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Proposal for an Online Service for Reporting Corruption in UK Local Government

Written by: Ewan Lusty

Formatted by: Brendan Tan

Abstract

Corruption is increasingly on the UK policy-making agenda. In December 2014 the Government published a comprehensive Anti-Corruption Plan, consisting of 66 points for further action in addressing corruption,¹ acting on repeated warnings from journalists, academics, and NGOs about the threat corruption poses in the UK and the need for an active policy response. Although this plan is wide-ranging in its scope and ambition, further thought and discussion is necessary to determine the exact shape of this action.

This paper proposes an online service that will act as both an easily accessible reporting mechanism and an information hub. It will allow citizens both to report corruption and to understand the principal corruption risks in more detail. It will specifically target corruption in local government, one of nine risk areas identified by the Anti-Corruption Plan.² Because Scotland and Northern Ireland have separate institutional arrangements for tackling corruption, this proposal will confine itself to England and Wales. It draws on a wide range of existing innovations around the world, including from low- and middle-income countries. In particular, India and Ukraine offer valuable examples of how to incorporate citizens' use of technology into an anti-corruption strategy.

This proposal can not only greatly improve the evidence base of law enforcement authorities, but will also expedite a shift away from traditional, top-down models of service delivery. Firstly, since much local government corruption is difficult to prove, prosecution depends on detailed information from citizens with close access to decision-making processes. This mechanism will allow this information to more closely and consistently inform the police response. Secondly, by the proposal will give citizens greater engagement with local government, countering apathy and marginalisation. It will exploit the potential of technology to forge new kinds of relationship between government service providers and citizens, making the most of their experience and expertise and giving them a more direct role in influencing service delivery.

There are risks and obstacles to implementing this proposal, and careful thought is necessary to tailor it to the UK context. Although full of specific recommendations for implementation, this paper does not offer a definitive, fixed policy, but one that is flexible and open to adaptation through a closely monitored pilot.

¹ HM Government, *UK Anti-Corruption Plan* (December 2014), accessed 24/02/15, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/388894/UKantiCorruptionPlan.pdf.

² *ibid*, 23.

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The Problem

Definitions of corruption vary, but Transparency International defines it as 'the abuse of entrusted power for private gain', an appropriately broad definition that acknowledges the diverse range of corruption risks.³ This proposal will focus on local government corruption, encompassing county councils, district, borough, or city councils, and parish, community, and town councils.

This is a critical time for addressing this threat because recent changes in the structure of local government may create a more favourable environment for corruption. The Local Audit and Accountability Act of 2014 abolished the national Audit Commission, which had played an integral role in detecting and investigating corruption in local authorities, instead making local authorities responsible for appointing their own external auditors.⁴ Corruption NGOs,⁵ accountancy bodies,⁶ and academics have all expressed concern about these policies' impact. Forthcoming research comparing audit arrangements for NHS trusts (with Audit Commission oversight) and Foundation Trusts (without Audit Commission oversight) has found that the Foundation Trusts have not benefited from the same level of audit independence.⁷ Whereas previously, external auditors were appointed by the Audit Commission, the direct appointment of auditors by the local authority they are investigating could deter them from more rigorous investigation. In an interview with Transparency International, one auditor claimed the likelihood of feeling 'pressure to keep their clients happy so as to avoid losing this contract, future contracts, or non-audit contracts with the local authority'.⁸

This proposal does not make a specific claim of any particular level or prevalence of corruption - indeed, one of the problems it seeks to address is a lack of adequate data - but there is a documented and possibly growing risk. Transparency International identified twelve key risk areas at the local level, which included the various stages of the public procurement process, control and accountability over outsourced services, and collusion in housing fraud.⁹ In January 2009, the Audit Commission investigated Nottingham City Council, exposing widespread abuse of the council housing system, with nearly 3,000 homes allocated outside of the normal 'points-based' system, often to housing service employees or their relatives.¹⁰ This is just one of numerous examples of

³ Transparency International UK, *Corruption in UK Local Government: The Mounting Risks* (October 2013), accessed 05/11/14, <http://www.transparency.org.uk/publications/15-publications/747-corruption-in-uk-local-government-the-mounting-risks>.

⁴ *ibid*, 35.

⁵ Transparency International, *Corruption in UK Local Government*, 34.

⁶ Chartered Institute of Public Finance and Accountancy (CIPFA) Press Release, *CIPFA stresses importance of strong local public audit* (January 2013), accessed 25/02/15, <http://www.cipfa.org/about-cipfa/press-office/latest-press-releases/cipfa-stresses-importance-of-strong-local-public-audit>.

⁷ S.M. Ellwood & J. Garcia-Lacalle, *The removal of a specialist oversight body for local public audit: Insights from the health service in England*, University of Bristol (Bristol, 2015), accessed 25/02/15.

