Table of Contents

Editorial .................................................................................................................................................. 3
Message from the ISC Vice-Chairperson ............................................................................................... 5
Enhancing the effectiveness of internal controls in the Afghan Customs Department ..................... 7
Internal control and supervision practices in China Customs .............................................................. 10
A dedicated anti-corruption public awareness campaign by Finnish Customs ............................... 11
Fostering an integrity culture at the institutional level - strategic actions by the Guatemala Customs Administration ........................................................................................................................................... 12
Governance Control Authorization in Ireland’s Revenue and Customs Authority .......................... 14
Promoting integrity through Gender Equality and Diversity in Jamaica Customs .............................. 15
Professional standards for integrity in Maldives Customs ..................................................................... 17
Corruption Risk Mapping as an important anti-corruption strategy for the Mauritius Revenue Authority .................................................................................................................................................. 19
Ethics in practice in the Administration of Customs and Indirect Taxes ........................................ 21
Monitoring and evaluation are essential aspects of the North Macedonia Customs Administration’s Integrity Strategy .................................................................................................................................................. 23
A three-level Integrity Promotion Strategy in Pakistan Customs ....................................................... 24
“Ethical Customs in the 21st Century” – Panama Customs Action Plan .............................................. 26
Inter-institutional cooperation as an integrity enabler in the Financial Administration of the Slovak Republic .................................................................................................................................................. 27
Update on WCO integrity-related activities
Summary of the latest integrity activities ............................................................................................... 29
How to build a culture of integrity ......................................................................................................... 32
Abbreviations .......................................................................................................................................... 35
Editorial

Dear Readers,

The World Customs Organization (WCO) is delighted to introduce this 18th edition of the Integrity Newsletter. We wish to thank all Members having contributed news articles on their integrity promotion and corruption prevention efforts.

Customs administrations in the 21st Century play a key role in global trade. Their mission is to collect revenue in a fair and efficient manner and facilitate legitimate trade, while ensuring effective global security and control of the international supply chain. Integrity is a critical issue for all nations and Customs administrations, as the presence of corruption can severely limit their capacity to effectively accomplish their missions. The priority for all governments should be to ensure that Customs is corruption-free. This requires strong political will and sustained commitment to fight corruption.¹

The global health crisis that has engulfed the entire world in 2020 has also reshaped global trade and the Customs environment. The prominent role played by Customs is more important than ever in addressing the crisis, given that Customs is at the forefront of the global supply chain. In times of crisis, it is vital to ensure supply chain continuity, and integrity is a key element in safeguarding the global economic recovery process.

This edition features new initiatives, measures, practices and integrity/anti-corruption programmes implemented to promote integrity and fight corruption in the Customs Administrations of China, Finland, Guatemala, Slovakia and Pakistan.

Readers also have an opportunity to learn about enhancing the effectiveness of internal controls in the Afghan Customs Department (ACD), Governance Control Authorization in Ireland’s Revenue and Customs Authority, and Gender Equality and Diversity promoted by Jamaica Customs.

This edition contains interesting articles on professional standards for integrity in Maldives Customs and monitoring and evaluation processes as part of the North Macedonia Customs Administration’s Integrity Strategy.

In addition, readers can learn about Corruption Risk Mapping as an important anti-corruption strategy for the Mauritius Revenue Authority, ethics in practice in Morocco Customs, and Panama Customs Action Plan for “Ethical Customs in the 21st Century”.

The Integrity Newsletter offers an ideal opportunity to publish details of measures taken and practices adopted by WCO Member administrations around the world in order to foster integrity and fight corruption in the Customs environment.

You are kindly reminded that the success of this Newsletter depends very much on your voluntary contributions, and that the articles published in the Integrity Newsletter are provided by WCO Members and, therefore, reflect their own personal views.

We trust you will enjoy reading this latest edition of the Integrity Newsletter!

The WCO Capacity Building Directorate
Message from the ISC Vice-Chairperson

By virtue of their presence at borders, Customs administrations play a vital role not only in collecting public resources and protecting the economy and citizens, but also and primarily in facilitating trade. In view of this role, the private sector has consistently expressed the need to work with Customs administrations that operate standardized, straightforward, effective and predictable procedures. The Customs objectives set by the relevant State and the expectations held by the private sector cannot be met unless the stakeholders develop good administrative practice, devoid of corruption, at borders. As we all know, corruption gives rise to unnecessary additional costs, wastes time and slows down the movement of goods, consequences which are damaging to the development of the economy and to the business climate.

Mindful of the challenges of maintaining integrity in international trade transactions, the World Customs Organization (WCO) set up a Sub-Committee specifically to deal with issues relating to integrity. The Integrity Sub-Committee enables Customs administrations to lay the foundations for creating a business environment free from unethical practices and to share their experiences with each other in this area. Within this Sub-Committee, the WCO Secretariat also promotes a number of instruments which are guided by and in accordance with the various key factors of the Revised Arusha Declaration, one of the principal defining components of the policy for preventing corruption in Customs. Accordingly, the Anti-Corruption and Integrity Promotion (A-CIP) Programme, launched in 2019, should be supported because it is concerned with promoting good governance in Customs administration.

The special circumstances of the COVID-19 pandemic, which has placed enormous pressure on the trade supply chain, mean that Customs have to lend their assistance to facilitate the movement of equipment for combating the disease. Bearing in mind the scale of the pandemic and the global threat it presents, the survival of a very significant number of people depends on the rapid availability of medicine. The wholesale closure of borders, coupled with the general lockdown imposed in many countries around the world to inhibit the spread of the disease, makes it all the more difficult to maintain supply to companies, especially to those operating in the pharmaceutical sector. At the moment, any Customs administration failing in the slightest manner to observe a principle of ethics or integrity will certainly be perceived to be hindering the collective efforts towards protecting the population. Thus, Customs services are required, more than ever, to root out any corrupt attitudes or practices that have taken hold in their ranks. They must, moreover, be encouraged to take the lead in combating corruption among parties involved in cross-border trade.

In a number of countries, anti-corruption initiatives have yielded highly favourable results, despite the inevitable resistance shown. These efforts must be maintained so that the Customs community can make
a decisive contribution to the battle currently being fought the world over against the coronavirus pandemic. Customs administrations continue to be advised to rely on political will and dialogue with the private sector in the hope of achieving satisfactory outcomes from anti-corruption measures. To sum up, integrity concerns are a global issue which must be addressed in a determined and methodical manner.

Finally, as Vice-Chairperson of the Integrity Sub-Committee, I would like to pay tribute to the countries and the editorial team involved in the drafting of the 18th Integrity Newsletter. I would also like to invite readers to delve into its contents and enjoy the enormous benefit of the wealth of experience printed on its pages.

Marcellin Djeuwo,  
(IT Director of Cameroon Customs)  
Vice-Chairperson of the Integrity Sub-Committee
Afghanistan

Enhancing the effectiveness of internal controls in the Afghan Customs Department (ACD)

Introduction

For a country to exercise effective Customs controls at its borders, a plethora of measures are required to create a culture of transparency and accountability. These measures are vital, especially in a country like Afghanistan where Customs controls focus primarily on matters relating to its security situation.

Effective internal Customs controls play a crucial role in improving the efficiency of import and export processes and establishing extensive trade relationships with other countries based on mutual trust. Furthermore, the Afghan Customs Act (No. 1235, ratified in 2016) provides for the control and monitoring of goods being either imported into or exported from Afghanistan. Article 10 of this law stipulates that “Goods/shipments may enter or transit the country via designated Customs border points, Customs warehouses, duty-free shops, airports or other areas subject to Customs inspection only where Customs officials are present”.

The Afghan Customs Department (ACD) comprises a number of specialist units that pool their efforts in a bid to resolve Customs-related matters, respond more effectively to the challenges faced by Customs and prevent Customs legislation violations from occurring throughout the country. In this respect, the ACD seeks to enhance the effectiveness of the following units in the implementation and control of Customs procedures:

Internal control units in the ACD

The ACD is committed to aligning its procedures and practices with international standards; this commitment is manifest in the active role and achievements of the following units through the ACD’s internal control system:

1. Risk Management Unit (RMU) and Post-Clearance Audit (PCA): A crucial step for the ACD was the adoption of a risk-based approach. At present, all Customs points in Afghanistan have successfully implemented the risk management module, and, according to their own assessment, many companies are being fined based on PCA analysis reports.

The PCA unit was established in 2013 and has made good progress so far. Both the PCA team and the RM unit have participated in a number of capacity-building courses, some of which are still in progress. PCA has conducted several analyses that were very effective for revenue generation and compliance. The figures show the improvements brought about by PCA and its essential role in the ACD.
2. **Container Control Programme**: The Container Control Programme (CCP) was developed by the United Nations Office on Drugs and Crime (UNODC) and the World Customs Organization (WCO) to assist governments in the creation of sustainable enforcement structures and procedures in selected seaports and dry ports in order to minimize the risk of maritime containers being exploited and used for illicit drug trafficking, transnational organized crime and other forms of illicit activity.

