Institutional Capacity and Choice in Australia's Integrity Systems

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This article examines recent debate over core or 'independent' integrity institutions in the Victorian and Commonwealth governments to highlight some of the need, and potential, for more careful deliberation over options for building the capacity of integrity systems – the second of the analytical themes used in Australia's national assessment. The first part compares resourcing of major integrity institutions by Australian governments over the past 15 years. Staffing and finances are seen as a useful basic measure of capacity, helping lift attention away from the assumption that creation of new bodies necessarily increases capacity. The data also show that some jurisdictions — including Victoria — may yet have some way to go if they wish to match other governments. The second part of the analysis identifies eight further issues for consideration in deliberations on institutional design. Our conclusion is that by working through such issues more systematically, it may be possible to identify new or different institutional options for configuring integrity resources. This could help avoid inappropriate choices — whether unnecessary new bodies, overloads on existing ones or the import of frameworks that do not necessarily 'fit' local conditions — of particular relevance to current proposals for a new Commonwealth anti-corruption agency.

Corruption, integrity and accountability are familiar themes in Australian media and politics. In 2004, debate over corruption in the Victorian Police demonstrated how short-term debate can translate into longer-term questions affecting the design and development of public integrity institutions, not just in Victoria but in other states and nationally. This article reviews this debate for lessons about how the capacity of 'core' integrity institutions is currently perceived, and how these perceptions flow over into institutional choices vital to the future of Australia's integrity systems. Capacity is fundamental to assessing such systems, because while nations and governments can sometimes appear to have all the necessary institutions and processes in place, their actual capacity to pursue integrity and control corruption may be very different.

Following on from some of the previous jurisdictional studies (Roberts, Smith, this issue), the first part of the article sets out some of this recent debate. The second part then seeks to set a new context for such debate, presenting a comparative analysis of the resource levels, in terms of staffing and funding, provided to key integrity bodies by Australian governments over the past 15 years. The results tend to suggest that even with recent expansion in its inte-grity infrastructure, the Victorian government's resourcing may still be comparatively low; but the third part of the article also highlights that many further factors are relevant when it comes to choices about integrity bodies. We identify eight key issues of institutional design bearing on both recent Victorian choices and recurring proposals for a new Commonwealth anticorruption body. Highlighting key recommendations from the assessment, we conclude that overall resource sufficiency and comprehensiveness of whatever bodies are created, are more important than fulfilling the political urge to create a new anti-corruption commission each time a new integrity debate arises.

Background: debate over Australian 'independent' integrity agencies

Since the 1970s, independent 'watchdog' agencies have become major repositories of institutional capacity, as well as political sym-

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bols, in government efforts to promote integrity and fight corruption. Integrity systems are by no means limited to these types of agencies, since they also include the 'distributed' integrity processes running through the management of all well run organisations. However, the Commonwealth and NSW phases of the Australian integrity system assessment provide reminders that like many aspects of Australian federalism, the tale of major integrity institutions is an important one — a tale of significant diversity within a similar pattern. Table 1 sets out some of this pattern, which includes auditors-general (see Coghill 2004; Wanna et al. 2001), ombudsman's offices and, similar, more speialist complaint commissions (see Douglas 2002:188-288), and the anti-corruption com-missions now established in three states, inclu-ding NSW's Independent Commission Against Corruption (1988) and Police Integrity Com-mission (1997), Western Australia's Official Corruption Commission (1989; now Corruption & Crime Commission), and Queensland's Criminal Justice Commission (1990; now Crime & Misconduct Commission). The work of these agencies is also often closely interlinked with that of crime commissions — enhanced law enforcement bodies tasked with investigating organised crime, crime research, and the tracking and recovery of criminal proceeds.

Table 1 also shows that while there are strong commonalities in this pattern, the distribution of roles across similar bodies nevertheless makes for a complex matrix. Among Australia's seven major governments, only Queensland and Western Australia now have directly similar arrangements. Indeed, the reality is even more complex than shown, because even apparently similar bodies may vary significantly in their scope and functions. Despite paying close atten-tion to the precedent set by the Hong Kong ICAC (1974), each of the 'equivalent' Australian bodies have emerged differently from the Hong Kong model, and from each other. In Australia, as elsewhere, there are