⁸ Transparency International, *Corruption in UK Local Government*, 37.

⁹ Transparency International, *Corruption in UK Local Government*, 19.

¹⁰ Nottingham Post, *Nottingham home scandal: Report given to police* (January 2009), accessed 28/02/15, <http://www.nottinghampost.com/City-council-tenants-let-housing-failure/story-12271956-detail/story.html#axzz2LLOCxZCD>.

documented cases where individuals entrusted with responsibility and discretion have abused that discretion.

Corruption has serious negative effects on the UK economy and society. Firstly, it engenders substantial wastage of limited public resources at a time of increasing pressure on those resources. The National Fraud Authority estimated the total cost of fraud against local government in 2012 to be £2.1 billion, including an estimated £845 million lost on housing tenancy fraud and £876 on procurement fraud.¹¹ This burden falls particularly heavily on certain affected communities at certain times, for example in May 2012, former head of energy procurement for Kent County Council (KCC), Ross Knowles, was found guilty of diverting over £2 million of KCC's public money into a fraudulent bank account.¹²

Secondly, there are serious social costs from the negative impact that corruption has on service quality. Alleged corruption at Hounslow Homes, a housing association overseen by the council, had a detrimental impact on the quality of housing services. An independent report published in December 2014 found that senior employees arranged for operatives to undertake extensive private work at their homes and those of their relatives and associates and 'misappropriated' materials.¹³ The precise impact on service quality is difficult to quantify, but a 'conservative estimate' of the value of goods misappropriated was £900,000.¹⁴ Had those extensive resources been used on the basis of genuine need, Hounslow Homes could have used its limited housing stock to benefit a greater number of residents at a time when council officers described the borough as facing a housing shortage 'crisis'.¹⁵

Thirdly, high perceptions of corruption damage citizens' confidence in local government. The Institute for Public Policy Research (IPPR) has stressed the need for citizens to more actively engage with local government, finding a higher likelihood that non-voters are ignored when it comes to government service provision.¹⁶ The 2014 National Strategic Assessment of Serious and Organised Crime demonstrated the potential for corruption to deter citizens from greater engagement,

¹¹ National Fraud Authority, *Annual Fraud Indicator* (June 2013), accessed 27/02/15, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/206552/nfa-annual-fraud-indicator-2013.pdf.

¹² BBC News, *Kent energy chief Ross Knowles jailed for £2m fraud* (May 2012), accessed 24/02/15, <http://www.bbc.co.uk/news/uk-england-kent-17937293>.

¹³ Get West London, *'Climate of fear allowed Hounslow Homes corruption to go unchecked'* (December 2014), accessed 23/02/15, <http://www.getwestlondon.co.uk/news/local-news/climate-fear-allowed-hounslow-homes-8230062>.

¹⁴ Get West London, *No civil action over alleged Hounslow Homes corruption, which may have cost taxpayers millions* (December 2014), accessed 23/02/15, <http://www.getwestlondon.co.uk/news/local-news/no-civil-action-over-alleged-8277616>.

¹⁵ Get West London, *Council to build 259 homes to address shortage* (August 2013), accessed 23/02/15, <http://www.getwestlondon.co.uk/news/local-news/council-build-259-homes-address-5964622>.

¹⁶ Institute for Public Policy Research, *Divided Democracy: Political Inequality in the UK and Why it Matters* (November 2013), p 16, accessed 28/02/15, http://www.ippr.org/assets/media/images/media/files/publication/2013/11/divided-democracy_Nov2013_11420.pdf.

suggesting that corruption actually has a 'disproportionate' impact on confidence.¹⁷ There is the risk of a vicious cycle of alienation and service quality decline, and so the reciprocal relationship between confidence and service quality aggravates the damage that corruption can inflict.

Policy Context

Until recently, there has been little large-scale strategic effort to understand the nature and prevalence of corruption in UK local government, let alone to tackle it. With the removal of the Audit Commission, there is no central institution responsible for collecting and analysing corruption data in the UK. Simon Maddocks, head of Governance at Croydon Council, recalled that 'the great thing that the Audit Commission had was an overview', providing data that informed efforts 'to identify trends, good practice, specific councils that were out of line'.¹⁸ A corruption research symposium in September 2014 pointed out the absence of 'verifiable figures' on the scale of the problem in the UK.¹⁹ In the absence of the Audit Commission, an intervention that helps with the collection, categorisation, and analysis of corruption-related data will allow the government to identify key risks and help determine strategic priorities.