At the heart of this innovative approach is the creation of Port Control Units (PCUs), comprising analysts and targeting teams drawn from different law enforcement agencies (e.g. Customs). Officers are trained and equipped to conduct the systematic targeting of high-risk containers for closer law enforcement scrutiny, using risk analysis and other proactive techniques designed to cause minimum disruption to the free flow of legitimate trade.

Currently, Afghanistan has seven PCUs located in Kabul, Nangarhar/Torkham, Shirkhan Bandar, Aqina, Hairatan, Islam Qala and Zaranj, and two Air Cargo Control Units located at Hamid Karzai International Airport in Kabul and Kandahar Airport. An Air Cargo Control Unit is being planned for Herat International Airport in late 2020.

With the support of the CCP and in cooperation with the relevant stakeholders, the ACD recorded the following number of seizures over the past three years. It is worth noting that there was a high increase in the number of seizures from 2017 to 2019:

![Seizures Graph]

In 2019, various types of prohibited and illegal goods were seized. The breakdown of seizures is as follows:

<table>
<thead>
<tr>
<th>No.</th>
<th>Type</th>
<th>Number of seizures</th>
<th>Weight/value</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Heroin</td>
<td>5</td>
<td>10,440 kg</td>
</tr>
<tr>
<td>2</td>
<td>Hashish</td>
<td>1</td>
<td>3 kg</td>
</tr>
<tr>
<td>3</td>
<td>Gold</td>
<td>9</td>
<td>6 kg</td>
</tr>
<tr>
<td>4</td>
<td>Currency</td>
<td>6</td>
<td>649,960 US dollars, 90,000 euros, 128,300 Saudi riyals, 75,800 UAE dirhams, 140,000 Indian rupees.</td>
</tr>
<tr>
<td>5</td>
<td>Explosives</td>
<td>4</td>
<td>More than 100 kg</td>
</tr>
<tr>
<td>6</td>
<td>Weapons</td>
<td>7</td>
<td>178 pistols and guns, 4 rocket launchers, 1 AK-47</td>
</tr>
<tr>
<td>7</td>
<td>Precursors</td>
<td>4</td>
<td>75 tonnes of drug and IED precursors</td>
</tr>
<tr>
<td>8</td>
<td>Other goods</td>
<td>95</td>
<td>These include cultural heritage property, mobile phones, expired/falsified medicines and other products.³³</td>
</tr>
</tbody>
</table>

²² UNODC
³³ UNODC
Among these significant seizures made by the ACD, there are unique cases that show how effective and useful the programme has been for the Department's internal control system.

For example, a joint operation between UNODC and stakeholders enabled the ACD, on 14 September 2020, to seize 6 metric tonnes of iodine. It is estimated that this substance could have been used to produce 4.5 metric tonnes of methamphetamines. According to the UNODC survey report, this seizure has an international market value of 546 million US dollars and averted the illicit funding of terrorist organizations.

3. Hamid Karzai International Airport (HKIA): The results of the ACD’s effective internal control functions at Hamid Karzai International Airport provide a further example of the Department's commitment. The airport is located in Kabul and is the largest international airport in Afghanistan. It is also one of the major hubs for smugglers of drugs, money, gold and other prohibited or restricted items.

The ACD is one of a number of border agencies responsible for preventing the smuggling of goods. The ACD team at HKIA enforces compliance with the laws and regulations and, in the process, has seized a huge amount of money and significant quantities of drugs and antiquities.

According to the HKIA Customs report, the amounts of money and drugs detailed in the table opposite were seized from early 2019 to October 2020.

It is worth noting that there are cases where both small and large amounts of different currencies are smuggled by the same individual. In one such case, 7,000 Afghan afghanis, 13,000 Indian rupees and 105,400 US dollars were seized from the same person, who had concealed them in his underwear and socks.
China

Internal control and supervision practices in China Customs

1- Integrity supervision at local level

It is well known that local Customs offices, as a front-line agency with significant enforcement powers, are more susceptible to rent-seeking behaviour, and this poses greater risks and challenges to Customs integrity development. In its efforts to build a clean and efficient Customs as part of its 2018 organizational reform, China Customs adopted a new approach to strengthening integrity supervision at local level, based on the Administration’s vertical management system and taking into account the essential features of the exercise of power, such as accountability, transparency and openness. According to the new approach, China Customs deployed over 400 discipline inspection and supervision offices stationed in local Customs authorities (some of the offices are responsible for supervising more than one local Customs authority), in the process exercising full supervision over local Customs administrations.

These “embedded” offices enable comprehensive and in-depth supervision of local Customs operations. In recent years, the discipline inspection and supervision offices have been diligently fulfilling their duties and missions in a targeted manner, giving advance warnings about and ensuring the timely resolution of emerging issues in connection with front-line officers’ integrity, law-based performance of duties and appropriate exercise of power.

2- Customs internal supervision

In accordance with its work requirements and management needs, the General Administration of Customs of China (GACC) has conducted specialized studies on potential risks in the fields of law enforcement, financial management and internal management, etc., so as to ensure the effective implementation of the major decisions and plans made by the Central Government and the GACC, and to promote integrity in Customs law enforcement.

3- Customs internal audit

China Customs implements its internal audit system by performing strict audit-based supervision over the financial liabilities of principal officials during their term in office or after leaving office. Principal officials are audited at least once during their term in office. In addition, specialized audit-based supervision covers the areas of law enforcement and internal administration.

4- “Three Lines of Defence” model for internal control

With the aim of building a clean and efficient Customs, China Customs has comprehensively enhanced internal control over Customs operations and management by means of a series of measures and procedures implemented since 2010. This has led to the establishment of an integrated “Three Lines of Defence” model that incorporates self-control management at local level, regular inspections by functional departments and supervision by internal audit departments.
This model provides an effective way of improving communications on risk management and control by clarifying the essential roles and duties of the various departments and encouraging them to work in a coordinated manner. Meanwhile, China Customs has established a system of internal audit points covering all areas of Customs operations, including over 1,000 key points covering 12 fields of law enforcement, such as revenue collection, port control, inspection and quarantine, as well as 16 fields of internal administration, such as finance, human resources and education. Administered at different levels of dynamic management, this system is conducive to improving the accuracy and effectiveness of risk prevention and control through daily supervision such as qualification and authorization control. China Customs is also engaged in developing the information system for Customs internal control, named HLS2017, with a view to continuously improving the capability of risk management.

Finland

A dedicated anti-corruption public awareness campaign by Finnish Customs

For decades now, Finnish Customs has engaged in systematic anti-corruption activities and, as a government authority, will continue to undermine the various manifestations of corruption. In the course of 2020, Finnish Customs has been a keen participant in the anti-corruption campaign headed by the country’s Ministry of Justice.

For Finnish Customs management, it was obvious that Customs would play an active part in the anti-corruption campaign. The campaign is aimed at increasing public awareness of corruption and anti-corruption activities, and at encouraging all types of organizations to join in efforts to build a Finland where corruption does not thrive.

Organizations have consequently joined the campaign to combat corruption and promote open and fair activities. By taking part in the campaign, Finnish Customs is asserting that:

- Finnish Customs management is committed to taking a stand against corruption;
- Finnish Customs will not tolerate any form of corruption from its employees or cooperation partners, and
- Finnish Customs will instruct employees to take appropriate measures in circumstances that involve risks of corruption, and to report any suspicious activities.

The encouraging, exemplary and positive attitude displayed by Finnish Customs management and senior staff has helped promote the campaign both within our own organization and in our external interest groups.

By way of example, the themes and outlooks of the anti-corruption campaign have been put into practice in several courses taught at the Finnish Customs Training School focusing on good governance, internal control, risk management and legality.
Customs staff encouraged to learn actively about combating corruption

During the campaign, several news items on combating corruption were published on the Customs intranet. Customs staff were encouraged to complete a test on the campaign website to see how Customs combats corruption and what areas might possibly need to be developed. Staff were also informed about online courses on civil service ethics and about how Customs is committed to fighting corruption.

Finnish Customs encourages fellow government organizations to join in building a corruption-free Finland

An element of the anti-corruption campaign was the effort to increase awareness of corruption among interest groups, and to invite other parties to join in the fight against corruption. Finnish Customs shared information about its anti-corruption work on Twitter, and invited other government organizations such as the Ministry of Finance and the Border Guard to join as partners in building a corruption-free Finland.

Finnish Customs contributes to the fight against corruption and will once again be a high-profile participant in this activity on 9 December, namely United Nations International Anti-Corruption Day.

