

Public Integrity for an Effective COVID-19 Response and Recovery in the MENA region

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Abstract

The COVID-19 crisis has created opportunities for many integrity violations and could intensify fraud and corruption, particularly in public procurement, economic stimulus packages and public organisations.

Indeed, the efforts undertaken by MENA countries to build effective mechanisms to fight corruption and modernise the government structure and operations might be hampered by the COVID-19 crisis, therefore increasing the numerous public integrity challenges already existing in the region.

Both short- and long-term measures are needed to address these risks, focusing on procurement strategies, the resources of internal audit functions, and integrity strategies in public organisations, among others.

This policy brief discusses the key integrity challenges and recommends measures that can help governments in the MENA region ensure an effective response and recovery from the COVID-19 crisis. It is based on the notes *Public integrity for an effective COVID-19 response and recovery* (OECD, 2020 [1]) and *Policy measures to avoid corruption and bribery in the COVID-19 response and recovery* (OECD, 2020 [2]) that focus on OECD countries.

In health crises and economic recessions, integrity violations are on the rise

The COVID-19 crisis has obliged governments to make quick decisions and implement drastic measures to protect communities at risk and limit the economic consequences that will follow. Past crises have shown that emergencies and subsequent rapid responses create opportunities for integrity violations, most notably fraud and corruption, seriously weakening the effectiveness of government action. Although fraud and corruption are not new phenomena, early evidence shows that they are occurring during the current crisis, while past experience suggests that their effects will likely be intensified in the near future. For example, there are instances of contracts for personal protective equipment being awarded to dubious companies; price gouging of key medication and healthcare

equipment; doctors stockpiling treatments for friends and family; or various types of online fraud, amongst others (Delić and Zwitter, 2020[3]; Babinec, 2020[4]; Gabler, 2020[5]; LaFraniere and Hamby, 2020[6]; Fyfe, 2020[7]; Steingrüber et al., 2020[8]; Vittori, 2020[9]; Glencorse, 2020[10]). In Tunisia, the national body for the fight against corruption announced that it has received several complaints concerning offences and suspicions of abuse of power during the crisis, notably overruns linked to monopoly practices and speculation, conditional selling, infringement of general containment measures, and abuse of power.

In addition, as governments transition from addressing the immediate crisis to focusing on economic recovery, integrity violations may continue to rise and undermine recovery efforts. It is therefore imperative that fundamental safeguards of public integrity are not weakened or disregarded in both the immediate response as well as the longer-term recovery from COVID-19. The following three issues deserve particular attention, as they have a high impact on the success or failure of current and future government interventions:

1. Integrity challenges in public procurement.
2. Accountability, control and oversight of the economic stimulus packages.
3. Increased risks of integrity violations in public organisations.

1. Integrity challenges in public procurement

Fraud, corruption, price gouging, and managing suppliers

The COVID-19 crisis has created three main integrity challenges for governments in the area of public procurement. First, governments are urgently procuring large quantities of goods and services, such as hospital equipment, medical ventilators, hand sanitisers, facemasks, and health services, in order to meet the immediate needs of the health sector and affected communities. To address this, many governments are enacting or reinforcing their emergency procurement procedures, using provisions that authorise and specify special procedures for emergencies. These provisions allow procuring necessary supplies directly from or via a pre-approved list of suppliers, without going through the standard, albeit lengthy, procurement processes. This may increase the integrity risks of procuring services and goods that do not meet quality standards and/or that are procured through corrupt means. While risks of fraud and corruption are always present in public procurement,¹ they are elevated in emergency procurement processes. Past health and humanitarian crises, such as Hurricane

Katrina in 2005 or the Ebola outbreak in 2014-16, have shown how these processes can be abused at the expense of those most in need of said goods and services ([Schultz and Søreide, 2008\[11\]](#); [Cray, 2005\[12\]](#); [Kupperman Thorp, 2020\[13\]](#)). These risks are particularly high in MENA countries where market gaps and inconsistencies in public procurement tend to be prevalent even before the onset of a crisis ([OECD, 2020 \[2\]](#)). Without the proper integrity and transparency safeguards in place, such emergency processes are vulnerable to abuse. As highlighted during the meeting of the MENA-OECD Working Group I on Civil Service and Integrity that took place on 23 July 2020, MENA countries adopted several measures to face the increased corruption risk in public procurement. In the Palestinian Authority, the cabinet granted the Ministry of Health direct purchase authority to allow a rapid response to the crisis. However, all purchase orders had to be submitted to review by audit authorities, in particular by the Internal Control Unit of the Ministry of Finance. Moreover, the Office of Administrative and Financial Control of the Palestinian Authority had an observer status in the procurement committee of the Ministry of Health for all procurement related to COVID-19. In Jordan, the Jordanian Integrity and Anti-Corruption Commission (JIACC) maintained communication with public sector institutions by using remote meeting technologies and conducted a program to raise awareness that national transparency and integrity standards must be respected despite the exceptional circumstances, public procurement operations are being controlled and violations of the procedures are being prosecuted.