The removal of the Audit Commission also reduces the likelihood that corruption will be investigated unless hard proof can be found of a criminal offence. Previously, if an accusation of corruption was made, the Commission could investigate the claim and publish Public Interest Reports that highlighted corruption risks, without the level of evidence that would be required by the Crown Prosecution Service. As an example, the Wirral Council's in-house Operational Services Department staff raised concerns about a procurement process in a competitive tendering process for the provision of highway and engineering services.²⁰ The Audit Commission's Public Interest Report, although not uncovering any specific evidence of impropriety, nevertheless shed light on a significant conflict of interest.²¹ Without the Audit Commission, any external auditor that attempts to fulfil a similar role risks being sued,²² increasing the need for alternative channels for reporting and investigating corruption.

¹⁷ National Crime Agency, *National Strategic Assessment of Serious and Organised Crime 2014* (May 2014), accessed 25/02/15, <http://www.nationalcrimeagency.gov.uk/publications/207-nca-strategic-assessment-of-serious-and-organised-crime/file>.

¹⁸ Transparency International, *Corruption in UK Local Government*, 39.

¹⁹ "Corruption Research with Impact" Symposium, Thursday 18th September, London, p 7, accessed 05/11/14, <http://www.transparency.org.uk/publications/15-publications/1151-corruption-research-with-impact-symposium-summary>.

²⁰ Audit Commission, *Highways and engineering services contract award and management, Wirral Council* (June 2012), p 2, accessed 30/03/15, <http://www.audit-commission.gov.uk/2012/06/wirral-council-report-in-the-public-interest/>.

²¹ *ibid*, 5.

²² Transparency International, *Corruption in UK Local Government*, 8.

In the current context, police and local authorities share the responsibility of investigating corruption. The Local Government Association has championed examples of effective co-operation between local authorities and the police, such as in Lewisham Council, where the anti-fraud & corruption team seconded a Detective Constable from the Metropolitan Police Specialist Crime directorate.²³ However, the difficulty of proving corruption - requiring the use of specially trained units armed with appropriate investigative powers - means that, in many areas, the police may not be able to justify the participation of officers in anti-corruption investigations as an efficient use of stretched resources. Whereas Police Scotland has a country-wide Public Sector Corruption Unit to prioritise corruption, there is no equivalent police body in England, increasing the likelihood that anti-corruption enforcement will be uneven and according to capacity and inclination to investigate in each locality.²⁴ A dedicated unit in England, equipped with the ability to analyse and investigate corruption claims, could ultimately ensure a more systematic and efficient law enforcement response.

The UK policy context is becoming more favourable to more concerted action on corruption. In December 2014, the UK Government launched the first ever cross-Whitehall strategy for combating corruption both at home and abroad.²⁵ This strategy incorporated improving the collection and dissemination of information on corruption, so that, in June 2015, the Cabinet Office will work with government departments, civil society organisations, and academics to identify how government data collection could help pinpoint preventative and remedial action. Equally, recognising the general public's ability to contribute to this process, from July 2015, the Home Office and law enforcement agencies will develop a model for a single reporting mechanism for allegations of corruption.²⁶ The political will evidently exists to build public participation and technology into a wide-ranging and innovative anti-corruption strategy.

The government has also committed to using digital technology to enable a shift towards more cost-effective, convenient services built around users' needs, without leaving anyone behind. Under the Government Digital Strategy, announced in December 2013, Francis Maude, Minister of the Cabinet Office, developed a plan to build services that are 'agile, flexible and digital by default', for example by promoting digital expertise at all levels of the Civil Service.²⁷ The Digital Strategy pledged to use online technology to engage with and consult the public, forming part of a more proactive engagement with citizen insight.²⁸ The Red Tape Challenge, for example, encouraged an open discussion of how to reform existing regulation to make it less burdensome on businesses and individuals, encouraging contribution on the website as well as on Facebook and Twitter.²⁹ The government's increased openness to incorporating online technology is allowing greater scope for citizen input for a whole host of public services.

²³ Fighting Fraud Locally, *The Local Government Fraud Strategy* (April 2012), p 29, accessed 01/03/15, <https://www.gov.uk/government/publications/fighting-fraud-locally-the-local-government-fraud-strategy>.

²⁴ Transparency International, *Corruption in UK Local Government*, 51.

²⁵ HM Government, *UK Anti-Corruption Plan*.

²⁶ *ibid*, 11.

²⁷ Cabinet Office, *Government Digital Strategy: December 2013*, accessed 25/03/15, <https://www.gov.uk/government/publications/government-digital-strategy/government-digital-strategy>.

²⁸ *ibid*.

²⁹ See Red Tape Challenge website, accessed 25/03/15, <http://www.redtapechallenge.cabinetoffice.gov.uk/home/index/>.