	Auditor-General	Ombuds-man	Police Complaints Authority	Police Integrity Commission	Anti-Corruption Commission	Crime Com-mission
NSW	**1**	**2**		**3**	**4** (ICAC)	**5**
Queensland	**1**	**2**	**3** (Crime & Misconduct Commission)			
WA	**1**	**2**	**3** (Corruption & Crime Commission)			
South Australia	**1**	**2**	**3**			
Commonwealth	**1**	**2**				**3**
Victoria	**1**	**2** (inc. Office of Police Integrity)				
Tasmania	**1**	**2**				

Note: This table does not include Health Care Complaints commissions and a range of other specialist independent integrity bodies, other than those dedicated to police.

arguments both for consolidation and for pluralist dispersion of accoun-tability mechanisms/bodies (Brennan 1999; Smith, this issue). International experience also suggests that even if the diffusion and adaptation of such bodies were undesirable, it would probably be unavoidable (Smith 2003; Maor 2004).

The key question for an Australian assessment, given this diversity, is how to judge the adequacy of the capacities present in a given public integrity system at a particular time. No matter how many institutions are involved, we know from the jurisdictional studies that these are only likely to help reduce the risk of corruption if (a) their mandates are clear, and (b) their pow-ers and resources are adequate to the tasks. Even when looking at the relatively simple question of basic, core integrity agencies, we need a better approach to understanding how Australia's different institutional configurations

compare on issues of staffing, skills, legal powers and organisational objectives; and better methods for judging whether one institutional model is bet-ter than another, in terms of basic capacity to promote accountability and control corruption.

In 2004, these questions were brought into sharp relief by debate over different solutions preferred by the Victorian and Commonwealth governments. As noted by Transparency International (Costigan, this issue), corruption in the Victorian Police has been one of the most prominent public integrity scandals of recent times, progressively revealed since 2001 as the organisation, under a new commissioner, strengthened internal efforts to deal with high-risk areas such as the Major Drug Investigation Division. From late 2003, however, public confidence in this process was shaken when a major war between Melbourne organised crime groups appeared to go unaddressed by police. Several killings, including that of a confidential police informer, were linked with possible corruption. The Victorian Government came under pressure from integrity groups, the media, serving and former police and the Victorian Opposition parties to establish three institutions: an independent royal commission into police corruption, as previously pursued in Queensland (1987-1989), NSW (1995-1997) and Western Australia (2002-2004); a permanent anti-corruption commission to supervise police integrity in the future, as well as corruption matters across the Victorian Government more generally; and a crime commission, either as a stand-alone body dealing with organised crime or combined with the anti-corruption commission (though the separation between the two roles was rarely clear in public advocacy: see Bottom & Medew 2004).

Instead, the Victorian Government broke with recent Australian trends by establishing no new commissions or organisations. A royal com-mission was resisted as a likely expensive 'wigfest', slowing down the existing investigations by Victorian Police and the Ombudsman, as well as unlikely to identify major reform issues not already identified by other com-missions (see e.g. Nixon 2004). Moreover, the existing role of the Victorian Ombudsman was presented as equivalent to a standing anti-corruption commission — though in a series of knee-jerk decisions his powers were pro-gressively augmented throughout 2004, culminating in the establishment of an Office of Police Integrity whose director is also the Ombudsman. Most significantly, new injections of resources for the Ombudsman were announced, responding to media comment about the budgets of NSW, Queensland and WA anti-corruption bodies. In April 2004, it was announced that the Ombudsman's budget would be boosted by $1 million per annum (from $3.5 to $4.5 million); then in June 2004, by $10 million rather than $1 million, taking the office from around 30 to a total of around 100 staff (see Bracks 2004; Victorian Parliament 2004a&b). At the same time, the government announced that the Hon Tony Fitzgerald QC had been retained by the Ombudsman to investigate the worst of the corruption allegations (see Gilchrist & Bachelard 2004; Skelton & Shiel 2004; Lewis 2004). The case for a crime commission, it was later revealed, was to be met through further reform of the Victorian Police powers.

Despite criticism, including from Victoria's Coalition (opposition) parties, these institutional responses appeared settled at time of writing (December 2004). However, the debate appeared to open more questions than it resolved about the relative long-term strengths and weaknesses of the different arrangements being used by the states. This was compounded by a mirror-image debate at the Commonwealth level, intersecting with the Victorian one.

