

Minimising Corruption in Hong Kong and Singapore: Lessons for Asian Policy Makers*

Jon S.T. Quah

Anti-Corruption Consultant, Singapore

Abstract

Unlike many Asian countries, corruption is not a serious problem in Singapore and Hong Kong because of the strong political will of their governments and the effectiveness of their anti-corruption agencies (ACAs) in enforcing the anti-corruption laws impartially, regardless of the status, position or political affiliation of those persons being investigated for corruption offences. Policy makers in Asian countries afflicted with widespread corruption can learn these five lessons from Singapore's and Hong Kong's success in combating corruption: (1) the critical importance of political will in curbing corruption; (2) addressing the causes of corruption instead of its symptoms; (3) establishing a Type A ACA instead of a Type B ACA; (4) the Type A ACA should be an independent watchdog, not an attack dog or paper tiger; and (5) combating corruption is a continuous work in progress.

Keywords: Corrupt Practices Investigation Bureau, Independent Commission Against Corruption, Hong Kong, Singapore, political will.

"China should learn from the Hong Kong and Singapore model for tackling corruption as both have independent anti-corruption bodies unlike China which relies on the party investigating itself."

Wang Qishan (2014) Secretary of the Central Commission for Discipline Inspection, China

Introduction

Corruption is a serious problem in many Asian countries judging from their performance on Transparency International's Corruption Perceptions Index (CPI) in 2016. Table 1 indicates that only seven countries have CPI scores above 50, with Singapore being the least corrupt Asian country as it is ranked 7th among 176 countries with a score of 84, followed by Hong Kong SAR, which is ranked 15th with a CPI score of 77. By contrast, the other 20 countries (74.1 per cent) have low scores ranging from 12 for North Korea to 49 for Malaysia.

** Revised version of the paper presented at the International Conference on the 20th Anniversary of the Establishment of Hong Kong SAR at the Hong Kong Polytechnic University in Hong Kong on 19 May 2017.*

Why is corruption a serious problem in most Asian countries? Why are Singapore and Hong Kong SAR more successful than other Asian countries in combating corruption? What lessons can Asian policy makers learn from analysing the successes of the two city-states in curbing corruption? To address these questions, this article begins with an analysis of the favourable policy contexts in both territories before accounting for their success and identifying the five lessons for Asian policy makers.

Table 1: Performance of 27 Asian Countries by their CPI scores in 2016

CPI Score*	Countries	No. (%)
80-100	Singapore (84)	1 (3.7%)
70-79	Hong Kong SAR (77), Japan (72)	2 (7.4%)
60-69	Bhutan (65), Taiwan (61)	2 (7.4%)
50-59	Brunei Darussalam (58), South Korea (53)	2 (7.4%)
0-49	Malaysia (49), China, India (40), Mongolia (38), Indonesia (37), Maldives, Sri Lanka (36), Philippines, Thailand, Timor-Leste (35), Vietnam (33), Pakistan (32), Lao PDR (30), Nepal (29), Myanmar, Papua New Guinea (28), Bangladesh (26), Cambodia (21), Afghanistan (15), North Korea (12)	20 (74.1%)
Total	27 countries	27 (100%)

* The CPI score ranges from 0 (very corrupt) to 100 (highly clean). To be included in the CPI, a country must have three independent surveys on its perceived extent of public sector corruption.

Source: Transparency International (2017).

Favourable policy contexts of Hong Kong SAR and Singapore

Hong Kong SAR and Singapore have favourable policy contexts for combating corruption for several reasons as shown in Table 2. First, as city-states with respective land areas of 1,050 sq. km and 719 sq. km, Hong Kong SAR and Singapore have no difficulty in enforcing the anti-corruption laws unlike larger countries like Indonesia and the Philippines. Second, they do not have large populations as Hong Kong has a population of 7,305,700 and Singapore has a population of 5,535,002 in 2015. Third, both are former British colonies which benefited from the introduction of meritocracy in the recruitment and promotion of civil servants with the establishment of the Public Service Commission (PSC) in Hong Kong in 1950 and in Singapore in 1951. On the other hand, both territories have also followed the British colonial method of relying on the police to curb corruption.

Fourth, both city-states have succeeded in economic growth as reflected in Singapore's GDP per capita of US\$52,888 and Hong Kong's GDP per capita of US\$42,422. Their economic affluence means that their civil servants are adequately paid to discourage them from accepting bribes. Fifth, while Singapore is a parliamentary democracy, Hong Kong became a Special Administrative Region (SAR) of China on 1 July 1997. Finally, apart from having high percentile ranks for government effectiveness and rule of law, Singapore is ranked second and Hong Kong ranked fourth among 190 economies for the ease of doing business in 2017. This means that unlike other Asian countries, red tape does not contribute to corruption in Singapore and Hong Kong and their effective civil services and high degree of rule of law have enhanced their ability to curb corruption.

Table 2: Policy Contexts of Hong Kong SAR and Singapore in 2015

Indicator	Hong Kong SAR	Singapore
Land area (sq. km)	1,050	719
Population	7,305,700	5,535,002
Colonial legacy	British (1841-1997)	British (1819-1959)
GDP per capita	US\$42,422	US\$52,888
Political system	Special Administrative Region, China	Parliamentary democracy
Government effectiveness	99.0	100.0
Rule of law	94.7	96.6
Ease of doing business rank 2017	4 th /190	2 nd /190

Source: World Bank (2016, 2017a, 2017b, 2017c).