In developing its approach, the UK will benefit from a growing global interest in corruption and transparency over the last ten years. RSA 2020 Public Services has promoted a 'shared space' between UK policy-makers and policy intervention in medium- and low-income countries, which are often more open to more radical innovation and the use of technology.³⁰ The ratification of the United Nations Convention Against Corruption (UNCAC) in 2005 has triggered a series of dedicated anti-corruption strategies and agencies in different countries.³¹ Of particular relevance to this proposal, many countries have begun to use online technology to harness citizens' potential in countering corruption. Although 'still a nascent area' for anti-corruption policy,³² there are sufficient indications so far to merit incorporating and piloting these ideas in the UK context.

In particular, I Paid a Bribe (IPAB), first implemented in August 2010 in Bangalore, India, has demonstrated the potential of technology to simplify and facilitate the reporting of corruption.³³ This is a web portal that affords easy use of a form for reporting a case of corruption, and which then analyses bribe data and uses it to map the prevalence and scale of corruption, identifying key problem areas for further investigation and lobbying pressure.³⁴ By 11th May, 2011, the site had already received a total of 450,180 visits, and in one survey, 65 percent of visitors either agreed or strongly agreed that information disseminated through the portal could help in reducing corruption in India.³⁵ These visitors have recognised IPAB's effectiveness in securing an official response in individual cases; in one example, a third-party operator of India's Unique Identification system asked for a bribe in Chennai in return for an identification card, and was subsequently blacklisted.³⁶

More recently, a municipality in western Ukraine, Ivano-Frankivsk, has pioneered the use of a mobile app for preventing corruption and improving service delivery. The city council launched the app in January 2014, giving citizens the opportunity of creating online petitions for other users to sign as well as easily accessible information on 14 anti-corruption hotlines of different local, regional, and national level agencies.³⁷ This scheme highlights the possibility of piloting innovative online services at the local level as a way of reducing risk, rather than immediately investing considerable resources on a national policy. There are challenges in adapting such initiatives to the UK, but these challenges should not close policy-makers' eyes to the opportunity of drawing on existing innovations elsewhere.

³⁰ RSA 2020 Public Services, *Widening the Lens: What can the UK learn from public sector reform in the developing world?* (January 2012), p 21, accessed 01/11/14, <http://www.rsa2020publicservices.org.uk/publications/publication-widening-the-lens-what-can-the-uk-learn-from-public-service-reform-in-the-developing-world/>.

³¹ United Nations Development Programme, *Global Thematic Programme on Anti-Corruption for Development Effectiveness (PACDE)* (March 2014), p 4, accessed 27/02/15, accessed via http://www.undp.org/content/undp/en/home/ourwork/democraticgovernance/focus_areas/focus_anti-corruption.html.

³² *ibid*, 8.

³³ OneWorld Foundation India, *ICT Facilitated Access to Information Innovations: A Compendium of Case Studies from South Asia* (July 2011), p 129, accessed 02/11/14, http://access2info.asia/Access_to_information.pdf.

³⁴ *ibid*, 133.

³⁵ *ibid*, 138.

³⁶ I Paid a Bribe, 'Government acts on an I Paid a Bribe complaint: Aadhaar operator blacklisted' (January 2014), accessed 01/12/14, <http://www.ipaidabribe.com/comment-pieces/government-acts-i-paid-bribe-complaint-aadhaar-operator-blacklisted#gsc.tab=0>.

³⁷ UNDP, *Global Thematic Programme on Anti-Corruption*, 18.

The Proposal

This paper proposes an online service that will act as both an easily accessible reporting mechanism for citizens' corruption claims, and as a centre of information on the main corruption risks. Users will be able to access this service via a web portal, a mobile App, and an Interactive Voice Response System (IVRS), whereby a toll free number is used to guide callers through an automated dialogue to gather specific information. This number will also give callers the option to arrange an appointment to discuss their experiences in greater detail. The web portal and App will draw on the most cutting-edge expertise in online and mobile technology to ensure that they are functional, clear, and simple. They will guide the user to providing relevant details about the corruption claim, including the type of corruption they encountered, when it happened, and the individuals and departments involved.

To facilitate access to the reporting mechanism, the government could bring it on to one of the common technology platforms it is in the process of developing. The government has outlined, as part of its digital strategy, Government as a Platform, the ambition to build common technology platforms, which consolidate different departmental and agency services onto shared domains.³⁸ GOV.UK, for example, is used by hundreds of departments and agencies to publish information, preventing users from having to navigate between different departmental websites, and Mike Bracken, head of the GDS, has suggested there is scope to build thirty of these common platforms.³⁹ Potentially, the anti-corruption reporting mechanism be hosted on a common platform for citizen input, alongside services such as the HMRC's Tax Evasion Hotline and Information online reporting form.⁴⁰ This is one way of integrating the reporting mechanism into a streamlined, cohesive provision of online public services.