Up until 2004, the Commonwealth's police anti-corruption arrangements were similar to those in Victoria. Since 1982, the Commonwealth Ombudsman had oversighted the investigation of complaints against the Australian Federal Police (AFP) and more recently the Australian Crime Commission (ACC), and since 1993 had progressively conducted more of its own investigations. This arrangement had also previously been criticised, with the Australian Law Reform Commission recommending a new anti-corruption body to oversight integrity in federal law enforcement bodies (ALRC 1996). However, the Commonwealth Government had not responded to the proposal, leaving Ombudsman oversight in place while also not granting the additional resources that the Ombudsman claimed were needed to do this

properly. All this changed in June 2004, when the Commonwealth Government announced it would establish a new body to oversee the AFP, ACC and Australian Customs Service: 'an independent national anti-corruption body… with telephone intercept powers which, if required, would be able to address corruption amongst law enforcement officers at a national level' (Ruddock & Ellison 2004; see also Roberts, this issue).

The new position had been triggered by two related events. The first was the Victorian debate, in which Victoria's Coalition (opposition) parties remained critical of the Ombudsman solution, and had lobbied their federal (government) colleagues to support their position by denying a Victorian request for the extension of federal phone-tapping powers to the enhanced Ombudsman's office. The second event was an ABC 'Four Corners' television report that the Commonwealth Ombudsman was oversighting the Australian Crime Commission's response to corruption allegations involving two seconded state police officers. This publicised the fact that the federal anti-corruption system was similar to that in Victoria, which the federal government wanted to criticise. At time of writing, the Commonwealth was understood to be deliberating on the establishment of its new body — possibly an 'Inspectorate General of Law Enforcement' comparable to the Inspectorate-General of Intelligence and Security. It was unknown what its level of resourcing would be, or whether it would meet the suggestions of the ALRC (1996) or Victorian Opposition that any such body should have positive capacity building, research and prevention functions, and capacity for self-initiated investigations and intelligence-gathering. The sole principle announced by the Commonwealth was that only independent anti-corruption commissions were to be eligible for phone-tapping powers — and not Ombudsman's offices — because one role of Ombudsman's offices was itself to monitor how other agencies used such powers. To avoid this conflict of responsibilities, the resulting Commonwealth position was that 'a properly-formulated independent Commission' was needed to investigate corruption, presumably in each jurisdiction (Ruddock & Ellison 2004).

The problem for the Commonwealth is that this apparently firm principle is not well established in either policy or practice. As shown in Table 1, even with the Commonwealth's proposed shift to a NSW/Queensland/WA model, Tasmania and to some extent South Australia remain on the Victorian model. Moreover, a bipartisan debate continues in NSW over the wisdom of a plethora of such bodies (Smith, this issue), while in Queensland, the Coalition (opposition) parties have continued to attack the Crime and Misconduct Commission as a 'multimillion-dollar joke... that couldn't track an elephant through snow' (see Victorian Parliament 2004b:12; also Preston et al 2002:177-8). Is there a better way to formulate the institutional choices involved in these kinds of decisions? In the next part, we seek out some more reliable evidence as to how past choices have impacted on the overall capacity of state and federal integrity systems, followed by an attempt to review the key issues of focus, skills, functions and powers caught up in present and future decisions.

Resourcing of key Australian integrity agencies

In the debates above, the apparently ad hoc resourcing decisions of the Victorian Government had little obvious policy basis, other than the familiar presumption that any meaningful initiative requires a boost in staffing and financial resources. This is consistent with a public debate in which the resources of different integrity regimes were compared with reference only to raw staff numbers and budgets of select agencies (e.g. Bottom & Medew 2004), without it being clear why either the selection of agencies or the budget data were necessarily comparable. Since no two jurisdictions are alike in the size of their public sectors or institutional configurations, a raw comparison provides few helpful insights; and in any event, one snapshot provides no insight into how institutions are evolving. For example, they could be low but on a consistent growth trend, or well resourced but in rapid decline.

To establish a better basis for comparison, we sought to compare only like bodies, or like groupings of bodies, and to examine their resourcing over time (at least 15 years). Most importantly, we also decided to present their staffing and budgets not as absolute numbers, but as a ratio of the total staffing and budgets of

each relevant public sector jurisdiction. This has the benefit of providing a reasonably direct basis for comparison, and also of escaping the need to adjust the available data for factors such as inflation in order to establish the accuracy of trends.

