

“The Good, Bad and Weak”: Evaluating the Effectiveness of Six Asian Anti-Corruption Agencies

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The “Wicked” Problem of Corruption in Asian Countries

According to Rittel and Webber (1973, p. 160), “wicked” problems are “ill-defined,” “rely upon elusive political judgment for resolution” and are “never solved.” Corruption is a wicked problem in many Asian countries today despite the anti-corruption efforts of the past seven decades. Table 1 confirms their disappointing performance on the CPI in 2022. Indeed, only six countries (24%) have CPI scores above 60, with Singapore being the least corrupt Asian country with its ranking of 5th among 180 countries and a score of 83. In contrast, the other 19 countries (76%) have low scores ranging from 17 for North Korea to 47 for Malaysia.

Anti-corruption agencies (ACAs) have been established in many Asian countries during the past 70 years to curb corruption. However, with the exceptions of the ACAs in Singapore and Hong Kong, these ACAs have failed to minimize corruption, judging from their countries’ poor performance on Transparency International’s Corruption Perceptions Index (CPI) between 1995 and 2022. This policy brief evaluates the effectiveness of six selected ACAs in terms of attaining their roles as independent watchdogs, attack dogs, and paper tigers. It concludes that the ACAs of Singapore and Hong Kong are “good,” those in India and Bangladesh are “bad,” while those of the Philippines and South Korea are “weak.”

Table 1: CPI Performance of 25 Asian Countries, 2022

CPI score*	Countries	No (%)
80 – 100	Singapore (83)	1 (4%)
70 – 79	Hong Kong SAR (76), Japan (73)	2 (8%)
60 – 69	Bhutan (68), Taiwan (68), South Korea (63)	3 (12%)
50 – 59	None	0
0 – 49	Malaysia (47), China (45), Timor-Leste (42), Vietnam (42) India (40), Maldives (40), Sri Lanka (36), Thailand (36) Indonesia (34), Nepal (34), Mongolia (33) Philippines (33), Lao PDR (31), Papua New Guinea (30) Bangladesh (25), Afghanistan (24), Cambodia (24) Myanmar (23), North Korea (17)	19 (76%)
Total	25 countries	25 (100%)

*CPI scores range from 0 (highly corrupt) to 100 (very clean). To be included in the CPI, three independent surveys must be conducted on its perceived extent of public sector corruption. Source: Transparency International (2023, pp. 2-3).

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Table 2: 21 ACAs in Selected Asian Countries**

Country	Anti-Corruption Agency	Date of Formation
Singapore	Corrupt Practices Investigation Bureau	September 1952
India	Central Bureau of Investigation	April 1963
Malaysia	Anti-Corruption Agency (replaced by Malaysian Anti-Corruption Commission in January 2009)	October 1967
Bangladesh	Bureau for Anti-Corruption (replaced by Anti-Corruption Commission in November 2004)	March 1971
Hong Kong SAR	Independent Commission Against Corruption	February 1974
China	Central Commission for Discipline Inspection	1978
Philippines	Office of the Ombudsman (reorganized in May 1988)	July 1979
Brunei Darussalam	Anti-Corruption Bureau	February 1982
Nepal	Commission for the Investigation of Abuse of Authority	February 1991
Sri Lanka	Commission to Investigate Allegations of Bribery or Corruption	November 1994
Pakistan	National Accountability Bureau	November 1999
Thailand	National Counter Corruption Commission (renamed as the National Anti-Corruption Commission in 2008)	November 1999
Macau SAR	Commission Against Corruption	December 1999
South Korea	Korea Independent Commission Against Corruption (replaced by Anti-Corruption Civil Rights Commission in February 2008)	January 2002
Indonesia	<i>Komisi Pemberantasan Korupsi (KPK)</i> (Corruption Eradication Commission)	December 2003
Bhutan	Anti-Corruption Commission	January 2006
Mongolia	Independent Authority Against Corruption	December 2006
Afghanistan	High Office for Oversight and Anti-Corruption	July 2008
Cambodia	Anti-Corruption Unit	April 2010
Taiwan	Agency Against Corruption	July 2011
Myanmar	Anti-Corruption Commission	February 2014

**This is not an exhaustive list of Asian ACAs. For a comprehensive list, see Quah (2017b, pp. 30-31).

Source: Compiled by the author.