The Home Office is the most suitable government department for developing and maintaining this reporting mechanism, because the closure of the National Fraud Authority in March 2014 made it the responsible department for raising awareness of fraud. The Home Office has also been developing its digital capability, establishing a digital leadership team and recruiting digital and technology specialists.⁴¹ It has experience of building transactional services designed to work effectively with common technology platforms, for example Registered Traveller, which enables eligible frequent travellers to the UK to apply to use e-passport gates.⁴² It possesses the digital expertise to build and maintain an accessible and functional online reporting mechanism.

³⁸ Mike Bracken, 'Government as a Platform: the next phase of digital transformation' (March 2015), accessed 01/04/15, <https://gds.blog.gov.uk/2015/03/29/government-as-a-platform-the-next-phase-of-digital-transformation/>.

³⁹ *ibid.*

⁴⁰ See HM Revenue & Customs, Tax Evasion Hotline - Information report form, accessed 25/03/15, https://online.hmrc.gov.uk/shortforms/form/TEH_IRF?dept-name=TEH&sub-dept-name=&location=39&origin=http://www.hmrc.gov.uk.

⁴¹ Cabinet Office, 'Home Office's actions in response to the Government Digital Strategy', (January 2015), accessed 26/03/15, <https://www.gov.uk/government/publications/home-office-government-digital-strategy-actions/hos-actions-in-response-to-the-government-digital-strategy>.

⁴² *ibid.*

The substantial amount of data this mechanism would gather would require a specialist unit to collate, analyse, and investigate these claims. The Government's Anti-Corruption Plan anticipated creating a new, dedicated, central bribery and corruption unit within the National Crime Agency (NCA).⁴³ This unit should include a capacity for the analysis of online data; in so doing, it will incorporate this reporting mechanism into its operations, providing a valuable source of information. As the NCA Director General is already accountable to the Home Secretary, this NCA unit would liaise with Home Office staff responsible for maintaining the reporting mechanism, in continually developing and refining the service. The NCA Director General has statutory powers to direct police forces in England and Wales to undertake operational tasks,⁴⁴ and so whenever this unit assembles sufficient evidence to pursue prosecution of individuals, it would hand over this evidence to the relevant local police force and direct it to commence prosecution proceedings.

The NCA unit would also require the statutory powers to conduct investigations effectively. In previous cases, for example the Hounslow Homes scandal, delayed investigation allowed those implicated plenty of time to wipe potentially damning emails, making it difficult to estimate the cost of corruption and deterring the Crown Prosecution Service from beginning criminal proceedings.⁴⁵ Under the Anti-Corruption Plan, the Home Office considered legislation further strengthening the financial investigation powers of law enforcers, specifically amending the Proceeds of Crime Act to change the legal test for a criminal 'restraint order' from 'reasonable grounds' to 'suspicion' so that authorities can more easily freeze suspected criminal assets at the beginning of an investigation.⁴⁶ If legislation gives the NCA unit broad powers to call up bank records, freeze accounts, and compel the release of local authority records, corruption investigations could yield far more satisfactory outcomes.

The service would not just allow citizens to report corruption, but would also provide them with further information on it. Research indicates that one of the obstacles to addressing corruption is a lack of understanding of what types of behaviour are legal or illegal, and uncertainty over where the boundaries lie. Transparency International interviews revealed that, in certain cases, local authorities knew that officials were adjusting the points system for social housing, but did not necessarily recognise this as corruption.⁴⁷ Greater understanding of what behaviours exactly constitute corruption would therefore make citizens feel more confident in reporting it. The website would offer a host of advice columns, blogs, and videos to highlight the costs of different types of corruption and promote a more vigilant and aware citizenry.

⁴³ HM Government, *UK Anti-Corruption Plan*, 14.

⁴⁴ National Crime Agency, *The NCA Commitment to Working in Partnership with Police and Crime Commissioners* (March 2014), p 3, accessed 24/03/15, <http://www.nationalcrimeagency.gov.uk/publications/177-the-nca-commitment-to-working-in-partnership-with-police-and-crime-commissioners/file>

⁴⁵ Get West London, *No civil action over alleged Hounslow Homes corruption*

⁴⁶ King & Wood Mallesons, 'Anti-corruption rules in the UK' (February 2015), accessed 26/03/15, <http://www.kwm.com/en/uk/knowledge/insights/anti-corruption-rules-in-the-uk-20150212>.

⁴⁷ Transparency International, *Corruption in UK Local Government*, 31.

Equally, this information hub would provide accountability for the reporting mechanism itself, allowing users to see that their claims are not ignored. In cases where corruption has been investigated and proven, an infographics application would create easily understandable graphs to reflect corruption patterns based on area and department. Annual reports published on the website for public consumption would allow for greater public oversight, showing users how their contributions are incorporated into anti-corruption operations. IPAB includes a section of 'Success Stories' demonstrating where effective action has been taken on a claim;⁴⁸ a similar section in the UK website would boost confidence in its efficacy as a reporting mechanism.