A second integrity consideration emerging from the COVID-19 crisis is the lack of stockpile preparedness across many OECD and MENA countries, leading to increased competition for necessary supplies globally. In this situation, the mechanics and bargaining powers of the public and the private sectors are reversed. Thousands of contracting authorities and private institutions are scouring the market for the same products that are produced by only a small number of suppliers. Furthermore, production in some of these companies is suspended or seriously affected by the lockdown measures. This exacerbates competition among public agencies and introduces haphazard practices in what is being described as an extremely chaotic market ([Tanfani and Horwitz, 2020\[14\]](#)). Additionally, many countries are introducing export curbs to satisfy their national needs, which affects product availability at the global scale. Given market dominance, many transactions are taking place off-book, and price volatility is extreme, with often significant advance payments required by vendors ([Folliot Lalliot, 2020\[15\]](#)). This could contribute to a paradigm shift in corrupt schemes, as buyers could now corrupt sellers in order to receive essential goods and services -- the reverse of what normally happens. Further, this risk could diffuse throughout the supply chain, since many of the supplies needed rely on scarce raw materials.

Finally, besides the procurement of goods and services required to directly address the current COVID-19 crisis, governments also have to manage ongoing public contracts. They must identify those particularly at risk and provide effective responses for suppliers seriously affected by the crisis and its impact on economic development. Governments, alongside their contracting authorities, must ensure that the suppliers most at risk are in a position to resume normal contract delivery once the outbreak is contained. Public procurement legislation often provides exceptional measures for paying ongoing contracts in emergency situations, for example allowing specific advance payments or exempting suppliers from penalties for the deficient performance of contracts. Such derogations to established practices that govern contractual relationships could open the door to corrupt practices, should those derogations not be subject to transparent guidelines communicated to all contracting authorities. For instance, the Moroccan and Tunisian Governments adopted an ordinance allowing them to adapt the rules for awarding delays for payment, performance and termination, in particular those relating to contractual penalties.

Some governments are putting strategies, regulations and guidelines in place to help their contracting authorities manage their suppliers' portfolio, and making sure that fair, transparent and equitable mechanisms continue to govern contractual relationships. For example, the central purchasing body of Ireland, the Office of Government Procurement, developed an information note on good practices for contracting authorities during the COVID-19 outbreak ([Office of Government Procurement, 2020\[16\]](#)). Similarly, the Ministry of Internal Affairs and Communications of Japan issued "Measures to be taken for public procurement by local governments in response to COVID-19" ([Ministry of Internal Affairs and Communications of Japan, 2020\[17\]](#)). In the United Kingdom, the Cabinet Office issued a procurement policy note on "Supplier relief due to COVID-19" ([Cabinet Office, 2020\[18\]](#)). To ensure business and service continuity, the policy note provides that contracting authorities should pay all suppliers as quickly as possible to maintain cash flow and protect jobs. The note also emphasises that contracting authorities and suppliers should work collaboratively to ensure there is transparency during this period. Suppliers in receipt of public funds on this basis and during this period must agree to operate according to an 'open book' policy. This means they are required to make any data, including from ledgers, cash-flow forecasts, balance sheets, and profit and loss accounts, available to the contracting authority as requested, in order to demonstrate that payments have been made to the supplier under contract in the manner intended. Similarly, France and Italy have developed and implemented new emergency procurement laws or guidance that deal specifically with the COVID-19 crisis ([Dentons, 2020\[19\]](#); [Brenot, Billery and Feroldi, 2020\[20\]](#)). In France, the Anti-corruption Agency has also developed an anti-corruption practical guide to raise awareness about the

risk of corruption in the public procurement cycle to prevent, detect and report corruption, favouritism, or embezzlement of public funds (French Anti-corruption Agency, 2020 [45]). Also MENA countries have adopted several measures to manage ongoing public contracts during the COVID-19 crisis, as highlighted during the meeting of the MENA-OECD Working Group I. For instance, the Tunisian National Authority for Public Procurement (HAICOP) published a circular to remind public buyers of the necessity to respect the provisions for cases of force majeure and loosen public procurement procedures (OECD, 2020 [12]), and decided to postpone the delays of execution and of calls for tenders, by asking public buyers to postpone the announcement of non-urgent procurement contracts. Morocco and Tunisia implemented a series of emergency tax measures for businesses, which aim to reduce administrative red tape and facilitate certain procedures related to public procurement ([Gide Loyrette Nouel. 2020 \[21\]](#)).

