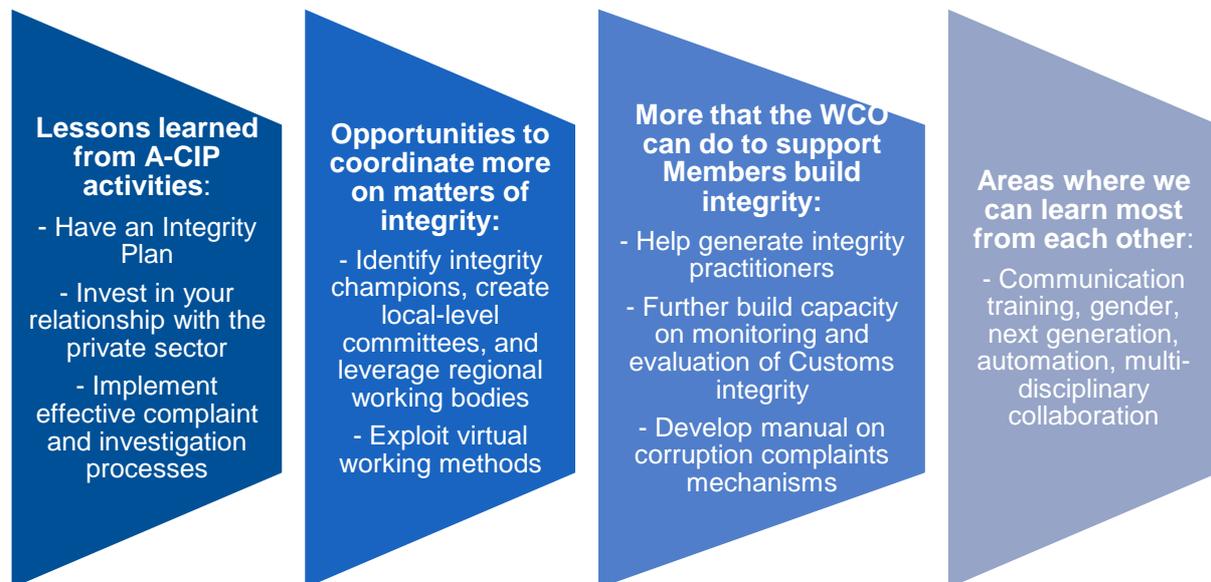


A-CIP Partner Administrations' Messages to the WCO Integrity Sub-Committee (ISC)

During the WCO's Annual A-CIP Programme Coordinators' Meeting, 7-9 February 2022, over 80 participants from the Programme's partner administrations were asked to share their thoughts and insights gained from working under the WCO A-CIP Programme with the WCO Integrity Sub-Committee (ISC), which was meeting in the days following, 10-11 February 2022.

The graphic below provides a highlight of a few of the key messages that was presented to the ISC by the A-CIP Programme Manager on 10 February. The remainder of this document provides a detailed collection of the input received from the A-CIP Programme participants.



Question 1: What experiences from activities conducted under the A-CIP Programme could be useful for all WCO Members to know?

Several inputs offered a broad perspective, looking across the WCO A-CIP Programme's approach and how it applied in relation to their own experiences:

"The experiences from the activities conducted under the A-CIP Programme have revealed that most Customs Administration are faced with similar challenges as Promoting Integrity and Combating Corruption is concerned. However, the approach for promoting Integrity and fighting the vice might be different and, in this regard, sharing of ideas becomes quite a useful tool for WCO members to embrace. Building a system to promote integrity requires not only the effort to put in place the necessary measures to combat corruption but also ongoing vigilance to ensure that the measures continue to operate as intended. The methods of operation (modus operandi) which corrupt officers use keep on changing there is need to WCO members to quickly share new discoveries for the good every member."

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“The A-CIP Programme has elevated the issue of integrity in Customs to another level such that it is strengthening and improving professionalism including good service delivery in Customs. I can freely say integrity is a major too for trade facilitation.”

“The analysis of the 10 key factors of the Revised Arusha Declaration to get a diagnosis of the situation of the Customs Administration.”

“Self-assessment is essential to understand our strengths and weaknesses, so that we can plan and execute actions that help to establish best practices, thus mitigating any act of crime or corruption.”