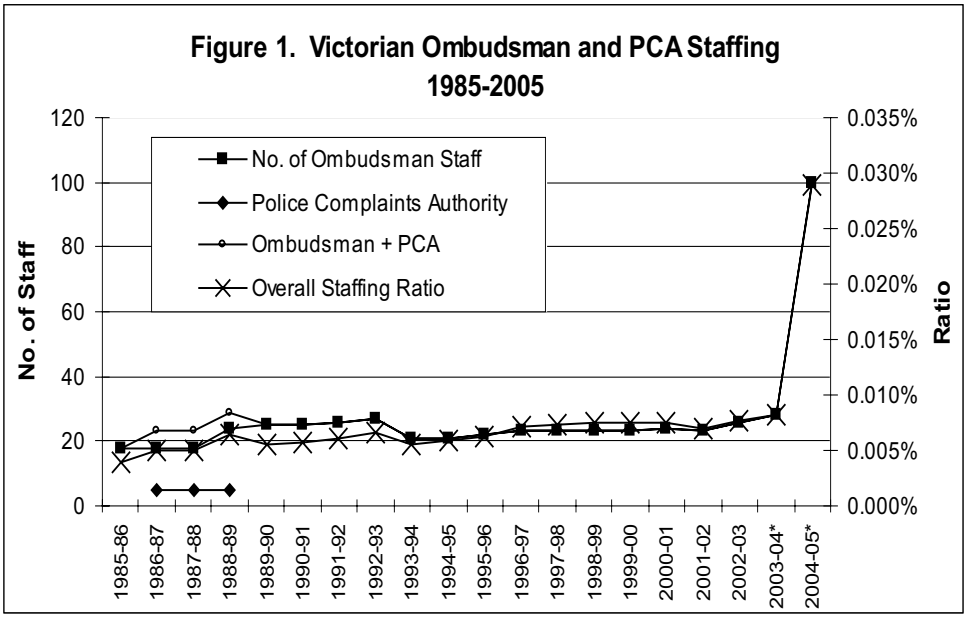
Figures 1 and 2 demonstrate this approach using the Victorian Ombudsman's office. Figure 1 shows Victorian Ombudsman staffing from 1985-2005, also showing the staffing of the short lived Police Complaints Authority (PCA) in the 1980s. The left axis shows raw staff numbers, while the right axis presents the staffing ratio (the number of Ombudsman staff as a proportion of the total number of Victorian Government staff for that year). Figure 2 shows the same data for financial expenditure. While these usually correlate (i.e. most resources are usually spent directly on staff), this is not necessarily guaranteed; for example, an agency might theoretically have few staff, but substantial financial capacity that allows it to cost-effectively outsource investigation activity, or to conduct more expensive forms of investigation, outreach or promotion. To cater for this, we also combined information on staffing and financial resources to present an aggregate picture — an average of the two ratios. Figure 3 shows this for the Victorian Ombudsman. Figures 1-3 show clearly the relatively static situation of the Victorian Ombudsman until the recent dramatic expansion, seemingly consistent with a degree of stagnation followed by the major shock of recent debates.

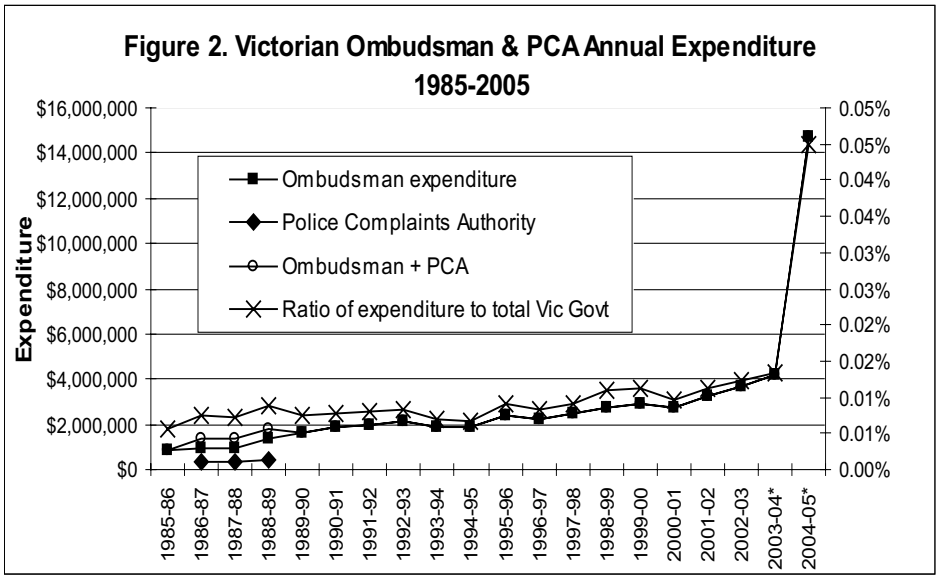
Figures 4 and 5 provide a more comparative analysis. Figure 4 shows similar results as for figure 3, but for all state and federal ombudsman's offices. The recent expansion of the Victorian Ombudsman shows clearly, jumping from a very small office to the nation's second largest, overtaking the Commonwealth Ombudsman in terms of raw staffing numbers and even more significantly on an averaged resource basis. Probably by coincidence rather than planning, it has jumped to relative equivalence to the NSW Ombudsman, the largest such office. A striking feature is the degree of change over time, especially the growth in NSW and Queensland, and fluctuations in the Commonwealth Ombudsman, as against static resourcing for the remainder. The comparison confirms that the Victorian office was definitely languishing until its recent injection; while the Commonwealth Ombudsman — traditionally regarded as a well-staffed office — has been outstripped by NSW on a staffing basis and falls significantly behind on an averaged resourcing ratio, due to the Com-monwealth's very large budget. The Com-monwealth Ombudsman's office appears relatively cash poor when the total size of Commonwealth operations (measured financially) is considered.