ACAs are specialized organizations established by governments to minimize corruption in their countries. More specifically, they are “durable” publicly funded agencies concerned with fighting corruption that employ prevention tactics and repressive measures to reduce the opportunities for corruption (De Sousa, 2010, p. 5). The Corrupt Practices Investigation Bureau (CPIB) in Singapore

—the oldest ACA—was formed in September 1952. It was followed later by the creation of the Independent Commission Against Corruption (ICAC) in Hong Kong in February 1974. The success of these early agencies in minimizing corruption has promoted the belief that ACAs are effective in combating corruption (UNDP, 2011, p. 8) and resulted in the proliferation of almost 150 ACAs around the world (De Jaegere, 2012, p. 80). However, a comparative study has found that, unlike the CPIB and ICAC, many Asian ACAs have failed to curb corruption because of the “weak political will of their governments, which is reflected in their inadequate legal powers, limited budgets, lack of trained personnel, and lack of independence” (Quah, 2017a, p. 246). Indeed, the other 19 ACAs listed in Table 2 are less effective than the CPIB and ICAC.

The purpose of this policy brief is to analyze the effectiveness of these six ACAs: the CPIB in Singapore, the ICAC in Hong Kong SAR, Central Bureau of Investigation (CBI) in India, Office of the Ombudsman (OMB) in Philippines, Anti-Corruption Civil Rights Commission (ACRC) in South Korea, and the Anti-Corruption Commission (ACC) in Bangladesh. These ACAs have been selected for comparison to illustrate their differing levels of performance as an independent watchdog, an attack dog, and a paper tiger. However, before proceeding further, it is necessary to identify the contextual differences before assessing their effectiveness.

Contextual Differences

In his comparative study of six political leaders, Kissinger (2022, p. xvi) observes that leaders are “inevitably hemmed in by constraints” because “they operate in scarcity, for every society faces limits to its capabilities and reach, dictated by demography and economy.” Likewise, Samuels (2003, pp. 2-6) contends that leaders are political actors with more assets for “stretching” the “constraints of geography and natural resources, institutional legacies and international location.” Indeed, a country’s policy context promotes or hinders its government’s anti-corruption measures depending on whether it enhances or obstructs their implementation (Quah, 2013, p. 30).

Table 3 confirms that the policy contexts of Singapore and Hong Kong are more favourable than the policy contexts of the other four countries for combating corruption. First, both are city-states with small land areas and populations. Second, both are also very affluent with the highest GDP per capita of US\$82,807.60 for Singapore and US\$48,983.60 for Hong Kong in 2022. Third, in terms of their total percentile ranks for the World Bank’s six governance indicators in 2022, Singapore ranks first with 539.3, followed by South Korea with 475.4, and Hong Kong with 471.7, as shown in Table 4.

Table 3: Policy Contexts of Selected Asian Countries and CPI Scores, 2022

Country	Population	Land Area*** (sq. km)	GDP per Capita (in current US\$)	CPI Score and Rank
Singapore	5,637,020	718	\$82,807.60	83 (5 th)
Hong Kong SAR	7,346,100	1,050	\$48,983.60	76 (12 th)
South Korea	51,628,120	97,600	\$32,254.60	63 (31 st)
Philippines	115,559,010	298,170	\$3,498.50	33 (116 th)
Bangladesh	171,186,370	130,170	\$2,688.30	25 (147 th)
India	1,417,173,170	2,973,190	\$2,388.60	40 (85 th)

***2020 data.

Sources: Transparency International (2023, pp. 2-3); World Bank (2023b, c, d).

On the other hand, the unfavorable policy contexts of India, Bangladesh, Philippines, and South Korea are reflected in their larger land areas and populations, as well as their lower GDPs per capita, CPI scores, and percentile ranks in governance. India has the largest population and land area but has the lowest GDP per capita too. However, its percentile rank in governance is higher than those of Philippines and Bangladesh.

Table 4: Governance Indicators Across Selected Asian Countries, 2022

Indicator	Singapore	South Korea	Hong Kong
Voice and accountability	44.4	74.9	35.3
Political stability and absence of violence	97.2	64.6	66.5
Government effectiveness	100	90.1	95.8
Regulatory quality	100	84.0	93.9
Rule of law	99.1	84.9	87.7
Control of corruption	98.6	76.9	92.5
Total percentile rank	539.3	475.4	471.7
Indicator	India	Philippines	Bangladesh
Voice and accountability	49.3	33.5	28.0
Political stability and absence of violence	24.5	20.3	13.2
Government effectiveness	63.2	56.1	23.1
Regulatory quality	50.9	53.8	17.9
Rule of law	55.2	33.5	29.7
Control of corruption	44.3	33.5	15.6
Total percentile rank	287.4	230.7	127.5

Source: World Bank (2023a).

