

The Caribbean Public Procurement (Law & Practice) Conference (CPPC) 2008

Enhancing Professionalism and Building Regional Consensus in Procurement

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**INTEGRITY IN PUBLIC PROCUREMENT – ANTI-CORRUPTION TOOLS FOR
CONSTRUCTION PROJECTS**

Introduction

The Trinidad and Tobago Transparency Institute (TTTI) welcomes the opportunity to share with this distinguished audience its views on *Integrity in Public Procurement – Anti-Corruption Tools for Construction Projects*.

For those of you who don't know TTTI, or its parent body Transparency International (TI), I shall briefly introduce our organisations.

TTTI is the local chapter of Transparency International (TI), the civil society organisation that has been the leader of the global coalition of anti-corruption movements since its formation in 1993.

TI is an independent, non-profit, non-governmental organisation, dedicated to curbing both international and national corruption through increased transparency and accountability.

TTTI was formed in 1998 and is one of a network of nearly 100 national chapters carrying out the TI mission around the world. TI works in a non-confrontational way with governments, the private sector, development agencies, NGOs and international organisations to seek a consensus on ways and means to combat corruption mainly through the promotion of good governance.

TI's vision is of a world in which government, politics, business, civil society and the daily lives of people are free of corruption. Its mission is to work towards a world that is free of corruption.

TTTI's mission is to work towards a country and region that are free of corruption.

Public Procurement

TTTI is pleased with the conference's focus on several aspects of Public Procurement because it is an area of public life in Trinidad and Tobago that we have given and continue to give much attention. Our interest in public procurement stems from the fact that a very large proportion of public money is spent on procurement thus making it an area that offers the most attractive opportunities to those who wish to corrupt the process and illegally enrich themselves.

Procurement, in general terms, means the acquisition of goods and services. In the construction sector, on which we are focussing in this address, procurement covers the entire process from needs assessment through project preparation, design, budgeting, tender invitation, contract award and execution.

The fact that TTTI has been invited to address this conference on integrity in public procurement is recognition by the organisers that procurement that is practised without integrity cannot truly serve the

common good and can inflict great harm. Therefore, corruption in public procurement is an issue that this important conference could not ignore. In fact, this conference would be failing in its purpose, and failing the citizens of the countries represented here, if the issue of corruption in procurement were not discussed in some detail and strong conference recommendations not made on possible strategies to combat it.

Corruption

Corruption in public procurement generally takes the form of bribery, extortion, fraud and/or collusion. We in Trinidad and Tobago know of corruption in public procurement only too well and the average citizen can cite many well known cases from the past. Currently, the nation is witnessing several ongoing criminal trials in our Law Courts arising from the procurement processes used in the construction of the Piarco International Airport through which you who are visiting entered this country.

Among the local persons facing trial are four former cabinet ministers (including a former Prime Minister), the project's main contractor, financiers, an attorney and a quantity surveyor.

Concurrent with the local criminal cases, we followed from here similar cases in the Law Courts of Florida, USA, arising from the same procurement processes. Those cases are now concluded and have resulted in the jailing of, the imposition of hefty fines on and the confiscating of multi-million dollar properties from some of the consultants and contractors who were engaged on that project.

TI has been a strong advocate of fighting both public and private corruption worldwide. It has emphasised that corruption on construction projects needs to be fought because:

- it damages developed and developing countries, resulting in projects which are unnecessary, unreliable, dangerous and over-priced; this can lead to loss of life, misuse of funds and resultant poverty, economic damage and underdevelopment;
- it damages companies, resulting in tendering uncertainty, wasted tendering expenses, increased project costs, economic damage, reduced project opportunities, extortion and blackmail, money laundering, criminal prosecutions, fines, debarment, reputation risk and resultant job losses; and
- it damages individuals, resulting in reduced morale, hopelessness, criminal prosecution, fines and imprisonment.

The Construction Sector

The construction sector is the primary vehicle used by governments and aid agencies to achieve physical development in developing countries and is the conduit through which billions of dollars enter the national economy. Therefore, it is no surprise that construction procurement acts as a magnet for persons wishing to illegally line their pockets.

