**The Risk of Corruption in Procurement**

**Checklist summarising risks and mitigation strategies**

*(Source: Transforming Education in Pakistan (TEP) Procurement Guide to Best Practice)*

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| **Examples of corruption risks** | **Examples of mitigation strategies** | **Examples of tools** |
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| Insufficient Accountability | Internal control and external audit.  Greater political will. | Document archive.  Standardised templates for documentation. |
| Lack of professionalism | Training of staff on technical expertise, commercial integrity,  Codes of conduct,  Ethical standards. | Training and education.  Codes of conduct. |
| Purchase is unnecessary and demand is induced | Separation of respective roles and responsibilities | Training and education |
| Bidding documents or ToR unnecessarily complex in order to hide corrupt actions and to make monitoring complicated. | Create clear and simple rules.  Simplify the processes and procedures. | Procurement guidelines and policy. |
| Unclear selection and award criteria | Define the criteria in measurable factors and use a technical and commercial panel to adjudicate. | Objective evaluation panel |
| Conflict of Interest | Require information for potential or perceived conflicts | Conflict of Interest Register |
| Short-listing or pre-qualification due to an offer of bribes | Ensure a code of conduct is implemented | Hospitality register  Bribery Act |
| Lack of justification or ignorance of the requirements of non-competitive procedures. | Create clear rules for when competition is required.  Rules for exceptional cases. | Procurement guidelines and policy |
| Relevant information is not shared consistently with all bidders | Establish clear protocols for communications | Procurement guidelines and policy |
| Collusive bidding competitors conspire | Encourage whistle blowing by creating clear lines of communication | Whistle blowing protection |
| Misuse of confidential information | Create clear point of contact for bidders.  Control number of people involved/and with access to the process. Share info equally with all bidders. | Due diligence routines  Respective roles and responsibilities |