The Three Roles of ACAs

The *raison d'être* of an ACA is to implement impartially the anti-corruption laws formulated by its government to minimize corruption in the country. In other words, the ideal ACA acts as an independent watchdog, without any political interference by the government. When a government decides to establish an ACA, it should learn from those countries like Afghanistan, China, India, Pakistan, the Philippines, Taiwan and Vietnam to avoid relying on ineffective multiple ACAs. Furthermore, it should establish Type A ACAs that focus exclusively on the performance of anti-corruption functions, like Singapore's CPIB, instead of a Type B ACA, like the Philippines' OMB, which performs both anti-corruption and other functions (Quah, 2017c, p. 7).

More importantly, the government must decide what role it wants its Type A ACA to play: the desirable role of an independent watchdog; or the undesirable roles of an attack dog against political opponents and/or of a paper tiger. A government with the political will to curb corruption would ensure that the Type A ACA that it creates has the required legal powers, resources and operational autonomy to act as an independent watchdog that enforces anti-corruption laws impartially, without fear, favor or political interference. In contrast, a government with weak political will would easily succumb to the twin temptations of abusing the ACA's role by using it as an attack dog and/or as a paper tiger instead.

Table 5 classifies the ACAs of 16 Asian countries according to the performance of the three roles. It shows that the desirable role of an independent watchdog is performed by only four ACAs: Singapore’s CPIB, Hong Kong’s ICAC, Indonesia’s KPK, and Bhutan’s ACC. The KPK was highly successful in prosecuting hundreds of politicians, officials, and businessmen from its establishment in 2003 until its powers were curbed by Parliament in 2019 to reform it (Idrus, 2023). Indeed, its chairman, Firli Bahuru, was accused recently of accepting bribes from the former agricultural minister (*Straits Times*, 2023).

Unsurprisingly, Table 5 also confirms that those governments which lack the political will to curb corruption readily use their ACAs as attack dogs against their political opponents. The reliance on ACAs as attack dogs is a common practice in Bangladesh, Cambodia, China, India, Malaysia, Myanmar, Pakistan, and Vietnam. This undesirable role of an ACA should be avoided because it undermines public trust in the government and its legitimacy.

Table 5: Roles Performed by Selected Asian ACAs

Anti-Corruption Agency Role	Examples
Independent watchdog (4)	Singapore’s CPIB Hong Kong’s ICAC Indonesia’s KPK (2003-2019) Bhutan’s ACC
Attack dog against political opponents (9)	Bangladesh’s BAC and ACC Cambodia’s ACU China’s CCDI India’s CBI Malaysia’s MACC Myanmar’s ACC Pakistan’s NAB Vietnam’s GI
Paper tiger (8)	Afghanistan’s HOOAC Bangladesh’s BAC and ACC India’s CBI Philippines’ OMB South Korea’s KICAC and ACRC Taiwan’s AAC

Source: Compiled by the author.

The third role of a paper tiger should also be avoided because it reflects the government’s weak political will in fighting corruption through its failure to provide the ACA with the necessary legal powers, budget, personnel, and independence to enforce the anti-corruption laws impartially. As will be analyzed below, the Philippines’ OMB and South Korea’s ACRC are excellent examples of paper tigers created by their governments to curb corruption ineffectively.

The “Good” ACAs: The CPIB and ICAC

The CPIB and ICAC are independent watchdogs which have minimized corruption in Singapore and Hong Kong respectively, because of the strong political will and capacity of their governments, which is reflected first in their

willingness to learn from the mistakes of their predecessors.