Explaining Singapore's and Hong Kong's success in combating corruption

Table 3 confirms that Singapore and Hong Kong SAR are the least corrupt Asian countries according to their performance on eight corruption indicators in 2015-2016. Unlike the first seven corruption indicators, "Public Trust in Politicians" is an indirect indicator of the perceived extent of corruption because corruption flourishes in those "societies with low levels of trust" and "people are likely to distrust the government" if the anti-corruption agencies (ACAs) and other anti-corruption policies are ineffective (Rose-Ackerman and Palifka, 2016, pp. 256-257). Corruption was widespread in both city-states after the Second World War but is not a serious problem today. There are several reasons for the success of Singapore and Hong Kong SAR in combating corruption.

Table 3: Singapore's and Hong Kong's Performance on Corruption Indicators

Indicator	Singapore	Hong Kong SAR
Control of Corruption 2015	2.1 (97.1)	1.7 (92.3)
PERC Survey of Corruption 2016	1 st /16 (1.67/10)	4 th /16 (3.40/10)
Corruption Perceptions Index 2016	7 th /176 (84/100)	15 th /176 (77/100)
Diversion of Public Funds 2016	3 rd /138 (6.2/7)	12 th /138 (5.9/7)
Irregular Payments & Bribes 2016	3 rd /138 (6.7/7)	12 th /138 (6.3/7)
Organised Crime 2016	7 th /138 (6.4/7)	18 th /138 (6.0/7)
Ethical Behaviour of Firms 2016	3 rd /138 (6.2/7)	17 th /138 (5.5/7)
Public Trust in Politicians 2016	1 st /138 (6.4/7)	21 st /138 (4.6/7)

Source: World Bank (2016); PERC (2016, p. 1); Transparency International (2017); and Schwab (2016, pp. 197, 319).

The most important reason for both countries' success in curbing corruption is the strong political will of their political leaders. Corruption was a serious problem in Singapore during the British colonial period because the government lacked the political will and made two major policy mistakes in its anti-corruption strategy. First, the British colonial government made the Anti-Corruption Branch (ACB) of the Singapore Police Force's Criminal Investigation Department (CID) responsible for corruption control with the enactment of the Prevention of Corruption Ordinance (POCO) in December 1937 even though police corruption was widespread according to the 1879 and 1886 Commissions of Inquiry. However, the ACB was ineffective because it had only 17 personnel and was a Type B ACA that performed both anti-corruption

and non-corruption-related functions. As part of the CID, the ACB's function of fighting corruption was not given top priority and compromised by the prevalence of police corruption. The folly of making the ACB responsible for corruption control was exposed by the revelation of the Opium Hijacking scandal in October 1951 when a gang of robbers, which included three police detectives, had stolen 1,800 pounds of opium worth S\$400,000 (US\$133,333). The ACB's failure to combat corruption made the British colonial government realise its mistake and resulted in the formation of the CPIB in September 1952 as an independent Type A ACA that performed only anti-corruption functions outside the jurisdiction of the police (Quah, 2007, pp. 14-16).

The second policy mistake of the British colonial government was its failure to provide sufficient legal powers, budget and personnel to the CPIB during its first eight years. The CPIB began its operations in October 1952 with R. Middleton-Smith as its director and 12 officers, who were on short secondment from the police. However, the CPIB was ineffective in curbing police corruption because of its investigation officers' "short secondment and limited time and capacity to conduct thorough investigations" and "the social stigma of investigating fellow police officers" (CPIB, 2012, p. 18).

Learning from the mistakes of the British colonial government, the People's Action Party (PAP) government, which assumed office in June 1959, retained the CPIB as an independent Type A ACA and enhanced its effectiveness by enacting the Prevention of Corruption Act (POCA) in June 1960 to strengthen its legal powers and increasing its budget and personnel. The POCA empowers the CPIB Director and officers to arrest and search persons and to investigate their bank accounts, income taxes, and other documents. Most importantly, section 24 assists the CPIB officers investigating corruption cases by requiring those accused persons to account for their "pecuniary resources or property" that are disproportionate to their known sources of income (Quah, 2011, p. 220).

The PAP government also demonstrated its strong political will to curb corruption by providing the CPIB with the necessary budget and personnel to perform its functions effectively. The growth in the CPIB's budget and personnel from 2008-2015 is shown in Table 4 and reflected in the increase of its per capita expenditure from US\$2.32 in 2008 to US\$4.87 in 2015. Similarly, the CPIB's staff-population ratio has improved from 1:56,163 to 1:23,858 during the same period.

Table 4: CPIB's Budget and Personnel, 2008-2015

CPIB	2008	2010	2012	2014	2015
Budget (in millions)	US\$11.2	US\$14.7	US\$20.3	US\$29.3	US\$26.8
Personnel	86	90	138	205	232
Per capita expenditure	US\$2.32	US\$2.90	US\$3.82	US\$5.36	US\$4.87
Staff-population ratio	1:56,163	1:56,408	1:38,496	1:26,682	1:23,858

Source: Compiled and calculated by the author from the CPIB's budget and personnel in its annual reports and Republic of Singapore (2008-2016).

Corruption was also a serious problem in Hong Kong during the British colonial period. Leslie Palmier (1985, p. 123) contended that corruption was already a way of life among the Chinese population in Hong Kong when the British acquired it in 1841. Hong Kong provided "a fertile soil for corruption to flourish" because the rapid population increase during 1945-1974 severely strained the provision of social services and food, housing, water, schools, health care and other services were in short supply. The government's monopoly and regulation of various activities and the discretion given to those civil servants in charge provided many opportunities for corruption, especially in the police, customs and excise service, immigration department, fire and ambulance services, and the prison service (de Speville, 1997, pp. 11-14).