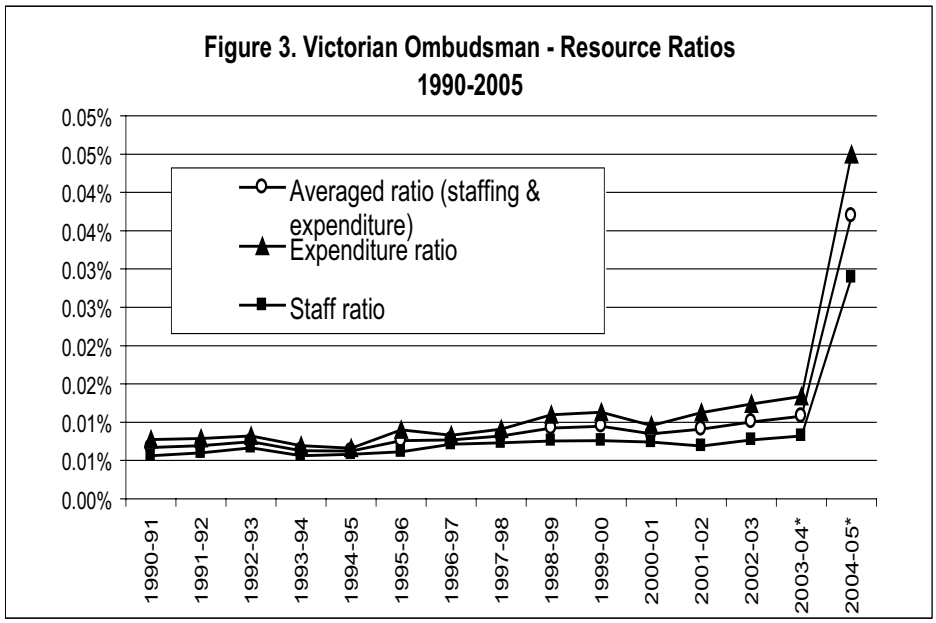
Overall, resourcing appears to be one useful measure of the capacity of the different integrity institutions of different governments. It confirms that the Victorian government may still have a problem persuading its electors that their integrity bodies are on par with other jurisdictions, even with recent expansion of the Ombudsman's office, because overall resourcing of the sector still appears comparatively low. However, these comparisons also show that the answer is not necessarily to create more integrity bodies, because the jurisdiction with the most watchdogs, NSW, still has a lower proportion of staff dedicated to these functions overall than some jurisdictions with only two or three organisations. One of the reasons why the Commonwealth may continue to fare fairly well on the integrity front, is that its core institutions remain comparatively well resourced, at least in staffing terms, even though they have a relatively simple and traditional configuration. In other words, the capacity of integrity institutions may hinge more on long-term commitment of appropriate resourcing, than creation of a new institution every time a problem appears. The comparative analysis tends to support historical claims by the Commonwealth Ombudsman's office, that new resources were needed for quality investigations, rather than necessarily a new organisation. Similarly, if a new Commonwealth anti-corruption body is created with only low capacity, it may do relatively little for overall capacity even though, superficially, the federal integrity system may appear to have been strengthened.