“For Guatemala, it has been a very valuable experience to take advantage of the benefit of the A-CIP Programme in promoting Ethics and Integrity both within the institution (promoting in the various areas working together to promote ethics and integrity and strengthened through of the inclusion of the A-CIP Programme within the Institutional Strategic Plan 2021-2025) at the national level through promotion within the Public-Private Dialogue and Cooperation Table on Customs Issues (public-private relationship) and at the regional level through the promotion opportunities within the work plan of the Central American Customs Committee and an action that is being managed as the Regional Vice Presidency, for the promotion of ethics in the Region of the Americas and the Caribbean.”

The need to communicate, raise awareness, and engage with all stakeholders, both internal and external was a common theme among the responses given:

“Share the Customs Integrity Perception Survey report and measures earmarked or taken to redress adverse findings.”

“Stakeholders’ engagement is the best experience in the promotion of integrity; whereby through Customs Integrity Perception Survey and various communication strategies the administration gathered opinions from stakeholders particularly the private sector on how to improve integrity in customs”

“[...] it was very clear from the last training that it is necessary to involve all stakeholders in the fight against corruption and raising the integrity levels of the customs, both in the State and in the private sector.”

“The importance of involving all levels of officers in the process on policy making.”

“I believe that the concrete measures implemented in terms of stakeholder engagement could be useful to all WCO members.”

“Involve top managers in the fight against corruption.”

“Raising awareness in schools, universities, in the family circle as well as at all levels of the social strata in the fight against corruption, in matters of integrity and ethics.”

“Information, awareness, and training for users, the creation of a forum to listen to users and customers to receive their complaints, alerts, etc.”

“Individual ownership of policies set by the department because they feel involved is irreplaceable.”

Others focused on *“The scope of support and technical details and outputs from the Programme”*, including specific interventions and technical assistance and support that they had received under the WCO A-CIP Programme:

“[...] I could divulge and implement more of the activities carried out by the facilitation committees.”

“The e-learning event based on the integrity e-learning module on Click, the reinforcement of capacities through virtual workshops on internal control, organizational culture and the Customs Integrity Perception Survey.”

“Instituting a full-blown complaints management and administrative investigation process. That is from reporting of complaints using various sources to reporting of the full investigation.”

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“The creation of the NGN group is essential in the development of an action plan to fight against corruption and the promotion of integrity on the short and long terms”

Some specifically highlighted the Customs Integrity Perception Survey (Customs Integrity Perception Survey), delivered under the Programme:

“Integrity Perception Results”

“The planning and execution of the Customs Integrity Perception Survey, especially due to the complexity of coordination between the Member Country, the WCO and Ernst & Young. In addition, it is important that a strategy for the implementation of the Customs Integrity Perception Survey is devised that considers the possibility of answering it online or that the tablets implemented do not require internet or a fixed electricity connection, as this greatly limits its reach, and therefore the number of people that can be surveyed.”

Lastly, representatives also looked towards the future and their plans to work under the WCO A-CIP Programme on:

“Training in investigations and assets declaration management process.”

“(1) Anti-Corruption and Integrity. (2) Linking vetting procedures with Anti-Money Laundering and Countering Terrorism Protocols.”

“Customs Valuation, Warehouse Management (including petroleum), Use of Automated system in Customs, scanning, etc.”

Question 2: What are the opportunities for the Customs community to coordinate more on matters of integrity?

A-CIP Partner Administrations offered a range of ideas for areas in which the Customs community could cooperate. At the highest level, the WCO and regional bodies' role in setting and implementing standards related to integrity was encouraged:

“Elaboration of standards and guidelines.”

“The regional economic communities, the vice-presidents of the WCO regions and the capacity building offices could be more involved in the implementation of activities relating to the promotion of integrity in general and in particular the work of the Revised Arusha Declaration.”

“At the regional level to caucus on recent manifestation and issues. 2. Implement measures to combat corruption. 3. Implement Automated Systems to minimize face to face contact.”

“Organize joint training programmes on integrity, ethics and anti-corruption. Create a platform accessible to any customs officer on which he will share the experience of the actions carried out annually by each administration. Produce regulatory texts applicable to any member country of the WCO.”

“Define stakeholder engagement strategy and effective internal controls.”

“Availability of private sector associations, for example TAFFA (Tanzania Clearing and Forwarding Agent Association) where issues of integrity and other customs operations can be handled effectively. Also, the established integrity committees in all customs stations for handling and spearheading integrity promotion programmes.”

Additionally, opportunities to share best practice for fighting corruption and promoting integrity were clearly valued across A-CIP Partner Administrations:

“Share best practices. Develop a peer review mechanism on integrity.”

“Technological advance and experience sharing at global level organized by organizations like WCO.”