Guatemala

Fostering an integrity culture at the institutional level - strategic actions by the Guatemala Customs Administration

In compliance with the strategic guidelines of the Guatemala Customs Administration and thanks to the WCO’s support, we have pursued an ongoing internal strengthening process which is aligned with the results of our Institutional Strategic Plan. Among the results obtained, we wish to highlight the promotion of institutional values and the building of institutional management capacities which have been achieved through the following strategic actions:

**Fighting corruption and establishing transparency policies within the institution:**

- Formulation of the Institutional Transparency Policy based on the updating and dissemination of the Code of Ethics.
- Creation of a management body to deal with Internal Affairs matters.
- Design and implementation of an advertising campaign focused on the “twin tracks of corruption”.
- Implementation of new reliability tests, through cooperation, and the subsequent adoption of an institutional model as part of the internal institutional strengthening process.
Incorporating the use of modern technology in the processes developed:

- Improvement of the processes for recruitment, promotion and career development, allowing for the renewal of over 95% of the management team at the Administration’s headquarters and nearly 99% of Customs operational directors.
- Rollout of the pilot testing of the official electronic signature, both for customer service processes and internal documentation.
- Implementation of project management improvements using international methodologies and standards (PMI, PDIA, BPMN, etc.); to bring about enhanced processes that facilitate compliance by external users, thus avoiding discretion and also promoting transparency in the public service.
- Automation of certain Customs procedures, such as those related to Public Function Assistants, through applications and online processing. This reduces management times and increases transparency when analysing the issuance or denial of authorizations requested.

Supply the institution with suitable human resources who are trained and have a development and growth plan within the organization:

- Definition and implementation of administrative career routes.
- Development of the proposal for an institutional policy on cultural relevance and gender.

Have adequate infrastructure for development of the redesigned processes

- Preparation of executive projects on physical infrastructure and implementation thereof to improve employees’ working conditions.
- Development and execution of a plan for the acquisition of the technological infrastructure necessary to support the modernization processes underway.

Make improvements to staff working conditions

- Evaluation and implementation of improvements to staff working conditions, in accordance with the regulations issued by the relevant labour authorities.
- Enhancement of staff working conditions (adequate spaces, appropriate ventilation, staggered hours, and timely evaluation).
- Preparation of a workload evaluation study.

As a supplement to our Institutional Strategic Plan in 2019, the Integrated Customs Modernization Programme-MIAD-2019-2023 was launched. It consists of the following sequential components: processes, infrastructure, technology, security and resources. See https://portal.sat.gob.gt/portal/miad/

Additionally, our Tax Administration is currently making progress with implementing the International Organization for Standardization (ISO) 37001 standard on Anti-Bribery Management Systems and looks forward to the possibility of WCO technical support to move forward with application of the A-CIP Programme.

It is worth noting that the Guatemalan Customs Administration has the following options on its homepage (website):

- Option for citizens to present complaints and grievances, including complaints of corruption and complaints of fraud and smuggling. The relevant link is https://portal.sat.gob.gt/portal/quejas-y-denuncias/.
- Option for various requests by Guatemalan citizens, in compliance with the National Law on Access to Public Information: https://portal.sat.gob.gt/portal/solicitud-informacion-publica/
The Customs Administration of Guatemala wishes to invite WCO Members to embrace Customs integrity in their modernization strategy plans and programmes. An institutionally holistic approach to integrity is a tool that allows Customs to face up to challenges and responsibilities effectively and that contributes to the competitiveness of our countries.

Ireland

Ireland’s Revenue and Customs Authority has established a Governance Control Authorization working group to review current governance and assurance requirements for senior managers, in order to enhance the effective and proportionate internal control requirements.

Ireland’s Revenue and Customs Authority has circulated a guidance note from the Office of the Comptroller and Auditor General (OCAG) on the impact of COVID-19 on control environments. This guidance note has been developed for audit committees and management to assist them when considering the impact of the public health emergency on their entity’s control environment as part of their work under the applicable corporate governance requirements. The new environment gives rise to a number of challenges for entities in maintaining effective internal controls.

This guidance is part of a programme of work to identify and share learning opportunities for bodies by providing information on common recurring issues and good practice examples, identified through OCAG’s financial audit and reporting work.

Revenue is currently preparing a new statement of strategy which will reflect the changed environment in Ireland as a result of COVID-19. All staff are actively encouraged to contribute their views on the statement of strategy.

Revenue, as a stakeholder in Ireland’s National Drugs Strategy, is committed to reducing the volume of illicit drugs available, by targeting and disrupting the activities of organized crime groups, and to undermining the structures supporting such networks. The Revenue Customs Drugs Watch Programme plays an integral role in highlighting Revenue’s confidential mechanism for the public to report on drug activities. It is our primary means of engaging with, and canvassing, members of the public, coastal communities and those involved in air/maritime activities, including the logistics trade sector. As the complexity of supply chains increases, and attempts are made by criminals to infiltrate legitimate supply chains, the national relaunch of the Programme, planned for 2020, will require an innovative “e” approach to engaging with the public due to social distancing constraints.

There is a dedicated page on Revenue’s website where members of the public are encouraged to report shadow economy activities or any tax and Customs issues. Revenue uses all media opportunities, including press releases about seizures, to spread the message of compliance, encouraging the public to notify us of any concerns. Both Civil Service-wide and internal Revenue Staff Engagement Surveys have been conducted recently.
The Civil Service Employee Engagement Survey invited all staff to provide feedback on their working environment and the future direction of the Civil Service. It allowed staff to provide input on various themes such as Involvement Climate, Innovation Climate, Performance Management, Wellbeing, Organization Support, and Leadership. Revenue achieved a response rate of 76% to the Survey, a 13 percentage point increase from 2017 and well above the average response rate across the Civil Service.

Revenue engaged with staff to hear their views on the impact of the sudden and necessary changes in their working arrangements in response to the COVID-19 pandemic, in order to inform Revenue’s plans and approach through the COVID-19 recovery phase and beyond.

A key aim of Revenue is ensuring a workplace that supports staff and their wellbeing. This is particularly relevant during the COVID-19 restrictions when all staff are faced with major changes in their working and personal lives. This is written into our statement of strategy 2020-2022: “We will support our people through meaningful engagement by promoting health and workplace wellness and by providing opportunities for professional development”. It is also written into our Corporate Priorities 2020: “Further embed our Values and Employee Engagement Charter and Public Sector Duty obligations through tangible support for staff and their wellbeing”.

Revenue have launched a ‘Wellbeing’ portal for staff with links to a lot of resources, tips and online support. The portal helps staff stay informed, stay well, stay active and stay in contact with each other by promoting a “we are in this together” culture.

Revenue have reviewed their working from home policy in order to ensure data confidentiality. Staff have been reminded of Revenue’s confidentiality and security policies and the importance of ensuring computers and papers are secure in their home working environments. The Data Breach Management Plan has also been re-circulated to all staff. They have also been provided with a link to the Data Protection Commission’s blog for employees working from home.

**Jamaica**

**Promoting integrity through Gender Equality and Diversity in Jamaica Customs**

The Jamaica Customs Agency (JCA) has always prided itself on being a leader and innovator in the application of best practices to allow for effective trade facilitation and compliance of its traders. Against this background, continued building and maintaining of integrity is a major priority and, as such, the JCA endeavours to embrace integrity development in all areas of its systems and operations, as a critical component for the achievement of its mandate.

**Promoting integrity through Gender Equality and Diversity**

The JCA is aware that Gender Equality and Diversity is relevant to the conversation on integrity. In keeping with the National Policy on Gender and Equality (NPGE), 2011, the JCA was one of the first government entities to be exposed to Gender Mainstreaming. This training was led by the Bureau of Gender Affairs through the United Nations (UN) Women - “Way Out” Project 2014. The JCA is dedicated to
providing a safe environment where men and women are able to contribute to achieving their personal goals, as well as to attaining the objectives of the Agency.

It is the Agency’s duty of care to ensure that issues affecting men and women are addressed, with due consideration in our planning and budget programmes. The Agency is now advanced in its preparation of policies for continued maintenance of a safe space work environment. Once these policies are finalized, virtual sensitization sessions will be held with all members of staff.

Through the use of gender sensitive communication, recruitment and selection announcements invite applications by team members to compete for career advancement opportunities. It is an equal opportunity for any team member, if they possess the requisite qualifications, competence and experience, to be considered for a job function.

Additionally, to expand the understanding and conversation on Gender, virtual sensitization sessions on Gender Mainstreaming will be delivered by the Bureau of Gender Affairs before the end of 2020. Accordingly, a working group will be established to conduct introspection of the Agency through the WCO Gender Equality Organizational Assessment Tool (GEOAT), which will formulate the Gender Action Plan to address identified gaps.