The crisis has also shown an increasing need to develop e-procurement platforms and systems. In the MENA region, while Egypt is working on developing an E-Procurement System to improve the government's audit system, the existing e-procurement system in Tunisia has contributed to maintain the transparency of operations during the pandemic period. The Tunisian online e-Procurement System (TUNEPS) is generalised since September 2019 and buyers were able to continue their operations online despite the confinements related to the crisis.

Short-term measures to ensure integrity in ongoing procurement processes

The current crisis requires governments to take a number of measures to ensure integrity in public procurement processes. These include:

- **Maintaining and retaining documentation of procurement processes:** basic documentation and record-keeping requirements should apply, including recording of information about procurement proceedings, any departures from or modifications of normal procurement procedures, the solicitation and submission of bids, recording of the grounds for any use of non-competitive procedures, information on bidders, evaluation of bids and contract awards.
- **Developing detailed guidelines on procurement strategies under a crisis,** which deals not only with the procurement of emergency products but also with good practices to document the management of ongoing contracts or procedures.

- **Putting further emphasis on contract management**, so that established procedures are applied to reinforce accountability and transparency.
- **Favouring existing collaborative procurement instruments such as framework agreements** whenever possible to avoid awarding contracts without any competition and conduct emergency procurement within an already established contractual framework.
- **Ensuring maximum openness of information, including open data**, as well as full disclosure of the measures used and their destination, stored in an accessible location.
- **Setting up a central price and supplier tracking system for key products and services** that helps with identifying red flags, collusion, price gouging, counterfeits and other misbehaviours.
- **Subjecting all emergency procurement processes to audit and oversight.**
- **Adapting audit and oversight strategies**, as well as analyses of potential corrupt patterns in relation to the COVID-19 situation, where bargaining powers of the public and the private sectors are drastically reversed, including effects on competition.
- **Respecting the sunset clauses** in place for the emergency procurement rules and extending only after applicable approvals (e.g. parliamentary oversight).

Long-term measures to improve emergency preparedness in public procurement processes

The COVID-19 crisis is already revealing gaps in existing emergency procurement plans, with some countries lacking the ability to respond quickly. Governments have had to rush to prepare legislation and policies to ensure they can secure required goods. Similarly, the lack of available stockpiles shows a vulnerability in preparedness. These issues present multi-faceted challenges, including those related to integrity and transparency. To address integrity challenges in the long term, once the immediate emergency is over, governments can consider the following:

- **Reviewing existing emergency procurement legislation** to ensure that it is relevant for future global health emergencies, thereby avoiding the need to create new legislation or guidelines under tight timeframes.
- **Using or expanding existing e-procurement platforms** to record transactional information on the procurement of emergency items. A database could be created to analyse bidding patterns and identify potential red flags, signalling risks posed to integrity. In the MENA

region, the development of e-procurement platforms has contributed to improving the government's audit system, ensuring accountability measures and transparency of operations during the pandemic period.

- **A posteriori sanctions and control mechanisms** are crucial in times of crisis to enhance accountability and foster awareness among buyers that they will be controlled and monitored.
- **Allowing remote access by auditors and oversight bodies** to all procurement records, to ensure that audits can continue despite restrictions on carrying out physical inspections and paper-based reviews.
- **Ensuring an appropriate cadre of trained public officials** who have the skills to carry out an emergency procurement procedure.
- **Preparing mechanisms to address future supply-chain disruptions for critical goods or services** that are becoming evident in the crisis, for example the provision of personal protection equipment, since a shortage in supply is creating more potential for corruption. The European Union has already decided to create a stockpile of emergency medical equipment in this regard ([European Commission, 2020\[22\]](#)).
- **Creating digital and easily accessible tools to allow the public to track all emergency purchases** undertaken in line with emergency procurement measures ([Salazar, 2020\[23\]](#)). Easy access to records and documents, information technology applications and IT systems in audit entities, and availability of audit entities to work and communicate with auditors are of a major importance in times of crisis.

2. Accountability, control and oversight of the economic stimulus packages

High risks and low controls

To mitigate the economic recession caused by COVID-19, governments are developing significant economic stimulus packages. Previous experiences with economic stimulus packages, most notably the one following the 2008 global financial crisis, show that the breadth and scope of such measures offer opportunities for and high risks of corruption, fraud, waste and abuse ([Zagorin, 2020\[24\]](#); [Office of the Auditor General, 2010\[25\]](#)). Paradoxically, governments are relaxing controls in order to

urgently spend funds, further amplifying these as well as strategic and operational risks, which can undermine the effectiveness and efficiency of such programmes.