The British colonial government in Singapore made a serious error when it entrusted the Anti-Corruption Branch (ACB) of the Criminal Investigation Department in the Singapore Police Force (SPF), a Type B ACA, with the function of corruption control in Singapore in March, 1941 (Liew, 2022, p. 40). While the 1879 and 1886 Commissions of Inquiry had documented the prevalence of police corruption in Singapore, the colonial government ignored this finding and made the ACB responsible for corruption control, following the same practice in Britain. The ACB's failure to curb corruption was exposed by the Opium Hijacking Scandal when 1,800 pounds of opium were stolen on 27 October 1951 by a gang of thieves that, included three police detectives. To prevent the conflict of interest faced by the ACB officers in investigating police corruption cases, the CPIB was established as a Type A ACA outside police jurisdiction to replace the ACB in September 1952. The colonial government's second mistake was its failure to provide the CPIB with the required legal powers and resources during 1952-1959 (Quah, 2013, p. 217). In other words, the CPIB was a paper tiger during its first eight years because it lacked the necessary legal powers, budget, and personnel to function effectively as an independent watchdog.

In addition to learning from and avoiding the mistakes of the British colonial government, Singapore also rejected the reliance on the police to curb corruption by making the CPIB independent of the SPF. A Hong Kong study team that visited Singapore in 1968 recommended that Hong Kong should follow Singapore's example by placing the ACB outside the jurisdiction of the police. However, this recommendation was rejected by the Royal Hong Kong Police Force (RHKPF) because it refused to relinquish the investigation of corruption cases (Quah, 2013, pp. 248-251). The ACB was upgraded into the Anti-Corruption Office (ACO) instead in 1971. Similarly, the ICAC was also created in Hong Kong as a result of a police corruption scandal. In June 1973, Chief Police Superintendent, Peter Godber, fled to Britain while he was being investigated for a corruption offence. Godber's escape angered the public in Hong Kong and resulted in Governor Sir Murray MacLehose's acceptance of the Blair-Kerr Commission's recommendation to replace the ACO with the ICAC in February 1974 (Quah, 2013, pp. 252-253). In short, Singapore's and Hong Kong's breakthrough in fighting corruption resulted from replacing the British colonial method of relying on the corrupt police with the creation of the CPIB and ICAC, which are outside the jurisdictions of the SPF and RHKPF, respectively.

As combating corruption requires substantial resources, the two indicators of a government's political will are the ACA's per capita expenditure (its budget for a selected year divided by the country's population for the same year) and the ACA's staff-population ratio (its personnel for a selected year divided by the country's population for the same year) (Quah, 2009, p. 182). The strong political will of the governments in Hong Kong and Singapore is reflected in the increase in per capita expenditures and improvement in staff-population ratios of the ICAC and CPIB between 2010 and 2015, as shown in Table 6.

Table 6: Per Capita Expenditure and Staff-Population Ratio of the ICAC and CPIB, 2010-2015

ACA	Indicator	2010	2012	2014	2015
ICAC	Per capita expenditure	US\$14.89	US\$15.78	US\$16.59	US\$17.24
	Staff-population ratio	1:5,317	1:5,581	1:5,333	1:5,408
CPIB	Per capita expenditure	US\$2.90	US\$3.82	US\$5.36	US\$4.87
	Staff-population ratio	1:56,408	1:38,496	1:26,682	1:23,858

Source: Quah (2017c, pp. 29, 34).

The “Bad” ACAs: CBI and ACC

The Indian Penal Code made corruption an offence in 1860 but the Delhi Special Police Establishment (DSPE) was only established in 1941 to investigate bribery and corruption cases in the War and Supply Departments (Quah, 2013, pp. 92-93). The CBI was created as the lead ACA in India in April 1963 by incorporating the DSPE as the Investigation and Anti-Corruption Division with five other divisions.

As a former British colony which was part of India until 1947 and Pakistan until 1971, Bangladesh inherited the anti-corruption measures initiated by the British. The Enforcement Branch was formed in the Police Department in 1944 to combat corruption. The enactment of the Prevention of Corruption Act (PCA) in India in March 1947 made the police responsible for investigating corruption offences. As the Police Department was ineffective, it was replaced by the Bureau for Anti-Corruption (BAC) in 1957. However, the BAC was a paper tiger with limited capacity, inefficient prosecutors, and afflicted by political patronage and political interference in its work (Ali, 2004, p. 202). Consequently, the BAC was replaced by the ACC, which was created on 21 November 2004 with the enactment of the Anti-Corruption Commission Act of 2004.