“Integrity and Assurance Committees, Internal Affairs, Internal Audit”

“I propose that there be a constant exchange of experience, between the communities, where each one shares its plans of action for the dissemination of matters of integrity to collaborators at all levels.”

“Create a virtual working group or an annual integrity forum to share integrity Programmes, policies, standards and initiatives that countries have implemented in order to learn about their experiences and success stories. This should not be limited to how countries have made use of WCO tools such as the Integrity Development Guide or Customs Integrity Perception Survey, but what they themselves have created within their administrations that may be useful for other countries. Also, the issue of gender equity and diversity remains an important area of work, with a lot of potential.”

“The opportunities are very good for customs administrations in the region to share experiences and good practices carried out in their countries and to interrelate and coordinate efforts among themselves.”

“Establish channels of communication and cooperation between A-CIP member countries, with feedback on transparency initiatives that can be replicated in other administrations.”

More general coordination across the board on matters of integrity was also seen as important:

“Customs coordinating more on matters of integrity increases the value of customs administration where customs administration is more transparent. Customs administration may have a very cordial relation with stakeholders and that obviously facilitates the Revised Arusha Declaration in return too.”

“For Customs to be able to coordinate more on integrity issues, they should interact frequently on the same issue, and an integrated plan could be created where Customs could discuss integrity issues.”

“More coordination between Customs in the various Territories and the building of better working relationship.”

“By identifying in each Customs administration, the department(s) dedicated to integrity issues that would ensure coordination in relation to the A-CIP Programme.”

“The designated NGN group within Customs administrations is the best tool to ensure coordination within Customs for integrity.”

“The inclusion of the A-CIP Programme as one of the actions within the Institutional Strategic Plan 2021-2025 of the SAT of Guatemala ensures the continuity and coordination of activities to promote ethics and integrity within the institution. Externally, ethics and integrity are also one of the work areas established as a priority and coordinated by the Intendencia de Aduanas.”

Some A-CIP Partner Administrations even suggested that more intelligence and information sharing between Customs Administrations could also be an effective response to corruption:

“Corruption in one Customs Administration can quickly become a regional or even a global development and law enforcement issue. The coming up with initiatives like A-CIP Programme provides a proper platform intelligence and information sharing. In a world where capital, information, people and enterprises move freely and rapidly, there is no guarantee that working single-handedly would be effective especially in cases where cross-border corruption is involved.”

“Exchange of credible data is key for coordination, so data integrity becomes crucial for effective coordination and national statistics”

“Customs administrations can make use of the opportunities provided in major too WCO tools such as the SAFE which highlights the importance of Customs partnership to strengthen coordination regarding

the major Customs objectives areas of revenue protection, security and trade facilitation. Administration should pursue seriously the need to share import and export information with each other.”

Question 3: What more could the WCO be doing to support its Members build integrity?

In response to a call for A-CIP Partner Administrations to identify ways in which the WCO may do more to support its Members, some focused on a continuation of the WCO’s role in providing guidance and awareness raising in matters of integrity:

“1. Provide guidance on good practices and protocols internationally. 2. Encourage its members to promote good governance and accountability.”

“WCO has been promoting various activities to its members build integrity. WCO should still promote much more capacity building activities, field study Programmes at the administrations having best practices, help members prepare and implement integrity plan, help performing survey etc.”

“This is by publicizing the new WCO initiatives on integrity and the fight against corruption while improving those that are already known and implemented by Members.”

“Continue raising awareness and training its members in ethics.”

“Communicate on good practices. Congratulate the actors who stand out positively. Award prizes and grant scholarships in order to make them experts in the field.”

“The exchange of experiences in terms of strengthening ethics remains important, the WCO can always support its members by providing conferences, meetings, sessions and training workshops.”

“Maintain the leadership on the issue, support, assistance and close relationship it has established with the Guatemalan Customs Administration, which allows it to provide support for all actions and activities carried out.”

“All integrity tools and resources should be translated into Spanish, and integrity could also be built in its members by encouraging them to regularly publish and disseminate the tools and resources developed by the WCO and to publish the good practices of other Customs offices.”

Some went further to propose a regulatory role for the WCO:

“I would suggest that WCO should introduce mandatory Integrity Certification for Integrity Practitioners from its members states. This would then require the Practitioners to constantly renew licences or whatever it may be called after fulfilling minimum requirements. This would make member states to realize that integrity should be considered as a priority.”