Trinidad and Tobago is described as a developing country but we are not typical because we rely less on aid than most other developing countries. This is because we enjoy a per capita income of US\$14,000.00, the highest in the region, mainly due to the income derived from our hydrocarbon resources. Our procurement rules, therefore, have been developed over the years more from self-regulation than from impositions from external agencies as is the case with most developing countries. Nonetheless, in common with other developing countries, we rely very heavily on the construction industry as the main vehicle in our development thrust. As a consequence, the record shows that construction procurement has been one of the more fertile grounds for corruption locally.

It follows, therefore, that in the construction sector, as elsewhere, integrity is an essential ingredient. Let us take a look at this not so common quality known as 'integrity'.

Integrity

I am sure that you have heard many times of the need to have integrity in your daily lives. The Good Book tells us '*Do unto others as you would have them do unto you*'. We have all heard also that integrity is necessary in the workplace whether in the public or private sectors. I wonder how many of you have asked yourself the question: 'Why all this fuss about integrity in the workplace when what really matters is getting through the day's work with the minimum of problems? Or some may have asked the other question: 'Should I be bothered – does it really matter - is there really any difference between having or not having integrity?'

Well, a wise man by the name of Alan K. Simpson answered both questions when he wrote: '*If you have integrity nothing else matters. If you don't have integrity, nothing else matters*'.¹

Another wise man, Robert Moment, put it this way with respect to the private sector: '*If I were to ask you what attribute is most influential in regard to the success of a business, would you know immediately which one is the most important? Based on my many years as a business owner and entrepreneur,*' he said, '*I have discovered that at the very top of the list is the distinguishing quality of integrity. Without integrity at the helm of a company, a business is usually short-lived. In fact, when business integrity is present throughout the deepest layers of a company and not just on the surface, it becomes the heart and soul of the company's culture and can mean the difference between a company that succeeds and a company that falters*'.

Robert Moment also advised that '*integrity is not something that can be grasped and then simply used. Integrity in its essence must be so engrained within the nature of an individual, his company and its team members that it remains steadfast no matter what. Without question, others sense it and find it very attractive. At its core, integrity begins with the company leader who understands the qualities of integrity which then filters down throughout the company into every department and every member's approach and attitude*'.²

Those views on integrity were directed to the private sector but they apply equally to the public sector and can be applied to Ministries and their departments and to state-owned companies.

It is clear that the practice of personal integrity among the leaders and their subordinates in the public sector leads to the development of an ethical culture within departments and within companies which is a prerequisite to successfully implementing and maintaining any corruption prevention programme. This is so because no one will take seriously any plans to tackle corruption announced by a government agency that is known, or is perceived, not to practice integrity.

In practice, a public sector agency that is perceived as, or is proven to be, lacking in integrity loses the confidence of some staff and customers. Staff would prefer to work elsewhere and customers would prefer to avoid that agency, if possible. It is important, therefore, that management recognizes the need to set integrity standards for staff and lead the way by example in compliance. Management must set both internal standards to govern its relationship with staff and external standards to govern the staff's

¹ Alan K. Simpson is a US Senator.

² Robert Moment is an American business strategist and author.

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relationship with customers. Two examples of Trinidad and Tobago government agencies that have gained a negative image for corruption that has been difficult to change are Customs & Excise and the Transport Licensing Department, possibly because of the actions of only a few 'bad eggs'.

Public Sector leaders, therefore, must recognize that it is their job to ensure that integrity becomes a way of life for managers and staff as a necessary first step toward curtailing the spread of corruption. The development of an ethical culture is one that has to be carefully introduced and nurtured. It is a subject with many facets that is worthy of more detailed treatment in another forum.

Transparency and Accountability

Full integrity in the procurement process requires more than an ethical culture. There must be a legal and regulatory framework that effectively ensures adequate transparency and accountability.

Transparency: because there will always be those who will try to illegally enrich themselves, unless the process is open to public scrutiny.

Accountability: because potential abusers must be made to realise that they truly risk having to pay a very high price.

The aim must be to make corruption a "high risk, low return enterprise" in order to discourage would be perpetrators.

Procurement Reform

All countries have more or less adequate legal and regulatory frameworks for public procurement. In many cases, it more a case of 'less' than 'more'. Fortunately, international treaties are now forcing countries to revisit their procurement rules and to introduce reforms where necessary. Treaties such as the Inter-American Convention Against Corruption and the United Nations Convention Against Corruption make it mandatory that public procurement rules meet a minimum threshold. International agencies such as the World Bank, the Organisation for Economic Co-operation and Development (OECD), the IADB, the UNDP and our own Caribbean Development Bank are also helping in the push for procurement reform. In the Caribbean, procurement reform is also being tackled regionally, through the Caricom Secretariat, with the aim of harmonising the rules and procedures of the different countries as part of the process of further deepening the regional economic integration movement.