This context puts pressure on public financial management systems, and more specifically internal control systems within public organisations. For instance, the pace of implementation of the economic stimulus packages requires adapting or relaxing routine control measures and *ex ante* due diligence. This can also involve simplifying requirements, such as limiting or delaying reporting, to allow managers time to focus on delivering services to the public.

Moreover, this situation is exacerbated by disruptions to the institutions that are typically responsible for accountability and oversight in government. These include internal audit functions, supreme audit institutions and parliamentary oversight committees. For example, in some cases, parliamentary oversight committees have been suspended, due to public health concerns or concerns over expediency. Many supreme audit institutions (SAIs) are also facing difficulties conducting audits and have postponed the publication of audit reports.

Despite the pressures facing internal control, internal audit and oversight functions within government, it is key to recall that these actors play a critical role in ensuring that public integrity is not compromised in the management of the economic stimulus packages and that these, in turn, produce the intended economic benefits. For example:

- Internal auditors can act as backstops to address any temporary control gaps and flag risks to management as controls and requirements change, and can provide real-time assurance on the validity of transactions as a result of emergency measures, using data matching and other analytical methods.
- SAIs can keep abreast of the modifications made to the public financial management systems and identify potential risk areas ([Gurazada et al., 2020\[26\]](#)) and, where necessary, adapt their routine end-of-year report audit activities, due to the volume of additional demands on the SAI's audit capacity.
- Internal audit functions, SAIs and other oversight bodies can help promote transparency and high-quality open data to enlist the public in holding government officials accountable. The 2008 financial crisis and the subsequent recession offer useful examples for the current circumstances, demonstrating the mutual dependencies of transparency and accountability. In the United States, the Recovery Accountability and Transparency Board, which coordinated the work of the inspectors general monitoring the implementation of the American Recovery and Reinvestment Act of 2009, created an analytical platform that could identify

recipient anomalies, and then tasked the inspector general for the particular programme to address issues. This had the dual benefit of preventing both fraud and corruption, while also building the capacity of the inspector general functions within the line ministries (Zagorin, 2020[24]). The public platform, Recovery.gov, allowed journalists and citizens to track their taxpayer money and see how the government was spending it.

- Both internal and external auditors are also well placed to support governments in managing risks in the short term. For instance, they can provide useful insights to decision makers on the integrity risks associated with emergency measures, such as cash outflows to businesses and individuals. Another example is the State Audit Bureau of the Palestinian Authority, which conducted performance audits of the emergency committees, which were established in governmental entities to reduce the spread of the Coronavirus. Work procedures of these emergency committees and the availability of controls were audited and the State Audit Bureau delivered a report to the Prime Minister with recommendations on how to improve work mechanisms.

Short-term measures to ensure accountability, control, and oversight in the management of economic stimulus packages

To ensure that the internal control, internal audit and oversight functions can exercise effective accountability and oversight of the economic stimulus packages, a number of measures could be taken immediately. These include:

- **Ensuring that SAIs and internal audit functions have the resources they need:** For instance, the United States' stimulus package also allocates funding to the Government Accountability Office (GAO), the SAI, enabling it to assist Congress in conducting oversight of overspending in relation to the current crisis. As such, governments can allocate, where necessary, the appropriate funding to ensure the necessary resources for conducting real-time audits of the economic stimulus packages.
- **Establishing or leveraging existing legislative committees:** For example, in New Zealand, a bipartisan parliamentary oversight committee has been established and given the task of overseeing the government's response to the current crisis, including the economic stimulus

package. The committee meets remotely via video conferencing platform, and publishes these meetings online to ensure transparency.