“Raise anti-corruption/anti-bribery certifications as a prerequisite for attendance.”

Others proposed specific interventions:

“Undertake periodic integrity surveys.”

“Exchange Programmes in specific areas like administrative investigation, capacity building on asset declaration software, stakeholder engagement, collaborative approaches with other agencies/ stakeholders etc.”

“Undertake more frequent integrity capacity building exercises.”

“Capacity building on Monitoring and Evaluation of customs integrity Programmes to ensure sustainability and results.”

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“Intensify training in matters on Integrity, provide greater exchange between member countries for debates on this matter and perhaps create an integrity development guide, conduct integrity surveys consistently, which will help to measure the level of integrity in their organizations.”

“Workshops, Training, skills share, study tours, engagements with top management, develop and upgrade policies, sensitization, and taking on more preventive approaches”

“We can, for example, disseminate more aspects of integrity to collaborators such as senior management of institutions through training, colloques, seminars, among others.”

“...automation is critical in building integrity. Such that the human interface is reduced considerably.”

“The addition of project management and implementation standards might assist.”

“By suggesting that they organize a survey on the perception of integrity and by continuing to provide them with simplified tools for promoting integrity.”

“Propose ongoing integrity training Programmes, such as diploma courses, courses, internships and other tools that may be useful and relevant to the achievement of the objective. Consider anti-corruption/anti-bribery certifications as a prerequisite for attendance.”

“Generate training Programmes in line with their particular reality. Promote the holding of annual or biannual events that put into practice some of the key factors of the Revised Arusha Declaration. Improve Customs Integrity Perception Survey planning and implementation, taking into account the context and constraints of the COVID-19 Pandemic. Generating a manual for the construction or improvement of a Complaints Mechanism, with special emphasis on the monitoring and resolution of complaints, in line with international best practice.”

The benefit of the long-term, sustained support initiatives, such as offered through the WCO A-CIP Programme was also recognized over one-off interventions:

“Funding on project base support is better than technical assistance.”

“The WCO has done so much in supporting members build integrity. What I would suggest is continuity and sustainability of the current initiatives subject to adjustment based on new trend. Continue reminder of members to keep the subject of integrity high in their year-to-year strategic objectives.”

Question 4: In what areas can the Customs community learn most from each other regarding integrity and the fight against corruption?

A-CIP Programme Partner Administrations identified a number of different areas where best practices could be shared between them:

“1. Sharing of best practices. 2. Cut Red Tape. 3. Build Capacity. 4. Power of the People.”

“Much as different environments present different challenges and often require different solutions, if information is shared on how successful certain strategies have been in one administration that may provide some yardstick in how others may approach their own situations. The fact that the Integrity promotion and corruption challenges may appear different should not be a trampling block to sharing both success stories and challenges.”

“Exchange programmes on comparative best advantages like professional attachments”

“The issue customs recruitment and professionalism is key”

“In the areas of communication of good practices and their actors.”

“Valuation, networking, anti-smuggling.”

“Shared experiences on what really works, and the various steps required to implement and get it done.”

“The commitment and leadership of senior customs officials, automation, regulatory framework, code of conduct...”

“As well as in that of training and sharing of experience”

“Capacity building - human resource management - accountability of managers and leaders - controlled decentralization - control of internal affairs”

Some sought to share experiences from specific bodies set up to combat corruption:

“In the areas of ethics and anti-corruption policies; having a designated integrity department for promoting integrity and establishing integrity committees across Customs Stations for close monitoring of staff integrity on benefits of risk management and technology”

“Ongoing audits and support from internal control bodies

- Through best practices and exchange of experiences in the field.*
- In the Codes of Conduct and Organisational Behaviour of other countries.*
- In its Programmes of liaison with the private sector.*
- In its whistleblowing and conflict resolution Programmes and mechanisms.*
- In their training Programmes*
- In its gender equality policies*
- In its Programmes for dissemination and awareness-raising among civil servants and society in general.*
- In its Programmes for the modernisation and integration of its electronic systems.*
- In knowing the good practices in the fight against corruption and the results obtained in customs.*
- In relation to the actions being carried out in its different operational areas and in the modernisation of procedures and processes.”*

Others looked to learn more from experiences engaging stakeholders more generally:

“We should consider each other as stakeholders in information sharing. My take is that a platform exists among ACIP member countries where information is shared frequently with on new measures adopted by countries to provoke others to do same assuming they are workable.”

“I sincerely believe that it is in the areas of stakeholder engagement and organizational culture that the Customs community learns the most from each other, when it comes to integrity and anti-corruption.”