**Implementation of a Quality Management System through ISO 9001:2015 certification**

The JCA has embarked on the journey of attaining certification from the International Organization for Standardization (ISO), with the objective of implementing a quality management system under the requirements of ISO 9001:2015. This initiative seeks to institutionalize quality, promoting harmonization of processes and procedures, transparency, accountability and predictability, as well as to drive continuous improvement and sustained customer satisfaction.

A project team has been established to lead the charge, as the Agency aims to provide a framework within which a set of standards will be adopted to encourage continual improvement. This process requires and calls for the full engagement of stakeholders at all stages of the process, from inception to implementation.

This initiative forms a part of the Agency's Integrity Programme, as implementation thereof will assist in strengthening mechanisms that impact its internal and external controls.

**Focusing on increased cooperation between state agencies along the supply chain**

The JCA prides itself on being a dynamic entity, not only repositioning to mitigate current threats but also positioning on the basis of predictions.
There are instances of limitations to what entities can do by themselves when it comes to border security and supply chain integrity, and the JCA continues to embrace positive collaboration and partnerships with both local and international agencies aimed at offering benefits, including creative problem solving; increased training opportunities; information, data, and intelligence sharing; and “force multiplier” opportunities. Effective coordination and use of capabilities across state agencies, along with stakeholders, is critical in this resource-constrained environment in order to respond to evolving threats.

The signing of numerous agreements to deepen cooperation and collaboration in the areas of enforcement, planning, information and intelligence sharing, joint operations, and trade facilitation with agencies such as the local port and shipping entities as well as law enforcement entities, both locally and internationally, has proven invaluable to the JCA.

Acknowledging our dual role of Border Security and Trade Facilitation, we are mindful that promoting the development and utilization of supply chain standards through active engagement with relevant stakeholders is key to any positive developments and lasting success.

Securing the supply chain is integral to the livelihood of our citizens and economy. The nature of travel and trade in our globalized world means that disruptions, whether natural or otherwise, can have major implications and cause considerable economic consequences. It is therefore through collaborative efforts that we are able to mitigate a myriad of threats and ensure smooth trade.

Maldives

Professional standards for integrity in Maldives Customs

Background and rationale

Customs administrations, due to the nature of their mandate from the state, require a transparent management framework on top of a high level of integrity from their staff. The core Customs competencies, namely collection of revenue, trade facilitation and protection of society from various types of contraband and other illegal cross-border crimes, naturally confer a great deal of discretionary powers on individual officers, thereby making the Customs environment susceptible to corruption and similar unethical behaviour if adequate controls are not in place.

Precisely measuring the prevalence of corruption is not a straightforward task. Institutions therefore have to rely on various indirect approximations, such as the perceived level of corruption. A public survey conducted in 2019 indicated that the public associated corruption as being synonymous with the Customs
institutions. However, these findings must be treated with caution since the lack of scientific rigour in the sampling, inclusion criteria and survey instrumentation undermines both the validity and reliability of the findings and their capacity for extrapolation.

Zero tolerance for corruption is a buzzword in the current Government’s development strategy, and fighting corruption was one of the key election pledges. Maldives Customs Service (MCS) Strategic Plan 2020-2024, which was formulated in alignment with national action plans, identifies several strategies and objectives aimed at creating a professional service culture devoid of inappropriate behaviour, no matter how minor. As part of the overall modernization efforts, the MCS has implemented several international standards and best practices over the years. More recent efforts include ratification of the World Trade Organization (WTO) Trade Facilitation Agreement and accession to the Revised Kyoto Convention (RKC), both of which are aimed at streamlining and simplifying Customs procedures to enhance predictability and transparency.

Until recently, matters pertaining to corruption and other misconduct were handled by the Investigation and Prosecution Section, which is primarily entrusted with the investigation of conventional crimes such as commercial fraud and illegal trafficking. Although the relatively recent Customs Act and the subsequent regulations lay out a suitable framework for internal controls and as well as arrangements for external controls, the absence of a designated section working primarily for the active promotion of integrity and disciplining staff often leads to a reactionary or disciplinary approach, in contrast to the preferred positive and proactive approach towards good behaviour.

Against this backdrop, the MCS celebrated a historic milestone with the creation of a new department entrusted with the mandate to carry out relevant activities related to the promotion and preservation of staff integrity. The new **Integrity and Professional Standards Section** sits directly below the Commissioner General of Customs in the organizational structure, independent of Customs Directorates and Divisions. This means that communication takes place directly between the Section and the Head of Customs. It is acknowledged that the potentially sensitive nature of the information to be processed by the new Section will require an airtight and very short communication channel in order to attain the desired outcomes.

**Integrity and Professional Standards Section**

The objective of creating an Integrity and Professional Standards Section is therefore to actively promote integrity and professional ethics by instilling organizational values among staff, as well as identifying incidences of misconduct and taking timely and proportionate measures to correct them. The ultimate goal is earning and maintaining public trust and confidence towards the MCS and the services it provides to the people of the country.

The mandate of the Integrity and Professional Standards Section is set out below:

1. Conduct an integrity assessment of Customs, in alignment with the guidelines and instructions disseminated by the World Customs Organization and related professional authorities.
2. Investigate and prosecute incidences of corruption, allegations of abuse of power, and other breaches of laws, regulations and the Code of Conduct.
3. Create an environment conducive to professional service through creation of anti-corruption awareness among staff and promotion of integrity at work.
4. Identify and resolve system deficiencies favouring acts of corruption.
5. Establish a proper and confidential channel for reporting alleged cases of staff misconduct.
6. Organize and conduct training and awareness programmes aimed at promoting integrity among staff.

Challenges and way forward

One of the drivers of corruption in the Customs environment is a lack of access to information regarding Customs procedures, together with the complexity of such procedures. Furthermore, due to the fact that potential whistleblowers are almost always customers who are concerned about their next shipment's fate, complaints about Customs officers are usually limited to unsubstantiated hearsay. Similarly, there are reasons to believe that the offences committed by individual officers are possibly being facilitated by staff of various grades and/or staff from other agencies working together, though performing different duties.

The next big step forward will be to establish a framework for guiding the implementation and discharge of the responsibilities assigned to the new Section. A working group is being assembled, comprising a good balance of expertise and diversity with a view to achieving wider staff representation, competency and credibility. The primary role of the working group will be to conduct a proper environmental assessment to measure institutional commitment, alongside an evaluation of the institution's strengths and weaknesses so as to determine a reasonable starting point for its work.

The pace of progress is being slowed by the coronavirus pandemic. Gathering information and organizing consultations are proving challenging because of social distancing measures and limited internet connectivity.

Despite all these challenges, our new team remains motivated and firm in its determination to produce impactful results and bring about a tangible change in public perception towards Customs.

Mauritius

Corruption Risk Mapping as an important anti-corruption strategy for the Mauritius Revenue Authority

Since the creation of the Mauritius Revenue Authority (MRA) in 2006, the Internal Affairs Division has continually strived to enhance integrity management in the MRA. We have focused our resources on developing a robust anti-corruption strategy which sets the “tone at the top” in terms of the full commitment by management to a culture of integrity.

Corruption Risk Mapping (CRM) is a proactive anti-corruption tool which plays a key role in the MRA’s fight against corruption. In line with its three-pronged approach to curbing corruption, the MRA recognizes that CRM is a means of understanding the essence of integrity, which is a fundamental component in tackling the scourge of corruption. The MRA does indeed face a variety of risks from both internal and external sources, and conducting CRM of different processes across the organization has helped in identifying and understanding how corruption risks and malpractices can occur and in providing a foundation for addressing these risks by implementing safeguards in the organization. It is therefore a proactive measure that ensures a sound operating system and eliminates/minimizes the scope for irregularities and
malpractices. Furthermore, CRM includes the production of a Corruption Risk Map which provides a bird’s-eye view of identified corruption risks, their priority level and impact on processes/the institution, thus enabling management to decide rapidly on the targeted allocation of resources to fight against corruption.

Recognizing that conducting CRM will assist in understanding processes vulnerable to corruption and malpractices and will offer a holistic and detailed view of corruption risks across the MRA, in 2015 we requested assistance from the WCO to provide us with hands-on experience of conducting such a risk mapping exercise. The MRA also sought an overview of the methodology for conducting CRM, as described in the WCO Integrity Development Guide and Corruption Risk Mapping Guide. The WCO responded positively by providing us with two integrity experts from German Customs.

Equipped with the guidance and internal expertise offered, the MRA’s Internal Affairs Division subsequently devised and adapted its own CRM process, fitting it specifically into our local context. Conducting a CRM is an art and not a quick-fix solution with a rigid approach. It is therefore tailored to the unique vulnerabilities and strategic goals of the MRA.