Even though the police was the most corrupt government department in Hong Kong (Palmier, 1985, p. 123), the Anti-Corruption Branch (ACB) was created as a special unit within the CID of the Royal Hong Kong Police Force (RHKPF) in 1948 to investigate and prosecute corruption cases (Kuan, 1981, p. 24). As part of the ACB's review of the POCO, a study team visited Singapore in 1968 to examine how its anti-corruption laws worked in practice. The government and the RHKPF did not support the study team's recommendation of establishing an independent ACA. The ACB, which was separated from the CID in 1952, was instead upgraded into the Anti-Corruption Office (ACO) with the enactment of the Prevention of Bribery Ordinance (POBO) in May 1971 (Lethbridge, 1985, p. 98). However, the escape of a corruption suspect, Chief Superintendent of Police, Peter F. Godber, on 8 June 1973, to Britain angered the public and undermined the ACO's credibility. The government responded by appointing a Commission of Inquiry chaired by Sir Alastair Blair-Kerr to investigate the circumstances that enabled Godber to leave Hong Kong and to evaluate the POBO's effectiveness (Quah, 2011, p. 252).

The governor, Sir Murray MacLehose, accepted Sir Alastair's advice of considering public opinion and decided for political and psychological reasons to establish a new ACA that was independent of the police. Governor MacLehose's decision was path-breaking because his predecessors and previous committees had deferred to the police for fear that police morale would suffer if corruption control was transferred to an independent agency (Quah, 2011, pp. 252-253). Consequently, the ICAC was established on 15 February 1974 with the enactment of the ICAC Ordinance of 1974. The ICAC's functions are: "to root out corruption and to restore public confidence in the Government" (Wong, 1981, p. 45). The ICAC was provided with adequate budget and personnel to perform its functions effectively. It began in 1974 with 369 personnel and a budget of HK\$16,108,152 (US\$2,065,148). However, 40 years later, the ICAC's budget has increased by 58 times to HK\$937.12 million (US\$120.14 million) and its number of personnel rose by nearly four times to 1,358 in 2014 (ICAC Budget, 2014; ICAC, 2015, p.25). Table 5 shows that the ICAC's per capita expenditure has increased from US\$13.40 in 2008 to US\$17.24 in 2015 and its staff-population ratio has also improved from 1:5,780 to 1:5,408 in during the same period.

Table 5: ICAC's Budget and Personnel, 2008-2015

ICAC	2008	2010	2012	2014	2015
Budget (in millions)	US\$97.7	US\$104.65	US\$112.96	US\$120.14	US\$126.01
Personnel	1,263	1,321	1,282	1,358	1,351
Per capita expenditure	US\$13.40	US\$14.89	US\$15.78	US\$16.59	US\$17.24
Staff-population ratio	1:5,780	1:5,317	1:5,581	1:5,333	1:5,408

Source: Compiled and calculated by the author from the ICAC's budget and personnel from its annual reports and budgets from 2008-2015.

Apart from providing the CPIB and ICAC with the necessary legal powers, budget and personnel, their governments have also provided these ACAs with the operational autonomy to perform their functions without political interference as independent watchdogs by investigating all corruption cases, without fear or favour and regardless of the position or status of those persons under investigation. Robert Gregory (2015, pp. 130-131) has described the CPIB and ICAC as good examples of ACAs with high *de facto* independence and high operational impartiality. Even though the CPIB comes under the jurisdiction of the Prime Minister's Office in Singapore, the Prime Minister does not interfere in its daily operations and the CPIB Director reports to the Secretary to the Cabinet. The CPIB's operational impartiality has been protected by the PAP leaders whose "political self-denial" has maintained its *de facto* independence, which has sustained its impartial reputation and popular legitimacy.

Another important reason for the success of the CPIB and ICAC is their impartial enforcement of the anti-corruption laws in Singapore and Hong Kong, respectively. This means that anyone found guilty of a corruption offence is punished regardless of his or her position, status, or political affiliation. The CPIB has investigated five PAP leaders and eight senior civil servants in Singapore without fear or favour from 1966-2014. For example, the CPIB's Assistant Director, Edwin Yeo, was charged on 24 July 2013 with misappropriating S\$1.76 million (US\$1.41 million) from 2008-2012. He was found guilty of criminal breach of trust and for forgery and sentenced to 10 years imprisonment on 20 February 2014 (Quah, 2015a, pp. 77, 80-81).

Similarly, the ICAC has not hesitated to investigate political leaders and senior civil servants in Hong Kong if they are accused of corruption offences. The investigation of the corruption scandals involving the former Chief Executive, Donald Tsang, in February and April 2012 culminated in his conviction on 17 February 2017 for misconduct in public office for not disclosing his rental negotiations with property tycoon, Bill Wong, while his Cabinet was reviewing a digital broadcasting licence by Wong's radio company (Scott, 2014, pp. 966-967; *Straits Times*, 2017a, p. A12). Tsang was sentenced to 20 months imprisonment on 22 February 2017. Commenting on the verdict and sentencing, Alan Leong, a former leader of the pro-democracy Civic Party, observed that "the rule of law prevails and is very much alive and kicking in Hong Kong" and "those who occupy public office - especially high office - ought to be whiter than white" (*Straits Times*, 2017b, p. A3).

Finally, Singapore and Hong Kong have succeeded in minimising corruption

because of their comprehensive approach in dealing with all corruption complaints. The CPIB has adopted a "total approach to enforcement" and deals with both major and minor cases of public and private sector corruption, as well as "both giver and receiver of bribes" and other crimes uncovered in the investigation of corruption complaints (Soh, 2008, pp. 1-2). Bertrand de Speville (1997, pp. 55-56), the ICAC Commissioner from 1992-1997, has contended that the ICAC has succeeded in gaining public confidence by ensuring that all corruption reports, no matter how small, are investigated and kept confidential. In the same vein, Fanny Law (2008, pp. 98-99) a former ICAC Commissioner from October 2006 to June 2007, has attributed Hong Kong's "sound integrity system" to these four strengths: a strong political will to curb corruption; a common integrity framework for civil servants, politicians, judicial officers, and staff of the watchdog agencies; a vibrant civil society with independent media and nongovernment organisations; and an independent ICAC with a comprehensive anti-corruption programme.