Trinidad and Tobago's first major step in public procurement self-regulation was the introduction of the Central Tenders Board Ordinance 1961. The development programmes introduced after political independence in 1962 saw projects of a size and implementation time-frames that showed up the deficiencies of the 1961 Ordinance resulting in piecemeal revisions thereto over the next few years. The net result was a procurement system that saw more public money being spent by ad-hoc agencies operating outside the control of the Central Tenders Board. The situation became untenable and open to abuse with resultant corruption both real and imagined. In those circumstances, a comprehensive reform of the rules governing public procurement was called for to allay public concerns and to avoid wastage.

In September 2005 the Prime Minister laid in Parliament a White Paper on 'The Reform of the Public Sector Procurement Regime.' It sets out an excellent policy for reforming the public procurement regime in a way that would make proper oversight the rule rather than the exception. The reform includes the appointment of an Independent Regulator with power to monitor, audit and, if necessary,

investigate without stifling initiative in the agencies that carry out the Development Programme. The Regulator would also, assisted by representatives of the Private Sector and Civil Society, establish guidelines that all who undertake projects using public money would be bound to follow.

But, despite a great deal of work done by the Ministry of Finance, helped by private sector and civil society, to implement the reform, the all important new legislation, which was first drafted two years ago, has not yet seen the light of day. Whatever the reasons for the delay, it now appears that the reform is about to get moving again. The Prime Minister recently told representatives of the construction sector and others that the reform process would be resumed. TTTI was represented at that meeting and took the opportunity to urge that all stakeholders be given ample opportunity to discuss the draft legislation so that together we can help to implement a system that can give the citizens what is their right: public procurement that is free of waste and corruption.

Anti-Corruption Tools

So far we have concentrated on what governments must do if there is to be integrity in public procurement. However, none of this will succeed unless the Private Sector also plays its part.

To help it do this, TI has developed — or facilitated the development of — a number of effective anti-corruption tools that can be adapted to the local needs of most countries.

Let us look at three such tools which are of particular interest to the construction industry: *Integrity Pacts*, *Anti-Corruption Forums* and *Project Anti-Corruption Systems*.

Integrity Pacts

The Integrity Pact (IP) is aimed at preventing corruption in public contracting. It consists of a process that includes an agreement (entered into before bids are invited) between a government or a government department (at the federal, national or local level) and all pre-qualified bidders for a public contract. It contains rights and obligations to the effect that neither side will: pay, offer, demand or accept bribes; collude with competitors to obtain the contract; or engage in such abuses while carrying out the contract. The IP also introduces a monitoring system that provides for independent oversight and accountability.

Bidders should disclose all commissions and similar expenses paid by them to anybody in connection with the contract; and sanctions will apply in cases of violations. These sanctions range from loss of contract, forfeiture of the bid or performance bond and liability for damages, to debarment of bidders from future contracts, and criminal or disciplinary action against employees of the government. IPs encourage companies to refrain from bribing by providing assurance that their competitors will also do so. Governments and government officials also have the assurance of a clear framework that protects them from dubious offers.

Through the use of the IP, governments are able to reduce the high cost of corruption in procurement, privatization and licensing arrangements.

Successful implementation of the IP on a major project can go a long way to restoring public confidence in a country's public procurement processes.

The IP has shown itself to be adaptable to many legal settings and flexible in its application. In the case of Trinidad and Tobago, no new legislation is required for its introduction. Obviously, the legal requirement will vary from country to country and that would need to be examined locally. So far, the IP has been successfully introduced in about 20 countries around the world with some major success reported. Regrettably, despite lobbying by TTTI, the government of Trinidad and Tobago is yet to use the IP on any of its projects.³

Anti-Corruption Forums

The Anti-Corruption Forum is a private sector anti-corruption alliance between the infrastructure industry (represented by business and professional associations and companies) and civil society (represented by TI and other organisations with particular interest in the infrastructure sector). The forum agrees and promotes anti-corruption actions in the infrastructure sector in liaison with government and other national bodies as necessary.