Unlike the CPIB and the ICAC, the CBI is a “bad” or ineffective ACA because of its four limitations. First, it was created as a Type B ACA that performs anti-corruption functions and other functions, including economic crimes and special crimes like terrorism and organised crime. Second, the CBI’s Achilles’ heel is that, as a police agency, its officers are vulnerable to conflicts of interest when investigating and prosecuting police corruption cases as police corruption is widespread in India (Verma, 2016, p. 158). Unfortunately, India has not learned from Singapore’s and Hong Kong’s breakthroughs in combating corruption and continues to rely on the ineffective CBI as the lead ACA in the midst of rampant police corruption.

The CBI’s third weakness is that it is a paper tiger because it is both under-staffed and poorly funded to perform its functions. Even though its established strength increased from 5,920 in 2002 to 6,676 in 2014, its actual strength varied from 4,908 to 5,676 for the same period. This means that the CBI’s number of vacancies ranged from 1,012 (17.1%) to 1,000 (15%) during 2002-2014. The CBI’s serious staff shortage was reflected in its unfavorable staff-to-population ratios of 1:234,217 in 2005 and 1:228,206 in 2014. Furthermore, the CBI’s inadequate funding was manifested in its low per capita expenditures of US\$0.03 in 2005 and US\$0.05 in 2014 (Quah, 2017d, pp. 9-10).

The fourth and most serious weakness of the CBI is its lack of independence and the reliance by various governments on it as an attack dog against their political opponents. Former Central Vigilance Commissioner, N. Vittal (2012, pp. 132-134) has described the CBI as “a football between the party in power and the party in opposition” as the cases initiated by one regime are neutralized by the next. In May 2013, Supreme Court Justice, R.M. Lodha, denounced the CBI for being a “caged parrot” and “its master’s voice.” He also reprimanded the attorney-general for interfering in the CBI’s investigations of the “Coalgate” scandal involving alleged irregularities in the allocation of coalfield licences to private companies (Colvin and Bhattacharya, 2013). In short, the CBI is not only a paper tiger but also an attack dog.

The BAC in Bangladesh was highly politicized and used by the governments of the Awami League (AL) and the Bangladesh Nationalist Party (BNP) as an attack dog against the opposition. During the AL administration of 1996-2001, 69 corruption cases were filed by the BAC against the opposition BNP leaders and members of parliament. When the BNP government assumed power in 2001, the BAC withdrew those cases and filed corruption charges against the former AL prime minister and six officials. In other words, the “standard practice” of the AL or BNP governments is to use the BAC against their political opponents (Quah, 2021, p. 106).

Unfortunately, the ACC has not learnt from the BAC's mistakes because it has continued the BAC's role as an attack dog instead of performing the desired role as an independent watchdog.

The “Weak” ACAs: The OMB and ACRC

The OMB in Philippines and ACRC in South Korea are weak and ineffective ACAs because they were created as paper tigers by their governments and not expected to succeed. Ferdinand Marcos replaced Diosdado Macapagal as president in 1965 and declared martial law in September 1972. In July 1979, he established the *Tanodbayan* or OMB and the *Sandiganbayan* (Special Anti-Graft Court) to pay lip service to fighting corruption. As the OMB was ineffective, President Corazon Aquino, who succeeded Marcos, reorganized it in May 1988 to enhance its effectiveness. However, the OMB was a paper tiger because it was inadequately staffed and funded and accumulated a heavy backlog of 14,652 cases by December 1994 (Quah, 2013, pp. 135-137).

The OMB's budget increased from US\$12 million in 2005 to US\$38.8 million in 2014. Similarly, its personnel have increased from 957 to 1,214 during the same period. However, in spite of these increases, its per capita expenditure had only grown from US\$0.15 to US\$0.39, and its staff-population ratio had improved marginally from 1:85,057 to 1:81,631 between 2005 and 2014 (Quah, 2017c, p. 58). Indeed, a former Ombudsman, Simon Marcelo (2005, pp. 1-3) observed that the OMB was “designed to fail because of its crippling lack of resources.” He found that in 2004, the OMB's field investigator-bureaucracy ratio of 1:17,045 compared unfavorably with the ICAC's ratio of 1:208. That year, ICAC's per capita expenditure of US\$12.43 exceeded the OMB's per capita expenditure of US\$0.10 by 222 times.

In addition to its shortage of funds and personnel, the OMB also lacked credibility because impeachment complaints were filed three times against Ombudsman Aniano Desierto during his seven-year term for betraying the public trust. Ombudsman Mercedes Guterrez was criticized for devoting the OMB's limited resources on investigating petty corruption cases instead of continuing her predecessor's exposure of grand corruption scandals. Consequently, the OMB was described pejoratively as “the Street Ombudsman” because of its focus on petty corruption cases. Guterrez resigned in May 2011 after her impeachment by Congress for not investigating corruption allegations against President Gloria Macapagal-Arroyo because she was a classmate of the latter's husband (Quah, 2017c, pp. 58-59).