However, it is worth noting that the backbone of our CRM process is based on the CRM Model suggested by the WCO. To date, the MRA has conducted risk mapping in vulnerable areas such as “Examination of Goods”; “Tax Audit”; “Courier Services”; “Unstuffing of Goods”; and “Airport Arrival Hall (Green Channel + Red Channel + Detained Goods)”. We recently also revisited the CRM exercise carried out on “Unstuffing of Goods” to reassess the risks and ensure that previous recommendations for reinforcing safeguards in vulnerable areas have been implemented.

In July 2016, the Director of the Internal Affairs Division was invited by the WCO to share the MRA’s experience with other island states (Fiji and a further five (5) surrounding island states) during the WCO Sub-regional Workshop on Integrity for the Pacific, held at the Regional Training Centre (RTC) for Fiji located in Suva. The focus was on CRM as an anti-corruption tool recently developed by the MRA, with technical assistance from the WCO.

In December 2016, the African Union and the WCO organized a Workshop on Corruption Risk Mapping in Africa held in Dakar, Senegal. The main resource person for the Workshop was Mr. Narrainen, Director of Internal Affairs (MRA), assisted by Mr. Patrick Gyan (WCO). The follow-up to this Workshop was held in Mauritius from 22 to 25 May 2018, during which the Director and staff of Internal Affairs (MRA) acted as resource persons and facilitators.

Corruption Risk Mapping is a key tool for fighting corruption, offering a mechanism through which (i) generic risks can be managed proactively, (ii) specific risks can be identified, assessed and managed, and (iii) ethical behaviour and best practices actively promoted. Furthermore, the CRM exercise can provide valuable information with a view to conducting meaningful vigilance exercises which form another preventive approach to curbing corruption. The MRA has already commissioned an Organizational Integrity Perception Survey this year, during which our Organizational Integrity Index will be reviewed. In the course of this exercise, the effectiveness of our integrity strategies (which include CRM) will be measured along with other integrity parameters based on the Revised Arusha Declaration. The Survey findings will made available and published next year.
Morocco

Ethics in practice in the Administration of Customs and Indirect Taxes (ADII)

In 2015, the Kingdom of Morocco adopted a National Anti-Corruption Strategy, overseen by a steering committee chaired by the Prime Minister. The Strategy covers the fight against corruption in its various aspects, including upgrading institutional and legal arrangements, stepping up prevention and enforcement activities and improving education and awareness-raising.

The approach advocated by Moroccan Customs in this area is fully in line with this strategy and consistent with WCO guidelines, and in particular the Revised Arusha Declaration.

The main measures taken in this area may be grouped under the following headings:

**Improving governance**

Having regard to the importance of prevention and control activities in the fight against corruption, the Administration of Customs and Indirect Taxes (ADII) has set up central and regional audit and inspection units, which carry out both preventive and corrective tasks in line with their scope. Through the annual action plans and programmes, broken down into audit, inspection, investigation and verification missions, the audit and inspection units help to strengthen ethical conduct and moral integrity in the behaviour of Customs officials. The objectives assigned on an ongoing basis to the various missions primarily relate to the detection of areas of vulnerability and risks of corruption and the ways and means of improving service provision.

The work done by the audit and inspection units has led to:

- the mapping of corruption risks;
- the establishment of safeguards to improve management of the risks identified; and
- the definition of internal management controls under the responsibility of local managers.

As far as internal control is concerned, since 2016, Moroccan Customs has established a system of control designed to deal with certain risks and to define the management controls falling to each manager. Through the mechanism that has been introduced, based on an appropriate, dedicated reporting system, Customs managers are able to control the management of their sections, detect anomalies and take corrective decisions, sometimes in real time, at the level of all the responsibility centres reporting to them.

Moreover, in 2012, in the awareness that ethical conduct is not promoted solely by control, but also by preventive actions and measures and the adoption of a reference framework of shared values, this Administration introduced its own Code of Conduct, to which all Customs staff members are required to adhere.
Simplifying procedures and going paperless

For several years now, Moroccan Customs has been committed to an ongoing process of streamlining its procedures with a view to making them more transparent and less cumbersome. The aim is for them to evolve in line with international standards and for administrative formalities that are burdensome, or indeed pointless or capable of fostering corruption, to be eliminated.

In parallel, Moroccan Customs has turned paperless Customs procedures into a way of promoting trade facilitation and also an effective means of limiting opportunities for contact with users and the resulting risks of abuses. This process, undertaken by way of a step-by-step approach, reached its culmination on 1 January 2019 with the entire Customs clearance circuit going paperless.

Specifically, these days, a user of the Customs service can access a whole range of services “at home”, such as:

- Signing of the Customs declaration by means of the online Customs clearance process;
- Establishment of an estimate of duties and taxes;
- Consultation of the integrated tariff;
- Issuing of the Customs duty assessment document;
- Electronic payment of duties and taxes;
- Issuing of the payment receipt;
- Issuing of the certificate of discharge with regard to Customs procedures with economic impact; and
- Real-time tracking of progress in the declaration circuit.

Access to information and documentation

Moroccan Customs posts all Customs information online on its website for the public at large, thus removing the uncertainties that can give rise to problems in Customs operations, bearing witness to the policy of openness and transparency that it favours.

For individuals and economic operators using the Internet, the website makes both static and interactive pages available:

- outlining current Customs laws and regulations;
- providing the ADIL (Assistance au Dédouanement des Marchandises à l'Importation en Ligne) Customs tariff determination system, giving full details of the duties and taxes payable, both based on preferential regimes and under ordinary law, and furnishing information about particular regulations applying to imports and exports;
- providing information about the authorizations granted by the Administration, the conditions governing their issue and the officers empowered to grant them; and
- making the contact details of the Administration, including those of managers, available to users.

Ethics as an aspect of the Strategic Plans

The importance attributed to strengthening ethical conduct in the Customs Strategic Plans demonstrates the Administration’s strong determination and also a commitment at the various levels of the hierarchy.

In this context, the 2023 Strategic Plan, on which work has started this year, under the slogan “Towards a relationship based on trust”, provides for six (6) strategic objectives split into 31 projects. With 10 dedicated projects, improving governance and developing human capital feature prominently in this new strategy.
North Macedonia

Monitoring and evaluation are essential aspects of the North Macedonia Customs Administration's Integrity Strategy

In June 2020, the North Macedonia Customs Administration conducted an analysis on the implementation of its Integrity and Anti-Corruption Strategy for the period 2019-2022, together with its Action Plan. Based on this analysis, it was determined that 37% of the planned measures have been implemented, 26% have been partially implemented and 11% are in progress. This situation may be considered satisfactory given the circumstances caused by the COVID-19 pandemic. The implementation of these measures should strengthen the system for preventing and repressing corruption and conflicts of interest.

Despite the prevailing circumstances, the Sector for Professional Responsibility, which plays an essential role in fighting corruption, carried out checks on the Customs Administration’s organizational units to ensure the observance of procedures and application of competencies as laid down by law. The Sector’s work includes the detection and elimination of corruption, unprofessional conduct, mismanagement, fraud and damage caused, conducting internal investigations based on operational knowledge of abuse of authority, recording and monitoring the asset and property status of employees of the Customs Administration, as well as organizing and conducting activities aimed at protecting the integrity of the Customs Administration.

During 2020, a total of 106 internal controls and investigations have been conducted, with 44 reports of irregularities in the work and actions of Customs officers being flagged, for which separate disciplinary proceedings were held and both disciplinary and other measures applied.

The Customs Administration continuously invests in the automation of processes and their upgrading, using the EDMS, NCTS, EXIM, CDEPS and ITE applications which reduce personal contact between Customs officers and participants during Customs procedures, and thus limit opportunities for corruption.

Regarding the possible abuse of official powers by Customs officers, the Customs Administration analyses data on the duration of procedures and, in cases where procedures are unjustifiably long, a detailed analysis is carried out. In the systems used for processing Customs declarations and excise documents, all actions by stakeholders in the Customs procedures and by Customs officers are logged. This makes it possible to determine with accuracy which part of the procedure is of the longest duration and whether this is due to inaction by the Customs officer or to action by the stakeholder.

As all actions by Customs officers are logged in the relevant systems, the level of engagement by Customs officers can be determined and appropriate measures taken to ensure proper allocation of resources. Based on an analysis of the above-mentioned data, the Customs Administration can plan future activities in terms of trade facilitation, greater protection of society and the work performance of Customs officers.

In order to prevent corruption and also to ensure proper implementation of laws and bylaws, thus avoiding mistakes and errors in Customs operations, a Guide to the most common mistakes and errors in the overall operation of the Customs Administration is used, along with a Register of risk points assigned to Customs operations susceptible to corruption, which is prepared on a quarterly basis. The Register contains clearly and precisely defined risks, references to the related processes, sources of risks, the degree of risk, the organizational unit to which the risks refer and measures proposed to avoid these risks.
A new Code of Conduct for Customs Officers has been produced and is due to be adopted shortly. The Code of Conduct has been supplemented with new standards and principles of conduct, based on an analysis of offences committed by Customs officers.