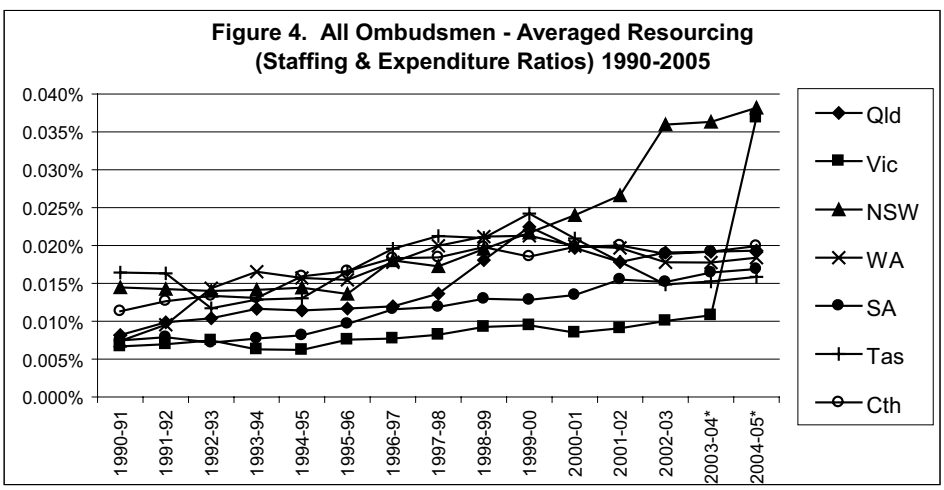
More than resources: roles, powers, skills and relationships

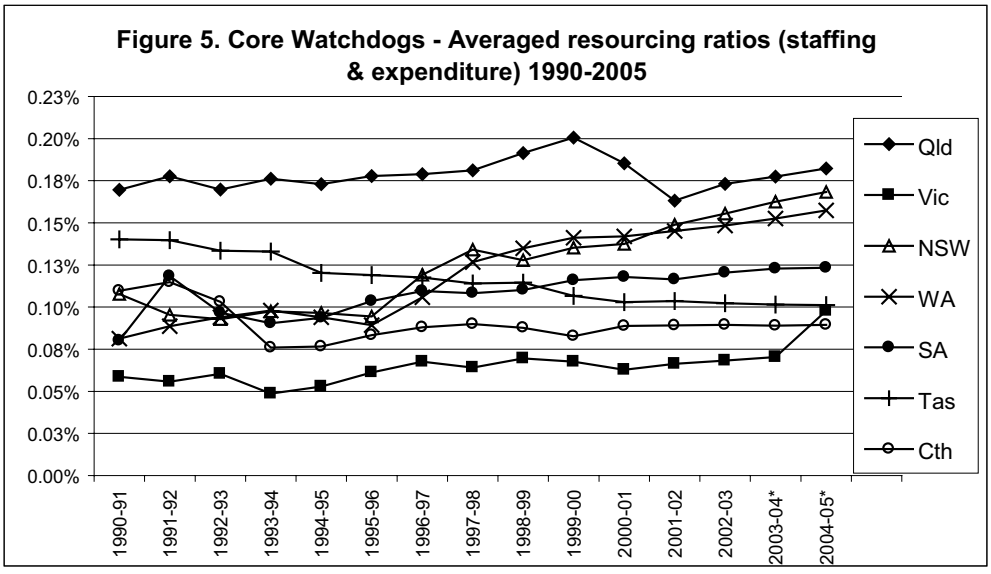
The above analysis shows the importance and feasibility of better benchmarking of key inte-











Note: Figure 5 includes all the agencies listed in Table 1, other than crime commissions and the crime commission component (or estimate thereof) for Qld and WA. For full data see Brown & Head 2004.

grity agencies, in terms of capacity as well as performance. As argued in the project report, standing government advisory bodies such as the Productivity Commission and Australian Law Reform Commission could pursue such benchmarking. Clearly, however, institutional choices such as confronted by the Victorian and Commonwealth governments do not turn on resourcing alone. Other issues have included the principle that Ombudsman's offices should not have phone tap powers, because they also have to supervise such powers; and strong views that no ombudsman, no matter how well resourced, has the right powers or organisational focus to investigate corruption, despite the Victorian and formerly Commonwealth claims that there is no reason in principle why such an office cannot do this job.

In all, our assessment identified eight further questions relevant to whether a new institution is needed to build capacity among key watchdog agencies, and if so what sort. The questions show that the choices are more complex than recent media reporting or political announcements tend to suggest, and that through more careful deliberation it may be possible to identify new or different institutional options, rather than copying a particular solution from another jurisdiction. The answer to each question is also rarely likely to be absolute, but to involve a chosen point on each of the following continua.