In South Korea, the draft legislation initiated by the People's Solidarity for Participatory Democracy and supported by other civil society organizations envisaged the Korea Independent Commission Against Corruption (KICAC) as an independent watchdog based on Hong Kong's ICAC. However, the KICAC's formation was opposed by the Public Prosecutor's Office and the National Police Agency because they wanted to perform the anti-corruption function themselves. Consequently, the enactment of the Anti-Corruption Act in July 2001 resulted in the establishment of the KICAC as a paper tiger and a “poor cousin” of the ICAC because it could not investigate corruption cases.

While the KICAC was a paper tiger, its anti-corruption functions were further diluted by President Lee Myung-bak when he merged the KICAC with the Ombudsman and Administrative Appeals Commission in February 2008 to form the ACRC to enhance their effectiveness. However, the ACRC's formation reflected the lower priority to curbing corruption by President Lee and his weak political will is seen in the marginal increase in its per capita expenditure from US\$0.97 to US\$1.15 during 2008-2014 and its unfavorable staff-population ratios of between 1:105,021 and 1:108,430 during the same period (Quah, 2017c, p. 37).

Conclusion: What Can Policymakers Do?

Table 7 compares the budgets and personnel allocated by their governments to the six ACAs for performing their anti-corruption functions. More importantly, it confirms that the ICAC and CPIB are the best funded ACAs with adequate resources, enabling them to be independent watchdogs.

On the other hand, the ACC and CBI are poorly funded with substantial vacancies and unfavourable staff-population ratios to be both attack dogs against political opponents or paper tigers. It was reported recently that the AL had arrested thousands of political opponents, including activists on 19 November 2023 in Dhaka to “eliminate” competition during the forthcoming general election (Voice of America, 2023).

Table 7: Per Capita Expenditures and Staff-Population Ratios of Selected ACAs, 2021

Anti-Corruption Agency	Budget (in millions)	Personnel	Per Capita Expenditure	Staff-Population Ratio
ICAC Hong Kong	US\$162.20	1,402	US\$21.88	1:5,287
CPIB Singapore	US\$41.02	245	US\$7.52	1:22,261
ACC Bangladesh	US\$11.98	975	US\$0.07	1:173,143
CBI India	US\$114.20	6,391	US\$0.08	1:220,309
ACRC South Korea	US\$77.00	562	US\$1.48	1:92,064
OMB Philippines	US\$91.12	1,293	US\$0.80	1:88,089

Source: Compiled by the author from the budgets and annual reports of the six analysed ACAs.

Is it possible to improve the effectiveness of the bad and weak ACAs? In her analysis of ACAs in Central Europe, Batory (2012, p. 640) asks this important question: “What is the motivation for political parties to set up [anti-corruption] agencies that wield the power to discredit them in the first place?”

Indeed, why should an incumbent government allow the ACA it created to investigate its leaders for alleged corruption offences? For example, Prime Minister Peter O’Neill created the Intermediate Task Force (ITF) in 2013 to curb corruption in Papua New Guinea. However, after the ITF issued him with a warrant of arrest for alleged corruption in 2014, he withdrew its funding which crippled its anti-corruption activities (Walton, 2016, p. 218).

Furthermore, a corrupt political leader would do his best to prevent and obstruct the ACA’s investigation into his corrupt activities. Najib Razak, former prime minister of Malaysia, hindered the investigation of his role in the 1 Malaysian Development Berhad (MDB) scandal by the Malaysian Anti-Corruption Commission by removing some ministers and distorting data (Jones, 2020, pp. 62-63).

In short, only honest and incorrupt political leaders, like Lee Kuan Yew, the first prime minister of Singapore, and Sir Murray MacLehose, Governor of Hong Kong, had the strong political will to establish the CPIB and ICAC and provided them with the legal powers, resources and autonomy to function as independent watchdogs in both city-states.

If a political leader lacks political will, he is likely to use the ACA he established as an attack dog or as a paper tiger. As political will is scarce among political leaders, unfortunately many of them use their ACAs as attack dogs or paper tigers instead.

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