For its success, the reporting mechanism and information hub would depend on a strong publicity strategy to drum up and sustain public knowledge and interest. Given the mechanism's online focus, this would necessarily involve concerted use of social media. The Department for Transport has been one of the most active government departments in promoting the use of digital channels, using Twitter campaigns and Youtube to target specific demographic groups.⁴⁹ The Home Office would raise awareness of the reporting mechanism through a combination of online methods, such as 'Thunderclap' campaigns where multiple users simultaneously promote an idea or innovation over multiple social media platforms.⁵⁰ It would also employ offline methods, for example incorporating the reporting mechanism into roadshows it runs to raise the profile of online services.⁵¹ The message of this publicity would be carefully crafted and targeted at the most common complaints of impropriety in local government, in order to rapidly expand interest in and use of the reporting mechanism.

As a preliminary step for nationwide implementation, a pilot in a small number of trial sites will test and further refine this proposal. These should include both city and county councils around the country, to test and demonstrate its applicability or otherwise in a number of different political, social, and urban/rural contexts. Public service reform increasingly operates through phased policies that include small-scale, localised pilots of policy innovations. The Anti-Corruption Plan itself, for example, pledged the Home Office to undertake a number of pilots to better understand the threat posed by organised crime to procurement processes in local authorities.⁵²

The pilots would require close monitoring in consultation with local stakeholders. One way to ensure greater independence and impartiality would be to commission a policy research organisation to conduct an impact evaluation. RAND Europe, as an example, has extensive

⁴⁸ I Paid a Bribe, *Government acts on an I Paid A Bribe complaint: Aadhaar operator blacklisted* (September 2013), accessed 01/11/14, <http://www.ipaidabribe.com/comment-pieces/government-acts-i-paid-bribe-complaint-aadhaar-operator-blacklisted#gsc.tab=0>.

⁴⁹ Cabinet Office, 'Action 8: departments will raise awareness of their digital services so that more people know about them and use them' (January 2015), accessed 25/03/15, <https://www.gov.uk/government/publications/government-digital-strategy-action-8/action-8-departments-will-raise-awareness-of-their-digital-services-so-that-more-people-know-about-them-and-use-them--2#home-office>.

⁵⁰ See <https://www.thunderclap.it/faq>, accessed 30/03/15, for further details.

⁵¹ Cabinet Office, 'Home Office's actions in response to the Government Digital Strategy'.

⁵² HM Government, *UK Anti-Corruption Plan*, 13.

experience of both quantitative and qualitative research in the UK on a number of areas.⁵³ Such an evaluation would gauge the effectiveness of the reporting mechanism in the pilot communities against a number of control communities according to a set of quantitative and qualitative indicators. This would provide crucial evidence of the proposal's strengths and areas for development, helping to evaluate its feasibility, refine it, and give it the maximum chance of successful implementation.

Advantages

This service has the potential to become an indispensable resource for authorities investigating corruption. The National Strategic Assessment of Serious and Organised Crime recommended that 'a more cohesive and consistent intelligence picture' is necessary to 'assess the full extent of corruption and help direct effective organisational control measures'.⁵⁴ The reporting mechanism will answer this need, providing not only specific leads for further investigation, but also data for the Home Office to map the prevalence of corruption in different regions and institutions. This will greatly assist in determining strategic priorities and budget allocations, promoting the development of more informed, targeted policy at all levels.

Secondly, by providing citizens with a more direct link to policy-makers, the service will also improve confidence in and engagement with local government, helping public services to become more accountable to their users. Policy experts and think-tanks such as the Carnegie UK Trust have urged the government to develop more avenues for citizen input and participation.⁵⁵ The Government Digital Strategy itself committed service providers, in Maude's words, to 'open themselves to dialogue with the public',⁵⁶ recognising how websites such as FixMyStreet, which allows users to report local problems such as graffiti or broken street lighting to the council, can enable more responsive, flexible service provision.⁵⁷ One survey found that 92% of UK residents would report corruption if they were aware of it, but only 30% knew how to do so.⁵⁸ A well-publicised and accessible online service would dramatically raise this figure, facilitating a greater level of citizen participation and oversight.

⁵³ For example, it worked with police chiefs to produce a study estimating the value of mounted police in various deployment scenarios. RAND Europe, *Assessing the Value of Mounted Police Units in the UK* (November 2014), accessed 28/02/15, <http://www.rand.org/randeuropa/research/projects/mounted-police-uk.html>.

⁵⁴ HM Government, *UK Anti-Corruption Plan*, 20.