- **Establishing specialised oversight bodies, while ensuring they have a clear and coherent mandate relative to existing accountability actors:** For instance, the Pandemic Response Accountability Committee was established to ensure oversight of the economic stimulus package in the United States. To avoid duplication and draw on existing capacities, the Committee will be made up of independent Inspectors General with responsibilities for conducting and co-ordinating audits and investigations to provide accountability and identify waste, fraud, and abuse in crisis-related spending ([Committee on Oversight and Reform, 2020\[27\]](#)).
- **Articulating clear responsibilities and lines of communication to ensure that all public officials are accountable for their actions** ([NSW ICAC, 2020\[28\]](#)): As noted, the COVID-19 crisis and economic downturn creates risks for the public financial management system, and the standard policies and processes for internal control and risk management. While some controls may be relaxed to meet immediate needs, and the work environment has temporarily changed due to social distancing measures, managers remain a critical “first line” of assurance. Programme management can reinforce this individual responsibility and at the same time communicate the expectations to all staff of the need for continued vigilance over public funds.
- **Ensuring that the appropriate integrity risk assessments are carried out:** Given the rapid pace at which these programmes are required to be rolled out, it may not be feasible to conduct a comprehensive integrity risk assessment. Public officials can, at the very minimum, be encouraged to document and report any obstacles and workarounds as they arise ([NSW ICAC, 2020\[28\]](#)). This can include documenting changes to control activities in order to accommodate short-term objectives.
- **Ensuring that adequate procedures are in place to design, review and approve programmes urgently:** For example, in order to ensure efficient yet accountable implementation of the 2008 Economic Action Plan, the Privy Council Office and Treasury Board Secretariat in Canada established an accelerated process for financial and policy approvals, reducing the timeframe from 6 months to 2 months ([Office of the Auditor General, 2010 \[25\]](#)). In the particular context of the COVID-19 crisis, with many public officials working from home, this could also include establishing protocols for using electronic signatures.
- **Establishing whistle-blower mechanisms:** For instance, in Tunisia, the National Anti-Corruption Agency (INLUCC) created a hotline to provide a safe reporting channel for whistle-blowers, launched an integrity radio to spread anti-corruption culture during the crisis and

issued recommendations regarding the anti-corruption process, public procurement and health. More than 11,000 suspected cases have been reported to INLUCC during the Covid-19 crisis as stressed in the meeting of the MENA-OECD Working Group I on Civil Service and Integrity.

Long-term measures to leverage the role of external oversight to prepare for the recovery

External oversight bodies can be key partners for governments as they transition from the immediate crisis and prepare for the long-term repercussions. In particular, auditors can highlight the potential for emerging integrity risks associated with longer-term recovery measures. For instance, auditors can report to decision makers on ex-post lessons learned to improve policy-making, especially on preparedness for future crises. Performance audits can give a wider perspective than just the financial and compliance aspects, and provide insights about the effectiveness, efficiency and economy of the programme, thus fulfilling their obligation to be “a credible source of independent and objective insight and guidance to support beneficial change in the public sector” ([INTOSAI, 2013\[29\]](#)).

SAIs can also adopt a risk-based and data-centred approach, while going beyond oversight to offer insights and foresight for better managing both the crisis and its aftermath. In particular, SAIs can support the centre of government and other public organisations, to identify and interpret evidence that can shape policies and improve the government’s capacity to act in real time in the face of evolving issues and risks.

However, SAIs in the MENA region remains often characterised by a strong focus on transactions rather than systems, and by conflicts of interest where the external auditor is part of the ex-ante financial control system ([OECD, 2017 \[30\]](#)). Another barrier to enhancing the relevance and impact of the audit work carried out by SAIs is the relatively minor role played by parliaments in many countries of the region – to varying degrees. In order for external audit actors to play a key role in the recovery of the MENA economies post-crisis, their capacities must first be reinforced.

3. Increased risks of integrity violations in public organisations

Economic downturns lead to more corruption and occupational fraud

While the majority of public sector employees have high standards of integrity, evidence from past recessions has shown that economic downturns lead to increased occupational fraud, embezzlement, bribery of public officials, and other integrity violations ([Association of Certified Fraud Examiners, 2016\[31\]](#); [Ivlevs and Hinks, 2015\[32\]](#); [Gugiu and Gugiu, 2016\[33\]](#)).

This could be a major challenge as, according to the Corruption Perceptions Index, corruption remains particularly high in the MENA region, with an average of score of 39/100 (0 being highly corrupt and 100 very clean) ([Transparency International, 2020 \[34\]](#)). Small-scale corruption, involving small sums of money, is widespread in the lower levels of the administration in the region, as reported for Tunisia in a survey by the Tunisian Association of Public Controllers. Some 70% of respondents interviewed by this association think that small-scale corruption aids everyday interactions ([Tlili, 2018 \[35\]](#)).

Such risks increase when the following three factors are at play, which is particularly the case in sudden economic downturns: financial pressure, opportunity and rationalisation ([ACFE, n.d.\[36\]](#)). As an immediate and longer term consequence of the COVID-19, many individuals and especially small and medium enterprises will be facing increased financial shortcomings which may trigger corrupt behaviour or fraud. At the same time, mass redundancies that are especially pervasive during a recession create gaps in organisations' internal control and audit systems, leaving them more vulnerable to internal fraud and corrupt practices. Given the pressures, individuals may also rationalise wrongdoing through justification such as “everybody does it” or “if I don’t take the opportunity, others will” ([OECD, 2018\[37\]](#)). Emerging corruption cases and scandals may also negatively affect citizens’ perceptions of corruption and thereby undermining support for government measures and reform. In the worst case, they also provide further rationalisation for wrongdoing ([Corbacho et al., 2016\[38\]](#)). In turn, an increased level of corruption at various levels and areas raises the transaction costs of doing business and will have a negative impact on the resilience of economies after the crisis and be an obstacle to economic recovery ([Ormerod, 2016\[39\]](#)). In the MENA region, the code of ethics for public officials has proven to be an important tool in consolidating the integrity system in the public sector by guiding the judgement of public servants on how to perform their daily operations during the crisis. For instance, Egypt relied on its recently developed Code of Ethics and created an e-learning system

that allows to disseminate the code of ethics to all civil servants (Ministry of State for Administrative Development [40]).