Five Lessons for Asian Policy Makers

1. Political will is essential for success in combating corruption

To minimise corruption in Asian countries, their policy makers must be willing to establish an independent Type A ACA like the CPIB or ICAC to enforce the anti-corruption laws impartially, without fear or favour. Political will refers to the sustained commitment of political leaders to implement anti-corruption policies and programmes (Brinkerhoff, 2000, p. 242). Sahr Kpundeh (1998, p. 92) contends that political will is "a critical starting point for sustainable and effective anti-corruption strategies and programmes" because elected or appointed leaders, civil society watchdogs and other stakeholders must demonstrate "credible intent" to "attack perceived causes or effects" of systemic corruption. Indeed, without political will, promises by political leaders and governments to reform the civil service or combat corruption will "remain mere rhetoric."

Political will is critical for the successful implementation of anti-corruption strategies as politicians can change "a culture of corruption if they wish to do so" because "they make the laws and allocate the funds that enable the laws to be enforced." Consequently, it is not surprising that those corrupt politicians "who are the greatest beneficiaries of corruption have the greatest power and use the corrupt nature of government to maintain that power" (Senior, 2006, pp. 184, 187). This means that to combat corruption effectively, the policy makers must enact comprehensive anti-corruption laws and provide the Type A ACA with adequate financial and human resources and operational independence to perform its functions impartially, regardless of the status or political affiliation of the offenders.

The political will of Asian countries in combating corruption is reflected in the budgets and personnel allocated by their governments to their ACAs. As shown in Table 6, the strong political will of the governments of Hong Kong and Singapore is reflected

in the high per capita expenditures and favourable staff-population ratios of the ICAC and CPIB, respectively. Conversely, the weak political will of the governments in South Korea, Taiwan, the Philippines, Indonesia and India is manifested in the lower per capita expenditures and unfavourable staff-population ratios of the Anti-Corruption and Civil Rights Commission (ACRC), Agency Against Corruption (AAC), Office of the Ombudsman (OMB), *Komisi Pemberantasan Korupsi* (KPK) and Central Bureau of Investigation (CBI), respectively.

Table 6: Per Capita Expenditures and Staff-Population Ratios of Seven ACAs, 2014

ACA	Budget (in millions)	Personnel	Per capita expenditure	Staff-population Ratio
ICAC	US\$120.14	1,358	US\$16.59	1:5,333
CPIB	US\$29.3	205	US\$5.36	1:26,682
ACRC	US\$58.3	465	US\$1.15	1:108,430
AAC	US\$14.4	240	US\$0.61	1:97,641
OMB	US\$38.8	1,214	US\$0.39	1:81,631
KPK	US\$50.17	1,102	US\$0.19	1:230,943
CBI	US\$65.5	5,676	US\$0.05	1:228,206

Source: Calculated by the author from the budgets and personnel provided in the annual reports of the seven ACAs.

2. Address causes of corruption in their country and not the symptoms

It seems obvious that to curb corruption effectively, policy makers should initiate appropriate reforms to address its causes. However, in spite of what is known about the causes of corruption (see Treisman, 2007), most governments in Asian countries have failed to do so because it is easier to deal with the symptoms of corruption than with addressing the root causes (Levitt and Dubner, 2014, pp. 66-67). A good example is President Xi Jinping's five-year old anti-corruption campaign, which is ineffective because it has only introduced regulations to curb official extravagance and gift-giving without tackling the other four causes of corruption in China: low public sector salaries, red tape, low probability of detecting and punishing corrupt Chinese Communist Party (CCP) members, and lack of accountability of local government officials (Quah, 2015b, pp. 84-90).

The British colonial government failed to identify the causes of corruption in Singapore and made a serious mistake by entrusting the function of corruption control to the ACB of the Singapore Police Force (SPF) with the enactment of the POCO in December 1937 even though police corruption was rampant. This first mistake was only rectified 15 years later with the establishment of the CPIB in September 1952. The British colonial government's second mistake was its failure to provide the CPIB with adequate legal powers, budget and personnel to perform its functions during its first eight years.

By contrast, the PAP government has avoided the mistakes of the British colonial government by retaining the CPIB as Singapore's only Type A ACA and enacting the POCA in June 1960 to strengthen the CPIB's legal powers and providing it with adequate budget, personnel and operational independence to perform its functions effectively. Police corruption was widespread during the colonial period but the British

colonial government failed to introduce measures to address these causes: the low salaries of policemen, their poor working conditions and ample opportunities for corruption, and the ineffectiveness of the ACB and POCO. However, the PAP government has minimised police corruption by improving salaries and working conditions in the SPF, enhancing its recruitment and selection procedures, strengthening its training programme, including the introduction of values education in 2002, and adopting administrative measures to minimise opportunities for corruption (Quah, 2014, pp. 198-204). More importantly, the PAP government's comprehensive anti-corruption strategy has focused on reducing both the incentives and opportunities for corruption by empowering the CPIB through the POCA and providing it with the necessary legal powers, budget, personnel and operational independence to enforce the POCA impartially without political interference.

3. Establish a Type A ACA instead of a Type B ACA

Policy makers in Asian countries have three options to combat corruption. The first option is to follow Denmark, Finland and New Zealand, the three least corrupt countries on the CPI in 2016, which have succeeded in curbing corruption without relying on ACAs but on other institutions like the Ombudsman, the Chancellor of Justice, the Auditor General's Office and the Serious Fraud Office (Quah, 2013a, pp. 226-232). However, this option is not suitable for those Asian countries which do not have other strong institutions to deal with the rampant corruption. Faced with the other two options of relying on a single ACA or multiple ACAs, policy makers should learn from the ineffectiveness of the multiple ACAs in Afghanistan, China, India, Pakistan, the Philippines, Taiwan and Vietnam, and avoid establishing more than one ACA (Quah, 2013b, pp. 21-23).

