pressure to change Mauritian law regarding asset seizures. Prior to 2015, it had been difficult for authorities to seize undeclared assets, because the legal system did not allow for *in rem* proceedings (a term for court actions against property), as opposed to *in personam* proceedings—against a person, according to Maneesh Gobin, the member of parliament who had been for several years

an ICAC legal officer. In the United States, for example, the government used in rem proceedings to seize large amounts of cash or other properties that had an unknown owner. In Mauritius, authorities had no such option and found it difficult to seize undeclared assets in cases involving illicit campaign contributions, drug trafficking, or other crimes.

As a response to the corruption scandals, the government created a ministry of financial services, good governance, and institutional reforms in January 2015, appointing former ICAC director of investigations Roshi Bhadian to serve as the new ministry's first minister. The ministry prepared the Good Governance and Integrity Reporting Act, which parliament passed in late 2015. The act included a provision for so-called unexplained-wealth orders, which allowed officials to seize funds if the holder could not explain where the money had come from, and it created an agency to initiate the process of seizing unexplained wealth. That agency could request that any person explain the sources of funds owned or funds used for acquiring property. If the explanation was not satisfactory, the agency could initiate legal proceedings to seize the property.¹²

Parliament also amended the asset recovery law in 2015 to give the Financial Intelligence Unit responsibility for recovering assets that were the proceeds of crime or the property of a terrorist entity. The Office of the Director of Public Prosecutions had previously held that responsibility.¹³

In addition to those laws, the ministry oversaw a December 2015 amendment of the constitution to give the state the legal right to take possession of unexplained wealth.

ASSESSING RESULTS

The decentralized corruption prevention strategy, embodied in the Public Sector Anti-Corruption Framework, gradually began to succeed. By December 2016, ICAC reported that 73 public agencies had signed on and established anticorruption committees. Fifty-five of those agencies had established anticorruption policies, 44 had begun the corruption risk management process, and anticorruption committees in those agencies had approved 383 measures to address corruption risks.

The framework led to meaningful reforms across agencies that had previously struggled to fight corruption or had ignored it. Some were major changes to core agency procedures, and others were smaller revisions that nonetheless had a significant impact on the experience of citizens' interactions with public agencies. The police service improved its corruption-prone passport division to provide service in two days rather than seven, sharply reducing the temptation for bribery. Reforms in the traffic division led to fewer complaints about bribery regarding traffic tickets, and for the first time, police officers were beginning to report citizens' efforts to bribe them. The ministry of industry uncovered corruption in its inspections of jewelry shops and began rotating its inspectors. The fire service worked with

ICAC to develop a code of conduct and provide new integrity training for its staff. Municipal councillors became subject to new codes of conduct. Agencies reviewed their procurement processes and made corruption training part of employee recruitment. Though many of those changes were incremental rather than sweeping, the sheer number of reforms meant that citizens enjoyed better service and had fewer temptations to offer illicit money to officials.

The Civil Status Division exhibited perhaps the greatest success. Survey data from ICAC's 2004 report listed it as one of the institutions most perceived as corrupt. By 2014, the division had completely fallen off the list of corrupt agencies in the same survey.¹⁴ Ayelou established a committee that transparently made decisions about where to assign officers, thereby removing the opportunity for people to lobby for specific assignments. The division also removed the affidavit requirement from its marriage license process, which eliminated the opportunity for officers to collect kickbacks from lawyers. Ayelou placed complaint boxes in every office and produced a citizen's charter explaining each procedure.

Officials in public agencies said they appreciated the framework and assistance from ICAC prevention officers. "The idea was there, the framework was there, the steps were there, and they even had helpful templates," Maudarbocus-Boodoo said. ICAC corruption prevention officers tracked progress on a wide range of measures, including the creation of codes of conduct, the digitization of file systems, new policies for recruitment, and the installation of security cameras.

The framework enabled ICAC to increase its effectiveness in public sector corruption prevention without the need to spend more money or hire more staff. The commission developed a tool to coordinate and track anticorruption efforts across public sector institutions through a combination of formal reporting obligations and the informal pressure of ICAC corruption prevention officers' regular communication with agency officials. The strategy created incentives for action where there had been little will to implement reforms.

The framework helped ICAC fulfill its obligations under the UN Convention against Corruption and the Southern African Development Community's Protocol Against Corruption. It also enabled public agencies to comply with international operating standards such as those of the International Organization for Standardization, which set standards for the procedures and practices of agencies and companies around the world.

ICAC officials shared their experiences with other small-island developing states and promoted the framework as a model that could be useful elsewhere. The framework helped agencies avoid ICAC investigations by identifying problem areas before they turned into rule violations.

Despite those achievements, though, the strategy had clear limitations. There was mixed evidence about whether citizens' overall perceptions of

corruption or their trust in ICAC had improved. Afrobarometer, which conducted periodic national surveys, reported that perceived levels of corruption had increased in most institutions from 2012 to 2014, although there was a slight decrease in the perception of corruption among local government councillors.¹⁵ High-level scandals like the Jugnauth case were likely factors in persistent negative perceptions despite improvements at lower levels.

ICAC staff continued to struggle with those measurement problems. “We can’t measure corruption, whether it has decreased or not,” Ujoodha said, echoing concerns expressed by anticorruption reformers in other countries.