In the UK an Anti-Corruption Forum (ACF) was successfully established in 2004. It is an alliance of TI's UK chapter with business associations, professional institutions and companies with interests in the domestic and international infrastructure, construction and engineering sectors. Over 1,000 UK companies and 200,000 engineers and construction managers are represented on the Forum.

The purpose of the UK ACF is to promote industry-led actions which can help eliminate corruption. The members believe that corruption can only be eliminated if governments, financiers, business and professional associations, and companies working in these sectors co-operate in the development and implementation of effective anti-corruption actions.

Actions taken so far by the Forum include:

- working with the UK Office of Government Commerce and the EU Commission to try to ensure that the debarment procedures implemented under the EU Public Procurement Directives and the EU Commission regulations and multilateral development bank (MDB) regulations operate transparently, fairly and reasonably, and take proper account of mitigating circumstances;
- working with the UK Foreign and Commonwealth Office to examine ways in which UK embassies and other organisations can provide greater support and advice to UK companies working overseas that may be faced with corruption issues;
- examining ways in which increased transparency and disclosure in the infrastructure sector by governments, project owners, funders, contractors and consulting engineers can help prevent corruption;
- examining ways in which improved training, professional standards and professional institution disciplinary mechanisms may help reduce corruption; and
- working to promote the creation of anti-corruption forums in developing countries.

TTTI sees this tool as having great potential for local use. We have begun planning a project to work with the UK ACF to introduce it to the local construction industry.⁴

³ For further information on the IP visit www.transparency.org/global_priorities/public_contracting/integrity_pacts.

⁴ For further information on the UK Anti-Corruption Forum visit the web site:

www.anticorruptionforum.org.uk.

The Project Anti-Corruption System (PACS)

The Project Anti-Corruption System (PACS) is currently being developed by TI and will be launched this year. It is an integrated and comprehensive system designed to assist in the prevention of corruption on construction projects. It uses a variety of measures which impact on all project phases, on all major participants and at a number of contractual levels.

The developers of PACS have started from the premise that corruption on construction projects is a complex problem. It may occur in the form of bribery, extortion, fraud or collusion. It can take place during any phase of a project, including project identification, planning, financing, design, tender, execution, operation and maintenance. In each project phase, corruption may involve any one or more of the participants i.e. government, state enterprises, project-owner, financiers, consultants, contractors, sub-contractors, suppliers, joint venture partners, and agents. It may occur at any level of the contractual structure.

PACS is modular system comprising:

- *standards* that recommend anti-corruption measures which should be used on construction projects; and
- *templates* that provide the tools by which the measures recommended in the PACS Standards may be implemented.

A government, a public or private sector project owner, or a funder can:

- assess its existing project anti-corruption measures against the PACS Standards;
- modify its existing measures in accordance with the PACS Standards; and/or
- use some or all of the PACS Templates, appropriately customised, in order to implement its anti-corruption measures.

The PACS Standards

There are ten PACS Standards, each dealing with a separate anti-corruption measure.

1. *Independent assessment*: There must be scrutiny of major project players by an independent assessor whose duty is to detect and report corruption for the duration of the project.
2. *Pre-contract disclosure of information*: At tender stage, the project owner and each applicant for a major contract should provide each other with all relevant information such as, for example, on their principal shareholders, officers, financial status, agents, joint venture partners, major sub-contractors, criminal convictions and debarments.
3. *Contractual anti-corruption commitments*: The project owner and each applicant for a major contract should provide anti-corruption contractual commitments to each other which expressly cover the main types of corruption. Remedies should be specified in the event of breach of these commitments. Contractors should also exchange equivalent anti-corruption undertakings with their joint venture companies, major sub-contractors and agents.
4. *Government anti-corruption commitments*: Relevant government departments should provide an anti-corruption commitment to take steps to minimise extortion by its officers, to appoint a senior manager to whom complaints of extortion can be made, and to publicise a list of fees and time-scales which should properly apply to government procedures;
5. *Transparency*: At the outset of the project, the project owner should set up a project website and disclose project information on that website on a regular basis and in an easily accessible and

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comprehensible form. The independent assessor should check the accuracy of the information disclosed.