Policy makers should establish a Type A ACA like Singapore's CPIB or Hong Kong's ICAC and avoid creating a Type B ACA like South Korea's ACRC, which is a "toothless" ACA because of its inability to investigate corruption cases (Quah, 2010, pp. 41-42). As combating corruption is difficult and requires extensive financial and human resources, it would be more effective for policy makers to establish a Type A ACA that is dedicated solely to performing anti-corruption functions instead of a Type B ACA, which performs both corruption and non-corruption-related functions. Indeed, China's Central Commission for Discipline Inspection (CCDI), India's CBI, South Korea's ACRC and the Philippines' OMB, would be more effective if they focus only on combating corruption and relinquish their non-corruption-related functions to other agencies in these countries.

It is not difficult for Asian policy makers to establish a Type A ACA in their countries if they wish to do so. The challenge for them, however, would be to ensure that the new Type A ACA would have sufficient trained personnel to investigate corruption cases impartially and function effectively as an independent watchdog and not as an attack dog or a paper tiger, as will be discussed below. The most likely scenario would be that the new ACA would have difficulty in recruiting trained

investigators and function as an attack dog or a paper tiger rather than as an independent watchdog.

4. The Type A ACA should be an independent watchdog, not an attack dog or paper tiger

How does an ACA help the government that creates it to minimise corruption in the country? An ACA can perform three roles as shown in Table 7, which has classified nine Asian ACAs according to these roles. The first role, which is preferred, is the watchdog role performed by an independent ACA that investigates all corruption cases impartially, without fear or favour and regardless of the position or status of those being investigated. Luis de Sousa (2010, p. 13) has defined an ACA's independence as "the capacity to carry out its mission without political interference, that is, operational autonomy." Examples of Type A ACAs are Singapore's CPIB and Hong Kong's ICAC, which have high *de facto* independence and high operational impartiality.

Second, an ACA can also act as the "attack dog" of the government that abuses its powers by using corruption as a weapon against its political opponents. As mentioned above, corruption charges have been used to discredit rivals and settle political scores in many Asian countries, including Cambodia, Indonesia, Malaysia and Vietnam (Djalal, 2001, pp. 32-33). In China, anti-corruption campaigns are used frequently against political foes to undermine their power base in the CCP. In July 2014, the CCDI investigated Zhou Yongkang, the Minister of Public Security from 2002-2007, for corruption and the procuratorates confiscated US\$16.05 billion worth of assets from his many residences in seven provinces in China. Zhou was expelled from the CCP on 5 December 2014 not only because of his corruption offences, but more importantly for his conspiracy with Bo Xilai to challenge Xi Jinping's leadership (Quah, 2015b, pp. 79-81).

Table 7: Roles of Nine Asian ACAs

Role	Anti-Corruption Agency	CPI Rank/Score 2016
Watchdog	Corrupt Practices Investigation Bureau (Singapore)	7 th /176 (84/100)
	Independent Commission Against Corruption (HKSAR)	15 th /176 (77/100)
Attack dog	Central Commission for Discipline Inspection (China)	79 th /176 (40/100)
	Central Bureau of Investigation (India)	79 th /176 (40/100)
	National Accountability Bureau (Pakistan)	116 th /176 (32/100)
	Anti-Corruption Commission (Myanmar)	136 th /176 (28/100)
	Anti-Corruption Unit (Cambodia)	156 th /176 (21/100)
Paper tiger	Anti-Corruption & Civil Rights Commission (S. Korea)	52 nd /176 (53/100)
	Office of the Ombudsman (Philippines)	101 st /176 (35/100)

Source: Compiled by the author.

Similarly, India's CBI has been perceived by the public as "a pliable tool of the ruling [Congress] party, and its investigations tend to become cover-up operations for the misdeeds of ministers" (Gill, 1998, p. 238). Madhav Godbole (2000, p. 88), a former senior civil servant in India, has criticised the CBI for being used by the then

Prime Minister Indira Gandhi as "an instrument of prosecution" and for its "disgraceful" record of investigating corruption cases "involving the high, the mighty and the powerful." More recently, the former Central Vigilance Commissioner N. Vittal (2012, pp. 132-134) has criticised the CBI's lack of independence and credibility because it has become "a football between the party in power and the party in opposition" as the cases initiated by one regime are neutralised by the next.

Other examples of Asian ACAs that are used as attack dogs by their governments are Cambodia's Anti-Corruption Unit (ACU), Myanmar's Anti-Corruption Commission (ACC) and Pakistan's National Accountability Bureau (NAB). In Cambodia, Prime Minister Hung Sen has used the campaign against illegal logging to remove those military officers who threatened his power (Quah, 2016, p. 256). A foreign correspondent based in Yangon has observed that "it is common practice for the government to misuse anti-corruption laws as a means of ousting political opponents" (Nwe, 2012, p. 194). In Pakistan, successive governments have "issued injunctions to control corruption" but, according to Mohammad Waseem (2002, p. 158), "more often than not, it was the political goal of eliminating opposition which prompted legislation and subsequent trials for corruption."