“Customs community might learn mostly from Stakeholders and through perception surveys regarding integrity. In all the areas of the Revised Arusha Declaration have coined, customs community can learn regarding integrity and fight against corruption.”

“In Mozambique, customs officers can learn more about integrity and the fight against corruption by exchanging experiences with the Office of Internal Control of the AT, the Centre for Public Integrity, the Police of the Republic and the Office of the Attorney General of the Republic, specifically the Office for the Fight against Corruption.”

“We can learn more by having constant contact with the main interested areas such as customs partners, in the case of Mozambique, the Attorney General, or the Anti-Corruption Cabinet, the Public Integrity Center, among others.”

Question 5. How can the Customs community be doing more to engage other stakeholders in combatting corruption?

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Partner administrations further considered the issue of stakeholder engagement, looking specifically at what action could be taken. Most echoed the importance of effective communication and consultation regarding Customs policies and procedures in general:

“Multi-Stakeholders engagements on issues of related concerns. Sensitization on duties and taxes with all the parties involve.”

“Memorandum of understanding and continuous feedback mechanisms instituted”

“Through awareness-raising campaigns on the work of customs and customs administrations, disseminating their achievements in terms of seizures and other actions in the area of national security. Also, by creating forums for discussion and cooperation involving parties that may be involved in customs activities, so that they are aware of the role they play in them.”

“We can further disclose two customs clearance procedures, together with stakeholders at all levels, as well as how to opt for greater transparency of customs clearance actions, for example, in cases of documentary verification and physical examination of merchandise.”

“Exchange of credible data that could be relied on for national and other developmental statistics by other stakeholders outside WCO. This endures data credibility and reliability “

“Set up formal consultation frameworks with stakeholders.”

“Involve them in the creation of observatories on customs operations.”

“Have a good communication strategy for them.”

“Through the direct involvement of the authorities of the administrations”

Others felt it important to engage with stakeholders on specific matters of integrity:

“Customs community should open up and engage the stakeholders through regular meetings and discuss issues on how to fight corruption and promote integrity. It must always be understood that corruption has both the demand and supply side. Fighting corruption from only the demand side may not be effective.”

“Each Customs office having an internal integrity awareness plan, it would be very beneficial to make it known to the private sector and other interested parties to join the effort being made, so that they can provide their comments or views, opportunities for improvement related to the issue and involve them in the activities that can be carried out.”

“Signing agreements and memorandums of understanding with civil society organisations, the private sector and other international bodies that ensure transparency and integrity; ensuring participatory democracy. So that all actors involved in the customs logistics chain can express their opinions, consultations and suggestions.”

“Collaboration with the private sector and civil society organisations to combat corruption by commending people and organizations with good integrity standing and severely sanctioning poor integrity standing persons and organisations.”

“Customs Community needs to work together with stakeholders in combating corruption, where stakeholders are engaged together since planning to implementation.”

“Continue stakeholder engagements and open discussions on the subject of integrity in Customs and the role of the business community in this matter.”

“The Customs Community to do more and involve other stakeholders in the fight against corruption, can make memoranda of understanding with stakeholders, create a constant exchange where they discuss matters of corruption, disseminate the integrity development guide and implementation of the Arusha declaration.”

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“Engagements with top Management, develop and upgrading policies, sensitization, and taking on more preventive approaches”

“Developing closer working relationships with stakeholders and providing safe and confidential means to report instances of corruption.

“By initiating a forum to listen to partners, a forum in which they will come to express themselves without constraint, to denounce and issue alerts. The customs community should raise their awareness and train them in the fight against corruption, through communication - dialogue - partnership - constructive conversation.”

“The Guatemalan Customs Administration has included the promotion of ethics and integrity in the work plan of the Public-Private Dialogue and Cooperation Roundtable on Customs Issues, in which 29 public-private institutions, all actors within the Guatemalan Customs System, actively participate. With this initiative, it has been possible to get everyone involved in the issue and make them aware that the responsibility is shared and two-way.”

“Publication of customs integrity information and dissemination of the same to stakeholders; conducting integrity forum with the private sector stakeholders and with their representatives”

The role of the WCO in the process to engage stakeholders was also considered:

“It is better to have frequent and continuous meeting and workshop Programme on the issue which should be organized by WCO.”

“Involve stakeholders in the implementation of projects.”

“By making known to new partners the performance of Members of the Customs community related to the implementation of the WCO initiatives.”