Public and less public approaches

A large part of the rationale for royal commissions or special inquiries, such as rejected in Victoria, is their high public profile. Royal commissions have been very useful in identifying systemic problems, changing the political agenda, and clearing the decks for major reforms. This option is always likely to remain valid where public confidence is dependent on a comprehensive public cleansing process. Public concern, assisted by the media, will always have a valid role to play in forcing change (Tiffen 1999). By contrast, the traditional methods of Australian ombudsman's offices have been informal and often low profile, despite having a quite good performance record (Mulgan & Uhr 2001:159). However, it is important to note an increasing area of 'middle ground' in integrity agency behaviour. Standing commissions also have the power and capacity to conduct public hearings and act as royal commissions, and such bodies have reduced the need for one-off commissions. Finally, legislation also typically empowers ombudsman's offices to undertake independent investigations, interview witnesses on oath, and issue public reports.

While the demand for a major public inquiry might be valid, it should not be assumed that royal commissions are the only appropriate vehicle for conducting them.

Internal and external review

Despite the need for independent 'external' integrity bodies, integrity systems in the public sector will always rely heavily on good internal investigation capacities within line agencies. This reality is both unavoidable from a workload perspective, and desirable given the need for agency management to take responsibility for its own ethical climate. The key issue is the relationship between these functions, hinging on when line agencies are required to notify external agencies of complaints or problems, when line agencies' procedures can be recognised as sufficient to handle some complex matters, and when watchdog agencies need to become directly involved. Here again, the institutional answer is not 'black or white' — not a question of all internal complaint-handling or all external scrutiny — but an appropriate balance. While some anti-corruption commissions were established as entirely independent, they have since spent years building relationships with line agencies so that the latter can take responsibility for routine investigations, reserving their own resources for serious matters. On the other hand, ombudsman's offices tended traditionally to rely heavily on agencies' internal capacity, but in recent years have tended to develop their own independent capacity.

Reactive and proactive inquiries

One of the major recent organisational distinctions has been between those agencies that are primarily complaint-handlers – or reactive – and those that conduct a higher proportion of self-directed inquiries including intelligence gathering, risk assessment, clandestine operations and 'integrity testing'. Citizens' rights to have their complaints heard by an independent reviewer has been fundamental to the role of an ombudsman, and thus forms the main basis for some strong claims that proactive corruption investigation should be undertaken by others:

> Ombudsmen's offices are complaint bureaux for dissatisfied citizens. They are incapable of dealing with organised corruption. Corruption is a consensual crime. Both parties to the arrangement are unlikely to complain — illegal gain flows to the police officer while criminals are unhindered in their pursuits. By the time, if ever, the matter is manifest as a complaint, the problem has usually assumed serious proportions (Le Grand 2004).

Currently (late 2004), it is not clear whether the Commonwealth intends to create another complaint-reactive model of inspectorate-general, which would be somewhat inconsistent with the background to the June 2004 announcement. In any event, however, this sharp categorisation of all ombudsman work as reactive and all anti-corruption work as proactive is too 'black and white'. While administrative investigations may be less complex and expensive than the robust inquiries needed to respond to corruption, Ombudsman's offices usually have powers to initiate investigations of their 'own motion', are legally empowered to act proactively and increasingly do so, and use complaint trends and public debates to identify systemic issues that call for larger investigations. Similarly, contrary to Le Grand's suggestions, corrupt practices do often come to light through complaints, particularly from whistleblowers, informants and those not benefiting from favourable treatment. The real issues of capacity become whether the organisation has the resources and skills to gather the information it needs, act proactively when necessary, and manage investigations of differing complexities.

Specialist or general sector wide jurisdiction

One of the most important issues raised by the current Commonwealth proposal is the specialist brief of the proposed body — confined to oversight of certain law enforcement agencies — rather than a broad mandate to uncover maladministration or corruption wherever found (in the manner of the NSW ICAC, Queensland's CMC or the WA CCC). Indeed, on this point, the bolstering of the Victorian Ombudsman may have built capacity more generally, as both the police and general jurisdictions of the Ombudsman were boosted. As shown by Smith (this issue), there is now a common and logical view that new injections of capacity should be capable of being flexibly

delivered wherever needed across the integrity system and not constrained by narrow portfolios. The Commonwealth result may be that major corruption allegations against non-police agencies will have to be dealt with by the Ombudsman anyway, and yet the capacity will have been invested elsewhere. A major overall recommendation of the assessment (recommendation 1) is that while the resource analysis shows a good case for the Commonwealth to boost resources, this should be for an integrity body operating across the public sector and not simply oversighting law enforcement bodies.