In the current situation, online training programmes and tools can be particularly helpful to disseminate integrity standards among public officials and to reduce and fight against corruption in the civil service. To this end, France established online anti-corruption courses aimed at local public management to strengthen a culture of integrity (Agence Française Anti-corruption [42]).

Short- and long- term measures to strengthen integrity in the public sector

In anticipation of this, public sector organisations can proactively improve controls that would prevent and detect corruption and occupational fraud during the recession. This could include:

- **Review and strengthen existing public integrity systems in public organisations.** In the post COVID-19 economic recession, this will require a risk-based approach to identify which public organisation employees may be at higher risk and identify targeted mitigation measures. The [OECD Recommendation of the Council on Public Integrity](#) provides ample guidance on how to apply a systematic approach to fraud and corruption, building a culture of integrity and ensuring effective accountability (OECD, 2017[43]).
- **Ensuring core internal controls**, such as management certification of financial statements, anti-fraud policies, surprise audits and job rotations are in place, fit-for-purpose, and communicated to employees (ACFE, 2018[44]).
- **Leveraging and improving digital tools to promote integrity and accountability**, especially by ensuring that relevant government data is available in an open and re-usable way allowing for social control or by ensuring the effectiveness of online reporting mechanisms.
- **Establishing or supporting employee counselling or financial assistance programmes**, to support employees in addressing the increased financial pressures and feelings of helplessness that stem from economic crises (ACFE, 2018[44]).
- **Raising awareness of integrity standards**, to ensure that all staff continue to abide by the rules and uphold public sector values to a high standard.

References

- [44] ACFE (2018), *Report to the Nations: 2018 Global Study on Occupational Fraud and Abuse*, https://www.acfe.com/uploadedFiles/ACFE_Website/Content/rtnn/2018/RTTN-Government-Edition.pdf.
- [36] ACFE (n.d.), *Occupational Fraud: A Study of the Impact of an Economic Recession*, https://www.acfe.com/uploadedFiles/ACFE_Website/Content/documents/occupational-fraud.pdf (accessed on 14 April 2020).
- [31] Association of Certified Fraud Examiners (2016), *Report to the Nations on Occupational Fraud And Abuse: 2016 Global Fraud Study*, <https://www.acfe.com/rtnn2016/docs/2016-report-to-the-nations.pdf> (accessed on 21 September 2017).
- [4] Babinec, A. (2020), *Kyiv Cancels \$2.2 million Deal for Thermal Cameras*, OCCRP, <https://www.occrp.org/en/daily/12097-kyiv-cancels-2-2-million-deal-for-thermal-cameras> (accessed on 19 April 2020).
- [20] Brenot, V., H. Billery and B. Feroldi (2020), *COVID-19: Adjustment of the Rules of Public Procurement*, <https://www.august-debouzy.com/fr/blog/1465-coronavirus-and-public-procurement-flash-2> (accessed on 14 April 2020).
- [18] Cabinet Office (2020), *Procurement Policy Note - Supplier relief due to COVID-19*, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874178/PPN_02_20_Supplier_Relief_due_to_Covid19.pdf.
- [27] Committee on Oversight and Reform (2020), *Coronavirus Package Includes Oversight and Accountability Measures*, <https://oversight.house.gov/news/press-releases/coronavirus-package-includes-oversight-and-accountability-measures> (accessed on 10 April 2020).
- [38] Corbacho, A. et al. (2016), "Corruption as a Self-Fulfilling Prophecy: Evidence from a Survey Experiment in Costa Rica", *American Journal of Political Science*, Vol. 60/4, pp. 1077-1092, <http://dx.doi.org/10.1111/ajps.12244>.
- [12] Cray, C. (2005), "Disaster Profiteering: The Flood of Crony Contracting Following Hurricane Katrina", *Multinational Monitor*, Vol. 26/9.