The Customs Administration provides ongoing training for Customs officers, in the form of the Annual Plan for Training, Professional Development and Improvement which includes “Prevention of Corruption, Integrity and Ethics” as a topic and is split into basic and advanced training. In addition, specialized training courses are provided through projects or collaboration with other state institutions such as the Ministry of the Interior, the Ministry of Justice, and the State Commission for Prevention of Corruption.

This year, as in the previous one, the Customs Administration conducted a “Stop Corruption” campaign by distributing brochures and posters printed in Macedonian, Albanian and English at all border and inland Customs offices and at Customs headquarters. The campaign aims to raise public awareness and inform citizens about the appeals system, as well as to encourage them to report cases of unprofessional behaviour and corruption. Since the campaign was first launched, the number of submitted by citizens has been increasing continuously.

The Customs Administration conducted a survey of external entities, i.e. stakeholders in Customs procedures, through the Research Agency on Public Opinion, Market and Media. The results of the survey were presented to Customs Administration management and are being used to correctly determine targeted future activities in the area of combating corruption as well as building and promoting integrity within the Customs Administration.

In order to successfully combat corruption and organized crime, a distinct Sector for Special Investigation Measures has been established, for which special technical equipment and separate premises have been supplied that meet the required standards. The provision of the requisite safety certificates for employees is underway, as well as appropriate training that will be carried out in cooperation with the Ministry of the Interior.

As a result of successful cooperation with the Ministry of Interior, and through the application of special investigative measures, two cases in which Customs officers were suspected of accepting bribes were uncovered. The officers have been arrested and suspended.

Furthermore, the Customs Administration regularly monitors the assets and property status of its employees and, in the event of doubt about the legality of acquisitions of moveable and immovable property owned by officials, initiates a procedure with the competent government agencies for further investigation.

Pakistan

A three-level Integrity Promotion Strategy in Pakistan Customs

Reliance has been placed upon the latest/viable instruments, including the WCO Revised Arusha Declaration, and the latest international practices to prevent corruption and increase the level of integrity in Pakistan Customs. An Integrity Promotion Strategy in Pakistan Customs has been implemented simultaneously at three levels: operational level; technical level; and strategic level.
Operational (Collectorate) level.

i. The performance of the assessing/examining officials (i.e. Appraisers, Principal Appraisers and Additional Collectors (ACs)/ Deputy Collectors (DCs) is regularly measured/monitored along the following lines:
   a) Number/percentage of cases in which correct/incorrect assessments are made.
   b) Percentage of detection rate in cases sent for import/export examinations.
   c) Average time taken for assessment/examination of goods as compared to peers (i.e. benchmarking).
   d) Overall level of trade facilitation.

ii. Installation of CCTV cameras in the import and export yard of Faisalabad dry port for continuous monitoring of the work carried out.

iii. Rotation policy for officials in different sections to ensure transparency and effective management.


v. Strict disciplinary/panel actions are initiated against officers/officials involved in any serious lapse and/or Customs fraud.

vi. Regional Integrity Committees (RICs), at the Collectorate level, have been constituted by the respective Chief Collector of Customs, comprising officers of the Collectorate and the relevant chambers/federations/associations to address complaints of corruption in Customs.

Technical (regional) level

i. Officers posted to key positions are not only honest and fair but also have the capabilities to ensure implementation of the Strategy (for integrity in Customs), as articulated by the organization's leadership.

ii. Officers regularly engage with the private sector to gain first-hand information/feedback about integrity issues in their areas of jurisdiction.

iii. Preventive/audit wings, such as the Directorate General of Customs Intelligence and Investigation and the Directorate General of Post-Clearance Audit, have been strengthened to provide independent monitoring and control of commercial/organized Customs fraud.

Strategic/policy level:

i. An Integrity Management Cell (IMC) has been established in Pakistan Customs, Federal Board of Revenue (FBR) to strengthen the Integrity Management System within the organization.

ii. The Integrity Management Cell, in coordination with Pakistan Revenue Automation Limited (PRAL), has successfully implemented a Complaint Management System which has been placed on the FBR's main website. Taxpayers can file corruption-related complaints via this portal.

iii. Pakistan Customs is scrutinizing the trade facilitation agenda/reforms and giving confidence to trade.

iv. In view of the paramount importance of rationalization/modernization/automation of Customs procedures in minimizing corruption in Customs, priority is being attached to the said goals.

v. Risk Management Systems in all areas of Customs are being implemented to improve integrity and compliance.

vi. The FBR’s Code of Conduct, which has already been published, is inculcated into Customs officers/officials.

vii. Close interaction/coordination with other state institutions (dealing with corruption) is being ensured in order to have an outside-in view for a fair assessment of integrity levels in Customs.

viii. Anti-corruption awareness seminars are being conducted to make the general public familiar (through press releases, media clips and advertisements) with the initiatives taken in this regard.
ix. Written instructions to prevent the posting of any political/external links have been issued to all officers of Pakistan Customs. Any such act is treated as ‘Misconduct’ under the Government Servants (E&D) Rules, 1964, read in conjunction with Government Rule 2 (4) of Government Servants (E&D) Rules, 1973.

x. A Whistle Blowers’ Law has been implemented to make sure that cases of tax fraud/evasion are duly reported and that corruption within the organization is minimized.

Panama:

“Ethical Customs in the 21st Century” – Panama Customs Action Plan

Panama occupies a privileged geographical position, with a recently expanded Interoceanic Canal, one of the largest free trade zones on the American continent, and a multimodal cargo transportation system supported by the biggest commercial airport in the region. This allows for a great deal of movement through the entry and exit of goods by land, sea and air, the controls on which fall to the Panama Customs Authority. We cannot ignore the existence of high levels of corruption at international level in recent years in Latin America, which have also impacted Panama as a world trade centre and multimodal logistics hub. In this respect, the National Government of Panama has as its objective the facilitation of world trade through investment on Panamanian territory. However, at the same time it faces the huge challenge of corruption that exists at all levels of society. The Corruption Perception Index 2019, published by Transparency International, placed Panama in position 101 with a score of 36, reflecting the lack of optimism in the Latin American and Caribbean region in terms of the existing situation regarding corruption. This leads us to believe that those who participate in the system do not all do so in an honest and responsible way.

The mission of the Panama Customs Authority lies in facilitating global trade, collecting taxes efficiently, participating in national security and promoting the country’s sustainable development, in addition to exercising controls and surveillance of the entry, exit and movement of goods, people and means of transport across all the country’s borders, ports and airports, as well as preventing, investigating and punishing Customs offences and intervening to combat international trafficking in goods. Cognizant of the impact of corruption and in order to fulfil the previously-stated mission, the Panama Customs Authority is developing an Action Plan, through which a proposal to curb in-service corruption will be defined in order to gain the trust of Panamanian society in the work of Customs officials. This Action Plan is entitled “Ethical Customs in the 21st Century” and is based on a measurement system developed by applying surveys through a maturity model. The results obtained from those surveys will be used to measure the ethics and integrity levels of Custom officials, so that the Administration can identify the weak points in this respect which require strengthening.

The Panama Customs Authority has developed a “Code of Ethics and Conduct” that all Customs officials have to comply with and respect in the exercise of their functions, in order to achieve efficient controls of ethics and integrity. The Code of Ethics and Conduct of the National Customs Authority is set out in Cabinet Decree No. 29 of 18 August 2004, and is a legal instrument that has mechanisms to prevent, detect and punish corruption in the exercise of the public functions of Customs officers, by virtue of the fact that corruption in Customs undermines legitimacy, limits the effectiveness and efficiency of its management...
and creates conditions of unfair competition between economic operators, thus affecting the economy. The Code of Ethics and Conduct details the behaviour that Customs officials must observe and their responsibilities regarding prevention, investigation methods and applicable sanctions in case of offences. In this matter, we use the Guidelines of the WCO Code of Ethics and Conduct as a foundation.

Turning to transparency, the Panama Customs Authority has a specific tab on its website (www.ana.gob.pa) referring to TRANSPARENCY, to which the Authority and community are committed through application of Law 6 of 22 January 2002. In this regard, we wish to address the application of the content of Chapter III of the above-mentioned Law which says that all State institutions are obliged to provide, to any staff that require it, information about the operations and activities they carry out, with the exclusion of information of a confidential nature to which there is restricted access. In accordance with the principle of making information public, State institutions are required to have available on their respective Internet sites and to periodically publish updated information on the topics and policies described below:

1. The updated internal regulations of the institution. 2. The general policies of the institution, which form part of its Strategic Plan. 3. The internal procedures manuals of the institution. 4. The description of the organizational structure of the institution. 5. The location of documents by categories, records and archives of the institution, and the official responsible for these. 6. The description of the forms and procedural rules for obtaining information from the institution and where they can be acquired.