High and low officials

A more important design issue than investigative capacity can be legal capacities limiting who may be investigated. This is not only in terms of which agencies (above), but the level of official. Australian Ombudsman's offices have typically been empowered to investigate 'matters of administration' from agency-heads down, but not actions of ministers, ministerial staff, politicians, or judicial figures. Even after the recent amendments, this remains the case for the Victorian Ombudsman. In line with public opinion, more recently created anti-corruption bodies, by contrast, are usually empowered to investigate any public official along with any related persons (e.g. those suspected of corrupting public officials). Therefore, concerns about tasking old organisations to undertake new oversight or capacity-building functions may well be valid, unless their powers to reach into the realms of high office are not similarly updated.

Misconduct and maladministration

Much of the debate has concerned whether Ombudsman's offices are the right bodies to investigate misconduct or criminal matters. This question can also be reversed: are anti-corruption investigators the best people to respond to public complaints and assess more routine problems of defective public administration? Even though these issues may be interlinked, anti-corruption operations are typically more resource-intensive than administrative investigations, as are the resulting personnel and criminal actions. A valid reason for a new institution, therefore, may be the need to not overload existing institutions with new responsibilities or distract them from an existing mandate. However, this is only true if the new workload and staffing justifies a body of sufficient size to warrant legal autonomy and in which a 'critical mass' of skills and experience can be built up.

Investigation versus research, policy and prevention

Much integrity debate easily focuses on catching 'rotten apples', particularly when conducted in the media; the bringing of individuals to account has an important demonstration effect, not to mention its place in the populist politics of moral hygiene. However, many of the key capacities are now recognised as lying in arrangements that enhance integrity across the board and reduce opportunities for corrupt behaviour. The substantial research, policy and education roles of recent integrity bodies testify to this. Previously, Ombudsman's offices and anti-corruption bodies often fell foul of this imbalance:

> One of the risks inherent in any complaints system is that the processing of large volumes of complaints becomes the sole function. A concern with prevention, on the other hand, will lead to the integration of findings from investigations within a larger research-based risk management approach to integrity (Prenzler 2004: 109).

A crucial question remains: what degree of resources will be placed into research and policymaking aimed at boosting workplace ethical standards overall, in line with changing legal or community standards — rather than individually focussed investigations?

Who guards the guards?

A final institutional design question relates to the accountability of integrity bodies themselves, as raised by the question of Ombudsman's monitoring of other integrity agencies' phone-tapping powers. The evidence considered at more length elsewhere (Sampford et al, this issue) suggests that while a plethora of organisations can enhance mutual accountability by allowing them to supervise one another, it is a mistake to keep creating new bodies simply to monitor existing ones — a quest that can

ultimately never be satisfied. Ultimately, accountability comes down to public transparency and the integration of integrity agencies as permanent features of the political system, increasingly achieved through special purpose parliamentary committees to periodically oversight different agencies' use of their powers.

Conclusions: assessing integrity system capacity

This article has used debate over core 'independent' integrity institutions to highlight some of the need, and the potential, for more thorough and careful deliberation over the institutional options on which key capacities of modern integrity systems depend. By comparing the resourcing of key institutions by Australian governments over the past 15 years, we have shown how basic staffing and financial resources might be more legitimately developed as measures of capacity — helping lift attention away from a 'knee-jerk' assumption that the creation of new bodies necessarily lifts capacity overall. In Victoria, although recent resource increases are significant, there may still be some way to go before core integrity institutions are resourced at an equivalent level to other governments. At a Commonwealth level, there is a clear case for the injection of more resources. However, evidence suggests there has been a fairly scrambled approach to institutional design and a risk of overlooking some key capacity issues, such as jurisdiction and coverage, in early proposals for a new anti-corruption body,. By breaking down some of the institutional design questions currently lumped together in debate, we have tried to demonstrate how policymakers might identify fresh options for configuring integrity resources, in preference to unnecessarily creating new bodies, overloading existing ones, or importing frameworks that do not necessarily 'fit'. In the long-term, more careful analysis is needed on these questions. It may also be possible to develop improved methods of assessing integrity system capacity more broadly, that are sensitive to the mix of resources, staffing, powers, skills and political will to tackle public accountability problems through continuing innovation and reform.

Notes

[1] The authors warmly thank Scott MacNeill and Megan Kimber for research assistance. A more detailed version of this paper including the basis for the data in Figures 1-5 is available in Brown and Head (2004).

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