- [3] Delić, A. and M. Zwitter (2020), *Opaque Coronavirus Procurement Deal Hands Millions to Slovenian Gambling Mogul*, OCCRP, <https://www.occrp.org/en/coronavirus/opaque-coronavirus-procurement-deal-hands-millions-to-slovenian-gambling-mogul> (accessed on 19 April 2020).
- [19] Dentons (2020), “Italy’s “Cura Italia” decree introduces new public procurement measures”, *Official Gazette* 70, <https://www.dentons.com/en/insights/articles/2020/march/19/italys-cura-italia-decree-introduces-new-public-procurement-measures> (accessed on 10 April 2020).
- [22] European Commission (2020), *COVID-19: Commission creates first ever rescEU stockpile of medical equipment*, https://ec.europa.eu/commission/presscorner/detail/en/ip_20_476 (accessed on 10 April 2020).
- [15] Folliot Lalliot, L. (2020), *La concurrence entre États sur l’achat de matériel médical et sanitaire aggrave le problème*, *Le Monde*, https://www.lemonde.fr/idees/article/2020/03/30/la-concurrence-entre-etats-dans-les-chaines-d-approvisionnement-public-aggrave-la-crise-sanitaire_6034848_3232.html (accessed on 10 April 2020).
- [7] Fyfe, W. (2020), “Coronavirus: ‘Unprecedented’ number of scams linked to virus”, *BBC News*, <https://www.bbc.com/news/uk-wales-52296936> (accessed on 19 April 2020).
- [5] Gabler, E. (2020), “States Say Some Doctors Stockpile Trial Coronavirus Drugs, for Themselves”, *The New York Times*, <https://www.nytimes.com/2020/03/24/business/doctors-buying-coronavirus-drugs.html> (accessed on 19 April 2020).
- [21] Gide Loyrette Nouel (2020), “Covid-19 et commande publique au Maroc : éclairage sur les mesures prises par le Gouvernement » <https://www.gide.com/fr/actualites/covid-19-et-commande-publique-au-maroc-eclairage-sur-les-mesures-prises-par-le> (accessed on 10 June 2020)
- [10] Glencorse, B. (2020), *Why Tackling Corruption Is Crucial to the Global Coronavirus Response*, WPR, <https://www.worldpoliticsreview.com/articles/28689/why-tackling-corruption-is-crucial-to-the-global-coronavirus-response> (accessed on 19 April 2020).

- [33] Gugiu, M. and C. Gugiu (2016), "Economic Crisis and Corruption in the European Union", *Journal of Methods and Measurement in the Social Sciences*, Vol. 7/1, pp. 1-23.
- [26] Gurazada, S. et al. (2020), "Getting government financial management systems COVID-19 ready", *World Bank Blogs*, <https://blogs.worldbank.org/governance/getting-government-financial-management-systems-covid-19-ready> (accessed on 10 April 2020).
- [29] INTOSAI (2013), *ISSAI 12 - Value and Benefits of SAIs - making a difference to the life of citizens*, <https://www.issai.org/pronouncements/intosai-p-12-the-value-and-benefits-of-supreme-audit-institutions-making-a-difference-to-the-lives-of-citizens/> (accessed on 11 September 2018).
- [32] Ivlevs, A. and T. Hinks (2015), "Global economic crisis and corruption", *Public Choice*, Vol. 162/3-4, <http://dx.doi.org/10.1007/s11127-014-0220-0>.
- [13] Kupperman Thorp, T. (2020), "To Defeat the Coronavirus, Stop Corruption", *FP News*, <https://foreignpolicy.com/2020/04/06/defeat-coronavirus-stop-corruption-humanitarian-crisis-disaster-response-emergency-medical-supplies/> (accessed on 19 April 2020).
- [6] LaFraniere, S. and C. Hamby (2020), "Another Thing to Fear Out There: Coronavirus Scammers", *The New York Times*, <https://www.nytimes.com/2020/04/05/us/politics/coronavirus-scams-fraud-price-gouging.html> (accessed on 19 April 2020).
- [17] Ministry of Internal Affairs and Communications of Japan (2020), *Measures To Be Taken for Public Procurement by Local Governments in Response to Covid-19*, https://www.soumu.go.jp/main_content/000673056.pdf (accessed on 10 April 2020).
- [28] NSW ICAC (2020), *Managing Corrupt Conduct During the COVID-19 Outbreak*, <https://www.icac.nsw.gov.au/prevention/corruption-prevention-publications/latest-corruption-prevention-publications> (accessed on 14 April 2020).
- [2] OECD (2020), Policy measures to avoid corruption and bribery in the COVID-19 response and recovery, https://read.oecd-ilibrary.org/view/?ref=133_133216-hn3bqtlvkw&title=Policy-measures-to-avoid-corruption-and-bribery-in-the-COVID-19-response-and-recovery