⁵⁵ Sir John Elvidge, *A route map to an Enabling State* (2014), accessed 26/02/15, <http://www.carnegieuktrust.org.uk/publications/2014/a-route-map-to-the-enabling-state>.

⁵⁶ Cabinet Office, *Government Digital Strategy: December 2013*.

⁵⁷ See www.fixmystreet.com, accessed 26/03/15.

⁵⁸ Transparency International UK, *Corruption in the UK: Part One - National Opinion Survey* (July 2013), accessed 25/02/15, <http://www.transparency.org.uk/publications/15-publications/91-corruption-in-the-uk-part-one-national-opinion-survey>.

This proposal's use of online technology will also ensure anonymity to whistle-blowers and others reporting corruption. Whistleblowers have been vital in triggering media or public investigations uncovering evidence of corruption in numerous cases, including in the Hounslow Homes case.⁵⁹ However, Public Concern at Work, a UK whistleblowing charity, analysed 1,000 calls to PCaW's whistleblowing advice line, and found that 41% of callers who reported receiving a response to their actions had either been dismissed or had faced some form of informal reprisal. In particular, of all those surveyed, this research found that 'those working in local government have the lowest expectations...that the investigation will be satisfactory throughout the process of raising a concern'.⁶⁰ Whereas whistleblowers may feel uncomfortable in registering their accusation face-to-face, an online service would offer security and reassurance that they would not face reprisal for their actions.

A website would moreover be more accessible than any mechanism that required people to report claims in person. Although the opportunity to arrange an appointment is necessary to give users uncomfortable with written communication the opportunity to express their experiences, the online service forms the bulk of this proposal partly because of its convenience of use, accessible at any time and in any place providing that there is an internet connection. By contrast, requiring individuals to journey to regional centres to report corruption would likely impose significant costs of time and money. Research has shown that time and money have been powerful barriers to greater civic participation in a variety of contexts.⁶¹ Potential whistleblowers would be especially discouraged from making this investment if not completely sure of what they have witnessed. A web portal would provide an investigating unit with a larger, more representative sample of data to analyse and investigate.

Finally, exploiting online technology is likely to be far more cost-effective than an in-person reporting mechanism. Research into the provision of government services online has shown that the cost of building and maintaining a website, per transaction, is generally far lower than the cost of hiring and providing space and equipment for employees in local centres all around the country. The Government Digital Strategy recognises the potential savings from online service delivery, drawing on a study, conducted by IT professional body Socitm across 120 local councils, which estimated that the cost of face-to-face transactions averaged £8.62, compared to just 15p online.⁶² An online reporting mechanism would be highly suitable for this Digital Strategy, and its ambition to develop digital services that are more efficient in their use of resources.

⁵⁹ Get West London, *No civil action over alleged Hounslow Homes corruption*

⁶⁰ Transparency International, *Corruption in UK Local Government*, 59.

⁶¹ The Center for Information & Research on Civic Learning & Engagement (CIRCLE), in its Working Paper #63, *Civic Engagement and the Disadvantages: Challenges, Opportunities and Recommendations* (December 2008), p 6, found that college graduates were much more likely to volunteer and belong to political and other civic organisations than high school graduates. Accessed 24/03/15, http://www.civicyouth.org/PopUps/WorkingPapers/WP63_Hyman_Levine.pdf.

⁶² Cabinet Office, *Government Digital Strategy: December 2013*.

Risks

Exploiting recent technological innovation always carries a risk of a 'digital divide', excluding those without access to that particular technology. Sceptics have questioned the value of technology to an inclusive democracy, and whether new technologies widen access or simply normalise and enhance the access of those that already participate.⁶³ One drawback of IPAB was its restriction to a relatively narrow, albeit significant, demographic, an online survey revealing that that nearly all portal visitors were between the ages of 18 and 40, with either a graduate or post graduate degree.⁶⁴ In the UK, the principal risk is that older people, unfamiliar with online or App technology, lack the same access to this reporting mechanism, with 2011 ONS data showing that 5.7 million people aged over 65 had never used the Internet.⁶⁵

Implementation of this proposal will therefore focus on minimising this risk. The IVRS, an automated telephone dialogue system, and the opportunity to arrange in-person appointments, will ensure that the ability to use online and App technology is not a pre-requisite for reporting corruption. A further key strategy is to publicise the service through a variety of media. The use of face-to-face marketing techniques as well as leaflets and posters will extend this scheme's reach to different groups of people. In addition, older people's rapidly increasing familiarity with online technology will further mitigate if not remove this risk, with an August 2011 study finding that 1.3 million over 65 year olds had gone online for the first time since 2009.⁶⁶ Permanent and long-term exclusion of the elderly is not an insurmountable risk, and current trends suggest that this risk will only decrease as time goes on.