The ACA's third role as a paper tiger is also undesirable because it reflects the government's lack of political will to curb corruption by not providing the ACA with the necessary legal powers, budget, personnel and operational independence to enforce the anti-corruption laws impartially. South Korea's Korea Independent Commission Against Corruption (KICAC) was established on 25 January 2002 as a "poor cousin" or weak replica of Hong Kong's ICAC because it could not investigate corruption cases. The KICAC's successor, the ACRC, inherited not only the KICAC's Achilles' heel of being unable to investigate corruption cases but its anti-corruption functions were further diluted when the KICAC was merged in February 2008 with the Ombudsman and Administrative Appeals Commission to form the ACRC, which became a Type B ACA. South Korea's inability to improve its CPI score beyond 53-56 during 2012-2016 reflects its failure to curb corruption and is an indictment of its futile strategy of relying on such paper tigers as the KICAC and ACRC during the past 14 years (Quah, 2017, pp. 23, 26).

Unlike the ACRC, the OMB in the Philippines can investigate and prosecute corruption cases in addition to its other functions of graft prevention, disciplinary control, and provision of public assistance. However, the OMB's ineffectiveness as the lead ACA in combating corruption is the result of its serious staff shortage, limited budget, poor reputation, and inability to cooperate with the other ACAs in the Philippines (Quah, 2011, pp. 144-146). This explains why the OMB is criticised for being the "Street Ombudsman" that focuses only on petty corruption cases and is perceived as a paper tiger rather than as a watchdog or attack dog. In short, the ineffectiveness of South Korea's ACRC and the Philippines' OMB confirms the futility of establishing a "toothless" ACA or paper tiger to combat corruption in both countries.

5. Combating corruption is a continuous work in progress

Combating corruption is a difficult, expensive, and arduous task because, apart from the resources and expertise required by the Type A ACA in the country, the implementation of the anti-corruption laws will be strongly resisted by those intelligent and powerful corrupt individuals and organisations with vested interests to circumvent these laws to avoid arrest and conviction for their offences. Christian Gobel (2004) has described the tasks of combating political corruption, organised crime and vote-buying in Taiwan as "beheading the Hydra," the Greek mythical creature with several heads that grew again when cut off. In the same vein, Laurence Cockcroft (2012, pp. 231-232) has emphasised the need for a sustained campaign against corruption to assure victory because corruption is like "a snake which will frequently respond with poison, and will only die with repeated attack" and "only if severed at the head."

To combat corruption effectively in Asian countries, their governments must identify accurately the causes of corruption in the country and recommend appropriate measures to address these causes over a sustained period of time. However, many governments, including those in China, India, the Philippines and South Korea, to mention four examples, have not only neglected this important task but have also relied on ineffective and poorly-resourced Type B ACAs to enforce their anti-corruption laws. Consequently, it is not surprising that these four countries have failed to minimise corruption. On the other hand, the success stories of Singapore and Hong Kong SAR show that minimising corruption in Asian countries is not an elusive dream. There is now a wealth of knowledge on the causes of corruption, which policy makers can distil from to enhance the effectiveness of their anti-corruption measures. What appears to be lacking, however, is the political will of the policy makers in many Asian countries to address the causes of corruption.

Even though Singapore and Hong Kong SAR have minimised corruption, this does not mean that their governments can rest on their laurels because of the growing importance of private sector corruption and other threats. The number of private sector corruption complaints in Hong Kong increased for the first time in 1988 and the Hong Ethics Development Centre (HKEDC) was established in 1995 by the ICAC's Community Relations Department to facilitate liaison between the various professional and commercial organisations in Hong Kong (Scott, 2013, pp. 95-96). The HKEDC has published many useful anti-corruption guides for the private sector, including an information kit for business organisations (ICAC, 2003) and a *Toolkit on Directors' Ethics* (ICAC, 2008).

The investigation and conviction of four senior civil servants for corruption offences during 2010-2014 indicates that even though corruption is not a serious problem in Singapore, the CPIB must remain vigilant to deal not only with public sector corruption but with the increasing number of private sector corruption cases in recent years. In January 2017, the CPIB published *PACT: A Practical Anti-Corruption Guide*

for *Businesses in Singapore* to assist business owners to develop and implement an anti-corruption system (CPIB, 2017).

As mentioned earlier, the shocking revelation in July 2013 that the CPIB's Assistant Director Edwin Yeo had misappropriated US\$1.41 million during 2008-2012 has tarnished the CPIB's reputation even though he was found guilty and jailed for ten years. At the official opening of the CPIB's Corruption Reporting and Heritage Centre (CRHC) on 6 June 2017, Prime Minister Lee Hsien Loong reiterated Singapore's zero-tolerance approach towards corruption and stressed that the setting up of the CRHC shows that the government treats corruption complaints seriously as well as the importance of protecting the legacy of clean government left by Singapore's founding fathers (Cheong, 2017, p. A6).

Similarly, the ICAC has also not hesitated to investigate political leaders and senior civil servants in Hong Kong if they are accused of corruption offences. The investigation of former Chief Executive Donald Tsang in February and April 2012 culminated in his conviction and sentencing to 20 months' imprisonment on February 22, 2017 for misconduct in public office. However, Ian Scott (2017, p. 3) contends that, political support for the ICAC was "usually unequivocal and often proactive" until 2012 because recent scandals at the highest levels have raised questions about "the ethical commitment of Hong Kong's leaders to the anti-corruption cause."

Conclusion

As the lack of political will is the most important reason for the failure of many Asian countries to combat corruption effectively during the past six decades, these countries need substantial doses of political will and capacity to implement impartially comprehensive reforms to address the causes of corruption and to sustain their implementation over a long period of time. However, this is a tall order indeed because of the scarcity and fragility of political will (Quah, 2015c, p. 53).

Whether the policy makers in those Asian countries with widespread corruption can draw lessons from the success stories of Singapore and Hong Kong SAR and the failures of China, India, the Philippines and South Korea, depends on their political will and capacity to establish a Type A ACA and provide it with the necessary legal powers, budget, personnel and operational independence to enforce the anti-corruption laws impartially. This means that the Type A ACA's role should be an independent watchdog that investigates all corruption complaints impartially, regardless of the status, position, or political affiliation of those being investigated. It should not be used as an attack dog against the government's political opponents, or a paper tiger that cannot investigate corruption cases.