- [1] OECD (2020), Public integrity for an effective COVID-19 response and recovery, https://read.oecd-ilibrary.org/view/?ref=129_129931-ygq2xb8qax&title=Public-Integrity-for-an-Effective-COVID-19-Response-and-Recovery
- [37] OECD (2018), *Behavioural Insights for Public Integrity: Harnessing the Human Factor to Counter Corruption*, OECD Public Governance Reviews, OECD Publishing, Paris, <https://dx.doi.org/10.1787/9789264297067-en>.
- [43] OECD (2017), *OECD Recommendation of the Council on Public Integrity*, OECD, Paris, <http://www.oecd.org/gov/ethics/OECD-Recommendation-Public-Integrity.pdf>.
- [30] OECD (2017) Internal Control and Risk Management for Public Integrity in the Middle East and North Africa, OECD Public Governance Reviews, <https://www.oecd.org/gov/ethics/corruption-risks-internal-control-mena.pdf>
- [16] Office of Government Procurement (2020), *Information Note – Covid-19 (Coronavirus) and Public Procurement*, <https://ogp.gov.ie/information-note-covid-19-coronavirus-and-public-procurement/> (accessed on 10 April 2020).
- [25] Office of the Auditor General (2010), *2010 Fall Report of the Auditor General of Canada*, https://www.oag-bvg.gc.ca/internet/English/parl_oag_201010_01_e_34284.html (accessed on 14 April 2020).
- [39] Ormerod, P. (2016), “Corruption and economic resilience: recovery from the financial crisis in western economies”, *Economic Affairs*, Vol. 36/3, pp. 348-355, <https://doi.org/10.1111/ecaf.12198>.
- [23] Salazar, C. (2020), “Monitoring COVID-19 emergency procurement with data”, *Open Contracting Partnership Blog*, Open Contracting Partnership, <https://www.open-contracting.org/2020/03/25/monitoring-covid-19-emergency-procurement-with-data/> (accessed on 14 April 2020).
- [11] Schultz, J. and T. Søreide (2008), “Corruption in emergency procurement”, *Disasters*, Vol. 32/4, pp. 516-536, <http://dx.doi.org/10.1111/j.1467-7717.2008.01053.x>.
- [8] Steingrüber, S. et al. (2020), *Corruption in the time of COVID-19: A double-threat for low income countries*, U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute, <https://www.u4.no/publications/corruption-in-the-time-of-covid-19-a-double-threat-for-low-income-countries> (accessed on 19 April 2020).

- [14] Tanfani, J. and J. Horwitz (2020), “Special Report: The Mask Middlemen - How pop-up brokers seek big paydays in a frenzied market”, Reuters, <https://www.reuters.com/article/us-health-coronavirus-masks-specialreport/special-report-the-mask-middlemen-how-pop-up-brokers-seek-big-paydays-in-a-frenzied-market-idUSKBN21I32E> (accessed on 10 April 2020).
- [35] Tlili, A. (2018), Tunisia’s integrity challenge, OECD Observer, https://oecdobserver.org/news/fullstory.php/aid/6107/Tunisia_92s_integrity_challenge.html (accessed on 10 June 2020)
- [34] Transparency International (2020), Corruption Perceptions Index 2019, https://images.transparencycdn.org/images/2019_CPI_Report_EN_200331_141425.pdf
- [9] Vittori, J. (2020), *Corruption Vulnerabilities in the U.S. Response to the Coronavirus*, CARNEGIE, <https://carnegieendowment.org/2020/03/20/corruption-vulnerabilities-in-u.s.-response-to-coronavirus-pub-81336> (accessed on 19 April 2020).
- [24] Zagorin, A. (2020), “He Oversaw \$787 Billion in Stimulus Spending. Here Are His Lessons on Spending Coronavirus Recovery Effectively”, POGO, <https://www.pogo.org/analysis/2020/04/he-oversaw-787-billion-in-stimulus-spending-heres-his-lessons-on-spending-coronavirus-recovery-effectively/> (accessed on 19 April 2020).
- [40] Ministry of State for Administrative Development, Egypt, <http://www.mans.edu.eg/images/files/2019/190206/employees-behavior.pdf> (accessed on 17 September 2020).
- [44] French Anti-corruption Agency (2020), <https://www.agence-francaise-anticorruption.gouv.fr/fr/nouvelle-diffusion-mooc-corruptionfavoritismedetournement-comment-prevenir-dans-gestion-locale> (accessed on 17 September 2020).
- [45] French Anti-corruption Agency (2020), <https://www.agence-francaise-anticorruption.gouv.fr/fr/maitriser-risque-corruption-dans-cycle-lachat-public-guide-pour-accompagner-tous-acteurs> (accessed on 17 September 2020).