We are focused on working hard on prevention and developing new mechanisms to fight corruption, having developed a culture of ethics and transparency within the Customs Administration and among Customs officers. In this way, we will have an autonomous, modern and efficient Customs serving international trade and the nation of Panama.

**Slovakia**

**Inter-institutional cooperation as an integrity enabler in the Financial Administration of the Slovak Republic**

The Financial Administration of the Slovak Republic gives importance to activities focused on promoting and contributing to the goals of integrity and the fight against corruption. The relevant department within our Administration with responsibility for handling integrity-related tasks is the Inspection and Internal Control Section.

**Training activities**

Based on the Educational Plan adopted, the Financial Administration of the Slovak Republic organizes a number of training activities for employees, focused on the fight against corruption and related topics. These training activities are carried out in close cooperation with the Inspection and Internal Control Section and the Financial Administration's Academy.

At national level, our Administration actively participates in joint training activities with the Police Authorities, namely the Police Presidium, Border and Foreign Police Office and the National Unit for Combating Illegal Migration. These common training activities are based on the Action Plan on “Cooperation and the Fight against Corruption” concluded by these institutions.
Besides active cooperation in training activities between our Administration and the Police Authorities, we also cooperate with criminal proceedings when Financial Administration staff are suspected of criminal activity.

At international level, we would like to highlight regional cooperation within the Visegrad Group (Slovakia, Hungary, Czech Republic and Poland), through which we are currently involved in an ongoing integrity training activity focused on internal security in relation to anti-corruption measures, personal integrity issues, loyalty checks and internal inspection activities. The main benefit of this training activity is the unique opportunity to exchange valuable experiences and best practices among the Customs Administrations of the Visegrad Group.

**Legislation**

Legislation is a key aspect of the effective fight against corruption. The 2019 adoption of Act No.35/2019 on the Financial Administration introduced, among other things, some new concepts and tools for enhancing the fight against corruption, namely “Verification of Observance of Professional Discipline” and “Verification of Reliability”.

We would additionally like to mention the adoption of Act No. 54/2019 on the Protection of Persons Reporting Anti-Social Activities (Whistleblower Protection Act). This Act regulates the conditions for providing protection to individuals against unjustified sanctions as regards their employment. It covers the reporting of crimes or other anti-social activities, including the rights and obligations of natural and legal persons when reporting anti-social activities. Related to this Act, the Financial Administration adopted an internal Regulation on the reporting and verification of reporting related to anti-social activities. This Regulation establishes presumptions for the reporting of anti-social activities by employees within our Administration.

The Inspection and Internal Control Section, in cooperation with other departments in our Administration, has drafted an Internal Anti-Corruption Regulation that prohibits the use of private communication devices, such as mobile phones using SIM cards, PCs, laptops, pagers and all other private devices used for electronic communication, while on duty. This Regulation also prohibits excess cash (over 20 euros) being carried while on duty.
Update on WCO integrity-related activities

Summary of the latest integrity activities
From 25 June to 10 December 2020, the WCO conducted several integrity-related activities for its Members and engaged in further cooperation with its international partners.

Integrity development and support missions
In November 2020, the WCO conducted an integrity diagnostic mission in a virtual format for the benefit of Brazil Customs. The remote integrity assessment successfully covered the examination of the 10 key factors of the Revised Arusha Declaration which encompass all areas of Customs work. Brazil Customs reaffirmed its strong commitment to organizational integrity and expressed its support for the remote assessment.

The WCO and Brazil have moved on to the next stage and are now planning to conduct a Customs Integrity Perception Survey to supplement the diagnostic with a quantitative assessment.

Cooperation with other international organizations
The WCO participated in several meetings of the United Nations Office on Drugs and Crime (UNODC) that focused on implementation of the United Nations (UN) Convention against Corruption (UNCC). This included participation in the following activities: 11th Session of the Implementation Review Group, 11th Session of the Open-ended Intergovernmental Working Group on the Prevention of Corruption (from 31 August to 2 September 2020), and 1st Intersessional Meeting of the Conference of the States Parties to the UNCC on preparations for the UN General Assembly Special Session (UNGASS), held from 2 to 4 September 2020.

In September 2020, the WCO participated in the Virtual Plenary Session of the Network of Corruption Prevention Authorities (NCPA) and informed participants about the latest initiatives by the global Customs community on integrity development. It reiterated the importance of enhanced cooperation and information exchange between Customs and state anti-corruption authorities in the fight against corruption. The WCO and NCPA will explore further ways of collaborating to support Members with their integrity agenda.

Integrity-related capacity building projects
On 16 July 2020, WCO Members of the Virtual Working Group (VWG) on Gender Equality and Diversity participated in online meeting to discuss the links between gender equality, diversity and integrity.

The meeting, jointly organized with the WCO Anti-Corruption and Integrity Promotion (A-CIP) Programme, provided an opportunity for representatives from 14 Customs Administrations (Brazil, Ghana, Iceland, Indonesia, Israel, Japan, Kazakhstan, Liberia, Maldives, Mexico, Mozambique, Thailand, Tunisia and Zambia) to exchange ideas on how Customs could incorporate a gender perspective in its fight against corruption. Prior to the meeting, VWG Members were invited to provide feedback on how Gender Equality and Diversity could be linked to the 10 key factors of the Revised Arusha Declaration, the WCO’s main policy document promoting integrity and good governance in Customs.

Building on a previous meeting held last year on the topic of “Exploring the links between gender and integrity in Customs”, participants also analysed various assumptions and misperceptions around gender and integrity by providing concrete examples drawn from their own experience. It was concluded that rather than being a question of gender, corrupt behaviour is a question of personal attitudes and exposure. It was
also noted that women and men experience, perceive and are affected by corruption in different ways, and this needs to be taken into consideration when designing efficient integrity strategies. Finally, it was also concluded that improving gender equality and inclusiveness overall can also have a positive impact on preventing corruption.

**Review of the WCO Integrity Development Guide**

During the 19th Session of the WCO Integrity Sub-Committee (ISC), held on 20 and 21 February 2020, Members endorsed the review and update of the WCO Integrity Development Guide (IDG), the Organization’s key capacity building tool on integrity, based on the lessons learned, identified gaps requiring improvement, emerging issues and new best practices in the area of integrity development that need to be reflected in this important tool.

In this regard, the ISC established a WCO Virtual Working Group (VWG) on the Review of the IDG which worked for 12 weeks between 6 April and 28 June 2020. It provided more than 400 submissions via the CliKC! platform, with approximately 1,200 specific proposals for improvements to the IDG being received. These materials provided a solid basis for a comprehensive review of the Guide.

The WCO has continued to offer remote support as well as the CliKC! platform to assist with the review of the IDG. For the next steps of the review process, the WCO has engaged selected Members’ integrity experts to join a Remote Working Group. Together, they have redesigned the IDG and continued enhancing and updating it based on materials and feedback received from Members through the VWG. The activities of the Remote Working Group started on 17 June 2020 and will continue with the purpose of presenting a new version of the IDG, for WCO Members’ consideration, at the ISC session scheduled for February 2021.

**Development of a new WCO Integrity E-Learning Module**

The WCO, under the Norwegian Agency for Development Cooperation (Norad) funded A-CIP Programme, launched a new integrity e-learning module on the CLICK! Platform in November 2020. The module supports Members with distance learning on the main WCO integrity development tools, highlighting the importance of integrity in the Customs environment. In this regard, the A-CIP Programme worked closely with a consultative working group made up of WCO lead officials, representatives from all 6 WCO regions, WCO Private Sector Consultative Group (PSCG) and the International Anti-Corruption Academy (IACA).

**Integrity Webseries**

The WCO's Anti-Corruption & Integrity Promotion (A-CIP) Programme, with funding from the Norwegian Agency for Development Cooperation (Norad) is hosting a web series on various topics relating to Customs and integrity. Guest speakers from WCO Secretariat and Membership are invited to discuss issues concerning the fight against corruption in Customs and provide insights into key WCO integrity tools and instruments, as well as the importance of related areas such as gender equality and diversity or the measure of corruption.

Customs administrations, other international organizations and representatives of the private sector alike will find those episodes useful and insightful, and will help generate further discussion around the topic of integrity in Customs.
A-CIP Programme

The Anti-Corruption and Integrity Promotion (A-CIP) Programme for Customs is funded by Norad and was initially launched in January 2019 in 11 partner administrations: Afghanistan, Ethiopia, Ghana, Lebanon, Liberia, Mali, Mozambique, Nepal, Sierra Leone, Tanzania and Tunisia. Thanks to Norad’s generous contribution to expand the Programme this year, six additional partner administrations – Burkina Faso, Côte d’Ivoire, Jordan, Malawi, Niger and Palestine – are now collaborating with the WCO on the A-CIP Programme.