6. *Raising awareness*: Each participant organisation should:
 - post up anti-corruption *rules* at all project and site offices;
 - provide or arrange anti-corruption *training* for relevant staff; and
 - establish a *gifts and entertainment policy* and require staff to record such benefits given or received on a register.
7. *Funder involvement*: Details of the funding terms and conditions, and any changes to these, should be published on the project website. The independent assessor should make regular reports to the funders on his activities, and report any suspected corruption to them.
8. *Compliance programme*: The project owner, each major contractor and each major sub-contractor should take all reasonable steps to ensure compliance by the company and its management and staff with the PACS Standards.
9. *Reporting*: PACS provides for reporting in a number of ways:
 - *members of the public* should be provided on the project website with the contact details of the independent assessor to whom they may make reports of suspected corruption in connection with the project;
 - each participant organisation should set up an internal system for reporting corruption by their *staff*; and
 - *the independent assessor* should be under a duty both to receive reports from the public and project staff, and to investigate those reports; he should also be under a duty to report suspicion of corruption to the project owner, the funders, other project participants, relevant professional associations and the criminal authorities.
10. *Enforcement*: There should be statutory and/or contractual remedies and penalties for corruption in relation to the project which can be enforced by the major project participants, applying from the outset of each party's involvement in the project.

The PACS Templates

The PACS Templates may be used to implement the measures recommended in the PACS Standards. They can be downloaded free of charge from TI's web-site⁵ and can be used in their existing form, or may be modified to suit the requirements of the country and project:

1. Definitions
2. Independent Assessor Agreement
3. Disclosure Form
4. Disclosure Assessment Guide
5. Anti-Corruption Agreement
6. Notices of Breach
7. Anti-Corruption Procurement Requirements
8. Anti-Corruption Notice to Government
9. Anti-Corruption Government Commitment
10. Anti-Corruption Programme

⁵ See www.transparency.org/tools/contracting/construction_projects/section_a_pacs

11. Anti-Corruption Rules for Individuals
12. Anti-Corruption Training Manual⁶
13. Project Transparency Policy
14. Benefits Register
15. Instructions to Project Owner for the operation of PACS
16. Instructions to Project Owner Joint Venture Members
17. Instructions to Funders
18. Instructions to Applicants

Benefits

The use of the tools described is not a guarantee against corruption in procurement. However, it will reduce the opportunity for corruption, discourage it and increase the chances of identifying it. Use of the tools will also help to:

- reduce project costs;
- improve project quality;
- give financiers some degree of assurance that their money is being properly spent;
- provide a level playing field for companies undertaking the work and services;
- reduce the risk of a project participant being a victim of corruption in that project; and
- satisfy the public that corruption is being tackled.

Cost

You may be wondering if the use of the tools described comes at a cost. The answer is ‘yes’ but experience has shown that, on larger projects, the potential savings in project costs, and the reduction in defective work as a result of less corruption, will significantly outweigh the cost of using the tool.

In weighing the cost/benefit of using such tools, the following factors should be borne in mind:

- a) *The direct cost of corruption is considerable.*
As corruption is usually concealed and differs in extent from project to project and from country to country, it is not possible to accurately assess the amount lost to corruption on any particular project. However, it is estimated that corruption can add from 5% to 50% to the total project costs, can result in delays, and can adversely affect quality and safety. It is believed, therefore, that the use of one of the tools can reduce costs and improve project completion times, quality and safety. Consequently, provided that the cost of the use of the tool is kept proportionate to the value of the project, these savings are likely to be significantly greater than the cost of its use.
- b) *The indirect cost of corruption is also considerable.*
Corruption deters or prevents good quality companies from bidding for projects. Companies and individuals run the risk of criminal liability, civil liability, debarment, reputation damage, and fines. The use of one of the tools will reduce these risks
- c) *Spending money to curb corruption on projects is a necessity not an option.*
It is regarded as a political, social and economic necessity to spend money to ensure proper

⁶ The *Anti-Corruption Training Manual* developed by TI can be particularly useful in internal training programmes of companies of any size, whether or not they are implementing any other modules of PACS. It can be downloaded from www.transparency.org/content/download/21248/308531.

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safety and quality controls on construction projects. In Trinidad and Tobago, we have the Occupational Safety and Health Act which sets safety standards in the workplace. We also have a Bureau of Standards which sets quality standards for construction materials. It is equally necessary, in the interest of all stakeholders, to spend money on anti-corruption measures, such as the use of the tools described, to prevent attempts at avoiding the safety and quality controls and, in addition, reduce the other negative effects of corruption.

Alternatives

We noted that the use of anti-corruption tools comes at a price (which, particularly on large projects, can be cost effective) and that their use requires the active participation of all stakeholders.