As a related risk, the use of a web portal and App might also discourage users lacking the ability to articulate what they have witnessed in written form. In England, the International Survey of Adult Skills in 2012 found that 16 percent of adults achieved Level or 1 or below in a literacy proficiency test, showing a limited ability to both interpret and produce written text and suggesting that many adults would not feel comfortable describing their experiences in a form on a web portal.⁶⁷ To address this problem, callers through the IVRS would have the opportunity to arrange an appointment with a Home Office employee responsible for raising public awareness of fraud at one of a small number of regional centres. This would limit the expenditure on extra staff while ensuring that every citizen's claim is given the attention it deserves.

⁶³ Sonia Bussu, *On technology and democracy* (July 2014), accessed 26/02/15, <http://www.involve.org.uk/blog/2014/07/09/on-technology-and-democracy/>.

⁶⁴ OneWorld Foundation India, *ICT Facilitated Access to Information Innovations*, p 138.

⁶⁵ Cyan Distribution, *Surfers increase in age and numbers* (December 2011), accessed 21/02/15, <http://www.cyandistribution.com/blog/internet-users-age-and-numbers-increasing/>.

⁶⁶ Race Online 2012, *Getting On: A Manifesto for Older People in a Networked Nation* (August 2011), p 4, accessed 21/02/15, http://www.go-on.co.uk/wp-content/uploads/2013/12/Getting_ON_August_2011.pdf.

⁶⁷ Department for Business Innovation & Skills, *The International Survey of Adult Skills 2012: Adult literacy, numeracy and problem solving skills in England* (October 2013), p 57, accessed 25/03/15, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/246534/bis-13-1221-international-survey-of-adult-skills-2012.pdf.

Another serious risk is that users will make inaccurate or deliberately false claims, unfairly damaging an individual or organisation's reputation. This is the main difficulty of applying innovations like IPAB to the UK context: whereas IPAB generally examines clear-cut occurrences of corruption, such as an enrolment officer asking for a bribe, corruption in the UK is rarely as obvious. As a result, the danger exists not that individuals - whether misinformed or acting maliciously to damage personal or political rivals - will table false claims. The difficulty of proving or disproving these claims one way or the other could allow such false claims to wreak serious political damage, even if unproven, if they enter the public domain.

Any effort to minimise the risk of false claims must not come at the expense of citizen confidence that the service will take their claims seriously. Removing user anonymity and so making users responsible for their claims is not an option for countering false or inaccurate claims; the aforementioned Public Concern at Work (PCaW) research shows that legitimate whistle-blowers making accurate claims would have good reason to fear reprisal if identified.⁶⁸ Instead, to prevent claims from entering the public domain before they are proven or disproven, there would need to be clearly defined procedures for restricting access to the specific details of corruption claims. Only the specialist NCA investigating unit and Home Office employees responsible for maintaining the service should have access to these details until evidence is passed on to local police forces to commence prosecution proceedings. To allow the Home Office to map and present perceptions of corruption in infographic form, the data would be anonymised and stripped of certain identifying details, such as the individuals and departments implicated.

⁶⁸ Transparency International, *Corruption in UK Local Government*, 59.

Conclusion

This paper has proposed the implementation of an online service as a citizens' reporting mechanism and information hub as an integral part of any future strategy to tackle corruption in UK local government. This proposal possesses the key advantages, firstly, that it will provide a central bank of corruption information that will help to inform not just the law enforcement response but also anti-corruption policy generally; and secondly, that it will strengthen links between local government and the communities it serves, promoting greater community engagement and oversight of responsible officers. Finally, it has addressed the risks of a 'digital divide' and the abuse of the system to make false or inaccurate claims, suggesting effective mitigation strategies and highlighting the need for considered, committed implementation.

2015 promises to be a defining year in determining a coherent and wide-ranging government policy on corruption. The Anti-Corruption Plan published in December 2014 finally recognised the need for a coordinated policy response, based upon, firstly, improving knowledge of the nature of the threat, secondly, increasing protection against corruption and strengthening the institutions of government, and thirdly bolstering the law enforcement response.⁶⁹ The precise shape of these policies is still to be decided, in part through a forum with academics and civil society groups to outline what data should inform this effort in June.⁷⁰ There are signs that the government is increasingly open to incorporating new ideas and innovation into its approach, especially ideas which envisage the use of digital technology to build accessible, user-oriented, and cost-effective online services.⁷¹ An online service for reporting and learning about corruption is an innovative, potentially very effective idea that is worth developing and pursuing further.

⁶⁹ HM Government, *UK Anti-Corruption Plan*, 8.

⁷⁰ *ibid*, 11.

⁷¹ *ibid*, 13.

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