The Programme is aimed at improving the business environment for cross-border trade in selected WCO Member countries, by making changes to the operational and administrative context in order to curb corrupt behaviour and promote good governance in Customs operations and administration. These changes are guided by and in line with the 10 key factors of the Revised Arusha Declaration concerning Good Governance and Integrity in Customs.

In response to the COVID-19 pandemic, remote technical assistance and capacity building (TACB) bilateral support activities are being delivered to 10 of the original A-CIP partner administrations. Virtual planning sessions are held regularly to review the Project Information Documents (PIDs) and identify activities that could be supported remotely. TACB materials are consequently being adapted from face-to-face to virtual delivery. Experts from WCO Members, including Poland, Netherlands, United States, Canada and Mauritius, are assisting with this process.

In conjunction with the six new A-CIP partner administrations, a remote Scoping Assessment Activity Package has been designed and approved by A-CIP partners. The delivery of the package enables situational analysis to be carried out on the fight against corruption in administrations, and this will lead to the identification of two priority areas to be supported under the Programme. The results of this remote scoping assessment will be incorporated into each new partner administration’s PID.

Over the past few months, the A-CIP Programme Team has also conducted the analysis of over 300,000 data points from over 6,000 Customs officials and private sector respondents to the Customs Integrity Perception Survey (CIPS) that was conducted earlier this year. This has provided 10 WCO Members/A-CIP partner administrations who participated in the survey in January and February 2020 with comprehensive summary reports of the analysis, including plans for the next steps such as mechanisms to engage other stakeholders in responding to the results, especially the private sector.

A second iteration of the CIPS will be conducted in seven (7) more beneficiary countries in early 2021, taking into account the health and safety measures in place as a result by the coronavirus pandemic. The CIPS is a key instrument of the A-CIP Programme and allows participating administrations to gain insights into the perceived success rates of their administration in promoting integrity and combating corruption. The methodology, questionnaires and lessons learned from piloting the CIPS under the A-CIP Programme have been assembled as Guidelines that will be presented at the next WCO Integrity Sub-Committee. These will be available for all WCO Members to use. In addition, with the assistance of data analysts from Netherlands Customs, the anonymized data collected from the CIPS is being reviewed to highlight patterns and trends that might be of interest to WCO Members.

By the end of the year, the A-CIP Programme will introduce a new WCO Integrity E-Learning Module that will be available to all WCO Members on the WCO’s e-learning platform (CLiKC!). Thanks to input by a
consultative group made up of WCO lead officials, Member representatives from all six (6) WCO regions, the WCO Private Sector Consultative Group (PSCG) and academia (International Anti-Corruption Academy (IACA)), it is expected to be a comprehensive module fostering WCO Members’ culture of integrity and anti-corruption strategies. Thanks to Norad’s support, the module will be available in English and French, with subtitles in Spanish, Portuguese, Russian and Arabic.

Finally, readers might be interested in listening to the Integrity Webseries hosted by the A-CIP Programme since July 2020. Guest speakers from the WCO Secretariat and membership are invited to discuss issues concerning the fight against corruption in Customs and to provide insights into key WCO integrity tools and instruments, as well as the importance of related areas such as Gender Equality and Diversity, how to measure corruption and how to build a culture of integrity in Customs. Customs administrations, other international organizations and representatives from the private sector alike will find these episodes useful and insightful, as they will help generate further discussion around the topic of integrity in Customs.

How to build a culture of integrity

A proactive approach to integrity in Customs administrations

Fighting against inappropriate professional behaviour or illegal practices such as fraud or corruption is not limited to Customs administrations adopting legal frameworks, standards and rules, or applying sanctions in the event of problems. In parallel, there is also a need to adopt a proactive approach to integrity that focuses primarily on the human factor.

A culture of integrity influences the behaviour and professional practices of officials

Generally, individuals always prefer to act with integrity. However, these same individuals can be subjected to the pressures of their environment and adopt, in defence of their interests, behaviour that is sometimes contrary to the values that drive them under normal circumstances.

Take the example of new recruits who join a Customs administration. Once recruited, these new officials enter a process of integration and socialization which will lead them to adapt to their new work environment, to the applicable rules and to the dominant culture of their new employer. The officials will most likely tailor their behaviour to this new environment and act according to the behaviour, practices and expectations of their superiors, colleagues and other stakeholders such as users and economic operators.

Under these conditions, when officials work in an organization with a strong culture of integrity, it is easier for them to integrate and apply values such as probity and respect for rules, since the values of the administration are in line with their own.

Conversely, an individual will more easily adopt behaviour that is contrary to integrity if this can already be observed in the organization in which they perform their duties. For example, if their managers or colleagues are used to not treating others fairly, it is possible, even probable, that the official will adopt the same behaviour. Because of conflicts of values and ethical dilemmas which are unmanageable for them, they might also wish to change position or even employer.

Culture of integrity: a major factor in societal and economic performance

A culture of integrity is an essential asset for strengthening Customs administrations’ performance and development.
A proactive approach to integrity implies, above all, a strong commitment from leadership to the promotion and ownership of behaviour and good practices that ensure the respect of key values and the achievement of quantitative and qualitative objectives.

It is therefore essential to build and continuously improve the culture of integrity in organizations and to encourage everyone involved to be the custodian of this culture.

**Building a culture of integrity: a priority for the WCO**

To support Customs administrations in initiating and developing their integrity approach, the WCO designs and implements assistance activities and has developed numerous support tools and instruments.

Among these, the WCO Revised Arusha Declaration (RAD) sets the benchmark for Customs integrity. The RAD features 10 key factors that correspond to areas of work, principles and practices that should be covered or used by all Customs administrations to promote integrity and reduce or eliminate possibilities for corruption.

When it comes to building a culture of integrity, WCO Members can refer in particular to the "Leadership & Commitment", "Code of Conduct", "Human Resource Management" and, of course, "Morale & Organizational Culture" key factors.

The WCO Integrity Development Guide and the Model Code of Ethics and Conduct are specific WCO integrity tools that can help create the necessary conditions for WCO Members to succeed in fulfilling their missions, and for their values to be reflected in all actions, decisions and behaviour.

Other WCO tools and initiatives, such as the WCO's Leadership Management and Development (LMD) Programme and the Guide to Implementing Competency-based Human Resource Management, also help guide managers in their understanding and influencing of staff behaviour.

As WCO Members increasingly use these tools and guidelines in their efforts to build a culture of integrity, a greater understanding of the linkages between them is being formed. This is the case under the WCO
Anti-Corruption and Integrity Promotion (A-CIP) Programme. This Programme is the first of its kind entirely dedicated to supporting selected WCO Members with RAD implementation.

Morale and organizational culture have been identified as a priority for several A-CIP partner administrations. As a result, the Programme aims to further develop the WCO’s tools and guidelines in this regard. All WCO Members will be able to contribute to and benefit from this work.
Abbreviations
ACD- Afghan Customs Department
A-CIP- Anti-Corruption and Integrity Promotion Programme
ADII- Administration of Customs and Indirect Taxes
AFS- Afghani (Afghanistan’s official currency)
CCP- Container Control Programme
CCTV- Closed-Circuit Television
CDEPS- Customs Declaration and Excise Processing System
CIPS- Customs Integrity Perception Survey
CRM- Corruption Risk Mapping
E-DMS- Electronic Document Management System
EXIM- Electronic System for Import and Export Licences and Tariff Quota
GACC- General Administration of Customs of China
GEOAT- Gender Equality Organizational Assessment Tool
IDG- Integrity Development Guide
IMC- Integrity Management Cell
ISC- Integrity Sub-Committee
ITE- Integrated Tariff Environment
JCA- Jamaica Customs Administration
LMD- Leadership and Management Development
MRA- Mauritius Revenue Authority
NCPA- Network of Corruption Prevention Authorities
NCTS- New Computerized Transit System
NPGE- National Policy on Gender and Equality
NTCA- National Tax and Customs Administration
OCAG- Office of the Comptroller and Auditor General
PCA- Post-Clearance Audit
PCU- Port Control Unit
PID- Project Information Documents
PRAL- Pakistan Revenue Automation Limited
RAD- Revised Arusha Declaration
RICs- Regional Integrity Committees
RMU- Risk Management Unit
TACB- Technical Assistance and Capacity Building
UN- United Nations
UNCC- United Nations Convention against Corruption
UNGASS- United Nations General Assembly Special Session
UNODC- United Nations Office on Drugs and Crime
VWG- Virtual Working Group
WCO- World Customs Organization