As combating corruption in Asian countries is a continuous work in progress, policy makers concerned with improving anti-corruption measures in their countries must be realistic as their prospects for success also depend on their ability to overcome

the constraints of their unfavourable policy contexts, especially in those large Asian countries with huge populations and poor governance. As political leadership is the critical ingredient for effective corruption control, the \$64,000 question is: *Whether the citizens in those Asian countries with widespread corruption have the wisdom to elect honest and competent leaders to political office to implement the necessary anti-corruption reforms?* If they fail to do so, corruption will remain a way of life because corrupt individuals in their countries will continue to misbehave with impunity and encourage others to follow suit. The price for inaction against these corrupt individuals is too high for the citizens in those Asian countries affected to pay.

Corresponding author: Professor Jon S.T. Quah, Email: jonstquah@gmail.com

Acknowledgement

The author wishes to thank Professors Ian Scott and David Seth Jones for their useful feedback on an earlier version of the article.

References

- Brinkerhoff, D.W. (2000). "Assessing political will for anti-corruption efforts: An analytical framework," *Public Administration and Development*, 20 (3): 239-252.
- Cheong, D. (2017). "All S'poreans play role in fight against corruption: PM," *Straits Times*, 7 June, p. A6.
- Cockcroft, L. (2012). *Global Corruption: Money, Power and Ethics in the Modern World*. London: I.B. Tauris.
- Corrupt Practices Investigation Bureau (CPIB) (2012). *The Journey: 60 Years of Fighting Corruption in Singapore*. Singapore: CPIB.
- CPIB (2015). *Annual Report 2014*. Singapore: CPIB.
- CPIB (2016). *Annual Report 2015*. Singapore: CPIB.
- CPIB (2017). *PACT: A Practical Anti-Corruption Guide for Businesses in Singapore*. Singapore: CPIB.
- De Sousa, L. (2010). "Anti-corruption agencies: Between empowerment and irrelevance," *Crime, Law and Social Change*, 53 (1): 5-22.
- De Speville, B. (1997). *Hong Kong: Policy Initiatives against Corruption*. Paris: Development Centre of the Organisation for Economic Cooperation and Development.
- Djalal, D. (2001). "Southeast Asia." In Robin Hodess (Ed.), *Global Corruption Report 2001*. Berlin: Transparency International, pp. 23-38.
- Gill, S.S. (1998). *The Pathology of Corruption*. New Delhi: HarperCollins Publishers India.
- Gobel, C. (2004). "Beheading the Hydra: Combating political corruption and organised crime," *China Perspectives*, 56 (November-December): 1-17.
- Godbole, M. (2000). *The Changing Times: A Commentary on Current Affairs*. New Delhi: Orient Longman.
- Gregory, R. (2015). "Political independence, operational impartiality, and the effectiveness of anti-corruption agencies," *Asian Education and Development Studies*, 4 (1): 125-142.
- Independent Commission Against Corruption (ICAC) (2003). *Business Ethics – Your Way to Success: An Information Kit for Business Organisations*. Hong Kong: Community Relations Department.
- ICAC (2008). *Toolkit on Directors' Ethics*. Hong Kong: Community Relations Department.
- ICAC (2015). *Annual Report 2014*. Hong Kong: ICAC.
- ICAC (2016). *Annual Report 2015*. Hong Kong: ICAC.