Because of the narrow focus developed by Ujoodha and Domah, the strategy did nothing to change some of the most important drivers of corruption. Mauritius placed few restrictions on campaign financing, and elections had become opportunities for financial gain outside the reach of law enforcement. Parties *made* far more money in a campaign season than they *spent* on elections, according to Rabin Bhujun, a journalist who worked for a newspaper for 11 years before founding Ion News, an online media outlet. Rajen Bablee, director of the Mauritius affiliate of Transparency International, said that most of the donations taken in by politicians were undeclared and unaccounted for. A parliamentary committee set up to discuss the reform of electoral finance laws had made no progress as of 2017. Money laundering and drug trafficking were also beyond the reach of the prevention strategy.

At public agencies, there were two main concerns about the framework. First, the obligation to serve on anticorruption committees increased the workloads of busy civil servants. Members of agency anticorruption committees were reluctant to meet every month, as ICAC had recommended. Most committees met every three months, in line with their obligation to report progress to ICAC each quarter.

The second concern, related to the first, arose from staff turnover. When the chair of an anticorruption committee left the position, a new chair had to take over the committee post. Learning the details of the anticorruption framework and getting up to speed on the agency’s policies and commitments were time-consuming. Such complications worsened after the 2014 elections, when the change in government led to high rates of turnover in senior posts.

After the government removed Ujoodha from the post of ICAC director general in 2014, two successors served short stints in the office until the prime minister appointed Navin Beekarry to the role in 2016. Beekarry had been the first ICAC director general prior to Ujoodha’s appointment in 2006. In 2016, he said he wanted to place even more emphasis on prevention and expressed support for the framework. He said expertise developed in the prevention and education division helped inform the work of the

investigations division and that the work of investigators could point to the need for the prevention side to push for new policies and procedures.

REFLECTIONS

Several conditions contributed to the success of Anil Kumar Ujoodha, Rashida Domah, and other Independent Commission Against Corruption (ICAC) staff in implementing their corruption prevention strategy. Mauritius had strong institutions and a professional civil service. In addition, ICAC had staff who had been in the prevention and education division for years and had strong ties to officials at public agencies.

The focus on prevention and agency-specific risk assessments emphasized changes to agency policies and practices as a strategy for reducing corruption in the long term. The strategy succeeded in part because ICAC focused narrowly on the task of pressing agencies to take measures that were small but meaningful. Some measures, such as removing a procedural step from the application process for marriage licenses, seemed of little consequence individually. But together with changes in policies and procedures at other agencies, the reforms reduced opportunities for corruption and served as evidence to Mauritians that their government was trying to improve.

Over time, if fewer citizens experienced corruption in their interactions with civil servants, they could develop more trust in institutions. As of 2017, the Public Sector Anti-Corruption Framework was still a work in progress, and there was not sufficient data to assess the strategy's impact on public perceptions. A slight decline in ICAC survey data on the number of citizens who reported civil servants' soliciting of bribes offered some evidence that the situation had improved.

The decentralization of ICAC's corruption prevention efforts helped make the strategy more resilient. Agencies throughout the national and local governments created their own anticorruption committees and began their own corruption risk assessments. With those institutions in place, the strategy could likely survive some degree of turnover or upheaval in government or at ICAC. Agency managers were more aware of corruption risks in their institutions, and some agencies had integrated anticorruption assessments into their regular work flows. It would likely be difficult for agencies to roll back policy and procedure improvements made through their participation in the framework—especially changes that had improved service delivery to citizens.

The agencies that achieved the most under the framework had leaders who made anticorruption part of their broader goals for reforming the ways their institutions operated. When William Mario Ayelou took over as registrar of civil status in 2013, he had ambitious plans to improve customer service and make processes more efficient. The ICAC framework was one of the tools for achieving those goals.

The benefits of corruption risk management went beyond eliminating specific risks. Khoudija Maudarbocus-Boodoo, former director of the Board of Investment, said that even if corruption was not a significant problem, the ICAC framework was still a valuable tool because it helped fix processes and procedures for removing opportunities for citizens and agency staff to engage in corrupt actions. “If a license takes a while to be issued, people will wonder if they should try to pay a bribe, or they will accuse others of getting faster service because they are politically connected,” she said. For Maudarbocus-Boodoo and other agency leaders, the framework was a useful management tool that helped build capacity and became a core part of agency risk assessment procedures.

Mauritius’s anticorruption commission saw the importance of treating prevention and prosecution as equally important aspects of the commission’s mandate. The Public Sector Anti-Corruption Framework complemented ICAC’s work in investigating and prosecuting acts of corruption. Ujoodha and his successors continued bringing court cases against public officials from the lowest levels of the civil service to the very highest levels of the country’s political elite. Prevention officers and investigators shared information, and ICAC officials hoped that better prevention would remove opportunities for corruption and decrease the number of prosecutions over time.

ICAC relied on support from the government and the head of civil service to put its framework into place. Political leaders worried about perceptions of corruption, and Ujoodha promoted his strategy as a method to improve agencies’ reputations and fix persistent problems so as to make agencies operate more efficiently. If ICAC had not gained that backing, the framework would likely not have been possible. The success of a similar approach in other countries would depend on the degree of support from authorities that had the power to compel agency compliance with the strategy.

ICAC showed success in prosecuting acts of corruption and enhancing its prevention activities, but concerns remained about the commission’s independence. Institutions like ICAC could not be seen as truly independent because a prime minister could easily replace the director general, as happened with Ujoodha in 2014. Guillaume Ollivry, who became director of the Financial Intelligence Unit in 2015, said new nominees to head institutions such as his unit, ICAC, and other agencies that are meant to hold public officials accountable for their actions should at least go through a parliamentary confirmation process. Both Ujoodha and Ollivry acknowledged real political pressure on the heads of accountability institutions. “People will call you up asking to appoint their friends to jobs or will try to influence decisions you make,” Ollivry said. “You just have to ignore it.”

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