What if the cost is deemed too high? What if a key stakeholder (say, government or one of its agencies) refuses to participate in the use of these tools? In those circumstances, what alternative action can be taken by other stakeholders, such as you, to bring more transparency and accountability to procurement?

The answer is that you must accept individual and collective responsibility for:

- a) monitoring what is taking place when your taxpayers dollars are being spent;
- b) not turning a blind eye to the potential dangers of corruption; and
- c) holding your elected leaders accountable.

In other words, you should do your civic duty as members of civil society.

Civic duty

As persons involved in procurement, you should need no convincing that most procurement systems, particularly in developing countries, lack sufficient transparency and accountability thus leaving the door wide open for corrupt practices. A weak procurement system works against the best interests of all stakeholders and the interest of the public who should be the beneficiaries of public procurement.

We are sure that many of you spend part of your working time dealing with the consequences of an uneven playing field arising from the lack of transparency and accountability in the procurement process and the resultant corruption, real or imagined. If by doing your civic duty, you succeed in making even a small difference, there would be a dramatic increase in your peace of mind, job satisfaction, level of productivity and profitability. Therefore, in your self-interest, you should get involved.

However, as individuals, there is little you can do to influence significant change other than within your limited sphere. While change within your own office or department is also necessary, and should be encouraged by promoting ethical standards and practices among staff, the primary goal must be to effect change across the entire industry in which you work. Such change can only be achieved by the joint efforts of all stakeholders in a particular industry, e.g. construction industry, supported by civil society generally.

Fortunately, you are not limited to responding to the problems in your industry as individuals only because most of you are members of various professional, contracting, trade or business associations and, thereby, have strength in numbers. Unfortunately, TTTI's experience suggests that, whereas these

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associations exist to promote the welfare of their members, as a rule they do not recognize that their joining in the fight against corruption will also advance the interests of their membership. As a result, they do not see the need to get involved and their contribution to the fight against corruption is lost.

Since this conference is for procurement persons primarily, we urge you to bring your influence to bear in the field of procurement generally and, in particular, public procurement. Of the local participants in the audience we ask: have you been doing enough to promote higher standards in public procurement such as are being discussed at this conference? Was your voice among the few raised in calling on government to implement the new public sector procurement regime reform? If not, why not? Given the fact that the promised reform is now thirty (30) months overdue, would you join with the other concerned stakeholders, like TTTI, in calling for its implementation and being vigilant in holding the Prime Minister to his latest promise?

Given the secrecy that is sometimes practiced by Government departments, as members of civil society, you should be prepared to exercise your rights under the Freedom of Information Act when you are faced with undue delay or a refusal to provide procurement information requested. In this connection, you should join TTTI's call for government to set up a procurement website and publish procurement information on a regular basis in an easily accessible and comprehensible form.

Finally, we would ask you to add your voices to TTTI's call to government for the early introduction of whistle blower protection legislation to encourage the reporting of misdeeds and to protect from victimization persons, particularly public officers, who expose corruption.

Conclusion

In conclusion, we wish to underscore the point that while an ethical culture and an adequate legal and regulatory framework are essential ingredients for integrity in procurement generally, there is need to put in place additional measures in the procurement process for construction projects because of the many avenues open for corruption in that process. Note that there is no single or simple method by which to ensure integrity in procurement. Further, corruption by its very nature is concealed and those aware of it are either complicit in it or reluctant to report it for fear of reprisals. This makes corruption more difficult to detect and to fight.

As with safety and quality issues in construction, corruption can only be addressed by the use of a comprehensive system which combines a number of integrated measures. Also, it has to be fought on both the supply and demand sides. The fight is a difficult one but, if joined by all stakeholders, the battle can be won. Success, even if limited, will benefit the entire country by ensuring that all procurement projects satisfy the criteria of transparency, accountability and value for money.

On behalf of TTTI, I wish to thank you for the opportunity given to us today to share these ideas with you. We hope you will give serious thought to what needs to be done in your respective countries to bring greater integrity to and reduce corruption in public procurement. Our hope is that all civil society organisations in Trinidad and Tobago would recognize that they have a major role to play in combating corruption and, in the self-interest of their members, join us in the fight.

Thank you.

[For more information, contact TTTI at e-mail address: tti@tstt.net.tt or visit the Transparency International website: www.transparency.org.]