- ICAC Budget (2014). "Head 72 Independent Commission Against Corruption." Hong Kong. Available at: www.budget.gov.hk/2014/eng/pdf/head072.pdf (accessed 29 April 2017).
- ICAC Budget (2015). "Head 72 Independent Commission Against Corruption." Hong Kong. Available at: www.budget.gov.hk/2015/eng/pdf/head072.pdf (accessed 29 April 2017).
- Kpundeh, S.J. (1998). "Political will in fighting corruption." In Sahr J. Kpundeh and Irene Hors (Eds.), *Corruption and Integrity Improvement Initiatives in Developing Countries*. New York: United Nations Development Programme, Chapter 6, pp. 91-110.
- Kuan, H.C. (1981). "Anti-corruption legislation in Hong Kong – A history." In R. P.L. Lee (Ed.), *Corruption and its Control in Hong Kong: Situations up to the late Seventies*. Hong Kong: Chinese University Press, Chapter 1, pp. 15-43.
- Law, F. (2008). "The Hong Kong integrity system." In L. Huberts, F. Anechiarico and F. Six (Eds.), *Local Integrity Systems: World Cities Fighting Corruption and Safeguarding Integrity*. The Hague: BJu Legal Publishers, Chapter 6, pp. 79-101.
- Lethbridge, H.J. (1985). *Hard Graft in Hong Kong: Scandal, Corruption, the ICAC*. Hong Kong: Oxford University Press.
- Levitt, S.D. and Dubner, S.J. (2014). *Think Like a Freak: How to Think Smarter about Almost Everything*. London: Allen Lane.
- Nwe, N.A. (2012). "Role of the media in Myanmar: Can it be a watchdog for corruption?" In N. Cheesman, M. Skidmore and T. Wilson (Eds.), *Myanmar's Transition: Openings, Obstacles and Opportunities*. Singapore: Institute of Southeast Asian Studies, Chapter 10, pp. 185-203.
- Palmier, L. (1985). *The Control of Bureaucratic Corruption: Case Studies in Asia*. New Delhi: Allied Publishers.
- Political and Economic Risk Consultancy (PERC) (2016). "Annual review of corruption in Asia – 2016," *Asian Intelligence*, No. 944, March 30, 2016, pp. 1-5.
- Quah, J.S.T. (2007). *Combating Corruption Singapore-Style: Lessons for other Asian Countries*. Baltimore, MD: School of Law, University of Maryland.
- Quah, J.S.T. (2010). "Defying institutional failure: Learning from the experiences of anti-corruption agencies in four Asian countries," *Crime, Law and Social Change*, 53 (1): 23-54.
- Quah, J.S.T. (2011). *Curbing Corruption in Asian Countries: An Impossible Dream?* Bingley, UK: Emerald Group Publishing.
- Quah, J.S.T. (2013a). "Different Paths to Curbing Corruption: A Comparative Analysis." In Jon S.T. Quah (Ed.), *Different Paths to Curbing Corruption: Lessons from Denmark, Finland, Hong Kong, New Zealand and Singapore*. Bingley, UK: Emerald Group Publishing, Chapter 9, pp.219-255.
- Quah, J.S.T. (2013b). "Combating corruption in Asian countries: What lessons have we learnt?" *Public Administration and Policy: An Asia-Pacific Journal*, 16 (1): 15-34.
- Quah, J.S.T. (2014). "Curbing police corruption in Singapore: Lessons for other Asian Countries," *Asian Education and Development Studies*, 3 (3): 186-222.
- Quah, J.S.T. (2015a). "Singapore's Corrupt Practices Investigation Bureau: Four suggestions for enhancing its effectiveness," *Asian Education and Development Studies*, 4 (1): 76-100.
- Quah, J.S.T. (2015b). *Hunting the Corrupt "Tigers" and "Flies" in China: An Evaluation of Xi Jinping's Anti-Corruption Campaign (November 2012 to March 2015)*. Baltimore, MD: Carey School of Law, University of Maryland.
- Quah, J.S.T. (2015c). "The normalisation of corruption: Why it occurs and what can be done to minimise it." Paper prepared for the United Nations Department of Economic and Social Affairs, New York, December.
- Quah, J.S.T. (2016). "Combating corruption in six Asian countries: A comparative analysis," *Asian Education and Development Studies*, 5 (2): 244-262.
- Quah, J.S.T. (2017). "Learning from Singapore's effective anti-corruption strategy: Policy recommendations for South Korea," *Asian Education and Development Studies*, 6 (1): 17-29.
- Republic of Singapore (2008-2016). *Singapore Budget 2008-2016: Annex to the Expenditure Estimates*. Singapore: Budget Division, Ministry of Finance.

- Rose-Ackerman, S. and Palifka, B.J. (2016). *Corruption and Government: Causes, Consequences, and Reform*. 2nd edition, New York: Cambridge University Press.
- Schwab, K. (Ed.) (2016). *The Global Competitiveness Report 2016-2017*. Geneva: World Economic Forum.
- Scott, I. (2013). "Engaging the Public: Hong Kong's Independent Commission Against Corruption's Community Relations Strategy." In Jon S.T. Quah (Ed.), *Different Paths to Curbing Corruption: Lessons from Denmark, Finland, Hong Kong, New Zealand and Singapore*. Bingley, UK: Emerald Group Publishing, Chapter 4, pp. 79-108.
- Scott, I. (2014). "Political scandals and the accountability of the Chief Executive in Hong Kong," *Asian Survey*, 54 (5): 966-986.
- Scott, I. (2017). "The challenge of preserving a successful anti-corruption system: The case of Hong Kong," *Asian Education and Development Studies*, 6 (3): 1-14.
- Senior, I. (2006). *Corruption – the World's Big C: Cases, Causes, Consequences, Cures*. London: Institute of Economic Affairs.
- Soh, K.H. (2008). "Corruption enforcement." Paper presented at the Second Seminar of the International Association of Anti-Corruption Associations in Chingqing, China, May 17-18.
- Straits Times* (2017a). "Ex-HK chief guilty of misconduct in office," 18 February, p. A12.
- Straits Times* (2017b). "Ex-HK chief jailed 20 months for misconduct," 23 February, p. A3.
- Transparency International (2017). "Corruption Perceptions Index 2016," Berlin, available at: https://www.transparency.org/news/feature/corruption_perceptions_index_2016 (accessed 25 January 2017).
- Treisman, D. (2007). "What have we learned about the causes of corruption from ten years of cross-national research?" *Annual Review of Political Science*, 10: 211-244.
- Vittal, N. (2012). *Ending Corruption? How to Clean Up India*. New Delhi: Penguin Books India.
- Wang Qishan (2014). "Anti-corruption chief says China should learn from Hong Kong, Singapore," *Ejinsight*, 27 August.
- Waseem, M. (2002). "Corruption, violence and criminalisation of politics in Pakistan." In K.M. de Silva, G.H. Peiris and S.W.R. de A. Samarasinghe (Eds.), *Corruption in South Asia: India, Pakistan and Sri Lanka*. Kandy: International Centre for Ethnic Studies, Chapter 4, pp. 139-188.
- Wong, J.K.H. (1981). "The ICAC and its anti-corruption measures." In R.P.L. Lee (Ed.), *Corruption and its Control in Hong Kong: Situations up to the late Seventies*. Hong Kong: Chinese University Press, Chapter 2, pp. 45-72.
- World Bank (2016). "Worldwide Governance Indicators 2015." Washington, DC. Available at: <http://info.worldbank.org/governance/wgi/index.aspx#reports> (accessed 29 April 2017).
- World Bank (2017a). "Population total." Washington, DC. Available at: <http://data.worldbank.org/indicator/SP.POP.TOTL> (accessed 29 April 2017).
- World Bank (2017b). "GDP per capita (current US\$)." Washington, DC. Available at: <http://data.worldbank.org/indicator/NY.GDP.PCAPCD> (accessed 29 April 2017).
- World Bank (2017c). *Doing Business 2017: Equal Opportunities for All*. Washington, DC: World Bank.